



The countryside charity
Lancashire, Liverpool City Region
and Greater Manchester

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3rd August 2022

Dear Dominic Young,

1. I am writing on behalf of CPRE Lancashire, Liverpool City Region and Greater Manchester ('CPRE') to **object** to the appeal against Bolton Council's ('the Council') refusal in February 2022, PINs Ref: APP/N4205/W/22/3299644, for a golf resort and up to 1,036 dwellings on land at and adjacent to Hulton Park in Over Hulton detailed in a hybrid planning application ref: 12218/21 ('the Scheme') by Peel L&P Investments (North) Limited ('the Appellant').

About Us

2. We are CPRE, the countryside charity, representing Lancashire, the Liverpool City Region and Greater Manchester. We work with communities, businesses, and government to protect, promote, and enhance our towns and countryside to make them better places to live, work and enjoy, and to ensure the countryside and vital urban green spaces are protected for now and future generations.

Overview of CPRE's objection to PINS Ref: APP/N4205/W/22/3299644

3. CPRE support's the Planning Committee's refusal and it recommends that the appeal should be dismissed. The Council is not going to defend its decision by way of professionally procured representation, however Members of the Planning Committee will attend to express their views in a personal capacity, as set out in its letter dated 27th July 2022.

4. CPRE's view is that the Planning Applications Report ('PAR') to Planning Committee, dated 24th February 2022, although comprehensive in nature, missed out a few fundamental points, when compared to the extant permission application ref 0997/17 approved by the Secretary of State in July 2020 after a public inquiry. Consequently, it did not correctly identify, quantify, and weigh a number of harmful development effects. In addition, there was not proper scrutiny of the 'claimed' benefits of the Appellant, leading to a potentially unsound recommendation. This is evidently what the members of the Planning Committee believe to be the case as it refused the application. Of note, previously Bolton Council Planning Committee was minded to approve the application ref 099/17.
5. CPRE did engage with the Appellant during the pre-planning consultation, and since the finalised scheme was applied for and it acknowledges the proposal is in some regards is an actual improvement on the development proposals that it already has permission for, particularly that 18 hectares less of the housing is proposed to be built on land in protected Green Belt, due to the important aim of keeping land permanently open. Notwithstanding this, because the revised proposal involves a substantially larger development site, with an additional 89 hectares of greenfield land, and significant modifications within the Hulton Registered (grade II listed) Park and Garden ('RPG'), including lodges for tourists, it leads to a higher magnitude of adverse effects to the Over Hulton area. These increased harms must be properly weighed and reflected in the decision. In my view, this is what the Planning Committee correctly sought to do.
6. There are a range of representations from local people, businesses, and other stakeholders concerning the reliability of the evidence on benefits to economic, social, and environmental factors, especially employment, housing delivery, to the registered grade II listed Hulton Park and Garden, to the Public Rights of Way and to the ecology of the area. These benefits should be investigated at the appeal inquiry. CPRE is of the view that when they are scrutinised it will become clearer that many of the positive impacts are 'aspirational', simply serve to make an unviable scheme less unviable, and many of them (particularly legacy benefits) are unlikely to be realised. The benefits are at best a 'hope' and at worst a 'smoke-screen' for substantial harm in the Green Belt and to the RPG from the level of built forms coming forward within such important planning policy protected areas. What is a fact is the benefits arising from the modified proposals are not robustly evidenced and therefore they should be treated with extreme caution.

Consistency with the adopted development plan

7. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires development decisions to be considered in the context of the adopted local Development Plan and the weight to be applied to other material planning considerations.

8. Unlike before, there is now inappropriate development of in excess of 56 hectares of farmland covered by a criteria-based policy of Other Protected Open Land, which is contrary to Policy CG6AP of Bolton's Allocations Plan and against the stated Policy OA3 of Bolton's Core Strategy (see Appendix One for an extract map of area and policy wording). The Council will permit development proposals within the defined areas of Protected Open Land shown on the Proposals Map, provided that they fall within one or more of the categories: 1 to 4. My assessment is that the proposals do not fall into any of the categories because:
 - i. The development is not limited infilling, and it does harm the character of the site and the surroundings;
 - ii. It is not required for the maintenance of an existing source of employment;
 - iii. The development does not require a location outside of the urban area, and it is inappropriate in the Green Belt, and it will not maintain the character and appearance of the countryside; or
 - iv. The development is inappropriate within the Green Belt. The development would not be well screened, and it would be obtrusive in the landscape. CPRE considers that not all of the buildings would use materials that are compatible with the landscape.
9. There is a high level of landscape character harm and visual effects that arise during both construction and occupation, leading to permanent loss of countryside. This harm is contrary to the adopted development plan policies. Notably there is barely any reference to this Policy CG6AP in the PAR.
10. It is my opinion the proposals are inconsistent with the adopted development plan to a large extent.

Green Belt harm

11. This proposal will cause very substantial harm as set out in the PAR. This was also the conclusion of the Secretary of State at the previous inquiry. This is the conclusion in the PAR for the scheme before the appeal. This is a key reason for refusal of the Council. My assessment is that it is still very substantial harm even when acknowledging that there is a minor benefit from not having houses built on the southern part of the Western Agricultural Lands. (See Fig 3.2 in the Planning Statement). As the Planning statement says in Para 3.13 'This land is outside of but visible from within the Park, and forms part of its setting. It is comprised of agricultural land in use as pasture and is interspersed by a network of public footpaths, mature hedgerows, and blocks of woodland'.
12. There remains harm to 250 hectares of land in the Green Belt to be developed and this is a very substantial amount. In terms of the overall Green Belt impact, this proposal, when compared to the extant permission, only has plans for additional

lodges at Hulton Hall, a revised layout of Hulton Villages and an extension to the golf course and leisure facilities including the health and well-being hub with food, drink, and entertainment amenities at Hulton Parklands reducing the Green Belt overall aim and purposes. Due to the elements to deliver the Ryder Cup there is still very substantial harm to Green Belt. It is incorrect to suggest otherwise.

Other harms

Heritage

13. At the previous Inquiry the Rule 6 Party's historic landscape expert, Mr Chris Gallagher, educated the inquiry as to considerable antiquity of the RPG, which dates to the early 14th century, with pleasure grounds, woodlands and parklands. Mr Gallagher conveyed the importance of the work of garden designers or 'Improvers' William Emes and John Webb to create a mature landscape in the 'picturesque' thinking. This means the property is of considerable interest in historic landscape terms. He demonstrated how the layout of the farmland here is integral to Emes' & Webb's design for the RPG, with the 'Home Farm' later developed as a 'model farm' to manage the parkland. Having surveyed the site Mr Gallagher is of the opinion it is intact and largely unaltered, thus of significant value. Mr Gallagher's view was that the harm arises from the hotel, spa, & conference centre, as well as the proposed excavation and re-levelling of almost the whole of the historic park area outside the existing woodlands, which would be wholly out of scale and would consequently damage the RPG. The original hall would have been much smaller. Mr Gallagher's assessment was of substantial harm, even allowing for the restrictive test then applied. Given that new elements are added in the RPG, it is only possible for me to remain of the view the harm to the RPG has increased. Please see extracts from his proof in Appendix Three.
14. The Secretary of State's Decision letter in paragraph 22 identified substantial harm to the RPG and the loss of historic material as set out in the Inspector's Report ('IR') report para 14.220 to 14.222, concluding:

"When considering the matters together, I have come to the view that, even with the substantial improvements to significance in some parts, when these are weighed with the harm which I have identified there would remain overall harm that is less than substantial spectrum. I would not place it at the upper end of the less substantial harm spectrum. I do not consider it necessary to calibrate my findings any further."
15. CPRE believes that one does not have to calibrate less than substantial harm, as it is not necessarily helpful. This is supported by the Bramshill Appeal decision Citation Number: [2021] EWCA Civ 320 Case No: C1/2020/0160 the test of 'Substantial Harm' to a Heritage Asset has altered somewhat since the first Hulton Inquiry and is now much more responsive to individual sites, rather than there being the previous 'one

size fits all' prescriptive description which required nearly all of the Significance to be 'drained away'. I can send you the judgement if you require it. Mr Gallagher's conclusion was before lodges were introduced into the RPG and the significant extensions to the golf course leading to additional harm.

16. Although CPRE agrees that the openness of the land at South Fields is better retained free from any housing development upon it, there are additional inappropriate built forms in the RPG, which would have a very substantial spatial and visual consequence.
17. The Secretary of State found less than substantial harm, and attributed considerable weight to that harm, so it is difficult to understand how the revised proposal adding more elements that are alien to the RPG will not add to harm is difficult to comprehend. The officers of Bolton Council have increased their assessment of harm to the RPG since the Inquiry as they are now better informed. CPRE agrees but finds substantial harm from the introduction of lodges and other built forms into the RPG, which together completely ruin the elements of significance for which the RPG is listed.
18. Elaine Taylor a local resident and a local garden historian (who did an MA in garden design, which focused on the work of Emes), has indicated to CPRE that she will provide evidence to the inquiry on the rarity of Emes' work, particularly in combination with Webb's influence. She will inform on the cultural and historic value of the landscape and the degree of harm arising to the heritage asset. Her personal view is supported by the letter of objection from the Gardens Trust and Lancashire Gardens Trust that also identify the heritage harm as substantial harm.
19. Mrs Taylor's evidence shows that the views into, out of, and within the site have been inaccurately shown in Peel's documents and she shows the views characteristic of a Georgian park. These will be changed and harmed by the golf course because open pasture is necessary to appreciate views which are concealed then revealed.
20. The water features in a natural style are a major design element of such a park, and Mrs Taylor (and Mr Gallagher at the previous Inquiry) evidence that multiple water hazards cannot enhance the significance of this park but will cause the design to be no longer recognisable.
21. As the layout of a Georgian park cannot be recognised once a championship golf course is built over most of it, as planned; use will be made of illustrations of actual sites to show that the grouping of trees is a major element in such a design and that the introduction of planned groups of trees as hazards will harm the integrity of this.
22. Mrs Taylor, Mr Gallagher, CPRE, the inspector and the Secretary of State understood that the regrading of the golf course and loss of ancient woodland and specimen

trees will harm the RPG, hence the need for a condition specifying no Ryder Cup, no development, as it is the moment the bulldozers move soil and fell trees, that substantial harm arises. Very special circumstances are only be triggered in this if case, the Ryder Cup Tournament is successfully awarded.

Loss of Farmland

23. A further 89 hectares of land currently in use for farmland will be lost over and above the original application. This harm should be fully assessed in the planning balance.
24. There's been a hundred-fold increase in our best farmland lost to development in little more than a decade, new CPRE research has found. And 60% of our finest agricultural land is at risk of flooding. As a result, we're telling government we need a land strategy and new planning rules to safeguard our food security. Our newly published research on food security has found almost 14,500 hectares of the country's best agricultural land, which could grow at least 250,000 tonnes of vegetables a year, has been permanently lost to development in just 12 years. This is enough to feed the combined populations of Liverpool, Manchester and Sheffield their recommended five-a-day fruit and vegetables. For more information please see here: [We call for land strategy and new planning rules to guard food security - CPRE](#)

Benefits

Footloose

25. The planning statement says the development is not footloose. However, Bolton already has many golf courses, some recently brought forward for housing by the appellant on the basis of lack of viability, for example Horwich golf course that has approval for 276 and 150 houses (Appeal A - Ref: APP/N4205/W/20/3256381 Land off Victoria Road, Horwich) and (Appeal B - Ref: APP/N4205/W/20/3266030 Land off Victoria Road, Horwich.)
26. The wider area also has many 18-hole champion scale golf courses better suited to hosting the Ryder Cup. They also have tradition of golf and experience of golf.

