

Mr Dominic Young, Planning Inspector

1. CPRE, the countryside charity, **objects** to the appeal against Bolton Council's refusal and it recommends that the appeal should be dismissed.
2. 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. The proposal is inconsistent with the adopted development plan. CPRE does not accept there are material considerations to grant permission.
3. The Report to Planning Committee, missed out a few fundamental points, as it did not correctly identify, quantify, and weigh a number of harmful development effects or scrutinise the 'claimed' benefits.
4. **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.
5. This proposal will cause **very substantial Green Belt harm**. 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 reduction in harm from not having houses built on the southern part of the Western Agricultural Lands. 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.
6. **The revised proposal will lead to additional Heritage Harm, which previously was considerable, and it is now substantial.** Mr Gallagher's assessment was of substantial harm, was before lodges were introduced into the RPG and the significant extensions to the golf course.
7. Elaine Taylor a local garden historian (who did an MA focused on the work of Emes) has provided evidence on the rarity of Emes' work, particularly in combination with Webb's influence. As the layout of the Georgian park will not be recognised once a championship golf course is built over most of it, and it is the grouping of trees that is a major element in such a design, which will be lost. **CPRE 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.

8. **Significant harm to the Landscape Character and Visual Amenity** due to the added elements into the RPG. 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 planning report.
9. **The revised proposal leads to a moderate to significant loss of farmland** due to the additional 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. CPRE is pleased that the inspectorate has picked up on the omission from the Environment Statement. Future food security is an important consideration.
10. There is a **Significant loss of Ecology in the short term.**

Benefits

11. The realignment and erection of fencing along the Public Rights of Way (PROW) are highlighted by the appellant as a benefit, but local people who use the footpaths and Bolton Ramblers object to the proposed development and they see the changes as a dis-benefit. **Negligible benefit.**
12. The planning statement says the development is not footloose. However, Bolton already has many golf courses, as does the wider area. There are many 18-hole champion scale golf courses better suited to hosting the Ryder Cup, with a tradition of golf and experience of golf. **Limited benefits**
13. Mr Phil Woods a local resident has provided information on the lack of an economic case. Remember that there will be the loss of a number of farm businesses and a loss of local employment directly and indirectly to those in the supply chain should be factored in. There is an absence of a viability case for the consented and revised scheme. CPRE echoes his points about benefits and questions whether it is reasonable to approve consent on the basis of such economic evidence. Moderate level.
14. Local people have commented about the revised application putting additional stress on social facilities such as schools and health care where there are already capacity issues. Moderate level.
15. The cultural benefits are limited and at best offer moderate level of benefit.

16. Despite the fact the appellant shows a paper based exercise that shows a % increase in the 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. The Defra metric has yet to be tested and it can only be assumed it will work. Substantial
17. The sustainability credentials of the buildings are 'generic' and would arise wherever the golf course is developed. Negligible
18. 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.
19. The recently published CENSUS 2021 data verified much less actual household growth. 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.
20. 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.
21. The low level of affordable housing is of concern. Why approve an unviable scheme? It is Boltonians who miss out on affordable homes where they are needed.
22. The emerging Greater Manchester 'Places for Everyone' ('GMP4E') Joint Development Plan goes to examination on 1 November 2022. There is potentially a prematurity case here. 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. 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.

23. 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. It would be inconsistent with the earlier Inspector's findings and SoS decision to allow the revised proposal without such a condition.
24. The other conditions deemed as necessary should form a basis for the planning conditions of the revised scheme.
25. The revised application is highly contested. This proposal should be decided on its own merits. The inspector is focused on the differences arising from the revised application, and it is clear that the harms are greater due to the increased scale of greenfields to be built, and introduction of built forms into the RPG. The planning balance is negative, and the Council was right to refuse it. We recommend the inspector dismisses the appeal.

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