

**Appendices to Proof of Evidence of  
Stephen Bell BA (Hons) MTPI MRTPI  
Land at and adjacent to Hulton Park, Bolton**

Submitted on behalf of the Applicant,  
addressing planning / policy matters

**LPA Ref: 00997/17**

**MHCLG Ref: PCU/RTI/N2405/3198523**

# Contents

Appendix 1: Statement by Mr Richard Knight on behalf of the Applicant	3
Appendix 2: Policy appraisal of the Proposed Development	66
Appendix 3: Hulton Park Golf Business Plan 2025 – 2036	101
Appendix 4: Review of the housing requirement and housing need figures	158
Appendix 5: Critique of Housing Land Supply	164
Appendix 6: Illustrative phasing and delivery trajectory for the residential development	287
Appendix 7: Off-site paths condition survey and potential upgrades	289

## **Contact**

Stephen Bell  
Stephen.bell@turley.co.uk

## **Client**

Peel Holdings (Land & Property) Limited

## **Our reference**

PEEM3031

September 2019

**Appendix 1: Statement by Mr Richard Knight on behalf of the Applicant**



HULTON  
PARK

---

**LAND AT AND ADJACENT TO HULTON PARK, BOLTON**

---

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)**

**TOWN AND COUNTRY PLANNING (INQUIRIES PROCEDURE)  
(ENGLAND) RULES 2000**

**APPLICATION BY  
PEEL HOLDINGS (LAND AND PROPERTY) LIMITED**

**STATEMENT BY THE APPLICANT**

**PINS Reference: APP/N4205/V/18/3208426  
LPA Reference: 00997/17**

# 1 INTRODUCTION AND OVERVIEW

1.1 This statement is made by the applicant, Peel Holdings (Land and Property) Limited ("Peel" or "the company") in support of its planning application ("the Application") on land at, and adjacent to, Hulton Park ("the Site").

1.2 The planning application ref: 00997/17 ("the Application") was submitted to Bolton Metropolitan Borough Council ('the Council') on 22 May 2017. The Application comprises a hybrid planning application of 2 parts;

part a:

Full planning application for restoration works to Hulton Park and existing structures & heritage assets within it including the pleasure grounds, dovecote, walled garden and lakes, and development of an 18 hole golf course & clubhouse; golf academy including driving range, practice course, adventure course & academy building with sports & learning facilities, shop & café; 142 bed hotel with adjoining spa & conference facility; other ancillary buildings, structures & engineering & landscape works including a maintenance building, halfway house, highway accesses, underpass, various bridges, boundary treatments, internal access roads, external lighting, parking, landscaping; demolition of existing buildings/structures; & where applicable the re-routing, upgrading and extension of the public right of way network.

and part b:

Outline planning application for the residential development of 1036 No. dwellings, and a local centre ("the Development").

1.3 The company owns the Site and has done so since 2010. A small part of the periphery of the Site is owned by the Council.

1.4 The Council resolved to approve the Application on 22 March 2018. The Application was called in for determination by the Secretary of State for Housing, Communities and Local Government on 31 July 2018. A public inquiry is due to be held in October/November 2019.

1.5 This statement has been prepared by Richard Knight MRTPI, a chartered member of the Royal Town Planning Institute and Planning Director at Peel with responsibility for the Development.

1.6 The purpose of this statement is to inform the Planning Inspector holding the inquiry and the Secretary of State of the company's approach to the Development, specifically with regard to the following:

- (a) background context regarding the company, its proven track record and the origins of the Development (Chapter 2);
- (b) the acquisition of the Site and need for a restoration plan (Chapter 3); and
- (c) the approach to the Development including the Ryder Cup opportunity, the positioning of the Development as a candidate venue and the approach to be taken to delivery (Chapter 4).

1.7 This statement should be read alongside the expert evidence prepared by the company's appointed project team.

## 2 BACKGROUND AND COMPANY INFORMATION

### Background to Peel

- 2.1 The company is part of the Peel Group of companies, one of the leading infrastructure, transport and real estate investors in the UK, with collective investments owned and under management of more than £5 billion.
- 2.2 The Peel Group has two shareholders – the Whittaker family which owns 75% and the Olayan Group which owns 25%. Its principal investments are in land and property, transport and logistics, energy, retail and leisure. Led by Chairman John Whittaker, the Peel Group has grown through an ethos of recycling capital and long-term investment, and gaining a reputation for long term visionary regeneration projects, primarily in the North West of England.
- 2.3 Unlike publicly-listed companies where the emphasis is on the distribution of dividends to shareholders, Peel's business model is driven by asset growth, reinvestment and compounding value into future projects. It is this model that allows projects like the Development to be delivered.
- 2.4 Over the past 10 years, the impact of Peel's investments is £5.5 billion of capital investment, £27 billion GVA and 133,000 jobs<sup>1</sup>. The company is a strong advocate of a more balanced economy and is strongly committed to investing in the North of England, which is critical to the UK's global success. It is a founding member of the Government's Northern Powerhouse business partnership and has published its own investment programmes for the Northern Powerhouse and Ocean Gateway.
- 2.5 The long term placemaking approach taken by Peel to its major investments creates new destinations and markets, using new and established brands alongside a commitment to design quality and customer experience. Examples of such brand creation and alignment include:
- (a) **intu Trafford Centre** – built at the inauspiciously named Dimplington in Urmston at a cost of £350m in 1998 and now worth in excess of £1 billion, attracting 30 million visitors annually and anchored by Selfridges and John Lewis;
  - (b) **TraffordCity** – the area around the Trafford Centre is now the UK's most successful retail and leisure destination attracting 43 million visitors annually (including 30m visiting intu Trafford Centre), with a workforce of 16,500 and home to EventCity which is the largest event venue in the North of England, the Chill Factor-e indoor ski slope, Europe's busiest golf driving range, 1,000 hotel bedrooms and other attractions – investment to date is £3bn with a further £3bn planned;
  - (c) **MediaCityUK** – built at Docks 9 and 10, Salford Quays, a £700m global media village tenanted by the BBC, ITV, University of Salford, Kelloggs and others, including over 250 creative and digital SMEs;
  - (d) **Liverpool John Lennon Airport** – redeveloped and renamed by Peel, LJLA opened in 2001, passenger numbers have grown from around 2 to 5 million with a Master Plan in place to achieve 11 million passengers by 2050;

<sup>1</sup> Source, Amion Consulting

(e) **Liverpool Waters and Wirral Waters** – two iconic long term dockland regeneration projects in their early phases of delivery, with partners Everton FC, Urban Splash, Wirral Met College, Modal Living and Belong Group.

2.6 Peel has a strong commitment to corporate social responsibility in all its activities and is a market leader in delivering sustainable development. Its associated policies can be found in **Appendix 1**.

2.7 Peel will be 50 years old in 2021, the year that it hopes to commence delivery of the Development. The company is committed to creating a positive legacy of strategic importance to mark its presence as a force for progress in the North West. Further information about the company can be found on the websites [www.peel.co.uk](http://www.peel.co.uk) and [www.peellandp.co.uk](http://www.peellandp.co.uk).

### **Track record in regenerating heritage assets and golf development**

2.8 Peel is the custodian of many historic assets, including historic waterways and docklands, historic estates, listed buildings and other designated and non-designated heritage assets. The regeneration and restoration of these assets is an ongoing process and a core aspect of the company's business, not only in terms of physical restoration and investment, but in creating new economic activity and bringing new life and viable uses to assets whose original purpose is no longer viable.

2.9 These include the regeneration of Salford Quays and creation of MediaCityUK, the ongoing regeneration of Liverpool and Wirral docks, and the restoration of the Duke of Bridgewater's Estate around Worsley New and Old Hall.

2.10 The Development has been shaped by the company's track record and approach to preserving and enhancing heritage assets, working with partners and experts nationally and regionally. This has allowed us to bring forward a unique, sensitively designed, fully researched and high-quality proposal. **Appendix 2** provides more detail of Peel's strong track record in delivering heritage regeneration.

2.11 The company also has a strong interest and track record investing in sports-related development. It delivered the City of Salford Stadium in partnership with Salford City Council, which is now the home of Sale Sharks and Salford Red Devils. It is working in partnership with Everton FC and Liverpool City Council to deliver the new Everton stadium at Bramley Moore Dock.

2.12 In respect of golf, the Worsley Park development (see more below) demonstrates that Peel has already delivered a championship golf course and hotel in an historic setting. The company also developed and operates a major golf centre which includes Europe's busiest driving range at Trafford Golf Centre next to the Trafford Centre. The company also leases land to several golf courses and is fully aware of the challenges and opportunities facing golf in the UK.

### **Origins of the project at Worsley, Salford**

2.13 Following the company's acquisition of the Bridgewater Estate in the 1980s, the opportunity arose to restore the Worsley Old Hall and farm complex and adjoining lands to create what is now the four-star Worsley Park Marriott complex in Salford, some 10 kilometres south east of Hulton Park. The project was completed in 1998 and has become a mature, financially

sustainable and valued facility. It has hosted smaller PGA European Tour championship events and continues to host small scale tournaments, but simply does not have the scale or facilities needed for hosting the Ryder Cup.