Economic

27. None of the authors of the reports appear to take full responsibility for the data contained and it appears it was provided by the appellant.
28. The approved golf resort scheme is not viable in itself as shown in the Financial Viability Assessment ('FVA'), paragraph 2.21 with a deficit of -£48,410,000. It relies

on the profit arising from the market housing in the Green Belt to subsidise it, as set out in FVA, paragraph 1.24, and an affordable housing contribution did not meet the adopted housing policy requirements for greenfield development as set out in the local plan, instead the minimum 10% required by the Framework (which is said to be policy plus due to not being viable to deliver). The scheme is also unviable without the affordable housing. The level of benefit to attribute to affordable housing benefit is nil and beyond 10% limited.

29. It is understood from the FVA paragraph 1.19 that has been updated since 2017 but has not been reviewed by the District Valuer the deficit is now -£60,470,000 below the Benchmark Land Value ('BLV'). This was update in a letter from Cushman and Wakefield dated 4 November 2012 to c.-£66,000,000. This is a big change in just a few years from -£48,410,000.
30. Brexit, Covid and the Ukraine invasion has led to continuing economic uncertainty, and there is the potential to lead to further inflation depending on the fiscal policies over the next few months. This is of concern, and arguably if the figures do not stack up now, what will happen with continuing high inflation? This is a substantial revenue short fall when compared to costs.
31. The likelihood of the Appellant securing the Ryder Cup, at a venue that has no association with golf and no experience of golf, is very low. Even if successful the event is only responsible for delivering only 5% of the benefits.
32. The largest proportion of the benefits, equal to 65%, is to come from legacy events. Of note, the extant permission is for a golf course that can only host a single Ryder Cup scale tournament and then the phasing is for houses to be delivered on the car park and media areas. In short, the extant permission will ultimately for a golf course of standard size. This is repeated in the revised proposal as the staging areas are to be developed for housing after the event. It is a substantial incursion in the Green Belt for a 'single one-off tournament.' Previously, the appellant set out a dozen major events in the future as part of the legacy programme, but it appears Peel is no longer committed to this, which is concerning.
33. The popularity of golf is on the wane and new competitions, such as the LIV tour promoted by Saudi Arabia luring big names in golf with the promise of lots of money. People have changed behaviours and Covid means less travelling overseas, to sporting events. It will be interesting to see if people resume old habits.
34. Mr Phil Woods a local resident has indicated that he is going to provide information on the absence of a viable case for the revised scheme. CPRE echoes much of his points about benefits and questions whether it is reasonable to approve consent on the basis of such economic evidence.

Social

35. The social benefits claimed by the appellant need to be sense checked.
36. CPRE understands that Bolton has performed 77% against its Housing Delivery Test. However, the housing requirement is based on the Government's Standard Method, which relies on the Office of National Statistics ('ONS') 2014 based data. CPRE has repeatedly alerted to the Government that using old data is wrong, and against its own best practice, and the 2014 data is predicated on 'artificial' high growth.
37. The recently published CENSUS data verified that there was actually much less household growth than was assumed to be the case. Between 2011 and 2021, based on the ONS 2014 based data, the Submission version Greater Manchester Places for Everyone Spatial Plan planned for 100,626 houses, when the CENSUS shows only 50,035 are in fact needed. So, the housing requirement is roughly double of what it should be. Please refer to the tables in Appendices Five and Six, showing how the population has increased by a much lower than was assumed. The housing requirement is some 291% of where it ought to be.
38. The phasing of the housing needs to be scrutinised. How many would come forward in the next five years? The extant proposal has not secured the Ryder Cup and therefore the 1,036 homes promised did not start to be delivered. Bolton needs to be able to plan its supply of housing in a more certain way than on a proposal that at best is unlikely to materialise.
39. The low level of affordable housing is of concern. See comments under material considerations. The term policy plus, is a misnomer as the scheme is unviable so does not provide the level of affordable housing it should do if viable. Why approve an unviable scheme? It is Boltonians who miss out on an opportunity of affordable homes where they are needed.

Cultural

40. Cultural benefits are claimed and CPRE queries them, and considers them overstated, particularly as the key heritage asset is to be harmed. This is a rural area with agricultural traditions and not golf related ones.

41. People already enjoy the RPG and adjacent farmland as it is. When using the public rights of way and enjoying the views of countryside people have improved health and wellbeing.

Public Rights of Way

42. The improvements to the PROW are highlighted by the appellant as a benefit, but the local people and Bolton Ramblers object to the proposed developments and see the changes to the Public Rights of Way as a dis-benefit. Please refer to the representations of Bolton Ramblers and local people who enjoy the public rights of way on horseback, cycling and walking, undertaking a variety of leisure activities watching wildlife, exercising children and dogs and feeling the health and wellbeing benefits of spending time in the countryside.
43. Whether there is the claimed level of benefit is questionable.

Ecology

44. Despite the fact the appellant shows long term biodiversity net gain, there would be harm in the short term with loss of ancient woodland, trees, hedgerows, and wildlife habitat. The large-scale earth would involve the loss of many site-specific species and given the timescale to construct the golf resort and houses it is considered the species will take decades, even centuries to recover. This must be more accurately captured in the planning balance due to the many Sites of Biological Importance.
45. Also, it is important, without prejudice, to ensure in the conditions adequate ecological mitigation and compensation is secured, preferably on-site and off-site as an exception. This issue is picked up in Policy JP-G2 Green Infrastructure Network of the, soon to be examined, submission version Greater Manchester 'Places for Everyone' spatial plan (see under Material Considerations).

Sustainability

46. The site is served by car, bus and rail, but due to the nature of golf it is considered most people employed and visiting the golf resort would arrive by car.
47. The sustainability credentials of the buildings are 'generic' and would arise wherever the golf course is developed.

Material considerations

48. The emerging Greater Manchester 'Places for Everyone' ('GMP4E') spatial plan sets out policy and allocations for the period (2021-2037). It is going to examination,

which opens in November 2022. There may be a prematurity case here. Please refer to the GMP4E extracts in Appendix Six of this representation.

49. The Planning Statement site allocations are updated from 2016. The GMP4E 2019 position should be in front of the inspector, which proposes that the golf use is an allocation, as identified in paragraph 457, and referred to in the Policy JP-Strat 8 Wigan Bolton Growth Corridor. But, crucially there is no associated proposed housing allocation in the Green Belt in this area. Please refer to the GMP4E submission document for the Hulton Park allocation.
50. Andy Burnham, Mayor of Greater Manchester Combined Authority should be consulted for an opinion on affordable housing. The plan sets out a need for 198,709 housing land in Table 7.13. GMP4E Policy JP-H 2 Affordability of New Housing, shows that 50,000 additional houses need to be provided, equal to 25%. However, as mentioned the CENSUS data shows the population is not growing as quickly. But, the level of affordable housing required is still the same and it is an urgent issue. When considering whether the proposals provide enough affordable housing, CPRE considered it does not.
51. It is of relevance that under GMP4E Policy JP-G2 Hulton Park is reference under f) as an opportunity area, identified as having particular potential for delivering improvements to our Green Infrastructure Network. It is very important that new developments protect and enhance the ecosystem services including flood management, climate change mitigation and adaptation. Alongside this primary function an enhanced Green Infrastructure network will support wider public health benefits, including promotion of active travel, food growing and recreational opportunities. Making the most of opportunities is important to overcome decades of ecological decline.
52. Wherever practicable, opportunities to integrate new and existing green infrastructure into new development will be taken to protect, enhance and expand the green infrastructure network in accordance with the above priorities. Where new or improved green infrastructure is delivered as part of a development, the developer should make appropriate provision for its long-term management and maintenance. CPRE considers the level of contribution for ecological mitigation and compensation should be increased.

Planning balance

53. On review of the planning balance (see my appendix seven) the weight to the additional harms arising, and more reasonable weight for the understandably desired, albeit 'unsubstantiated' benefits lead to a conclusion, which is that the overall planning balance is negative. Consequently, PRE recommends that the appeal should be dismissed.

Summary

54. A review of key issues is important and having considered the 1,272 documents on Bolton's planning application website, CPRE finds the resulting balance is negative and recommends that the appeal is dismissed.
55. Without prejudice, if minded to approve, the extant permission should be quashed to ensure the housing on South Field are not permitted.
56. In line with the Secretary of State, in his paragraph 13 of the decision note, the approval of the application 0997/17 is predicated on the basis development should only proceed if the Ryder Cup is secured. This was the subject of a carefully worded Section 106 condition, which if the appeal is allowed ought to be applied in the same way, accepting that all of the harms arise as soon as the site preparations commence (they are irreversible), particularly to the RPG. It is only at the moment that a successful bid to host the Ryder Cup tournament is announced that the 'very special circumstances' necessary to build inappropriate development in the Green Belt occur.
57. The other conditions deemed as necessary should form a basis for the planning conditions of the revised scheme.
58. In the appendix is further information in support of CPRE's points and its objection letters to Bolton Council, dated 15th of November 2021 and dated 28th January 2022, highlighting the increased harms, issues with the benefits claimed, the fact that only a one-off 'single' championship scale tournament would be able to be hosted and is problematic in regards to securing future legacy benefits that according to the application documents will account for 65% of the benefits being delivered. Otherwise, the development is for a 'standard' could be anywhere golf course and there is no 'very special circumstance' case.
59. It is CPRE's view that the inquiry should focus on the differences arising from the modifications to the proposals, and in the respective appendices I provide information for the benefit of the inquiry on the following key issues:
 - Appendix One: To what extent the proposals are consistent with the adopted development plan, focusing on the differences arising from the revisions;

- Appendix Two: Consideration of the extent to which the proposals are consistent with the National Planning Policy Framework ('The Framework') for protecting Green Belt;
- Appendix Four: An assessment of other harms including loss of more farmland, biodiversity impacts, loss of rural and open countryside landscape character, and other;
- Appendix Five: An assessment of the socio- economic benefits claimed, with a refresh of the housing benefits against the Housing Delivery Test and CENSUS data, claimed highway improvements, Public Rights of Way;
- Appendix Six: Extracts from Greater Manchester 'Places for Everyone'
- Appendix Seven: A review of whether very special circumstances are demonstrable.
- Appendix Eight: CPRE Letter November 2021
- Appendix Nine: CPRE letter January 2022
- Appendix Ten: Hulton Park consultation letter June 2021

