

# Stocks Residents' Association, Horwich, Bolton, Lancashire

Chair: Mr Malcolm Harrison

Secretary: Mrs Maria Hilton and Mrs Ruth Rigby

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The Planning and Housing Team,  
Greater Manchester Combined Authority,  
Broadhurst House,  
56 Oxford Street,  
Manchester,  
M1 6EU.

Tuesday, 28 September 2021

By email: [placesforeveryone@greatermanchester-ca.gov.uk](mailto:placesforeveryone@greatermanchester-ca.gov.uk)

Re: Stocks Residents' Association Submission to Places for Everyone

Dear GMCA Planning and Housing Team,

## Introduction

- 0.1 I write on behalf of the Stocks Residents' Association [the 'SRA'] and as its chair to submit the Association's response to the GMCA Consultation on Places for Everyone [the 'Plan' also the 'Local Plan'].
- 0.2 The SRA is very pleased to be able to submit a response to a major planning consultation. It is in our view highly desirable that the public is consulted on land use and planning matters, and we are grateful for the opportunity to provide a response to you.
- 0.3 The SRA wishes to be kept informed about the progress of the Plan including when it has been submitted for Examination, when the Inspector's report is published and when the Local Plan is adopted. If you would be able to use the email address or postal address for future communication that we have given above, please to respond to us, we would be most obliged - thank you.
- 0.4 Our response on the Consultation is comprised of a number of sections. Firstly, we provide some brief background on the SRA. Secondly, we give our comments on the Places for Everyone proposals with which we are concerned, principally the **Green Belt Inclusion of Land Parcel GBA02**. We provide a brief account of why the SRA has opposed development on the site and why in our view, the Plan's proposals in regard to this site should go forward to examination, and why the GMCA should give the strongest possible support to this proposal. Thirdly, we propose a number modifications to the Plan area, specifically the southern limit of the new Green Belt area of GBA02. We illustrate these proposals with three diagrams contained in annexes. The first shows our suggestions concerning the logical line of the Green Belt designation for GBA02 for each of the developments as either might be adopted. These possibilities are shown in Exhibit 1. The Pink line identifies the southern boundary of the Green Belt we propose for the 150-home development [09488\_20], the Blue line identifies the limit for the boundary of the Green Belt we propose for the 276-home development [07254\_19]. The second annex, Exhibit 2, shows the southern boundary in more detail and is drawn on the developer map for the earlier proposal [07254\_19]. Exhibit 3 shows the southern boundary in more detail and is drawn on the developer map for the later proposal [09488\_20].

## 1 THE SRA

- 1.1 The SRA was formally constituted on 18th October 2016 (prior to such date having convened on an informal basis from time to time). The SRA has a written constitution, an elected Chairperson, Vice-Chairperson, Secretary, Treasurer, Committee as well as a designated bank account and records of its accounts. The SRA membership consists of "all residents who live in our neighbourhood", that being defined in the SRA constitution as the streets of Mayfair, The Strand, Park Lane, and Broadway, in which there are 66 houses.
- 1.2 The SRA is a residents' association located in Horwich which is situated within the Bolton Metropolitan Borough ['BMBC'] area. Horwich lies to the west of the Borough and adjoins the County of Lancashire on Lancashire's eastern border. Population density in Greater Manchester which is the Metropolitan County in which Horwich and Bolton are situated is 2,232 persons per square kilometre, while in Lancashire, the population density is 424 persons per square kilometre [ONS data]<sup>1</sup>.
- 1.3 There 55 active members of the SRA living within the neighbourhood area with whom we keep in regular contact. A further 270 people have requested to be kept informed of our activities. The SRA shares information with other community groups, especially those in the area surrounding Stocks Park Drive, and also has informal links with the other four residents' associations in Horwich - New Chapel, Grundy Hill, Ox Hey Lane, and Brazley.
- 1.4 The stated aims and objectives of the SRA include, inter alia, working for improvements to our local built environment, working to enhance our local natural environment and endeavouring to promote a culture of good stewardship of the local built and natural environment relating to the local neighbourhood.
- 1.5 The SRA has been recognised by Horwich Town Council as an active and fully constituted residents' association pursuing legitimate aims in the local community and has applied for, and been granted, funding by Horwich Town Council and the 'Two Towns Forum' on that basis.
- 1.6 The SRA was actively involved as a Rule 6 Party in an appeal brought by Peel relating to a proposal for up to 300 dwellings on the Appeal Site. Following a public inquiry, Inspector John Felgate dismissed that appeal and refused planning permission: see Appeal Ref: 3210299, dated 21st August 2019 ("the 2019 Appeal").
- 1.7 Subsequently, the SRA was again actively involved as a Rule 6 Party at Public Inquiry of 2021 [Appeals APP N4205W 20 3256381 3266030, the '2021 Appeals' that relate to applications 07245\_19 and 09488\_20 respectively] where two appeals brought by Peel were allowed by an inspector. This was, as you may be aware, despite the fact that the majority of the Appeal Sites were designated as Other Protected Open Land ("OPOL") in the Allocations Plan (policy CG6AP), that residential development of type proposed by the Appellants did not fall into any of the categories of development that would comply with policy CG6AP or policies OA1.4 and OA1.6 of the Core Strategy, and there remained a clear conflict with the most relevant and important development plan policy. Despite therefore a statutory presumption against the grant of planning permission on these sites, Inspector Jones decided in favour of development on the site.
- 1.8 The members of the SRA generally live in the referenced residential developments adjacent to Land Parcel GBA02. The members of the SRA thus have extensive local knowledge of Land Parcel GBA02 and the