- 2.14 Following the success of the Worsley Old Hall project, Peel tabled plans to restore and develop land to the south of Worsley Old Hall, on the Worsley New Hall and Gardens site and adjoining land. The Salford Forest Park project included a new horse racing course and community forest but the proposals were refused planning permission in 2010.
- 2.15 Subsequently and, building on its interest and track record in championship golf, the company identified the potential opportunity to create a new, larger and higher quality golf venue for hosting the Ryder Cup at Worsley New Hall and Gardens. The location of the site, on the edge of the Manchester/Salford conurbation with a high level of accessibility, made it suitable for such a use, as proven by the success of the Worsley Park Marriott. Discussions were held with the PGA European Tour and Peel progressed design and feasibility work to test the proposition, with a view at the time towards hosting the 2022 Ryder Cup.
- 2.16 This work advanced up to a point, with European Golf Design (EGD) preparing a golf course design, but two major obstacles became apparent. First, creating a contoured Ryder Cup golf course on peaty ground required millions of tonnes of earth to be imported, the environmental impact of which would be unacceptable. Secondly, it was apparent that to fund the development, significant cross-subsidy would be required, but the site did not have the potential for significant value-generating development. In 2014, it became clear that the project would not be feasible.
- 2.17 Around the same time, the company had become aware that the Royal Horticultural Society (“RHS”) was seeking a large site for a Fifth National Garden. The RHS chose the Worsley site due to its location and gardens, including its very large walled garden complex, and RHS Garden Bridgewater<sup>2</sup> is now being delivered on site by the RHS in partnership with Peel and Salford City Council. It is Europe’s largest gardening project and will open in summer 2020.
- 2.18 Although the Worsley site was ultimately destined for another use, the work undertaken on the golf project for the Ryder Cup did however lay the foundations for the Development, as set out more fully in Chapter 4 below.

<sup>2</sup> <https://www.rhs.org.uk/gardens/bridgewater>

### 3 **HULTON PARK – FROM ONGOING DECLINE TO RESTORATION PLANS**

#### **Acquisition**

- 3.1 The company acquired the Hulton Park Estate in 2010 when it came to the open market following 700+ years in the ownership of the Hulton family. The entire Estate is 1,000 acres of which around half comprises the Grade II Registered Park and Garden of Hulton Park, the remainder being contiguous land north of the M61, the areas immediately adjoining the Park which are outside the RPG and more remote parcels.
- 3.2 The whole Estate was acquired for £9.2m, slightly above the selling agents guide price of £8.5m. It is not known how many other parties bid for the Estate. No bids were received from the local authority or local community or heritage interests.
- 3.3 As a development company, the acquisition of the Hulton Estate was made by Peel with a view towards investing in the focal point of the Estate, namely the Grade II Listed Registered Park and Garden at Hulton Park, which was identified as providing the opportunity to combine restoration with creating new economic activity, in line with Peel's company objectives and track record of heritage regeneration. As explained below, Hulton Park, without such investment, is not a viable asset.

#### **Estate Management**

- 3.4 The company was conscious from the due diligence work on the acquisition that the Estate was in poor condition, suffering from decline and in need of active management. The Estate was immediately taken into management by Peel's in-house team. A number of estate related issues have emerged and are ongoing since the acquisition, including:
- (a) Security and prevention of anti-social behaviour and trespass: investment has been made in fencing, electric gates and signage although challenges remain, including unauthorised trespass, on-foot and by motorbikes and associated ongoing vandalism/damage. Two of the residential properties on the Site have also recently been the subject of drug related raids by Greater Manchester Police;
  - (b) Tenants: a number of longer-term tenants have remained on site whilst others were replaced, including at Home Farm which was taken under the direct control of Peel following an environmental pollution incident caused by the previous tenant. The Home Farm, which includes much of the Great Park area, is used by cattle, sheep and horses, which helps with managing the Estate and deterring unauthorised activity. An archery club uses the pleasure grounds and kitchen garden. A fishing club uses the Mill Dam lake;
  - (c) Health and Safety: maintaining a safe estate for tenants and adjoining properties, associated management of site access and health and safety concerns. This includes removing unsafe trees particularly around site edges and other hazards. A specific significant issue has been the close monitoring of condition of the Mill Dam (at the lower lake) which is at risk and the preparation of an engineering solution for the dam if it deteriorates further. This is the subject of a live planning application; and

(d) Survey work: extensive surveys of buildings, trees and vegetation including for invasive species. However, there is no active silvicultural management of the large woodlands and plantations due to the major cost of such a programme.

3.5 The above estate management approach has been ongoing since the acquisition in 2010. It represents an appropriate low level of activity reflecting Hulton Park's low-grade agricultural quality, its declined condition and the numerous ongoing challenges. Reflecting the condition and quality of the Park, levels of rent are very low and some are heavily subsidised (and uncertain due to Brexit). As a consequence of the above, the company is exposed to significant ongoing risks and costs, with minimal revenue generation. Hulton Park is not a viable Estate in its current use. The prevention of further decline (setting aside restoration aims) requires an ongoing budget from the company. There is no known source of available subsidy other than the company.

3.6 There has been no deliberate decline or decay to the Park since the Estate was acquired in 2010. Indeed, the company has taken many steps to halt Hulton Park's decline, putting in place a responsible estate management strategy and identifying a comprehensive restoration plan to secure its future.

3.7 The reality is however that without a major investment and restoration plan, the Estate is not viable and will inevitably continue to decline in a structural sense. The costs of preventing further decline and restoring the Park will furthermore increase over time. It has been clear to the company since acquiring the Estate that a comprehensive restoration plan is needed. As a result, Hulton Park has been and remains held for investment and restoration by the company.

#### **Future investment, restoration and use – no alternative**

3.8 Although the company's interim focus was on estate management and arresting the short-term decline and problems of the Estate, some work was done from 2011 through to 2014 on identifying a future restoration plan, including various surveys and appraisals, to provide a level of understanding of the scale and nature of the challenge. Surveys were undertaken of multiple buildings and structures in poor condition, alongside areas of invasive species and extensive unmanaged woodland and plantations. These were supplemented by a historic background study by LUC which began to consider the Site's historical assets and sensitivities, to inform what is now the Conversation Plan.

3.9 In 2014, Peel also contributed to the purchase of the Hulton Archive to help keep the whole Archive intact and prevent its component parts being sold off individually. The Archive is now stored between Lancashire Archives (located in Preston) and the Bolton Museum and Archive.

3.10 The question of what type of future use could achieve the restoration and viable future of Hulton Park was considered by the company over the period 2010 to 2014, but no feasible use or plan was found.

3.11 Hulton Park has its obvious qualities and potential, not least its:

(a) Landscape and heritage setting – which is both a constraint but also a great opportunity, providing a ready-made mature landscape and historic interest, allied to the Hulton Archive and family story;

- (b) Areas that are more – and less – sensitive to development, providing the opportunity for some value-generating development to subsidise the restoration, whilst keeping the majority and core of the Site undeveloped; and
  - (c) Large catchment (over 7 million population within a one-hour drivetime) served by multiple modes of transport.
- 3.12 However, it has always been clear that any proposed restoration use would need to be able to generate sufficient value across the whole site to both deliver restoration works and provide a long term revenue for estate management.
- 3.13 Furthermore, Hulton Park's location between Bolton and Wigan and adjoining a mix of residential areas means that market values in the local area (be they leisure, commercial or residential) are at present weak, not only relative to more affluent areas nationally but also in a Greater Manchester context.
- 3.14 Hulton Park is also of a scale, in its size and the extent of investment needed to overcome its degradation, such that modestly scaled proposals are highly unlikely to be viable. It has become clear to the company that any future use would need to be of a scale and profile that would create a new market for itself, to drive demand and values.
- 3.15 Some initial feasibility work was undertaken in 2011-12 on a holiday village concept and initial discussions were held with the Council, but the business case was neither realistic nor viable.
- 3.16 No other uses were identified which had the required blend of scale, new viable uses and the necessary value-generating development to fund the major costs associated with the Park's restoration.
- 3.17 It is notable that no other uses have been realistically suggested by others, including the Council, the local community (including those opposed to the Development) and other organisations with an interest in the Park, such as the Gardens Trust. It is clear that no alternative use other than that proposed by the Development has been identified to date. Nor is there a realistic likelihood of such a use being found.
- 3.18 The company is firmly of the view that the Development is the only realistic means of restoring the historic asset and giving it a new sustainable use. In so concluding, it draws upon its experience as a major investor across development markets with an unparalleled record in Greater Manchester over the past 30 years, and an intimate and unique knowledge of the challenges and opportunities facing Hulton Park. The company does not see a future means of securing a long-term viable use without significant cross-subsidy from value-generating development, given the significant costs associated with restoration, the need to create a viable use of significant scale, and the limited public funding available for heritage restoration projects of this nature.
- 3.19 Clearly the sensitivities and constraints of the Site are major factors that naturally limit options. For historic asset reasons it is clearly preferable that an holistic approach to the regeneration of the Estate should take place. It is possible that if an holistic Site-wide solution is not delivered, then a disaggregated or incremental approaches would need to be considered, posing a risk of the Park becoming fragmented. The company understands,

and has been clearly advised by its expert team of advisors, that retaining and restoring the RPG as a single entity with a permanent use is of great importance. It is therefore seeking to achieve such a solution insofar as that is possible.