60. Please contact me if you require further information.

Yours sincerely

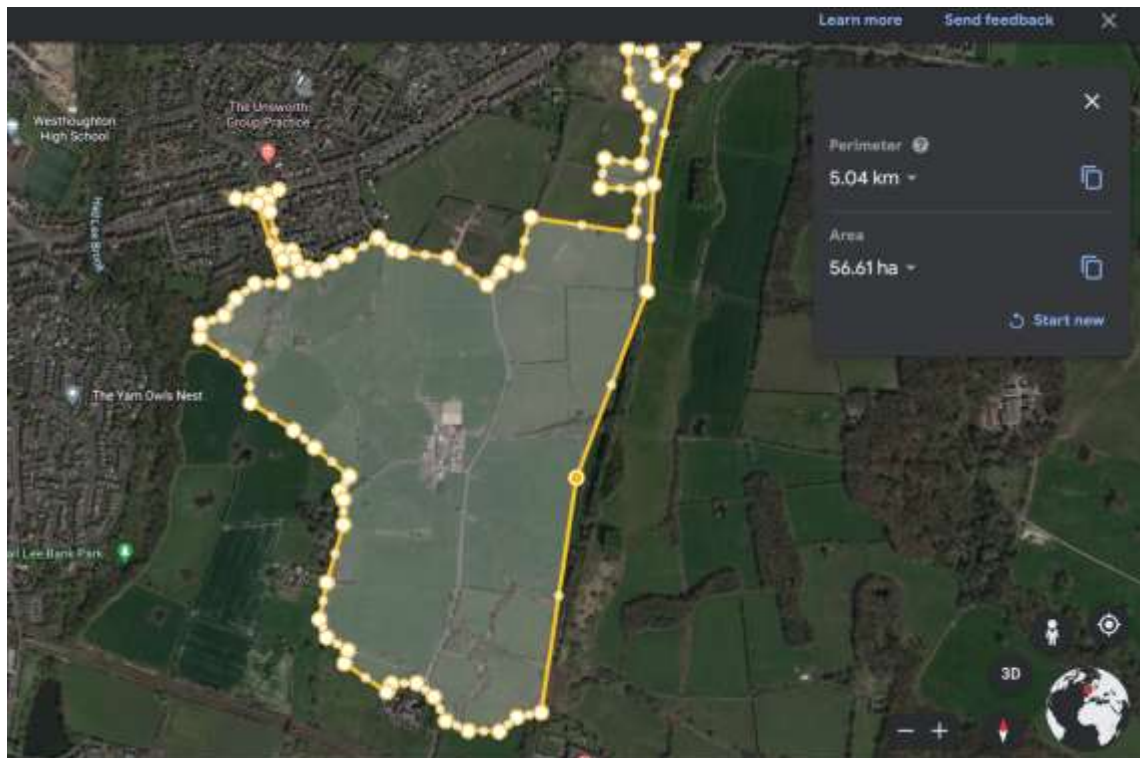
Jackie Copley MA, BA, (Hons), PgCert, MRTPI
Planning Director

Appendix One: To what extent the proposals are consistent with the adopted development plan, focusing on the differences arising from the revisions

Extract: Housing Parcels on the site



Extract: Google Earth measuring the area of land currently in use for agriculture and covered by Bolton Local Plan Allocations DPD, 2014 Policy CG6AP Other Protected Open Land



Policy CG6AP – Other Protected Open Land

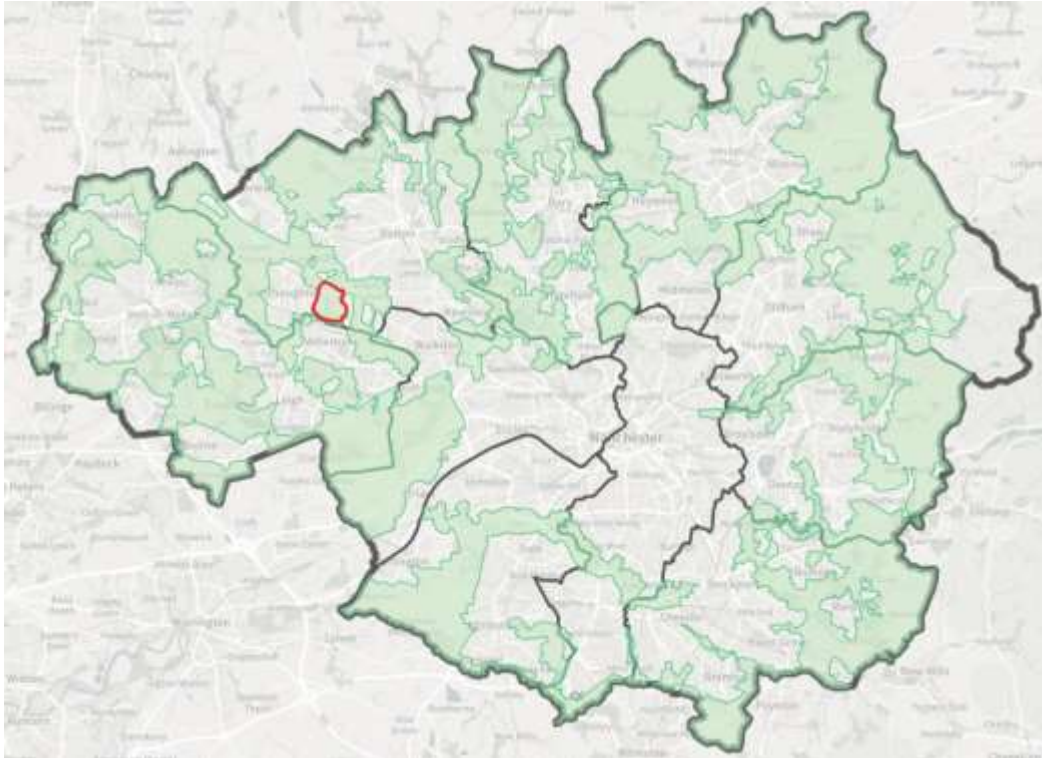
The Council will permit development proposals within the defined areas of Protected Open Land shown on the Proposals Map, provided that they fall within one or more of the following categories:

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

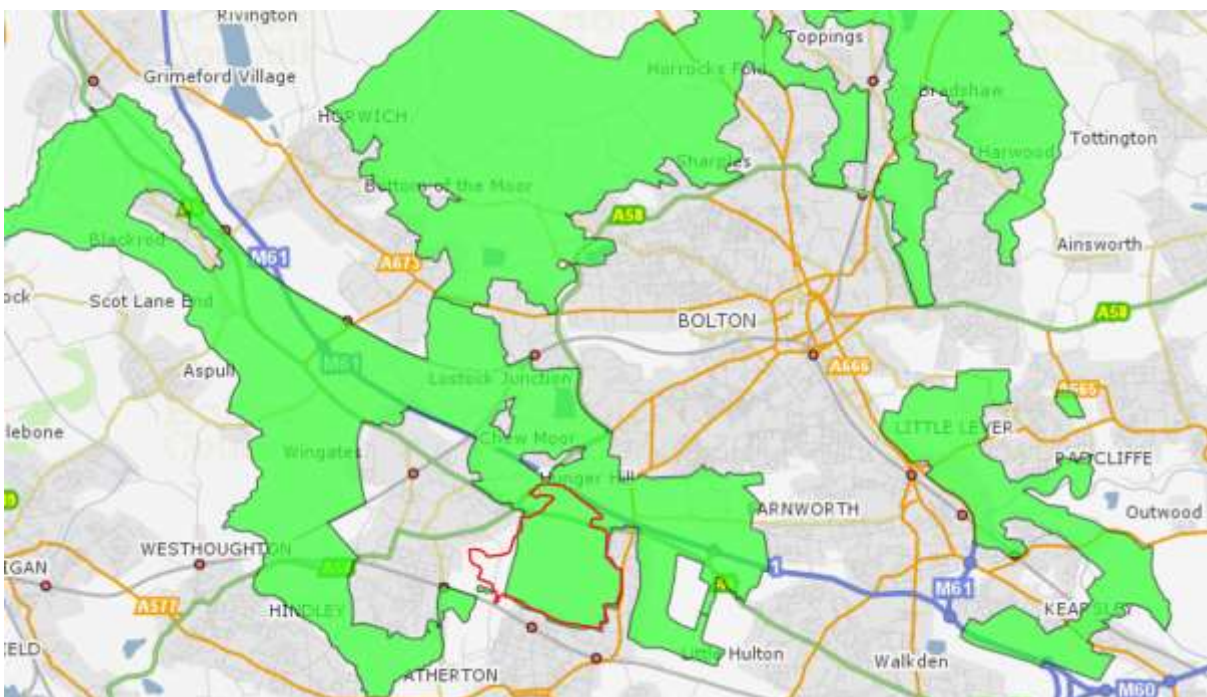
Where new buildings are permitted they should be sited to form a group with existing buildings wherever possible. In cases where this is not possible, buildings, car parking areas and any other new structures should be sited where they will be well screened and unobtrusive in the landscape. All buildings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

Appendix 2. Consideration of the extent to which the proposals are consistent with the National Planning Policy Framework ('The Framework') for protecting Green Belt

Extract from GMCA Open Data Mapping: Green Belt



Extract from Development Plan: Green Belt



Appendix Three: A review of the heritage impacts, extracts from Mr Chris Gallagher proof of evidence appendices



CGFigure 2: Extract from an engraved and hand-painted version of Christopher Saxton's *Map of Lancaster* (1574-7) showing 'Hulton PK' at centre left of the image, to the south of a ridge of hills, shown here as three protuberances, separating Hulton from the nearby town of Bolton. Some two and a half centuries after this map was drawn, the same hills would become significant in the construction of a rail link between Bolton and Leigh, shown to the south and west of Hulton Park
©British Library Board



CGFigure 6: Bill & Receipt from William Hulton to William Emes (March 20th 1765, Lancashire Archives DDHU/42/25). A transcript of the text of this item is included as **Appendix B**.



CGFigure16 (upper): Hulton Hall from the south east, from an aerial photograph of 1927. The eastern approach to the Hall is visible in front of the building, with a part of the Pleasure Ground path network to the left and William Emes' *Serpentine Lake* beyond. ©*Britain from Above*

(lower): Hulton Hall from the north west, viewed across the elegant *Serpentine Lake*. The projecting Bay at the centre of the building was added towards the end of the 19th century¹. Note the apparently modest size of the Hall apparent in both images, having two principal floors only above basement level, with an attic storey most likely used for storage and sleeping accommodation by servants.



CGFigure 18: Extract from OS 1st Edition 25" plan (1893-4) showing Hulton Park and its immediate surroundings. Woodland clumps and plantations are much as shown on the OS 1st Edition 2" to 1 mile 'Outline Drawings' (1841), confirming the survival of William Emes' and John Webb's landscape design for the park. In areas to the east and north of Hulton Hall, the density and pattern of individual trees and clumps is shown in considerable detail.

Other trees are also shown throughout the demesne parkland landscape, including to the north, west and south. The House, Stables, Home Farm complex, Pleasure Grounds, Kitchen Gardens, Serpentine Lake and extended walks through Mill Bank Plantation to the south and east are also shown in detail, with alterations to the Pleasure Ground path network particularly noticeable.

Changes on this plan are apparent in the area of *Cow Wood* which is greatly enlarged towards the south and east, due largely to the presence within it of an earlier coal mine, by this date apparently redundant, although the track of the former rail line connecting it to the *Hulton Collieries* in the north is still visible, as is the former crossing-keeper's lodge adjacent (now incorporated within Dearden's Farm buildings). Other colliery workings are visible to the north and west of the park, at Chequerbent, but the park at this time was otherwise clear of large-scale mineral extraction workings.

Note the large number of small ponds shown on this plan, both within Hulton Park itself and in surrounding areas. These may in some cases have resulted from historical mine workings (e.g. at the south-eastern corner of '*Cow Wood*'), but their widespread distribution points more to a geological origin, perhaps due to the character of the surface glacial deposits.