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<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalescotlandandnorthernireland>



SRA is well placed to give a considered view of the proposal that it be added to the Green Belt as part of Places for Everyone.

## 2 Specific comments: Green Belt Inclusion GBA02, Horwich Golf Club / Knowles Farm

- 2.1 The Bolton Authority has proposed Land Parcel GBA02 to be Green Belt. We wholly support this step. We believe however that certain aspects of policy should be clarified, notably the appropriate logical Green Belt boundary, following the decision on the 2021 Appeals. We make our submission on the basis of extensive knowledge of the site which, for many of us, involves daily walking for exercise and the enjoyment of countryside on and around the area, and experience in a number of planning decisions relating to this and other sites in the locality of Horwich.
- 2.2 The original proposal for Green Belt designation noted that:
- 2.2.1 “The parcel is located in the east of Horwich. Land within the parcel slopes down to the southwest and comprises Horwich Golf Club Golf Course, a block of woodland, and arable fields. Horwich Golf Club buildings and part of the associated car park are located in the south of the parcel and a farmstead is located in the north. The parcel is enclosed to the northwest, west, south and southeast by residential developments, a church and educational facilities. The parcel is crossed by a footpath and this is not Green Belt land.”
- 2.2.2 The special nature of land parcel GBA02 has been recognised by Bolton Council’s Landscape Regeneration Manager, Landscape Development & Design in its report of 22 May 2018 (the ‘Landscape Report’) which described the unique and historic nature of part of the development site:
- 2.2.3 “...the fields on the upper part of the proposed development site which are not part of the golf course possess far more naturalistic and vernacular landscape character; following the natural flowing contours of the land they are the remnants of the upland livestock farming landscape that would have been typical along the valley in the past decades, and would have pre-dated the industrial growth of Horwich-but that now is being increasingly lost or degraded by built development and landscape change as a result agricultural change.”
- 2.2.4 “Small to medium sized grazing fields enclosed by dry stone walls, that would have been typical along this valley, and which provide the visually pleasing setting for the South-Western edge of the Wallsuches Conversation Area, in particular the vernacular stone buildings informally clustered at Knowles Farm and at the top of Fleet Street. The experience of walking along the top end of Fleet Street in the environs of Knowles Farm is delightful; there is a real sense of historic Horwich from the Georgain (sic) period still living on here, when it was predominantly still a rural, farming economy in this location with narrow lanes, woodland blocks, plenty of wildflowers, an abundance of birdsong and open countryside.”
- 2.3 It was further noted by the Landscape Manager, that:
- 2.3.1 “If the housing development [relating to the 2019 Appeal] were to encroach into the fields closest to Knowles Farm, this would impact on the setting of the Conservation Area and further add to the loss of the rural vernacular farming landscape. If however the housing were only to extend over the present footprint of the golf course proper, the negative impact on views out from the Conservation Area South-West from the dwellings around Knowles Farm, and to the setting of the Conservation Area would be very much reduced - as would the impact on views from residential properties in the vicinity of Mayfair, Belgrave Crescent, Kensington Drive et al, looking South currently across an open



field to woodland, and from those around Buckingham Avenue looking North-West towards the Conservation Area, currently across open fields.”