- 3.20 As noted above, the ongoing decline of the Park means that the longer it takes for a comprehensive restoration plan to emerge, the greater the cost of restoration. It follows that the extent of value-generating development needed to cross-subsidise a new use and restoration plan would also be likely to need to increase over time.
- 3.21 It is also material that there is no other proposal in England for a golf proposal of the scale and nature of the Development, which has been explicitly designed as a modern facility to host the Ryder Cup and other major tournaments. Hence there is no other means of securing the unique blend of benefits – heritage, sport and legacy - that the Development would realise for the region and the nation.
- 3.22 The company is also not aware of any existing venue in England that would now meet the requirements of the Ryder Cup in terms of location, capacity, infrastructure and course design. The delivery of such an investment, in an area in need of investment (both in terms of Hulton Park itself and Bolton generally), creates a set of benefits that could not be realised anywhere else. In the company's view, the benefits of the Development – which are set out fully in the evidence of expert witnesses – taken together are both significant and unique.

## 4 THE RYDER CUP DEVELOPMENT PROPOSAL

### **Ryder Cup and the wider golf opportunity**

- 4.1 The Development responds to a window of opportunity to host the Ryder Cup. The Ryder Cup has not been held in England since 2002, having been held here much more regularly prior to that. Having been held in Ireland, Wales, Scotland, France and with Italy to host in 2022 and Ireland in 2026, it is likely in the company's view that the Ryder Cup and associated tournament programme will be held in England in one of the next two available hosting years, these being 2030 and 2034.
- 4.2 It is pertinent that in terms of hosting the Ryder Cup, Europe has only announced the next two Ryder Cups in 2022 and 2026, the latter announcement being made very recently in July 2019 to Ireland. In the USA, the venue for the next six Ryder Cups is known, up to 2040. The company is aware from discussions with the PGA European Tour that decisions on the 2030 and 2034 Ryder Cups in Europe are intended to be made in the short term.
- 4.3 It is also known that as the largest revenue driver for the PGA European Tour, maximising the impact of the Ryder Cup is central to its business strategy. The move towards large, modern and advanced venues that are capable of hosting large crowds and of creating a unique atmosphere and spectacle, located on the edge of international cities, and in parts of Europe that are under-provided for with such facilities, can be seen in the decisions to award the Ryder Cup to Paris and to Rome. The Paris Ryder Cup in 2018 set a new bar in terms of spectator venue experience and infrastructure.
- 4.4 As important as the Ryder Cup is, as the world's largest golf event, it is known from discussions with the PGA European Tour and leading golf experts that in the UK there is a major challenge in increasing golf participation generally, and in sustaining other golf tournaments, for example the British Masters and major events for seniors, junior and women.

### **Hulton Park and the Ryder Cup – concept and initial stages**

- 4.5 In 2014-15, the company's ongoing ambition to create a new Ryder Cup golf venue, the absence of an alternative option for Hulton Park and ongoing discussions with the PGA European Tour led to the emergence of the idea for a "Ryder Cup community" at Hulton Park.
- 4.6 The concept for Hulton Park provides a strategic infrastructure response to this challenge: creating a new, modern international golf venue that is flexible, adaptable and attractive to a range of different tournaments and formats. The alignment of Hulton Park's heritage, alongside the profile of Bolton and Greater Manchester for major events and sport, alongside international and local access, provides a strong foundation for a world class venue.
- 4.7 The proximity to England's North West 'golf coast', which includes some of the most famous links golf courses in the world, provides a particular opportunity for Hulton Park to align with a strong regional offer, but one that at present lacks a "world class" parkland venue. Hulton Park would complement other tournament venues in England which are centred around the South East (including Wentworth) and Midlands (most significantly the Belfry) but would be a modern bespoke design capable of hosting much larger events including the Ryder Cup.

- 4.8 Hulton Park's associated development of the academy and learning complex has the potential to attract golf organisations, sport science and educational users, who may be located on site (if suitable) or clustered in the wider area. Discussions with local education providers and sporting organisations, such as the University of Bolton, Bolton College, the Greater Manchester Sports Partnership and the Golf Foundation, confirm that there is clear interest in such uses. Alongside the golf course itself, the luxury hotel (with conferencing and spa/health facilities) and clubhouse, creates a critical mass and diversity of golf uses that have not been the subject of a similar scale project in England in recent years.
- 4.9 The potential for such an investment to drive participation in golf, to transform the perception of UK golf and to act as a wider economic catalyst has been apparent from the company's first conversations about the Development with the relevant golf bodies. It would be of great significance to, and help deliver the aims of England Golf, UK Sport and the PGA European Tour, as well as local partners in Bolton and Greater Manchester, across a range of agendas.
- 4.10 If the Development is delivered, it will inevitably attract the support of a wide range of partners to maximise its beneficial impact. Peel would be one of many delivery partners, acting in a similar way to the way it helped create other major destinations such as the global media and creative industries cluster in Salford through its MediaCityUK development (see above).
- 4.11 Early design testing by EGD established that the Site was large and flexible enough and particularly compatible in its natural form with championship golf, specifically the Ryder Cup's requirements. The undulating nature of the open landscape area, framed by mature woodland plantations, were deemed highly suitable for the creation of a parkland golf course of international quality. The potential for a new hotel complex as a focal point in the heart of the Site, to replace the former Hulton Hall, was also an ideal fit. Crucially, it was also apparent from the historic work and advice of LUC that the wider Hulton Park area would be able to accommodate some housing development in less sensitive areas, so as to create an overall mixed-use community. Overall, Hulton Park was considered to be a perfect fit for the Ryder Cup project.
- 4.12 Meetings, briefings and site visits took place through 2015 with the PGA European Tour, England Golf, the Council and GMCA, including respective Leaders/Chief Officers, to discuss the concept. It became apparent that: all key partners recognised the potential opportunity; Peel was committed and would be capable of delivering such a project; Central Government remained keen to secure the Ryder Cup as a global mega-event; and the PGA European Tour were open to the working up of a potential candidate venue for the Ryder Cup at Hulton Park with the involvement of their property and design companies (ETP and EGD). The 'residential community' was seen as a key ingredient to the overall project and thus formed part of the concept from the outset.
- 4.13 The central challenge was how to move from an idea to a fully detailed proposal with certainty, capable of underpinning a proposal to host the Ryder Cup and associated tournament programme. Specifically, given the complexity and scale of the proposal, planning permission for the Development would be required in order for the prospective venue to be considered and selected.

- 4.14 Peel agreed to bring forward a scheme design and planning application for the project, at its own risk and cost, on a 'without prejudice' basis to a future Ryder Cup proposal. The company was sufficiently confident from the range of discussions held that the project would meet the necessary criteria and have a good chance of being selected.
- 4.15 To ensure the best possible design and business plan, the company assembled a project team of leading national and international advisors, including:
- (a) Golf design – EGD (specifically Mr McMurray who has been responsible for designing and successfully delivering other Ryder Cup courses and who is well versed in understanding the specific requirements of the relevant bodies)
  - (b) Business plan – European Tour Properties, GVA/Humberts, Cushman & Wakefield
  - (c) Golf and business advisory – Brookes Sport and Deloitte
  - (d) Planning and economics – Turley and Ekosgen
  - (e) Building and community design – Leach Rhodes Walker / Calder Peel
  - (f) Heritage and Masterplanning – LUC, Peter de Figueredo and Lloyd Evans Pritchard
  - (g) Engineering and environmental – TEP, Aecom, i-Transport
- 4.16 The briefs for the project evolved through multiple stages and as the constraints and opportunities became clearer. Design and business planning work was progressed through 2015/16 informed by full site surveys and other work. At its heart, the project has consistently from the start been about the integration of heritage restoration, sport, tourism and community development.
- 4.17 The opportunity to create a new community as a core and complementary part of the project was fundamental from the outset, due to the enhanced value that can be achieved through proximity to and integration with the golf course and facilities. This is a key aspect of the business plan and is necessary to make the project commercially realisable. It was apparent very early that any new housing (being located in the Green Belt), would only be justified on the basis of the 'very special circumstances' surrounding the Ryder Cup golf project and its legacy. Accordingly, the Development, having been designed for that purpose, would need to be conditional upon being selected as the venue.
- 4.18 The project team had direct experience of, and was able to access information relating to, previous Ryder Cup bids. The formulation of the proposals was guided by these previous bids, the criteria applied and the experiences of both successful and failed bids. The project was designed to meet and where possible exceed these requirements, to put it in the strongest possible position.
- 4.19 A development team approach was put in place with the Council which met several times both pre-application and during the application, with consultation also undertaken with a wide range of relevant external

stakeholders, the vast majority of whom have confirmed their support for, or no objection to, the Development.

- 4.20 Public consultation was also undertaken at two stages, on the overall project principles and later with a more detailed design proposal. This was mainly attended by those living closest to the Site and many were concerned about the scale and nature of the Development and impacts it might have, although some attendees were in support of the proposals. A full consultation report was prepared. The extensive work undertaken for the planning application responded to all the comments and concerns raised by the community.