CGFigure 22: Sir Geoffrey Hulton photographed in 1986 in the garden of 'The Cottage' at Hulton Park. Note the high standard of maintenance of both the garden itself and, more significantly, of the farmed parkland landscape beyond. Sir Geoffrey at this time was closely involved with the Scouts movement and rented the former site of Hulton Hall to the Scouts for use as a camping site from c.1957 until his death in 1993. *Image reproduced by permission of The Bolton News*



CGFigure 23: 'The Cottage' at Hulton Park, from a mid-19th century photograph. This was formerly an elegant Georgian residence, but has since been much 'put upon' by successive owners. Note the then fashionable 'studded' flower beds within the gardens and the stylish attire of the young women seated on the lawn.

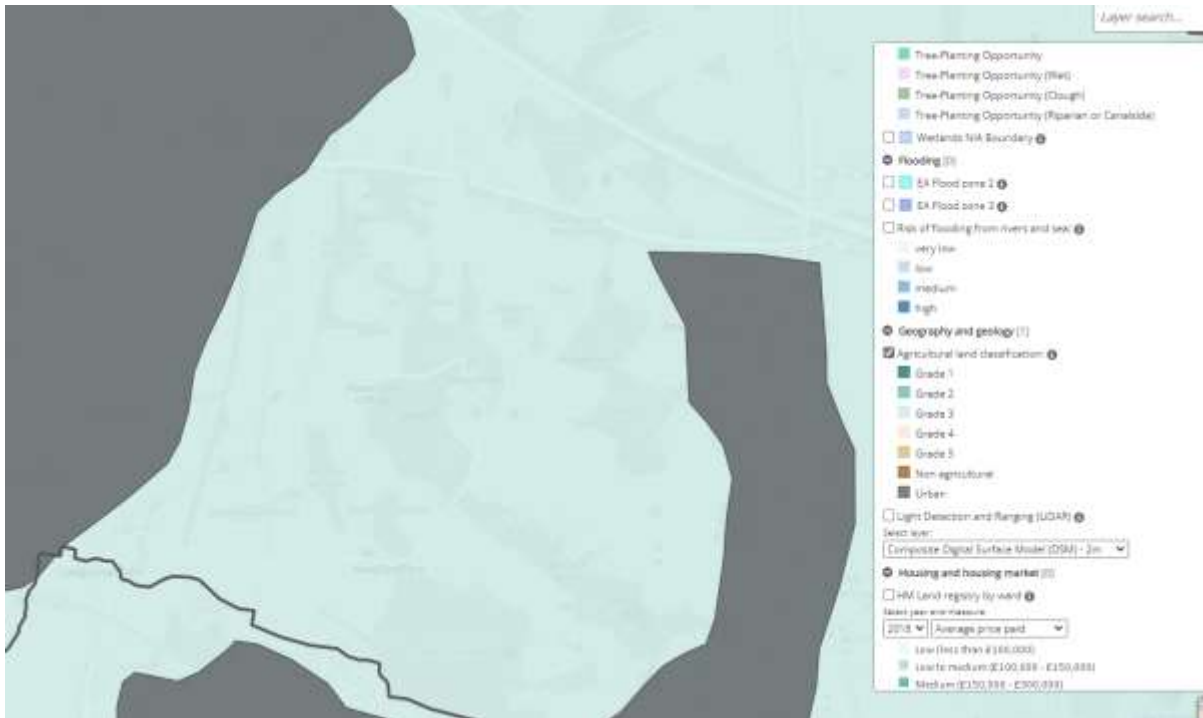


CG Figure 36: 15th & 18th hole montages produced for the Applicant's Statement of Case document (June 7th 2019).

These are clearly 'imaginary' views but give a good impression of what a 'Ryder Cup' standard golf course might actually look like when in use for its stated purpose.

Appendix Four: An assessment of other harms including loss of more farmland, biodiversity impacts, loss of rural and open countryside landscape character, and other

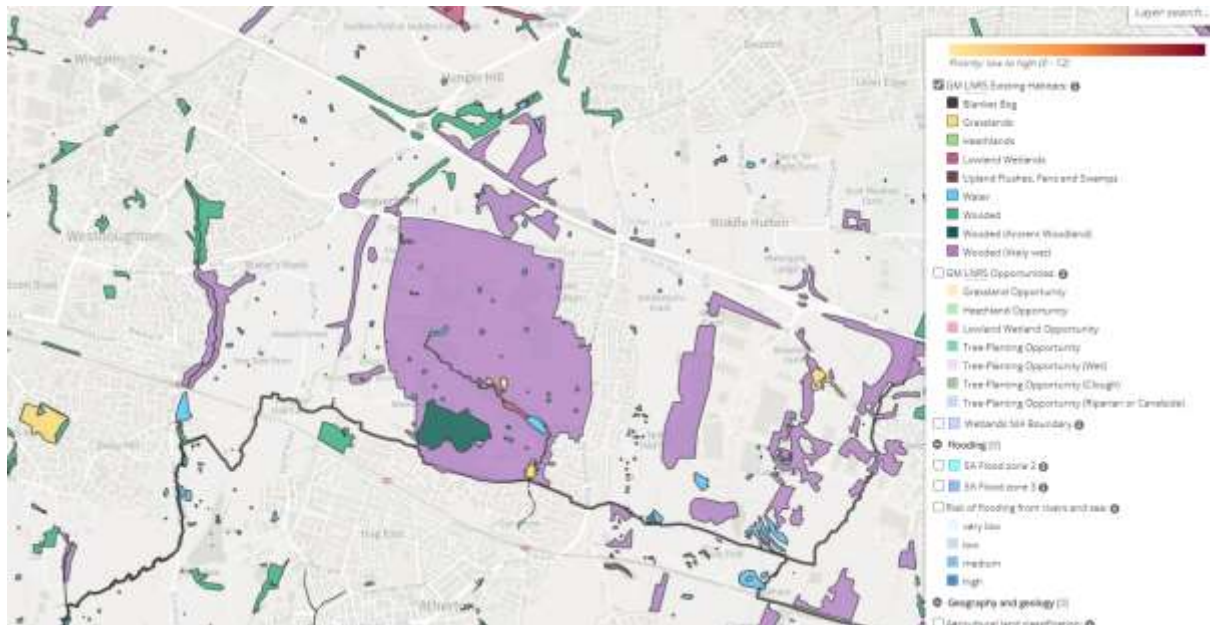
Extract from GMCA Open Data Mapping: Agricultural Land Classification



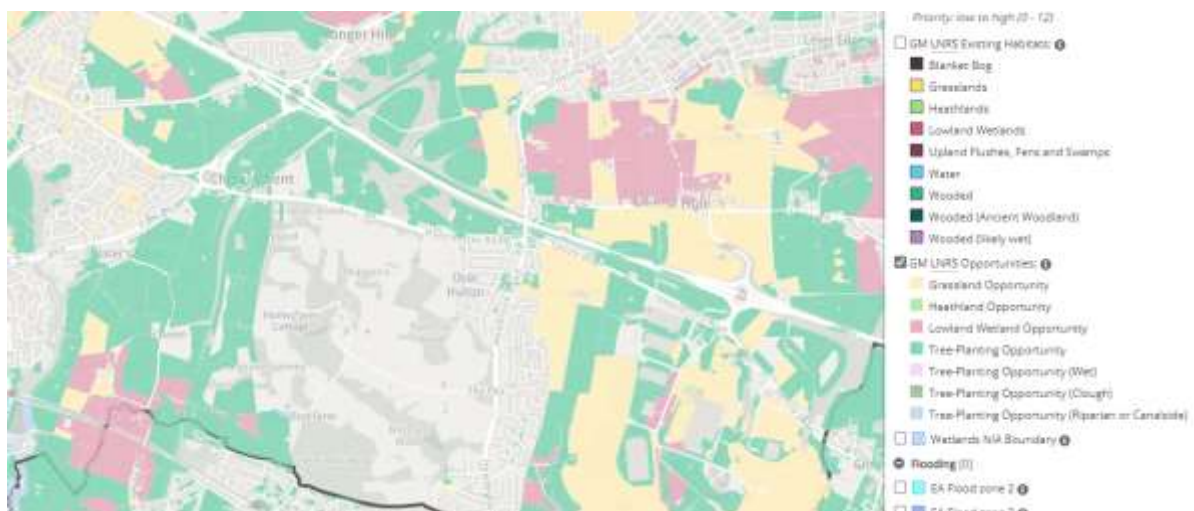
Extract from GMCA Open Data Mapping: Sites of Biological Importance



Extract from GMCA Open Data Mapping: Greater Manchester Local Nature Recovery Strategy, Existing Habitats, purple indicates wooded (likely wet), dark green ancient woodland and green Wooded. There are also water features. Lowland wetlands, and grassland on the site.

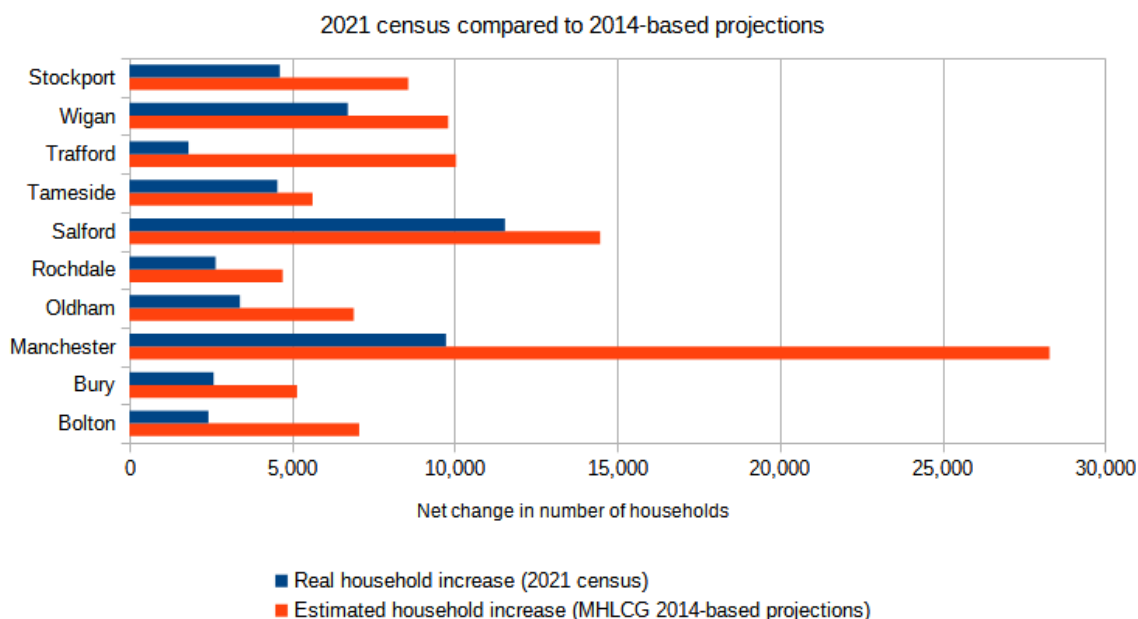


Extract from GMCA Open Data Mapping: Greater Manchester Local Nature Recovery Strategy, Opportunities



Appendix Five: An assessment of the socio- economic benefits claimed, with a refresh of the housing benefits against the Housing Delivery Test and CENSUS data.