- 2.4 In addition to the assessment findings of the original LUC Report, the Landscape Report thus provides further evidential support to justify the addition of land parcel GBA02 to the Green Belt. In the Assessment Findings – the Land Parcel GBA02 was considered as follows:
- 2.4.1 It is noted that to obtain a ‘Strong’ rating, the land parcel must perform strongly against the stated purpose and a ‘Moderate’ rating requires the land parcel to have performed ‘moderately’ against the stated purpose. It is further noted that the NPPF does not require a parcel of land to be classified as ‘Strong’ against all five of the Green Belt purposes and a ‘Strong’ rating against any Green Belt purpose could be sufficient, on its own, to indicate that the land has the potential to make an important contribution to the Green Belt.
- 2.4.2 In its assessment of Land Parcel GBA02 as against the five Green Belt purposes, the LUC Report concluded that for three of the purposes, there were ‘Strong’ ratings and for the other two purposes there were ‘Moderate’ ratings.
- 2.4.3 It is noted in particular, that in respect of ‘Purpose 1’ which is to check the unrestricted sprawl of large built-up areas, the assessment rating was ‘Strong’ in respect of the land parcel already exhibiting evidence of urban sprawl and loss of openness. Furthermore, the rating was ‘Strong’ as against Purpose 2 which is to prevent the margining or erosion of the visual or physical gap between neighbouring settlements. The land parcel was also rated as ‘Strong’ against ‘Purpose 4’ and the requirement that it would preserve the settling and special character of a historic town.
- 2.5 It is also noted that in the Topic Report, that the response to the question of ‘Why should it be kept permanently?’ was as follows:
- 2.5.1 “It is necessary to keep this land open to conserve the character of Horwich as a town with a setting of rising open land especially in light of the proposed development of urban land of within the built-up area of the town”. (Page 36 of the Topic Report)
- 2.5.2 Furthermore, that in response to the question of whether ‘Is Green Belt necessary to maintain openness?’ was as follows:
- 2.5.3 “Green Belt designation as recognised as affording the highest level of protection, thereby giving the greatest level of certainty to those wishing to see the land kept permanently open.”
- 2.6 The SRA considers that these assessment ratings are entirely understandable when one considers the nature of the land parcel in question and its historic and rural characteristics, particularly given that it is adjacent to the Wallsuches Conservation Area. The SRA is thus fully supportive of these findings and they confirm the pre-existing views of the SRA.
- 2.7 Taking into consideration the requirements of the NPPF in terms of the five Green Belt purposes and the assessment findings as set out in the LUC Report, the SRA considers that the proposal to allocate Land Parcel Reference GBA02 as an additional site for Green Belt to be entirely sound and justifiable.
- 2.8 The addition of land parcel GBA02 to the Green Belt would have the support of the people of Horwich who value the land highly and believe that it should be protected from unwanted development when other brownfield and urban sites are available. The designation of the land as Green Belt would also serve to give it enhanced protection in order to preserve it for future generations.



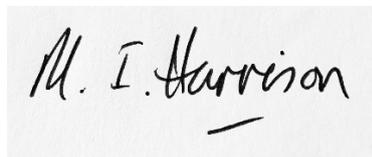
### 3 Places for Everyone - Specific Amendments to the Allocation Boundary