#### **Hulton Park – a potential candidate venue for the Ryder Cup**

- 4.21 The project is proposed as a candidate Ryder Cup venue. In the company's view, having tested the proposals against previous criteria and involved the European Tour's own teams and advisors, the project meets the key requirements. Specifically it would deliver a leading, iconic, modern, international standard venue, in a suitable location, that is capable of staging the Ryder Cup and other major tournaments. Crucially, this can be achieved and provided at no cost to the PGA European Tour, a standard requirement in the awarding of the Ryder Cup programme. There is also no requirement for grant funding for the Development itself.
- 4.22 If planning permission is granted, the project would then be capable of being a candidate venue for the Ryder Cup programme, where it could form part of a proposal to secure the rights to host the Ryder Cup and deliver the associated tournament and legacy programme. It is important to clarify that any proposal would likely be led by a combination of UK Sport and England Golf. If Hulton Park were the candidate venue, Peel would be one of several delivery partners alongside national and local government and other agencies.
- 4.23 Without planning permission, it is not possible for the Site to be taken forward as a candidate venue. It is clear that until and unless planning permission is in place, the PGA European Tour and UK Sport/DCMS will not be in a position to formally consider or endorse it.
- 4.24 DCMS and UK Sport are fully aware of the Hulton Park proposal and have been kept informed of its progress. The Ryder Cup opportunity presented by Hulton Park was publicly recognised in a press conference immediately following the Paris Ryder Cup<sup>3</sup>.
- 4.25 When the planning application was submitted in May 2017 and formally considered by the Council in March 2018, the programme for the 2026 Ryder Cup was achievable. However, the decision was made by the PGA European Tour in July 2019 to award the 2026 tournament to Ireland. Had the Development secured planning permission in 2018, it could have been taken forward as a prospective venue for 2026. However, that opportunity has as a result of the call-in now passed. As the planning decision on Hulton Park is unlikely to be made until 2020, the potential dates for a Ryder Cup at Hulton Park have therefore moved to 2030 or 2034.
- 4.26 It is known that PGA European Tour and UK Sport are currently working on a Feasibility Study which explores the potential of bringing the Ryder Cup to

<sup>3</sup> <https://uk.reuters.com/article/uk-sport-britain-bids/uk-sport-announces-plans-to-host-decade-of-sporting-events-idUKKCN1MD20O?feedType=RSS&feedName=domesticNews>

England in 2030/2034. This Study is due to be completed late 2019/early 2020 and is considering potential venues, including any existing venues and new proposed venues that could be suitable and available to host the Ryder Cup and other major tournaments. It is understood that this includes Hulton Park.

- 4.27 Peel has been in ongoing discussion with the European Tour over a candidate venue for the Ryder Cup in Greater Manchester for many years. However the European Tour – and similarly the UK Government – are not currently in a position to formally consider or endorse the Hulton Park project.
- 4.28 As there is a clear prospect of early decisions over the host venues for 2030/2034 following completion of the Feasibility Study, if Hulton Park is to be ready as a qualifying candidate venue it will require certainty of delivery including the grant of planning permission.
- 4.29 Outside of the planning process, commercial work has been undertaken by the company and shared with both the PGA European Tour and UK Sport to demonstrate how a proposal involving Hulton Park might be structured and how it can meet public funding requirements. This has been done on a commercially confidential basis. However, in summary, a partnership proposal would likely be structured as follows:
- (a) Golf facilities – this being the Development to be delivered and funded by Peel;
  - (b) Annual Tournaments for 10-12 years – to be funded by the host nation, including a European Tour main event (e.g. British Masters), a Seniors Tour and Challenge Tour Event, with funding required for event support, staging, security, transport, IT, insurance and volunteer programmes;
  - (c) Ryder Cup event – to be funded by the host nation, for event support, staging, security, transport, IT, insurance and volunteer programmes, plus associated licence fees;
  - (d) Golf legacy fund – commitments to develop golf participation amongst under-represented groups e.g. women, children, ethnic minorities, people with disabilities;
  - (e) Commercial requirements – a commercial delivery vehicle for project managing, marketing and delivering the tournaments, and commitments to underwriting tournament prize money for annual tournaments.
- 4.30 For such a proposal, it is likely that a partnership body would be established to steer activity and engagement, comprising key partners and including experienced individuals in sport, government, business, community and other areas of expertise. In the event that such a partnership proposal were to be selected for the Ryder Cup programme, contracts would need to be entered into between the numerous parties for delivering the programme.
- 4.31 The decision over where, when and how to decide on the awarding of the Ryder Cup Europe rests ultimately with the PGA European Tour and specifically its Ryder Cup Committee. It is they who will decide on the venues for 2030 and 2034. As explained in the Planning Statement and Proof of Evidence of Mr Bell, the process for forthcoming Ryder Cups may be different to previous decisions for Italy, France and others before that, which have

tended to result in a competitive selection process between nations where there can be only one successful party and several who miss out. Indeed, the recent decision to award 2026 to Ireland did not follow an open competition, with a deal having been effectively agreed between the PGA European Tour, the Irish Government and the delivery/venue partner (Adare Manor), and then announced publicly. The PGA European Tour will follow its own processes and cannot predetermine a selection process.

4.32 However, from the company's meetings and discussions with the PGA European Tour over several years, held with successive executives and leaders, and the involvement of its design and business plan companies (EGD and ETP). there is every indication that the Development would represent both a strategic fit for the PGA European Tour and meet the requirements of hosting major tournaments including the Ryder Cup.

4.33 The principal reasons for the 'strategic fit' can be summarised as follows:

- (a) A high-quality site and Development that can meet and exceed requirements in order to drive golf progress, experience and innovation;
- (b) The locational advantages of Hulton Park in an under-represented region with good potential for growth, and close to a major international city and associated transport links;
- (c) The ability to drive commercial revenues with a multi-faceted brand proposition based around Hulton Park, Bolton, Greater Manchester and the North West/North of England;
- (d) The security and simplicity of working with a delivery partner with a strong track record in delivering major infrastructure, events and property development; and
- (e) The potential to use the venue to help create a strong legacy for golf and the wider region, and to build on local support and create new partnership opportunities.

#### **Delivering the Development in Partnership**

4.34 A partnership proposal for the Ryder Cup would likely establish a number of steering and thematic groups to the project in order to realise the benefits. This is explored further in the evidence of Mr Tong and reflects the planning for major sporting events, venues and infrastructure e.g. Olympic Games, Commonwealth Games.

4.35 The Development would feature in all aspects of the project strategy, to varying degrees, but specifically in relation to:

- (a) Community and heritage – engaging the local community and providing access to the golf facilities, heritage assets within the Park and recreational proposals including the Hulton Trail and Pretoria Park. It is likely that a community steering group would be established to guide and manage these aspects;
- (b) Transport and infrastructure – implementation of travel plan arrangements, raising of transport related issues, tournament logistics;

- (c) Environmental – responsible long-term management of open spaces and woodlands, potentially including community project with local schools and environmental groups;
- (d) Education and Skills – working closely with local schools, Colleges and other education providers to align course content, deliver apprenticeships and so on;
- (e) Local business and supply chain – the construction and subsequent operation of the Development will require local supply chains in a variety of sectors including professional services, building construction, golf development, greenkeeping, landscape maintenance, housing construction, food and drink, hospitality, sports science, hotels and tourism to name a few.

4.36 These elements are addressed fully within the evidence and the proposed conditions and section 106 obligations. Peel has a strong track record delivering on such obligations and its own company policies in place to guide that process (**Appendix1**).

4.37 In relation to the delivery of the Development itself, the intention is that the company would play an overall managing and facilitation role across all aspects and would retain overall responsibility. The company would be responsible for funding and delivering the Development. It would likely use borrowings against its own portfolio, cash (liquidity and sales) or a combination thereof. The company may also seek an investment partner, such as an investment fund or a major hotel resort operator.

4.38 Other business partners will likely be appointed to manage the individual components of delivery, including expert developers and contractors. The environmental and engineering works proposed with the restoration of the Park would require specialist contractors with expertise working in such environments and in creating high quality golf venues. The construction of a luxury hotel and spa/conference facility may require a different specialist contractor.

4.39 In relation to housing, Peel would retain overall design quality control (alongside the Council) using Design Codes and other approved design documents, but would bring serviced parcels to the market to be developed out by house-builders. This may include Peel's own new house-building company Northstone<sup>4</sup>, other private house-builders (both premium national and local/SME builders) and potentially Registered Providers, custom/self-builders and other specialists (e.g. retirement homes).

#### **Delivering the Development and funding the shortfall**

4.40 The company recognises that planning permission is being sought on the basis of an apparent significant viability shortfall, as identified in the updated Cushman and Wakefield Viability Assessment which presently shows a deficit of up to circa £49 million on the basis of current values.

4.41 This deficit would be reduced if more positive values are achieved on future residential values and commercial revenues, as shown in the sensitivity analysis undertaken by Cushman and Wakefield. The company believes that looking forward and taking a long term perspective, the unique nature and

<sup>4</sup> <https://www.northstone.co.uk>

special quality of the Development can take both commercial and residential values to or beyond the levels considered in the sensitivity analysis.