Household growth in Greater Manchester 2011–2021



Household growth between 2011 and 2021

District	2011 Census	Projected household growth (MHCLG 2014)		Real household growth (2021 Census)		Projected : Real (ratio)
	Households (in 2011)	Households (in 2021)	Increase (2011–2021)	Households (in 2021)	Increase (2011–2021)	
Bolton	116,371	123,434	7,063	118,800	2,429	291%
Bury	78,113	83,265	5,152	80,700	2,587	199%
Manchester	204,969	233,259	28,290	214,700	9,731	291%
Oldham	89,703	96,600	6,897	93,100	3,397	203%
Rochdale	87,552	92,262	4,710	90,200	2,648	178%
Salford	103,556	118,029	14,473	115,100	11,544	125%
Tameside	94,953	100,583	5,630	99,500	4,547	124%
Trafford	94,484	104,524	10,040	96,300	1,816	553%
Wigan	136,386	146,186	9,800	143,100	6,714	146%
Plan area	1,006,087	1,098,142	92,055	1,051,500	45,413	203%
Stockport	121,979	130,550	8,571	126,600	4,621	185%
GM	1,128,066	1,228,692	100,626	1,178,100	50,034	201%

Appendix Six Places for Everyone Policy extracts

- 4.57 There are two significant assets at the eastern end of this growth corridor. Hulton Park is the proposed site for a Ryder Cup golf course and the Royal Bolton Hospital is a significant employer and the site of the Bolton College of Medical Sciences. The development of land at the hospital will enable its evolution and provide additional opportunities, including new health technology related activities, which would benefit from this location, alongside new housing development. The corridor also benefits from its proximity to other important assets. Wigan Town centre lies just to the north, which provides direct rail access to London, with the current journey times of 2 hours set to reduce substantially with the arrival of HS2 services. The lowland wetland and mosslands are just to the south, forming part of the strategic green infrastructure network.

Policy JP-Strat 8

Wigan-Bolton Growth Corridor

Lying within the area and policy framework covered by JP-Strat 6, the Wigan – Bolton Growth Corridor will deliver a regionally-significant area of economic and residential development.

New highway infrastructure will connect Junction 26 of the M6 and Junction 5 of the M61 including public transport provision. Measures to improve the provision of bus services and to increase the use of rail lines will be implemented, potentially including a Wigan to Bolton Quality Bus Transit corridor, conversion of the Atherton line to allow for metro/tram-train services, and the electrification of the Bolton to Wigan line.

Over the period 2020-2037, land to accommodate just over 1million sqm of new employment floorspace and approximately 13,000 new dwellings has been identified within the area.

The majority of this new development will be on previously-developed land, within the urban area. However, in order to meet the overall spatial strategy, this Plan allocates the following sites within the area, and makes associated changes to the Green Belt, to further support the success of the growth corridor:

- Policy JP Allocation 4 'Bewshill Farm'
- Policy JP Allocation 5 'Chequerbent North'
- Policy JP Allocation 6 'West of Wingates / M61 Junction 6'
- Policy JP Allocation 34 'M6 Junction 25'
- Policy JP Allocation 37 'West of Gibfield'

In addition, the following will also be supported:

- The restoration of Hulton Park, and the provision of a Ryder Cup standard golf course and associated leisure and tourism facilities
- The development of land at Royal Bolton Hospital, including a health village.

7.13 The table below summarises the sources of housing land supply up to 2037.

District	Strategic Housing Land Availability Assessment			Allowances ⁽⁷⁵⁾	Places for Everyone Allocations ⁽⁷⁶⁾	Total 2020-37	Estimated Completions 2020-21 ⁽⁷⁷⁾	Estimated Land Supply 2021-2037
	Brownfield land	Greenfield land	Mix brownfield land and greenfield land					
Bolton	10,686	2,469	0	2,021	0	15,176	-504	14,672
Bury	3,056	424	362	261	4,700	8,803	-187	8,616
Manchester	49,455	2,591	9,676	805	0	62,527	-2,951	59,576
Oldham	7,712	1,276	1,410	557	2,176	13,131	-330	12,801
Rochdale	5,518	2,836	426	-783	4,006	12,003	-569	11,434
Salford	30,634	2,137	1,473	1,959	1,500	37,703	-1,680	36,023
Tameside	5,017	755	575	576	1,558	8,481	-281	8,200
Trafford	12,293	2,568	824	777	4,827	21,289	-591	20,698
Wigan	10,769	6,403	68	756	1,600	19,596	-864	18,732
Places for Everyone	135,140	21,459	14,814	6,929	20,367	198,709	-7,957	190,752

Policy JP-H 2

Affordability of New Housing

Substantial improvements will be sought in the ability of people to access housing at a price they can afford, including through:

1. Significantly increasing the supply of new housing, in accordance with Policy JP-H 1 'Scale, Distribution and Phasing of New Housing Development', thereby reducing the potential for a shortfall to lead to large house price and rent increases
2. Aiming to deliver our share of at least 50,000 additional affordable homes across Greater Manchester up to 2037, with at least 60% being for social rent or affordable rent⁽⁸¹⁾
3. Support provision of **affordable housing**, either on- or off-site, as part of new developments (avoiding where possible clusters of tenure to deliver mixed communities), with locally appropriate requirements being set by each local authority
4. Working with Government to maximise the amount of public funding being directed towards the provision of new **affordable housing**
5. Increasing the supply of low-cost market housing, to complement the provision of affordable homes and diversify options for low income households.

WIGAN-BOLTON GROWTH CORRIDOR

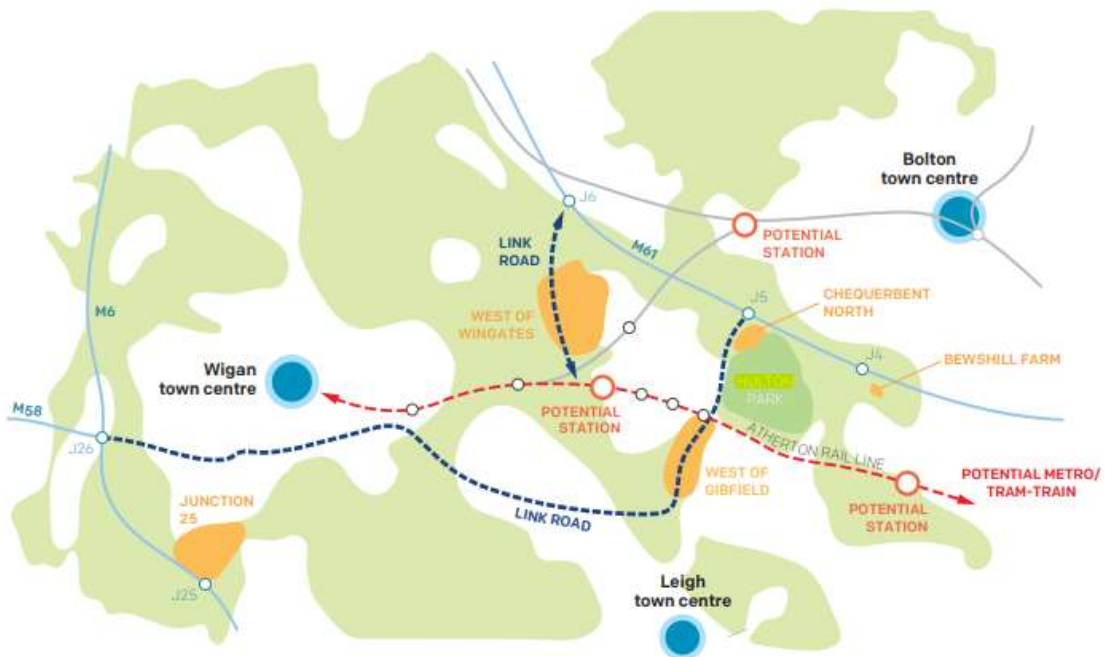
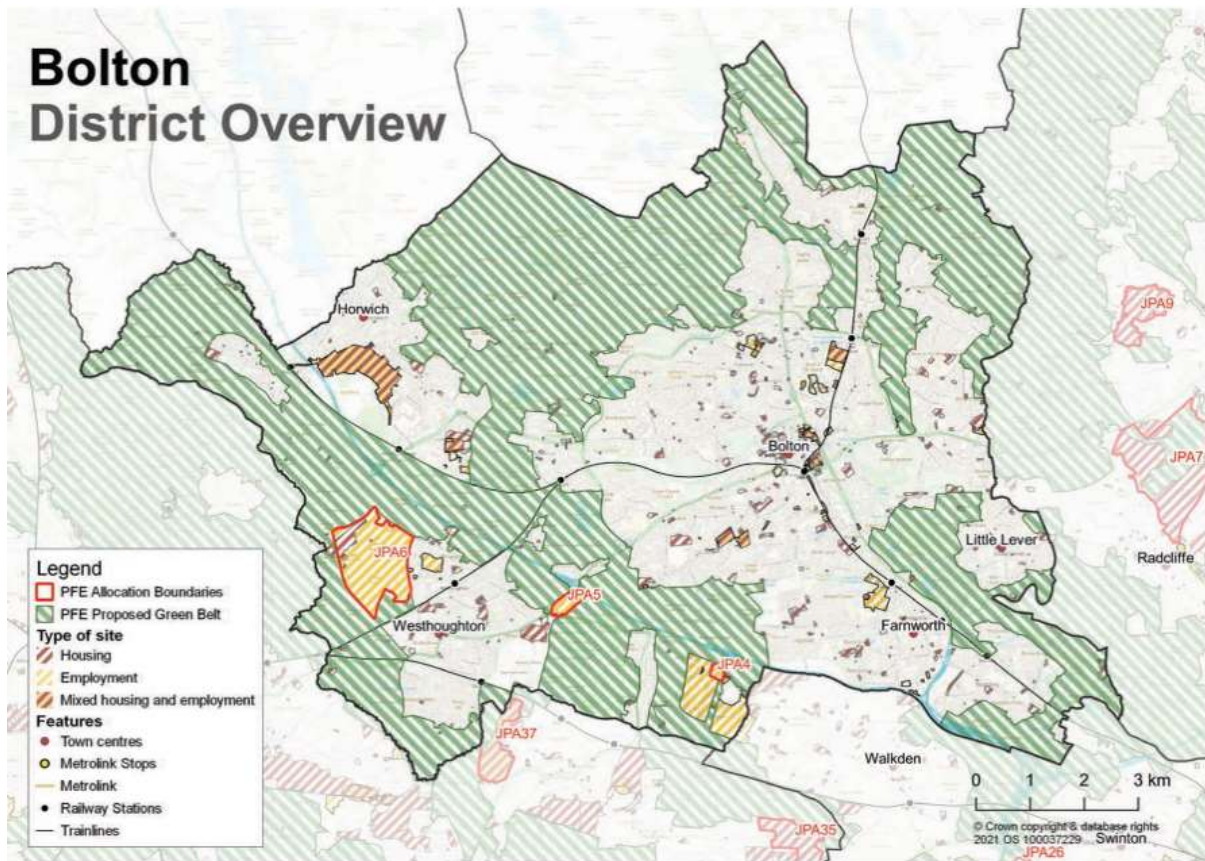


Figure 4.6 Wigan-Bolton Growth Corridor



Picture 11.11 Bolton District Overview

Policy JP-G 2

Green Infrastructure Network

A strategic approach will be taken to the protection, management and enhancement of our Green Infrastructure in order to protect and enhance the ecosystem services which the Figure 8.2 'Green Infrastructure Network' provides, including flood management, climate change mitigation and adaptation. Alongside this primary function an enhanced Green Infrastructure network will support wider public health benefits, including promotion of active travel, food growing and recreational opportunities.