- 3.1 The GMCA will no doubt be aware that on part of this site, further development has been recently been given permission following public inquiry.
- 3.2 Notwithstanding this permission, the SRA considers that the Green Belt addition proposed by BMBC should proceed because the arguments made in favour of Green Belt designation remain relevant and persuasive, albeit with some modification as regards the boundary. Moreover, the granting of permission for development on part of the parcel identified as Green Belt addition gives altogether greater force to meeting the key objectives of the NPPF and PPG, such objectives being formulated within *Places for Everyone* in the following way as Objectives 8 through 10:
- 3.2.1 Objective 8: Improve the quality of our natural environment and access to green spaces;
- 3.2.2 Objective 9: Ensure access to physical and social infrastructure; and
- 3.2.3 Objective 10: Promote the health and wellbeing of communities
- 3.3 We note the continuing importance of these objectives which were considered in the tilted balance at the recent Inquiry, and while the Inspector's view of the tilted balance concluded in favour of development, the following points were matters of Common Ground at that Inquiry [We quote from Counsel for the SRA – Closing Submission]:
- 3.3.1 “Living in a greener environment promotes and protects good health, as well as helping in recovery from illness”. There is consequently agreement about the relationship between greenspace and public health;
- 3.3.2 “The COVID-19 pandemic has made people more aware of how much they value and rely on outdoor spaces to support health and wellbeing and has opened opportunities for people to visit outdoor spaces who may not previously have done so”. JC confirmed that he did not challenge Prof Cook's evidence that there has been an increase in the use of greenspace during the Covid-19 lockdowns;
- 3.3.3 “Disadvantaged groups appear to gain a disproportionately greater health benefit and have reduced socioeconomic-related inequalities in health when living in areas that have more”. JC did not dissent from this proposition. Importantly, until receiving the Supp SoC JC was not aware that LSOAs 14C and 14D adjoined the Site and were in the 20% most deprived areas of the country;
- 3.3.4 Public Health England recommends ‘maintaining or even increasing provision of and equitable access to greenspace and growing the wider network of green infrastructure, especially through the planning system’; 8 CD7.5a.
- 3.3.5 It is less likely that residents will experience the public health benefits of greenspace if they are required to travel longer distances. That is especially the case for those with impaired mobility.’
- 3.4 Fortunately, the development proposals that are now permitted allow for *logical boundaries* to be drawn for the Green Belt at its southern edge at the margin of the indicative built up area.
- 3.5 The SRA does not consider those development plans to be an obstacle to the allocation of the substantial part of the original area to Green Belt.
- 3.6 The SRA proposes two possible boundary limits to the southern edge of the proposed Green Belt designation. We draw these at the edge of the proposed housing developments. These boundary limits are shown in our Annexes.



3.7 The SRA considers given the likely construction of more housing in this land currently designed at OPOL, require urgent confirmation of its Green Belt status as the need for Green Belt in this area is enhanced.

Yours sincerely,

A rectangular box containing a handwritten signature in black ink that reads "M. I. Harrison". The signature is written in a cursive style with a horizontal line underneath the name.

Malcolm Harrison

Chair

Stocks Residents' Association



Annexes

Annex 1 SRA Proposal for Green Belt Inclusion GBA02, Horwich Golf Club / Knowles Farm



Exhibit 1



Annex 2 Detailed Map of Green Belt Inclusion GBA02 For 07245\_19

**RANDALL THORP**  
 LANDSCAPE ARCHITECTURE  
 ENVIRONMENTAL PLANNING  
 MASTERPLANNING  
 URBAN DESIGN

Canada House, 3 Chestow Street, Manchester M1 5FW  
 0161 228 7721 mail@randallthorp.co.uk www.randallthorp.co.uk

- KEY:**
- Site boundary
  - Existing woodland/trees
  - Nellie's Clough
  - Existing reservoir to be retained
  - Proposed indicative open space areas
  - Proposed indicative buffer planting
  - Proposed indicative tree planting
  - Proposed indicative SUDS areas
  - Proposed indicative residential apartments (up to 3 storeys)
  - Proposed indicative residential dwelling (2 - 2.5 storeys)
  - Proposed indicative residential dwelling (single storey/bungalow)
  - Proposed indicative garage (single storey)
  - Proposed indicative private gardens
  - Proposed indicative route of primary roads
  - Proposed indicative route of secondary roads
  - Proposed indicative route of private drives
  - Proposed indicative car parking spaces
  - Proposed indicative footpath routes
  - Existing Public Rights of Way
  - Proposed primary access
  - Proposed secondary access
  - Proposed stone wall to demarcate boundary



**Illustrative masterplan land use schedule**

Developable area, excluding the main spine roads	7.36ha
Sub-total hard development	1.23ha
Existing woodland	2.93ha
Nellie's Clough	1.15ha
Sub-total of established landscapes for management	4.08ha
New woodland	0.20ha
New landscape areas provided for landscape mitigation, SUDS, and new accessible open land	3.46ha
Sub-total of new landscapes	3.66ha
<b>Total site area</b>	<b>16.33ha</b>
Potential development yield (average density of 38 housing per hectare)	278 units