- 4.42 The Viability Assessment also includes costs which Peel can control and manage itself. This includes a “master-developer” profit (circa £7m) and a benchmark land value (£6.6m) both of which are within the company’s gift: to be clear, if planning permission is granted, the company is committed to progressing the Development even without these elements. Additionally, a significant proportion of the professional fees anticipated have already been incurred, by bringing the project through to planning, environmental assessment and RIBA Stage 2 equivalent.
- 4.43 The company also recognises that it could deliver part of the housing development itself, thus retaining a part of the residential profit and providing a further incentive.
- 4.44 The company takes the view that the Viability Assessment is realistic at this time and necessarily (due to PPG and RICS guidance) cannot be based on more optimistic assumptions which may arise in the future. Nevertheless, the company believes that over the lifetime of the Development the returns will significantly exceed these “present day” values. The company has committed to a re-appraisal of viability at future trigger points, to assess whether additional affordable housing can be provided within latter phases (in addition to the 10% now committed in line with the Revised NPPF).
- 4.45 The company has a strong track record investing for the long term in regeneration projects in areas where present day values are low and where market values often need to be built up over time, by working with partners to create new activity and to change the investment profile of areas. This approach can be seen in several of the company’s major projects, including some of those identified in **Appendix 2**. The Development is of a global profile, but is in reality somewhat smaller in scale and cost/risk profile than other major ‘legacy projects’ successfully completed or underway by the company. For example the Trafford Centre, MediaCityUK, Liverpool John Lennon Airport and the Liverpool2 deep sea container terminal – all of which have been successfully delivered – have been larger and more complex, costly and risky projects, in different ways.
- 4.46 The company is therefore prepared to proceed with the Development despite the present identified shortfall because: it is seeking to create a legacy based around golf and heritage; and it believes that the Development can ultimately be commercially viable and profitable. The enclosed letter from the company’s Chairman at **Appendix 3** confirms this. The Hulton Park project carries the commitment and approval of the company’s Chairman and Board.
- 4.47 The company considers however that it would not be possible to remove any of the value-generating aspects of the project, or further increase the regulatory burden on the project. Without the proposed housing, or even with less housing, the deficit further increases. There is also marriage value between the different uses such that reducing the community aspect would affect commercial values. Had it been possible to increase the amount of value-generating development, without unacceptable impacts (namely to heritage and Green Belt), the company would have sought to do so. However, a very careful balance has been struck, and has been agreed not only with the company’s expert team, but also with the Council, to ensure the Development can be delivered in a sustainable and beneficial manner.

- 4.48 The company wishes to reassure the Secretary of State that there is no meaningful risk that the Development would be started and not completed, leaving the heritage asset partly developed but not restored. The Development can only be commenced if the Ryder Cup is secured, in line with the obligation in the proposed Section 106 Agreement. In that scenario there would be both a contractual obligation (most likely, underwritten by the Government) and a commercial imperative to deliver the Development. However, to ensure the planning permission is further restricted and the benefits are realised in a timely manner, the Development would also be subject to a restriction that no more than 275 homes can be occupied until the Park restoration are complete in accordance with approved details. The same provision is made in relation to the golf course and facilities.

#### **Operating and maintaining the Development**

- 4.49 In relation to operating the completed Development, a single party would likely operate the venue, golf course and country estate; this could be an international hotel operator, a bespoke high-end UK operator or a new venture. Again at this stage it is appropriate to retain flexibility. It is intended that the venue would be branded as one of the “European Tour Destinations”<sup>5</sup> alongside other global golf venues/resorts.
- 4.50 The residential areas and parts of the Site falling outside golf/hotel management (e.g. the Hulton Trail, the local centre, village green, play areas and associated woodland areas) would be managed by a site management company owned by Peel. The intention is that each new house will contribute to a service charge for the maintenance of the estate.
- 4.51 Peel anticipates retaining freehold ownership of the Site and thus retaining ultimate control and responsibility for its upkeep and delivery of obligations. The exception to this may necessarily be the residential plots, with the public realm and infrastructure retained. However it would be the company’s intention that the disposal of any freeholds would be with restrictive covenants that require the upkeep and maintenance of property and common areas.

<sup>5</sup> <https://www.europeantourdestinations.com/destinations>

## 5 **OVERALL CONCLUSION**

5.1 This Statement demonstrates that the Development:

- (a) Would be delivered by a committed and respected landowner/investor with a proven and highly relevant track record of creating new places and delivering heritage and sport-led investment and legacy, in partnership with relevant public and private bodies, particularly but not exclusively in the North West;
- (b) Would deliver significant positive benefits for Hulton Park and the local area, with a long-lasting positive legacy for the wider region; and
- (c) Is the only way of securing the comprehensive restoration of Hulton Park, and that harm would arise from the project not going ahead.

5.2 The Development is not a typical proposal. Its delivery requires the support of relevant sporting bodies (principally UK Sport and the PGA European Tour / Ryder Cup Europe). The company accepts that the special case being made for the Development is predicated upon securing the Ryder Cup tournament programme, for which it has been specifically designed. As a result, the Development must be considered as a whole.

5.3 In order to proceed for consideration as a venue by the relevant sporting bodies, planning permission is required. It is recognised that the proposals constitute, in part, inappropriate development in the Green Belt. However it is clear in the company's view, a view shared by the Council, that very special circumstances exist and that the proposals represent sustainable development overall.

5.4 The company respectfully asks that the Secretary of State grants planning permission on the restricted basis proposed, in the local and national interest.



**Peel L&P**  
REALISING POSSIBILITY



# Sustainability

## 5 Year Business Plan

---

Our strategy for creating better places  
for people and the environment

**“For Peel L&P,  
sustainability  
means delivering  
benefits to  
communities and  
the environment in  
everything we do.”**

## **Contents**

- 04 Peel L&P: ‘Realising Possibility’
- 06 Corporate Social Responsibility: Governance
- 08 Corporate Social Responsibility: Structure
- 10 Sustainability Principles
- 12 The United Nations Sustainable Development Goals (UN SDGs)
- 14 Peel L&P’s UN SDG Commitments
- 18 Five Year Targets



# Peel L&P: ‘Realising Possibility’

We devote our energy to accomplishing great things; not for their own sake, or ours, but for those who come after. Today, tomorrow and for generations to come. Our ambitions are for a more prosperous, sustainable future for all; where people and places are matched with the opportunity to be the very best they can be.

---

**We see possibility.  
We deliver transformation.**

---

Our sustainability plan aims to help us meet the current needs of our business and stakeholders whilst keeping ahead of key trends to ensure we future-proof our activities. We are often the facilitator, with an in-direct impact on sustainability, and our ambitions can only be achieved by working together with partners to keep pace with key future trends.

## Peel L&P model



## Future trends identified by the UK Green Building Council

The Past	The Future
Reasonable change of pace	<b>Unprecedented instability</b>
Regulation is the answer	<b>Business leadership is key</b>
Do less	<b>Do more</b>
Business as usual	<b>Breakthrough innovation</b>
It sits with the sustainability team	<b>The mainstream own it</b>

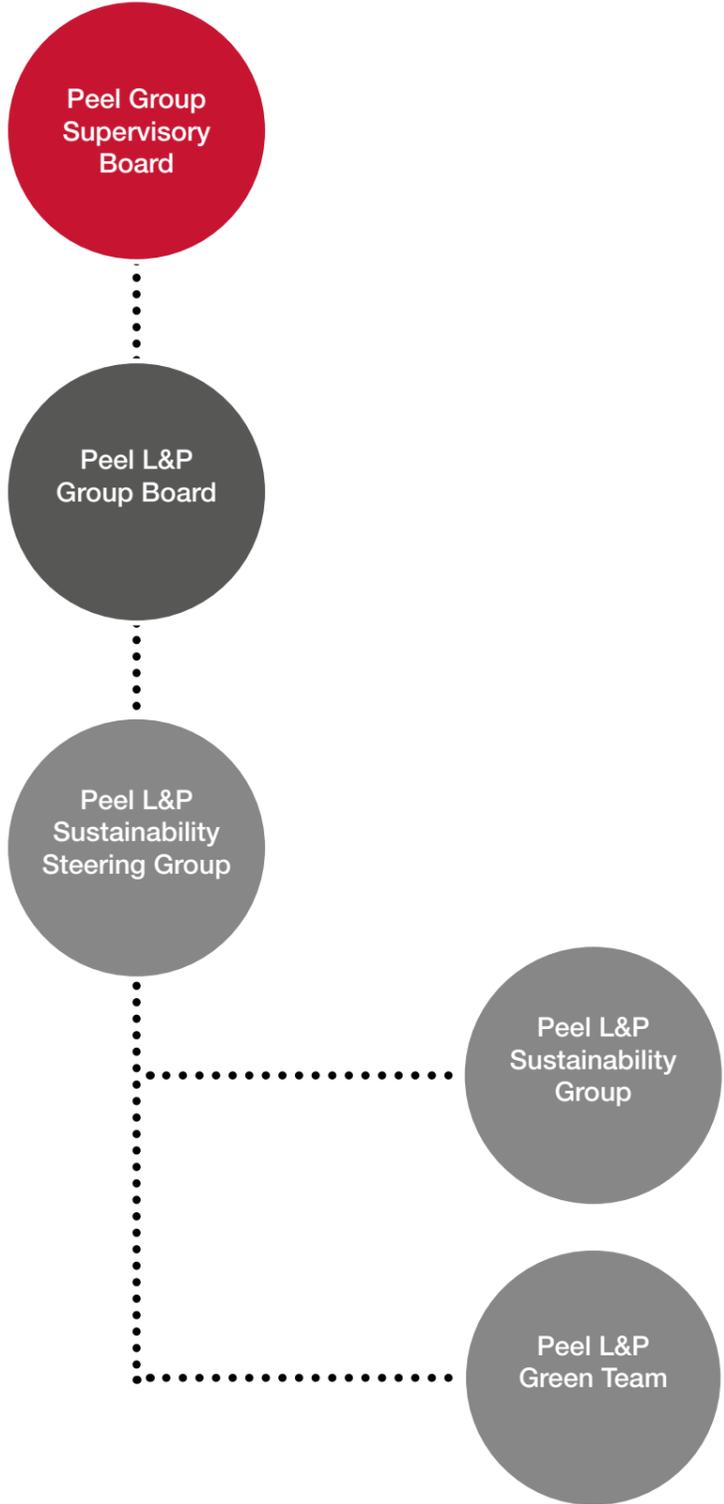


# Peel L&P Group Corporate Social Responsibility Governance

## Corporate Social Responsibility: Governance

At Peel L&P we recognise the responsibility we hold as a leader in regeneration projects, and we understand that this responsibility starts with a governance structure that involves our Senior Management Team.