The protection, management and enhancement of Green Infrastructure will contribute to the development of a Nature Recovery Network for Greater Manchester.

The following opportunity areas (as broadly illustrated on Figure 8.3 'Green Infrastructure Opportunity Areas') are identified as having particular potential for delivering improvements to our Green Infrastructure Network:

- g. **Hulton** Park (Bolton);

Development within and around the Green Infrastructure Network should be consistent with delivering major green infrastructure improvements within them and should contribute to improvements. Where Green Infrastructure Opportunity Areas overlap or are in close proximity to development allocations proposed in this plan appropriate measures to achieve this have been included. Further opportunities for delivering strategic green infrastructure enhancements and additional opportunities will be identified in the appropriate source(s) over time as the overall green infrastructure network evolves.

Wherever practicable, opportunities to integrate new and existing green infrastructure into new development will be taken to protect, enhance and expand the green infrastructure network in accordance with the above priorities. Where new or improved green infrastructure is delivered as part of a development, the developer should make appropriate provision for its long term management and maintenance.

Appendix Seven: A review of whether very special circumstances are demonstrable

Application	00997/17	12218/21
Impacts	Secretary of State	CPRE
Harm		
Green Belt	very substantial	very substantial
Heritage	considerable	substantial
Landscape Character and Visual Amenity	moderate	significant
Loss of agricultural land	none	moderate to significant
loss of local employment	n/a	moderate
Ecology	~	significant
Benefits		
PROW	moderate	negligible
Footloose	n/a	limited
Economic	very significant	moderate
Social (inc health and education	substantial	moderate
Cultural	significant	moderate
Biodiversity and tree planting	substantial	substantial
sustainability	n/a	negligible
Housing delivery	significant	moderate
affordable housing	initial 10% provision nil, beyond 10% limited	nil, then limited
off-site highway improvements	moderate	limited

CPRE's objection letters to Bolton Council, dated 15th of November 2021



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BL1 1RU

Patron
Her Majesty the Queen
President
Emma Bridgewater
Chair
Debra McConnell

15th November 2021

Dear Ms Jodie Turton,

1. I am writing on behalf of CPRE Lancashire, Liverpool City Region and Greater Manchester (CPRE) to object to:

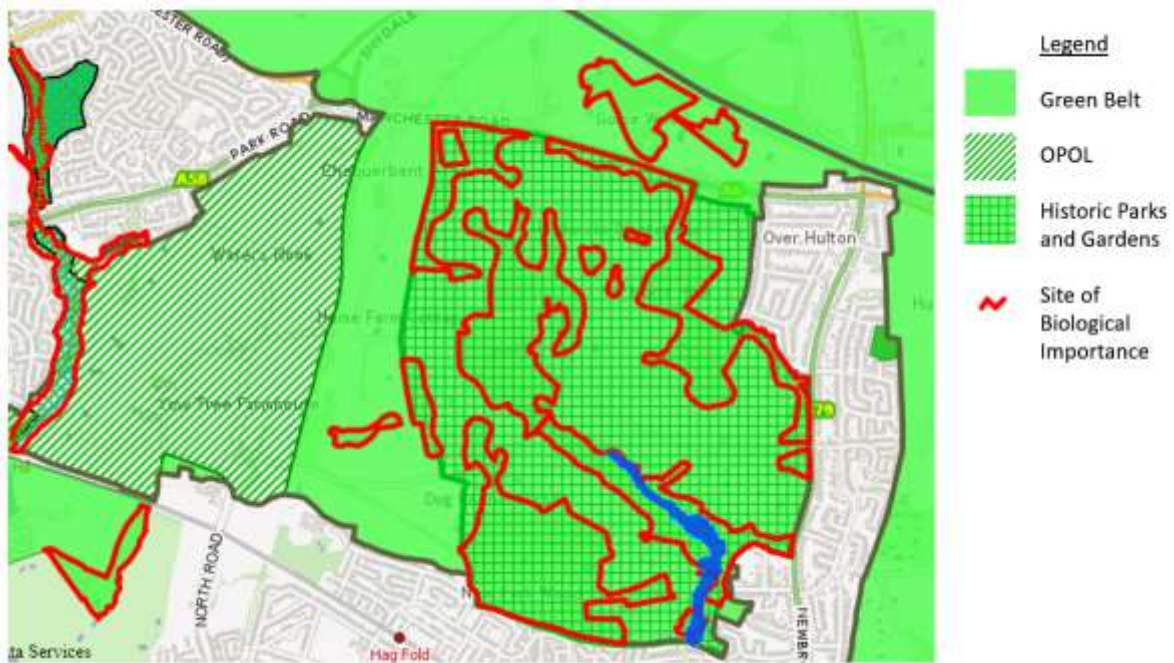
Bolton Planning Application: 12218/21. Developer: Peel L&P Investments (North) Limited. Site Address: Land at and Adjacent to Hulton Park, Manchester Road, Over Hulton, Bolton, BL5 1BH. Hybrid Application particulars:

PART A: A full planning application for restoration works to Hulton Park and various structures and heritage assets within it, including the pleasure grounds, Dovecote, Walled garden and lakes; the demolition of various existing buildings and structures, the development of a golf resort, including an 18-hole championship grade golf course, clubhouse, golf academy (comprising driving range, practice course, adventure golf course and academy building with sports and learning facilities, a golf shop and café), a hotel with adjoining spa and conference facility, and other ancillary buildings, structures and engineering and landscaping works including a maintenance building, highway accesses, internal access roads, highway underpass, various bridges, boundary treatments, external lighting, parking areas and new replacement landscaping and open space; highways infrastructure; and, where applicable, the re-routing, upgrading and extension of the public rights of way network and creation of new public rights of way, footpaths and trails.

PART B: An outline application for the residential development of up to 1,036 Dwellings; a village centre; village hall; community allotments; primary school, short stay holiday accommodation, comprising the conversion of Home Farm Cottage and the construction of a mews building, cabins and lodges; and a range of other retail, leisure, recreation, community and food and drink-related uses; highways infrastructure; the regarding of land

to accommodate the golf course and staging and subsequent residential development; and where applicable, the re-routing, upgrading and extension of the public rights of way network, and the creation of new public rights of way network, and the creation of new public rights of way, footpaths and trails, with all matters reserved except for (in part) access and in respect of the short stay holiday accommodation layout.

2. I have considered the supporting documents including drawings, layouts, access arrangements, parameters plan and the Public Right of Way Strategy. The site area of the new application is considerably larger at 356.76 hectares, an addition of 88.76 hectares. See the local plan policies map showing the extent of Green Belt, OPOL, Historic Parks and Gardens and Sites of Biological Importance within the enlarged site boundary.



3. See an extract of the new application’s masterplan next to the extant permission.



Hulton Park Consultation June 2021

4. CPRE responded to the applicant's pre-application consultation and welcomed the improvements to the proposals to address the identified harms and increase the benefits compared to application 00997/17, which has an extant planning consent that we remain strongly opposed. CPRE does not accept that the development benefits are high enough to justify the adverse impacts. This is particularly so as the development was only for a single (one-off) 'championship event', and thereafter the parts of the development used for hosting the Ryder Cup, such as coach parking, would be developed for other land uses, including houses. This is an issue that we remain concerned about.
5. We did reserve the right to consider the application in full before concluding on whether to support or object.

Extant Secretary of State Approval Decision

6. The extant approval for application 00997/17 was decided via a call-in inquiry (in pursuance of Section 77 of the Town and Country Planning Act 1990), reference APP/N4205/V/18/3208426.
7. Hulton Area Estate Residents Together (HEART) had Rule 6 Party status at the Inquiry and objected to the development on the grounds of: harm to the historic landscape of Hulton Park, which is a Grade II Listed Park and Garden, the permanent harm to the Green Belt, loss of farmland and associated businesses, loss of ecology, loss of residential amenity, among other harmful effects.
8. CPRE also objected, echoing many of HEART's concerns and it recommended, without prejudice if permitted the development should be conditional and only proceed if the Ryder Cup is secured. This is because very special circumstances only exist if the Ryder Cup Tournament is delivered.

'No Ryder Cup, no development'

9. The Secretary of State agreed with the Inspector (at 14.13 of the decision letter) that planning permission be granted subject to conditions and the benefit of obligations in the Section 106 Agreement, which effectively means 'no Ryder Cup, no development'. Both acknowledged it is only with the benefits of the Ryder Cup that very special circumstances would exist to justify the harm to Green Belt and other harms, including to the historic landscape fabric of Grade II Registered Hulton Park and Garden. This is confirmed on page 3 of the Secretary of State's decision letter signed by Andrew Lynch, dated 30 July 2020.

Application 12218/21

10. To aid the consideration of the new application 12218/21 by Bolton Council I set out what CPRE consider the key differences to be in the scale, form and impacts of the proposals compared to application 00997/17.

Policy and statutory considerations

National Planning Policy Framework (NPPF)

11. There were revisions to the NPPF on 20th July 2021 that need to be considered when taking the decision. The NPPF sets out the Government's commitment to protect existing Green Belt from inappropriate development. It promotes a plan led development model.

Greater Manchester 'Places for Everyone' Spatial Plan

12. Greater Manchester 'Places for Everyone': Joint Development Plan (JDP) Document for Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan, August 2021 went out to consultation with a deadline of 3rd October. As a progressed spatial plan, Places for Everyone requires more weight to be attributed to its emerging policies.
13. Despite 'Places for Everyone' focusing investment on the north of the sub-region, Figure 7.1 shows a focus of housing supply in the area of Trafford and north Bolton where a lot of permissions already exist in the planning pipeline.
14. Places for Everyone seeks 30% affordable housing, with at least 60% of that for social rent to mirrors housing needs across the local authority areas. Whereas the application seems to be for an exclusive residential development linked to the golf resort to support higher property prices, without real thought to lower income households who need affordable dwellings in Bolton.
15. Andy Burnham, Mayor of Greater Manchester and Greater Manchester Combined Authority were supportive of development of the site if it hosts the Ryder Cup and secures all the benefits associated with the international golfing tournament. CPRE recommends clarification from Andy Burnham, GM Mayor and GMCA should be sought to establish if there is still support for the new proposals without the benefit of the Ryder Cup Tournament.

Bolton Local Plan

16. So far as relevant, the statutory development plan comprises:
 - The Bolton Core Strategy (CS), adopted in 2011;
 - The Bolton Site Allocations DPD (ADPD), adopted in 2014.

17. The adoption of CS significantly pre-dates the publication of all versions of the NPPF.
18. CPRE finds the application does not conform to the adopted development plan as a whole, which sets out land for sustainable development with site allocations including both brownfield and greenfield land that have benefited from an assessment against sustainable development criteria.
19. These breaches are not merely technical; they set up a statutory presumption against the grant of planning permission, which the applicant will need to overcome. They also give rise to a negative policy presumption given that the planning system is meant to be genuinely plan-led. These proposals are self-evidently not the outcome of a plan-led process but the exception to it.