Exhibit 2



Annex 3 Detailed Map of Green Belt Inclusion GBA02 For 09488\_20

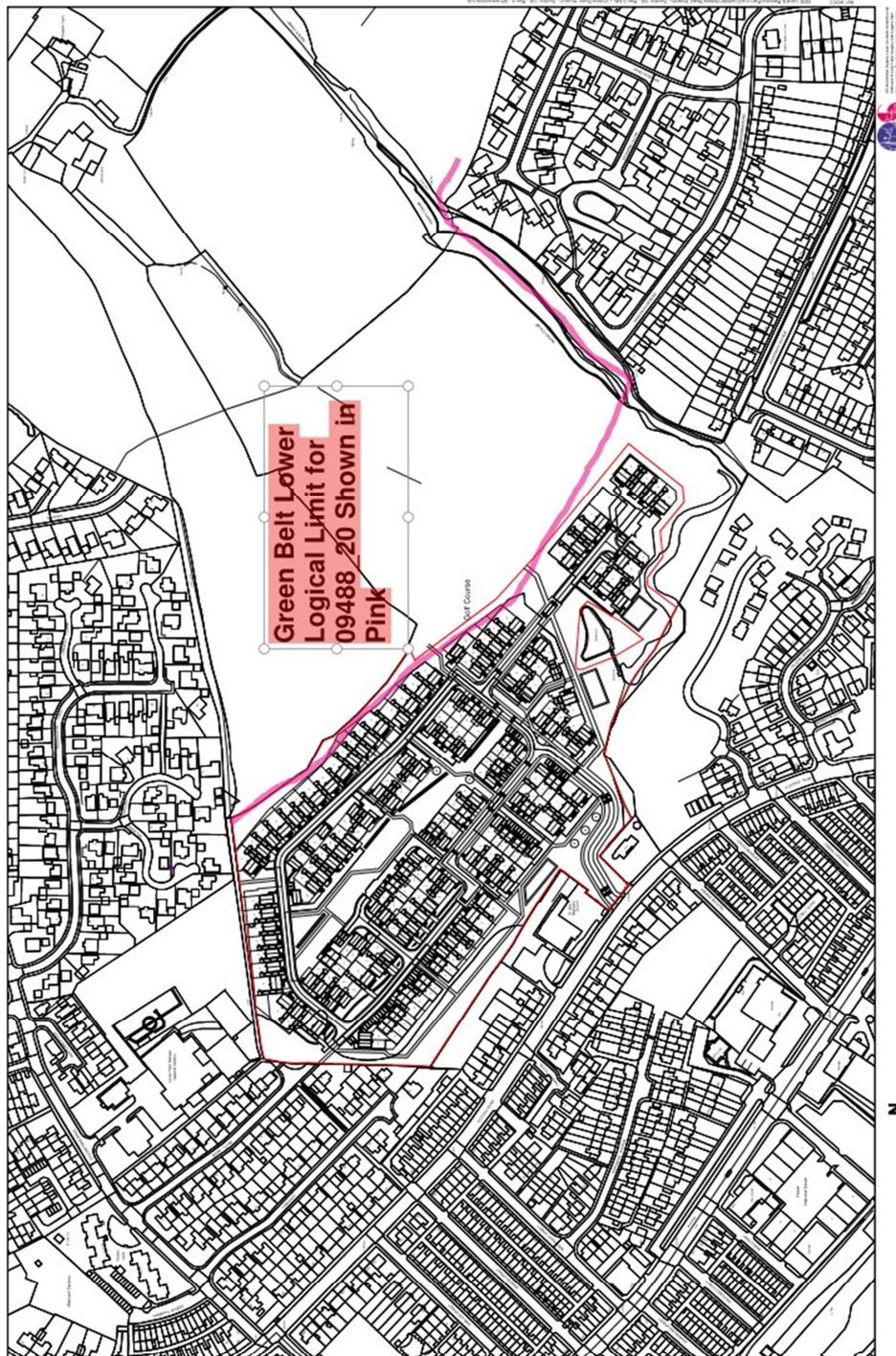


Exhibit 3