Our Corporate Social Responsibility (CSR) activities, including sustainability, are reported quarterly to the Peel L&P Group Board. The Sustainability Steering Group guides the direction of our sustainability strategy, whilst the Peel L&P Sustainability Group and Green Team both look at the delivery aspects of sustainability matters.



# Corporate Social Responsibility: Structure

We understand the environment we live and work in and we're here for the long-term. We aim to ensure that everything we do has a sustainable legacy for generations to come.

Our Corporate Social Responsibility structure shows how we split the key components of CSR into 5 themes which include the 3 Pillars of Sustainability:

- Pillar 1. Economic investment**
- Pillar 2. Environmental responsibility**
- Pillar 3. Communities**

Our work brings these pillars to life; delivering our promise for social and environmental responsibility and sensible, sustainable commercial actions.

We act for good; investing in the buildings, the communities and the environments in which we work, behaving with integrity to build on our legacy.

## Peel & Corporate Social Responsibility

### Our Vision:

To create sustainable environments where people and businesses can flourish

### Our Values:

- Long term vision, long term investment
  - Excellence in delivery
- Regeneration delivering sustainable growth
  - Leaving a lasting social legacy
- Adding value for all our stakeholders

**Determination | Perseverance | Patience**

#### THE 5 CORPORATE SOCIAL RESPONSIBILITY THEMES



Economic investment

Environmental responsibility

Communities

Our People

Health & Safety

The 3 Pillars of Sustainability

7 Sustainability Principles

4 United Nations Sustainable Development Goals Commitments

15 Five Year Targets

# Sustainability Principles

From the 3 Pillars of Sustainability we have developed 7 Sustainability Principles which are borne from our understanding of the responsibility that comes with delivering new neighbourhoods for the community and opportunities for business.

To encourage the creation of highly sustainable, future-proofed destinations, we have developed the Principles for all our partners to seek to deliver in our development schemes. By setting a consistent approach across our developments and measuring progress, we can ensure our activities deliver liveability for whole communities, more sustainable individual sites and long-term custodianship.



1 Create opportunities for people to lead **better, more prosperous lives**



2 Engage with local people to **understand the needs of existing and future communities**



3 Develop highly **sustainable and smart built environments**



4 Embrace a **low carbon energy strategy**



5 Strive to put more **back into the natural environment than is taken out**



6 Support the health and wellbeing of communities by **creating beautiful, functional and well-used green public realm**



7 Promote **sustainable transport options** for all

# The United Nations Sustainable Development Goals (SDGs)

The UN's 17 SDGs, otherwise known as the Global Goals, were launched in 2015 and underpin our ambition to embed sustainability into our placemaking activities. We support the principles of the SDGs and have started to look at how we can play our part in contributing to them.

We have prioritised the four that are most relevant to our business activities and recognise that none could be achieved without working in partnership with our stakeholders.

**12** RESPONSIBLE CONSUMPTION AND PRODUCTION



**11** SUSTAINABLE CITIES AND COMMUNITIES



**8** DECENT WORK AND ECONOMIC GROWTH



**15** LIFE ON LAND



# Peel L&P's UN SDG Commitments

12 RESPONSIBLE  
CONSUMPTION  
AND PRODUCTION



## Ensure sustainable consumption and production patterns

### What does this mean?

Sustainable use of natural resources, reduction of waste and sustainable business practices.

### Our commitment:

**We will continually improve the sustainability of our existing assets.**

Through owning and managing 12 million sq ft of property and 20,000 acres of land and water with a total portfolio value of £2.6 billion, we have extensive opportunities to integrate sustainable practices into our day-to-day business activities. This can be through the way we operate our buildings, such as using the ISO 50001 energy management system to help us identify and implement energy saving measures, the services we provide to customers in terms of recycling and waste management, sustainable procurement and our own office sustainability, and how we manage the public realm under our stewardship, maintaining safe, healthy, green environments for people to live and work in.

## Make cities and human settlements inclusive, safe, resilient and sustainable

### What does this mean?

High quality, safe and accessible housing, green spaces and public realm; inclusive and sustainable urbanisation; protecting and safeguarding cultural and natural heritage.

### Our commitment:

**We will support the development of sustainable low-carbon communities, transport, energy and infrastructure.**

Our specialist teams have a proven track record in delivering high-quality, legacy projects across land, property, water and air. This includes hotels, waterways, media hubs, event spaces, leisure facilities, retail, workspaces, residential development, industrial & logistical space, public realm, historic gardens and renewable energy, including electric-vehicle charging. Our objective is to put sustainability front-of-mind in all of our new development activities and think about how we reduce our overall impact during construction and operation, maximise the benefits for communities and the environment and future-proof our business.

11 SUSTAINABLE CITIES  
AND COMMUNITIES



**8 DECENT WORK AND ECONOMIC GROWTH**



**Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all**

**What does this mean?**

Economic growth, safe working environments and sustainable tourism.

**Our commitment:**

**We will create new training, employment and local business opportunities through our regeneration activities.**

As a social investor, we work with our partners to develop the skills of local people and create job opportunities that benefit the local economy. We create sustainable destinations and homes where people and businesses can grow, offering the ability for communities to prosper and thrive. We get involved; pledging significant funding within communities every year, and partnering with local organisations and educational establishments wherever we work.

**Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, halt and reverse land degradation and promote biodiversity net gain**

**What does this mean?**

Conservation, restoration, sustainable use of terrestrial and inland freshwater ecosystems and the enhancement of natural habitats and biodiversity.

**Our commitment:**

**We will help communities to connect with nature.**

We understand the innate connection between humans and nature and know that access to parks, woodland, water and open space is fundamental in assuring the long term health, wellbeing and productivity of any community. Through our land portfolio and development activities we have the opportunity to create high quality, functional new environments. We strive to put back more into the environment for people and wildlife – a net gain – to help ecosystems and communities prosper.

**15 LIFE ON LAND**



# Five Year Targets

Our 4 commitments are underpinned by 15 Five Year Targets, each with their own annual goals and focussed on the sustainability issues that are most relevant to our business activities and associated stakeholders.

We will review the targets annually to ensure they continue to capture key trends and help us to future-proof our activities.



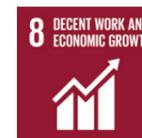
## SDG 12: Continually improve the sustainability of our existing assets

- Energy**
  - 15% reduction in absolute or activity-related energy use or greenhouse gas emissions, cumulatively from a 2018 baseline
- Waste**
  - Zero waste to landfill from Peel L&P sites
  - 20% increase in recycled waste, cumulatively from a 2018 baseline
- Water**
  - 20% reduction in absolute or activity-related water use, cumulatively from a 2018 baseline
  - Provide public access to free drinking water at all new developments
- Procurement**
  - All suppliers to meet Peel L&P's minimum requirements on Corporate Social Responsibility/Sustainability
  - Identify unnecessary single-use plastics across our portfolio and replace with more sustainable alternatives
  - Increase the number of electric vehicles in the Peel fleet year on year
- Office sustainability**
  - Conduct an annual Sustainability Survey: seek employee opinion on our office sustainability and ways to continually improve



## SDG 11: Support the development of sustainable low-carbon communities, transport, energy and infrastructure

- Buildings**
  - All our new commercial buildings will be BREEAM 'Very Good' or 'Excellent' where relevant
  - Report progress towards creating 150 acres of public realm at our Strategic Waters sites



## SDG 8: Create new training, employment and local business opportunities through our regeneration activities

- Jobs & skills**
  - We will help 200 people to get into work by facilitating apprenticeship opportunities across all appropriate development projects
- Communities**
  - Produce a 5 Year CSR Review report
- Sustainable tourism**
  - We will encourage 80 million visitors to our sites, to support the local economy



## SDG 15: Help communities to connect with nature

- Biodiversity**
  - Adopt natural capital accounting



# Peel L&P

REALISING POSSIBILITY





## Heritage Regeneration

# Document Summary

- This document provides a series of regeneration case studies of Peel Land & Property heritage projects. The purpose of these case studies is to demonstrate Peel's extensive track record and experience in restoring heritage assets back to their former glory through sensitive redevelopment. Each development case study illustrates that every site has its individual characteristics that have been responded to, ensuring the heritage assets are restored to the highest possible standards and given new viable uses.
- This document illustrates both heritage improvement schemes delivered and those that are emerging.
- It focuses on larger sites and projects. The company also has a significant portfolio of smaller development including listed building restoration works.