Socio-Economic Effects

20. The number of dwellings (1,036), and the number of hotel bed spaces (142), remain the same, but curiously the full time equivalent total jobs more than double to 430 jobs (before 198), which is a good improvement, however CPRE wishes this increase in employment to be fully understood.
21. The application does not specify the tournaments aspired to, merely stating a championship course. We need to know which championships and the relevant dates the applicant will be applying to host. We then require a Section 106 Agreement of the form obtained, on our recommendation, for the first application, except now in addition to Ryder Cup will be added all the other Championships the applicant has applied to host.
22. Furthermore, it is a matter of public interest whether, like the extant applicant, only a single (one-off) championship level tournament can be delivered, should housing be developed on the coach parking areas. CPRE is of the opinion the golf legacy values are greatly reduced as a consequence.
23. The Greater Manchester Local Industrial Strategy (at the time of the previous Planning Inquiry) said no more jobs in hospitality were needed, rather higher skilled and higher paid jobs to diversify the economy.
24. Covid and Brexit combine to have an unsettling effect on the economy, particularly concerning the hospitality sector with many businesses not surviving the lockdown and difficulties with supply chains. Whether additions to this is a sector is appropriate in Bolton, given the demand for existing golf provision, requires consideration. During the call-in inquiry, CPRE showed that it would be businesses and employees from outside Bolton that would benefit from the Ryder Cup. This is as there is limited hotel bedspaces and golf businesses in Bolton. There is also likely to be a displacement effect as other golf courses lose members. The net value needs to be better understood.
25. Retention of the farms that made up the model farm heritage of Hulton park estate would be welcome as the extant proposal will result in a farming family of more than three generations to be evicted, and in recent times it has progressed an ice-cream business,

selling via a farm shop. CPRE supports local food supply chains and sustainable land management.

26. In CPRE views, the socio-economic benefits of the Ryder Cup were not enough to outweigh the harms. The Inspector and Secretary of State considered (see para 14 of the decision note) the Ryder Cup delivers substantial benefits of 1,686 jobs and £1.1 billion GVA. In the absence of the Ryder Cup benefits, CPRE considers that the planning balance is even more negative than we previously considered. However, this needs to be weighed with other improvements such as the reduction in Green Belt loss. The loss of OPOL land for development needs consideration as that implies planning harms too to weigh against the benefit of delivery of housing.

Housing Requirement

27. The Standard Method, as revised in 2020, requires 776 dwellings per annum, which CPRE considers too high. This is because the latest population data should be relied upon when considering household projections for local plans. The Government has announced a +300,000 national level dwelling per annum figure, when the latest data shows it to be lower than 200,000 homes per year. We think local authorities should plan for reality not for developer demands.

28. The Bolton Core Strategy sets out an annual housing requirement of 694 dwellings per annum, and an average of 497 homes have been completed in the last three years.

29. Against this unreasonably high housing requirement there is understandably a shortfall in the supply of housing. In June 2021 there had been 5,933 completions since 2008/9 (or 494 d/pa). There has been an average shortfall of 200 d/pa (each and every year of the CS period). The total shortfall is 2,395 homes and rising. These are houses which should have already been built. In the terms of the NPPF's stringent Housing Delivery Test, the shortfall is very significant. CPRE understands that in cases of persistent under-delivery, a 20% buffer should be included.

30. It should be remembered the local authority only decides planning applications based on policy and it does not actually complete houses itself, this is the role of the house building sector, so it is an unfair metric to be performance checked against.

31. The Council does not have a 5-year supply, consequently the NPPF (paragraph 11) is engaged, and the tilted balance should be applied. However, Green Belt land is subject to footnote 7 policies. Planning permission should, therefore, be granted unless:

- the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed⁷ (*Green Belt*);
- any adverse impacts significantly and demonstrably outweigh the benefits (NPPF 11).

32. The decision taker therefore should be appraised of the harms to Green Belt land, and any adverse impacts, which CPRE considers there is significant harm to Green Belt and there are insurmountable other adverse impacts that do outweigh the claimed benefits.

Housing Mix

33. CPRE urges for a broader range of house types to reflect local housing needs, including 'genuinely' affordable homes, family housing, aspirational homes and homes suitable for those looking to downsize. There ought to be a sizeable proportion of homes for rental tenure to be affordable in perpetuity.

Biodiversity

34. CPRE echoes the concerns of other local environmental organisations that there are ecological harms that must be factored into the decision.
35. There is ancient woodland, New Park Wood, situated within the development boundary. The impacts on ancient woodland and ancient and veteran trees must be considered in line with paragraph 180 of the NPPF. This should be taken into account by the Council.
36. According to the ecological assessment included in the application documents, which accepts there are many ecological receptors, the felling of mature woodland and ancient and veteran trees from the registered Park and Garden to make way for the development of the golf course (the whole area is remodelled with over 1 million sqm earth moved to make viewing platforms bunkers, etc) and hotel/conference centre, 1,036 homes etc will ultimately establish newly planted trees and grassed areas at the fringe of the fairway and putting greens, leading to a positive biodiversity net gain.
37. The Wildlife Trust disputes this claim, and CPRE echoes its concerns as the proposed level of mitigation appears inadequate. The high significance and extent of harm to the existing ecology is great and that there are immediate harms, and the establishment of the suggested trees will take so long that the scale of short and medium harm must be a negative factor in the decision. This is particularly so, given the urgent problem of the biodiversity emergency, as evidenced by the Natural Capital Committee's most recent progress report showing degradation across all natural asset types.
38. We dispute the level of effects cited for the various stages of construction, and operational scenarios. The demolition of existing buildings which host bat roosts, losses of small areas of woodland and arable land, losses of hedgerows and ponds, and the disturbance to and loss of grassland is more significant than the applicant suggests.
39. Locally there are people with an interest in nature and they are aware of a great variety of bird species including protected and red-listed species, for example rare farm birds, and Barn Owls. There are a range of protected mammal species such as bats that are abundant on site, along with deer, badgers, hedgehogs, etc. Deer would be excluded with fences and manged 'humanely' to keep numbers down. There are ponds with great crested newts.

Highways

40. CPRE has considered the Highways Assessment, which covers an area that includes M61J5 and M61J4 and their slip roads, Chequerbent roundabout, Four Lane Ends (A579/A6) junction, the junctions of Platt Lane and Leigh Road with A58 Park Road, A58/A676 junction,

the A579 Bolton Road/Upton Road junctions and the junctions along Gibfield Park Way and Gibfield Park Avenue.

41. CPRE considers the highway access proposed to be problematic. For example, the proposed new road link to the M61 Junction 5 would cause congestion and lead to accidents and death. The new roads will induce more traffic and activity in the area.
42. CPRE notes that there is congestion at the roundabout with Westhoughton at peak times.
43. The package of measures to address the additional traffic would be secured via planning condition and a Section 106 Agreement.

Heritage

44. We echo the concerns outlined in the letter from the Gardens Trust and Lancashire Gardens Trust, which both object to this application on the grounds of the **substantial harm** which will be caused to Hulton Park, Grade II Registered Park and Garden.
45. CPRE agrees with the assertion of English Heritage (now Historic England) advice contained within *Golf in Historic Parks and Landscapes* that states “the introduction of a golf course within historic parks and landscape almost invariably alters their historic physical form and can erode their character and damage archaeology.”
46. The scale of earth moving with change the gradients of the landscape leaving little trace of the influence of famous landscape architects of Eames and Webb. The heritage asset is of high value and rarity. It should not have its important historical character so fundamentally altered. It will become unrecognisable.
47. HEART’s historic landscape expert Mr Chris Gallagher identified flaws in the design approach of the golf course design of the extant permission, as it is not sensitive enough to the historic core of Hulton Park. CPRE notes that feedback to the applicant through the Ryder Cup selection process supports his view, which undermines the conclusions of both the Inspector and Secretary of State who were persuaded that even though there would be harm to the heritage assets, improvements via site restoration would balance the negative impacts. CPRE is concerned that increased planting and landscaping throughout the site, as well as more ponds and lakes must be sympathetic to the Eames and Webb landscapes that are of historical note and are why the gardens and park are registered by Historic England.

Landscape Character

48. When considering the scale of landscape change, I have referred to the current good practice guidance, the Guidelines for Landscape and Visual Impact Assessment (GLVIA), 3rd Edition (Landscape Institute and the Institute of Environmental Management & Assessment, 2013).
49. In my view, the new proposal will permanently change the landscape character to a very large and significant degree. The local plan policies (CG3 and OA1) intended to safeguard

the character and appearance of this open countryside site are not out-of-date by reason of inconsistency. In this case significant harm is caused to the character and appearance of the area, there would be conflict with CG3 and OA1.

50. The Registered Park and Garden will also now incorporate a leisure and recreation land use with hotel, and holiday lodges, which would erode the tranquillity and pastoral setting. The farmland would in future be urbanised with a large housing estate with a district centre. The sculpted golf course with built viewing platforms and landforms from moved earth to enable spectators to enjoy the Ryder Cup Tournament will remove the historic landscape references.
51. The loss of woodland and significant trees would change the landscape away from a historic landscape of rarity and heritage value. Lighting would be introduced. This will cause light pollution. Now you can see the stars clearly, but in future this will be unlikely due to security lighting. New access roads would enable increased activity.
52. The scale of the hybrid proposal is immense. The separate parts of Golf Course, hotel and conference centre, link roads, residential estates and district centre are very large schemes in their own right. The Golf Academy should really be a stand-alone application. It will greatly harm the residential amenity for neighbours.
53. The Inspector and the Secretary of State agreed that the earlier application caused harm to the landscape as set out in paragraph 25 of the decision letter, albeit limited. The scale of landscape harm for the new proposal needs to be revisited as it is likely to be contrary to policies CG.1.1, CG3.2 and CG3.7.

Other Matters

Air Quality

54. Air Quality follows at the Full Development Construction Phase (Scenario 1), Full Development Operational Phase (Scenario 1) and the Ryder Cup (Scenario 2) will be reduced due to the significant increase in activity to the area from the golf club and new residential properties.

Loss of High-Grade Farmland

55. The development will have an adverse impact from the loss of agricultural land, including areas of Best and Most Versatile land in all stages of the development.

COP-26

56. We support a net zero carbon approach through sustainable design, low carbon energy opportunities and sustainable forms of transport in response to climate change. We are concerned that the development is too road focused.
57. CPRE is opposed to the loss of veteran woodland due to harm to the important carbon sequestration and ecological role.

Public Rights of Way

58. Hulton Park is beautiful. Local people regularly walk the Public Rights of Way and informal paths, which offer a welcome taste of countryside close to the urban area, some of which is relatively deprived. Users of footpaths enjoy a pastoral setting and the open views. Equally importantly, this convenient access to greenspace provides measurable benefits for physical and mental health. CPRE supports improved local access through new and improved cycle and pedestrian connections.
59. The applicant claims that there is public benefit from a new Hulton Trail, however CPRE considers the development does not add anything additional as it is routed along existing rights of way with only a very limited section crossing the Registered Park and Garden. Yet, in totality the development would still be an exclusive enterprise with little additional increase in public access to the historic core of Hulton Park.
60. We acknowledge the surface for multi-users is beneficial. However, the route is restricted to the perimeter and the health and well-being benefits of walking alongside a high fence will be low.
61. In the extant permission the heritage trail and interpretation walks had been secured as a planning condition.