**1715**

Liverpool builds the world's first commercial wet dock



**1761**

Frances Egerton, the first Duke of Bridgewater, builds the Bridgewater Canal to transport coal from his mines in Worsley to industrial areas of Manchester



**1850**

Sir Robert Peel, Prime Minister and founder of the Metropolitan Police, dies. His home town of Bury, where his father's textile business was founded, mourns him and erects Peel Tower in his memory

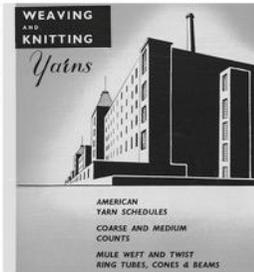
**1882**

Businessman Daniel Adamson becomes champion promoter of the Manchester Ship Canal although he does not live to see its completion in 1894



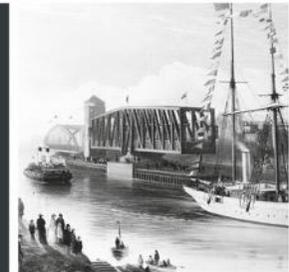
**1930**

Built in the grounds of Speke Hall, Liverpool, Speke Airport starts commercial flights to Croydon Airport via Barton Aerodrome in Salford - now City Airport and Heliport



**1971**

John Whittaker acquires Peel Mills, the foundation of The Peel Group



**1987**

Olayan Group becomes a shareholder in Peel upon the acquisition of Boundary Post Ltd



**1997**

Peel invests in airports with the acquisition of Liverpool Airport, subsequently renamed in honour of John Lennon

**1998**

Following a House of Lords decision confirming planning in 1995, The Trafford Centre opens



**2004**

Peel Holdings is taken private and rebrands as The Peel Group

**2007**

The BBC signals its intention to move jobs to Manchester in 2004 and the Salford Quays site is chosen. Construction of MediaCityUK commences in 2007 and opens in 2011

**2008**

50:50:50 Peel launches The Ocean Gateway



**2011**

Peel exchanges its investment in The Trafford Centre for shares in intu Properties

**2016**

Liverpool2 deep water container terminal, built by Peel Ports, officially opens

Not to scale  
© Crown copyright OS 100018033

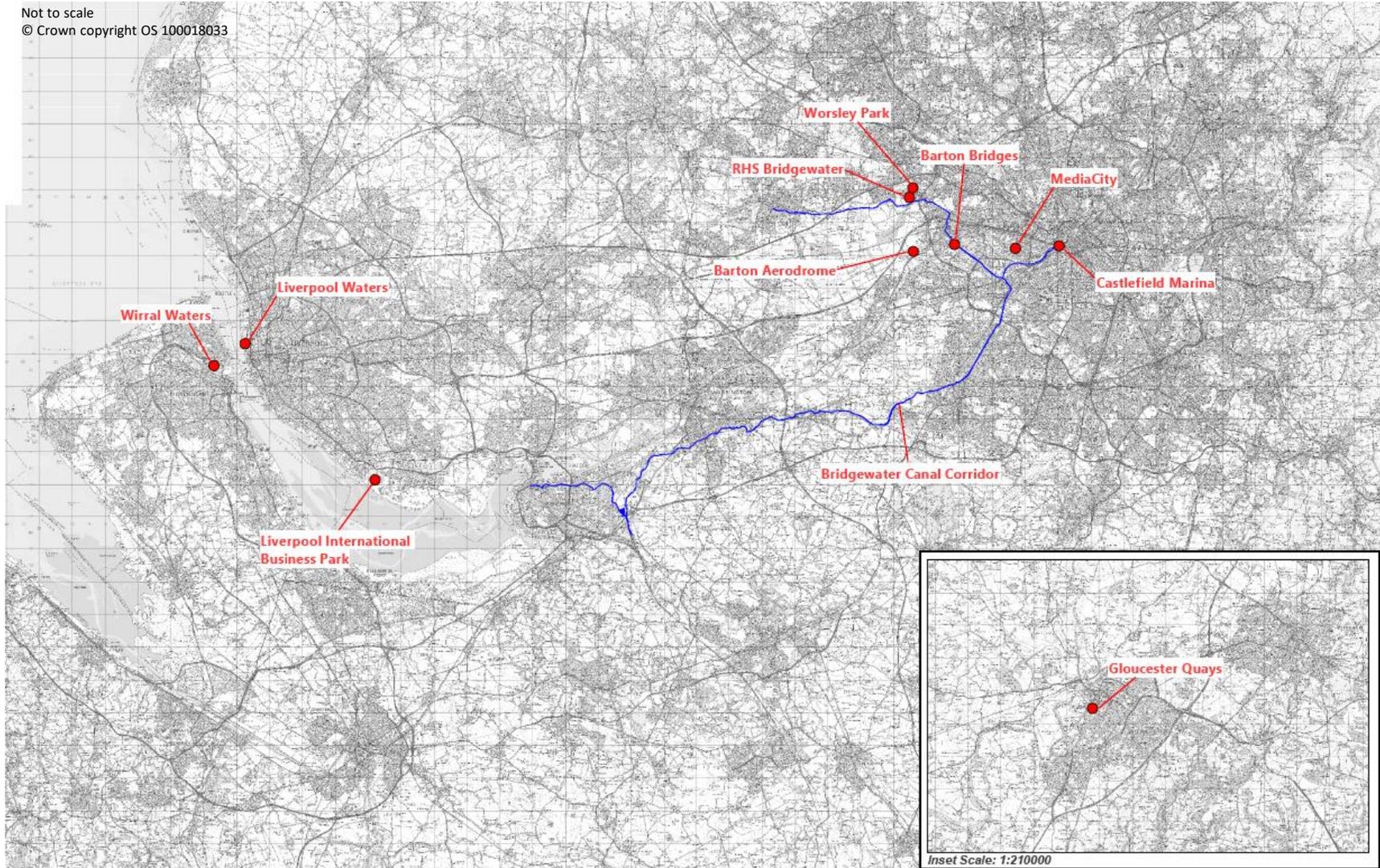


Fig: Overview Plan

Inset Scale: 1:210000

# Site Index

- Manchester, Castlefield 12
- Salford, Worsley Park 14
- Liverpool International Business Park 16
- Salford, Barton Aerodrome 18
- Bridgewater Canal Corridor 20
- Salford, Worsley, RHS Garden 24
- Salford, MediaCityUK 26
- Liverpool Waters 28
- Wirral Waters 30
- Gloucester Quays 32
- Trafford/Salford, Barton-upon-Irwell,  
Barton Bridges 34



*Fig: MediaCityUK*



*Fig: Liverpool Waters*



*Fig: Gloucester Quays Outlet Centre*



## PEEL'S ROLE

- Manchester Ship Canal Company, part of the Peel Group, **liaised and invested** with the Central Manchester Development Corporation to help **realise the Canal Basin's potential**
- Consequently, Peel submitted and secured planning permission initially for 3 waterside sites (Castlegate, Jacksons Wharf and Bridgewater Wharf), which then **catalysed the wider regeneration** that forms the popular Castlefield Marina today
- The conversion of the **Grade II listed Middle Warehouse** was one of the first in Manchester City Centre, paving the way for this new viable restoration of assets throughout the city
- The development was described as “one that **retains its unique links with the past** and keeps its **essential character**, but opens it up to more public activity and improves the environment to the extent that it has become an attractive area for living as well as working, leisure and tourism
- In 1992 the Castlefield Canal Basin was awarded the **British Tourist Authority's Tourism for Tomorrow Award**



*Fig: Castlefield Marina*



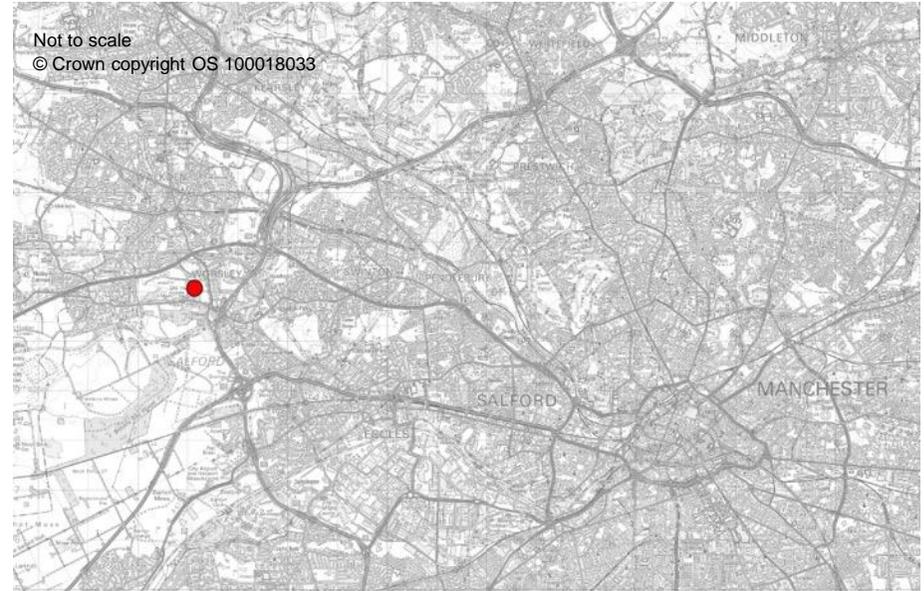
*Fig: Historical Images of Castle Quays, Peel Group Archives*



*Fig: Merchants Bridge Castlefield Marina built by Whitby Bird & Partners in 1996*