Green Belt

62. Much of the site is still in designated Green Belt, which the Government has promised to protect and as set out in NPPF policy. The development is out of step with Green Belt policy. Green Belt has the primary aim of maintaining land permanently open and serves five important purposes. Such a development could only be approved if very special circumstances are justified.
63. In advance of any Green Belt land being developed CPRE believes the applicant and Council should first properly consider all other available land options do need to be considered, including previously developed sites identified on the Brownfield Register.
64. In overview, there are fundamental problems with the application. The new application and the permitted application both involve an egregious amount of development in the Green Belt. The applicant claims the new proposal is compatible with the NPPF, because it involves recreational and sporting use, but this is wrong, as the NPPF specifically states that such development must maintain the essential openness of the Green Belt; yet many of the proposed buildings are large structures in conflict with this requirement. The land use, number of buildings, their massing and heights, would be inappropriate development in the Green Belt.

65. Furthermore, although the second scheme involves fewer dwellings in the Green Belt than for the consented scheme, those that remain are still inappropriate development, and therefore harmful to the Green Belt. A separate consideration of Other Protected Open Land is required.
66. Harms to Green Belt purpose must be considered in detail. The development does lead to urban sprawl, countryside encroachment, the merging of distinct places (albeit to a lesser extent when compared to the earlier application) and may hamper the regeneration of previously developed sites, such as the housing development that is on site at Horwich Loco Works.
67. The issue of very special circumstances remains a key issue as it is considered the new development does not amount to the required scale of benefit when compared to the extant permission that would deliver the Ryder Cup Tournament.

Other Protected Open Land

68. CPRE considers the proposals to be inappropriate development of Other Protected Open Land (OPOL) as there are landscape harm issues, therefore the proposal conflicts with the OPOL Policies (OA1 and CG6AP). This tips the scales against the development.
69. OPOL is that area which is neither the urban area nor the GB (CS at 5.11 and 5.12). The nature of the OPOL policies is to restrict housing development on open land. Policy CG6AP usefully restricts housing in OPOL to restricted categories.

Conditions

70. The Tree, Woodland & Conservation Officer has identified a large number of conditions to overcome harms and costs to Bolton Council.
71. In CPRE view the development requires too many conditions to overcome harms, ensure mitigation and compensation to be reasonably enforced by the Council, which lacks resources at the best of times.

Planning Obligations

72. There is concern that the developer will not deliver on agreed planning obligations, for example the level of affordable houses. Regrettably, the NPPF allows developers to too easily renege on affordable housing contributions.

Planning Balance

73. In brief, CPRE considers the planning balance of the application to lead to a negative impact overall due to harm to the registered heritage asset of Hulton Park and Garden, to Green Belt, Loss of Best and Most Versatile Farmland and other harms, including loss of ecology.

However, we do concede that this proposal is better in a number of respects than the consented application.

Summary

74. CPRE acknowledges the new application is an improvement on the development that has been permitted, as it better responds to community concerns. However, there are still a raft of adverse impacts, and additional residential properties and resident adversely impacted to the west of the site, yet curiously without the level of claimed benefits of a Ryder Cup tournament. This leads to CPRE concluding that the planning balance remains negative, and we recommend that the Council should refuse the application.

75. Without prejudice: if minded to approve application 12218/21, it is recommended that the Council should again refer the matter to the Secretary of State for his determination. If granting approval for 12218/21 (the second application), consent for 009979 (the first application) should be rescinded as to be rendered null and void because of the significant local contention. Both Members of Parliament opposed the application and the land area covered by the development is now significantly enlarged, and the national significance of a Ryder Cup Tournament that is now missing from this application removing the justification for very special circumstances allowing development in Green Belt.

76. If you require any further information, please do not hesitate to contact me.

Yours sincerely



Jackie Copley MRTPI MA BA(Hons) PgCERT
Planning Manager

CPRE's objection letter to Bolton Council, 28th January 2022



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Patron
Her Majesty The Queen
President
Emma Bridgewater CBE
Group President
Nick Thompson
Group Chair
Debbie McConnell
Scientific Adviser
Dr Des Brennan

28th January 2022

Dear Ms Jodie Turton,

I am writing to you on behalf of CPRE Lancashire, Liverpool City Region and Greater Manchester regarding the Bolton Planning Application: 12218/21 Hulton Park following its letter of objection dated 15th November 2021. I wish to highlight an important issue relating to very special circumstances in the Green Belt.

The extant permission is for a golf resort development that would only offer only a single 'one-off' Ryder Cup championship grade tournament. Afterwards, housing would be built on some of the land which is temporarily used to host the Ryder Cup, such as media facilities, and will be built after the Ryder Cup is complete limiting it to a 'one-off' event. The media coverage is an essential part of a modern-day golf tournament of global recognition, and it was this marketing of Bolton that would help deliver the scale of benefits required. It was the holding of the Ryder Cup that was deemed to trigger very special circumstances and therefore a Section 106 agreement was deemed necessary by both the Inspector and the Secretary of State specifying that all and any development was limited to the successful hosting of the Ryder Cup.

The approach is similar for this revised application, such as some of the housing can't be built until the land used for the temporary facilities for the 'unspecified' championship tournament is complete. It cannot be assumed to be the Ryder Cup. CPRE thinks the type of champion competition that the applicant aspires to deliver must be specified along with the dates. The level of benefit is directly impacted by the likely scale of the tournament and the level of media attention. The form of wording previously used for the extant permission must be retained in another Section 106, specifying whichever championships are to be delivered, and when, to trigger very special circumstances. It is important the development is reliant on very special circumstances due to the accepted harm to Green Belt, historic landscape, and other adverse impacts.

Having a championship scale golf facility that is immediately diminished to a standard course, where future prestigious golfing events could not be held due to a lack of space for media facilities, radically reduces the legacy benefits. CPRE believes that the weight attributed to the benefit of the golf resort is therefore severely limited. Each development proposal subject to the extant consent and the revised application do not achieve sufficient benefit to justify very special circumstances in CPRE's opinion. CPRE remains opposed, however, without prejudice if minded to approve the application, the grant of permission must be with a similarly worded Section 106 to precisely capture the specified championship tournament and date to trigger any and all development to take place. Therefore, CPRE strongly recommends that the Council requires the applicant specifies which championship tournaments and dates it aspires to so such a similarly worded Section 106 Agreement to cover the eventuality in the same terms as deemed necessary by the Inspector and endorsed by the Secretary of State.

I would be grateful if you can report this important material planning issue in your report to the Development Management Committee.

If you have any questions arising from the content of this letter, please do not hesitate to contact me.

Yours sincerely

Jackie Copley MRTPI MA BA(Hons) PgCERT

Planning Manager

Appendix Ten: CPRE's letter to Hulton Park Consultation 30th June 2021



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Patron
Her Majesty the Queen
President
Emma Bridgewater
Chair
Debra McConnell

30 June 2021

Dear Peel Land & Property,

Hulton Park Consultation June 2021

1. I am writing on behalf of CPRE Lancashire, Liverpool City Region and Greater Manchester (CPRE) to Peel L&P with comments on its revised vision for Hulton Park. We welcome that Peel L&P has listened to the objections of the local community to the development initially intended. A more relevant and respectful vision with fewer homes in the Green Belt would of course be welcome.
2. CPRE and Hulton Area Estate Residents Together (HEART) raised several key issues of harm to the historic landscape of Hulton Park, which is a Grade II Listed historic Park and Garden, including: the permanent harm to the Green Belt, loss of farmland and associated businesses, loss of ecology, loss of residential amenity, increase in traffic. All these elements and others remain in the new proposals, but new beneficial elements change to some extent the planning balance of harm versus benefit which CPRE is happy to reassess.
3. CPRE recognises now that the changes proposed may lead to an increase in local connectivity, more green infrastructure and improved access to Hulton Park. Extensive areas of natural, green open space supporting opportunities for wildlife projects and a significant biodiversity net gain (the previous approval promised in excess of +15% despite incurring significant loss of ancient and mature woodland) would be welcomed by CPRE.

4. Previously, we voiced concern that the Ryder Cup standard golf course (the claimed benefit constituting the very special circumstance justifying the development) would be for only a single Ryder Cup tournament. Thereafter, the land occupied by infrastructure necessary for an international standard golf course would be lost to housing. If incorporating further land to the west, which is not in the Green Belt, for housing means the golf course will be retained long-term as an international championship standard course, and if additionally, less damage is done to the historic Park and Garden, it is just possible that the planning balance would be critically shifted in favour of benefit. Also, if less farmland is lost to development, and there is additional space for recreation, and ecological and landscape mitigation would further move the planning balance in the direction of benefit.
5. HEART's historic landscape expert Mr Chris Gallagher identified flaws in the design approach of the previous golf course as it was not sensitive enough to the historic core of Hulton Park. CPRE notes that feedback through the Ryder Cup selection process supports his view. CPRE is concerned that increased planting and landscaping throughout the site, as well as more ponds and lakes must be sympathetic to the Eames and Webb landscapes that are of historical note and are why the gardens and park have been registered by Historic England. We ask why there are no references to these famous garden landscape designers in the overview information? Peel Land & Property do not fully appreciate of the historical value of the registered asset for which it is a custodian. There ought to be a reference to the history on the consultation website.
6. Previously CPRE was firmly of the opinion the proposals do not conform to the adopted development plan, which sets out land for sustainable development with site allocations including both brownfield and greenfield land that have benefited from an assessment against sustainable development criteria. We would need to review a new application in detail against the development plan.
7. CPRE helped HEART secure the imposition of a restrictive planning condition making development dependent on a successful bid to hold a Ryder Cup tournament. The inspector agreed that very special circumstances could only be delivered if the Ryder Cup bid was successful, and the event hosted. It is simply not sufficient from delivery of benefits to be a candidate to host the Ryder Cup tournament. Local concern is that the proposals were all about the housing and not enough about securing the heritage value of the registered property. Much of the site is still in designated Green Belt, which the Government has promised to protect. Green Belt has the primary aim of maintaining land permanently open and serves five important purposes. Such a development could only be approved if very special circumstances are justified.

8. Hulton Park is beautiful and CPRE would support more local access through new and improved cycle and pedestrian connections, ensuring that the local community is able to access and enjoy the development. Previously a heritage trail and interpretation walks had been secured as a planning condition.
9. A broader range of house types and tenures to reflect local housing needs, including homes that are truly affordable, family housing, aspirational homes and homes suitable for those looking to downsize would be welcomed by CPRE.
10. Retention of the farms that made up the model farm heritage of the Hulton Park estate would be welcome as the previous proposal would have caused a farming family of more than three generations to be evicted, and in recent times it has created a successful ice-cream business, selling via a farm shop. CPRE supports local food supply chains and sustainable land management.
11. We reserve the right to comment on the new road link to the M61 Junction 5 as we are generally opposed to new roads due to more traffic being induced.
12. We support a net zero carbon approach through sustainable design, low carbon energy opportunities and sustainable forms of transport in response to climate change.

Summary

13. Subject to our comments and reservations set out above, CPRE is supportive of the right development in the right places, for the right reasons and with adequate community infrastructure.
14. We objected before as we deemed the proposals to be contrary to local and national planning policies to an exceptionally large extent. The revised proposals do appear to better serve the environment, heritage, and local people, including the farm businesses. So, the planning balance may prove to be less negative.
15. We will obviously have to consider any further application on its merits when considering the policies of the adopted development plan and those at the national level. Please note the opinions expressed in this submission are strictly provisional and subject to change following scrutiny of the full planning application to Bolton Council.
16. If you require any further information, please do not hesitate to contact me.

Yours sincerely



Jackie Copley MRTPI MA BA(Hons) PgCERT
Planning Manager



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