*Fig: Site Aerial*



*Fig: Site Context*

## ABOUT THE SITE:

- **Grade II listed building** and grounds within the village of Worsley and is located within the **Worsley Old Hall Conservation Area**
- First reference to the Hall dates back to 1195
- 1748 the 3<sup>rd</sup> Duke of Bridgewater, Francis Egerton, inherits the estate and sets about building the Bridgewater Canal
- In 1923 Worsley Old Hall and grounds became the property of Bridgewater Estates Ltd
- In the late 1960s the building fell into disrepair
- Total site area is **163 hectares**

## PEEL'S ROLE

- Peel acquired the Old Hall and wider estate as part of the historic Bridgewater Estate in 1986
- The Old Hall was in need of investment to sensitively restore and find a viable use for the building
- Peel conceived a plan to create a hotel and golf resort and secured **planning permission** for the golf course, change of use and extension of existing farm buildings to a hotel, conference and leisure facilities incorporating golf clubhouse
- In 1995 Peel and Whitbread plc subsequently **redeveloped** the hall and the farm; the Old Hall farm then became the basis for the Manchester Marriot Hotel and Country Club
- The resort features an 18-hole PGA Championship golf course, driving range and putting green
- The Old Hall underwent a substantial programme of repair and renovation in 2013 and is now ran as a pub by Brunning and Price
- **The restored Grade II listed hall and grounds** now serves the community and is widely regarded as **one of the finest inland courses in the North of England**
- Since its opening, the championship course at Worsley Park has played host to several events on the **EuroPro Tour and the Challenge Tour**

*Fig: Worsley Old Hall Farm 1968, Peel Group Archives*



*Fig: The restored farm buildings serve as a spa hotel, attracting visitors from across the globe*



*Fig: Worsley Old Hall*





Fig: Site Aerial



Fig: Contextual Plan

## ABOUT THE SITE:

- 121 acre site adjacent to Liverpool John Lennon Airport and the Speke Garston Coastal Reserve
- Planning consent granted for 3,000,000 sq. ft. for high quality B1/B2/B8 use
- Adjacent to the **Grade I listed Speke Hall** and the former **Liverpool Airport Terminal Complex, a group of Grade II\* listed Buildings**
- The Business Park was also designed to provide a degree of visual separation and enclosure from the adjacent Speke Garston Coastal Reserve whilst concealed boundary fencing within a 'ha-ha' allows uninterrupted views from Liverpool International Business Park across the Estuary.



*Fig: Grade II\* Former Liverpool Airport Terminal Complex*



*Fig: Grade I Listed Speke Hall*



*Fig: Site Layout*

## Peel's Role:

- Peel, recognising the opportunity to design an area that responds to the adjacent listed assets, submitted a planning application in 2001
- Planning permission was granted May 2004
- Peel worked diligently with the **National Trust** and **England Heritage** when designing the Masterplan and Development Framework to **design a landscaped setting that responds to the setting of the nearby listed buildings**
- Careful consideration was given to **preserve the main vistas across to the coast from the Grade II\* Listed terminal building**
- Since approving planning permission, Peel have facilitated the delivery of a first class commerce and amenity park, bringing jobs and investment to one of the fastest growing English cities whilst **enhancing its historic setting**

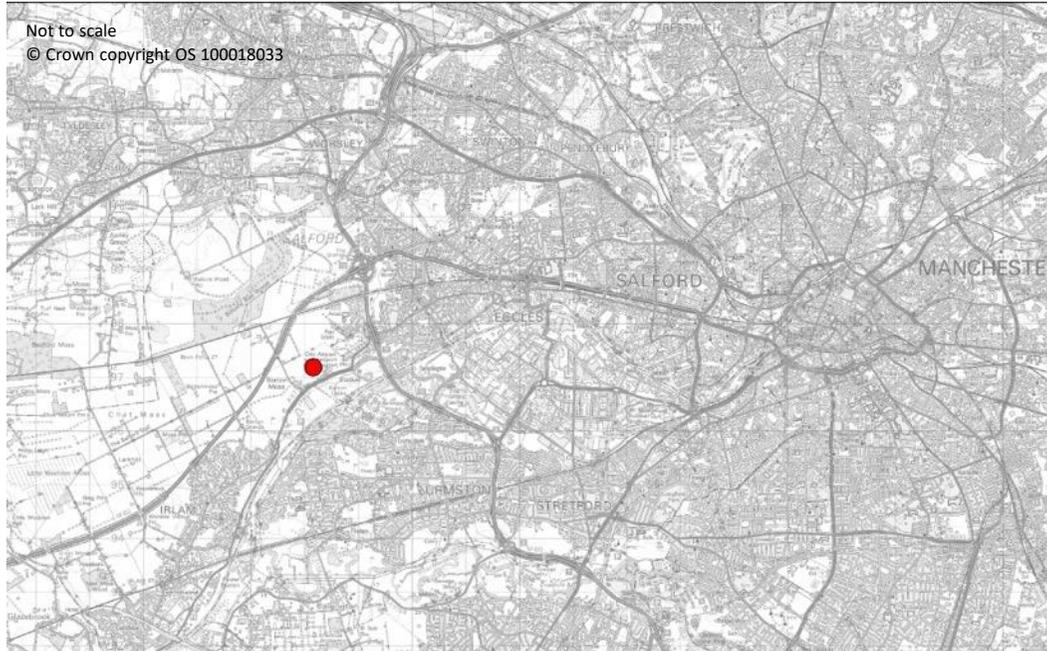


Fig: Site Context



Fig: Site Aerial

## ABOUT THE SITE:

- Building of the aerodrome commenced in 1929 and formally opened on the 29<sup>th</sup> January 1930 with a large Hangar, which was designed to house the most advanced passenger aircraft of the day, the Imperial Airways Argosy
- The airport became the **first** municipal airfield in the UK to be licensed by the Air Ministry and the iconic Control Tower was completed shortly after in 1933
- Both the **Control Tower** and **original Hangar** are now **Grade II listed buildings** and remain in operation today.



Fig: The Grade II Listed Hangar



Fig: Operational Manchester City Airport And Heliport, The Grade II Listed Control Tower And Hangar And A Transport Heritage Plaque



## PEEL'S ROLE

- Manchester Ship Canal Developments (of which Peel is the majority shareholder) acquired the land, hangars and other buildings from Manchester City Council in 2003
- In 2006 the **Control Tower** building underwent a **major programme of rebuilding and refurbishment**
- In 2010 the original **Grade II listed** building was given a **full refurbishment**
- A former University of Manchester building is converted into a new Helicopter facility, branded as **City Heliport**
- The 'Clubhouse' building was given a full refurbishment in 2011
- The restorations alongside other investments in the site have allowed the aerodrome to remain a sustainable and viable asset used by the local business and aviation community, the local services and the local community.

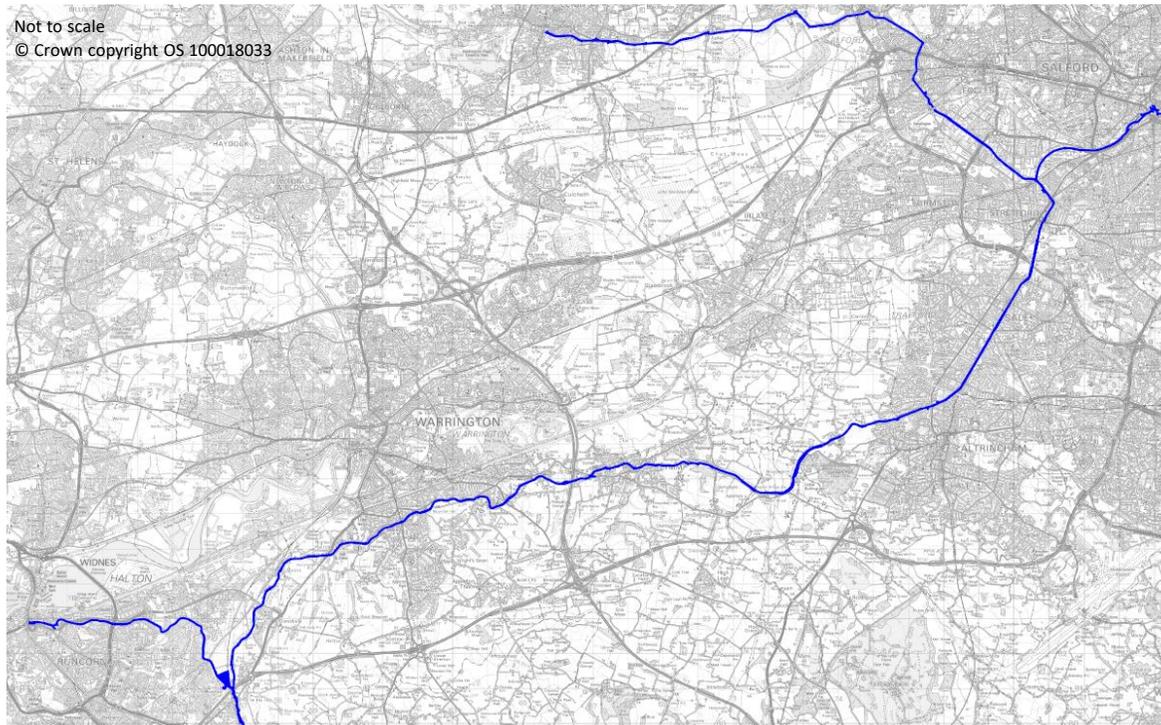
## ABOUT THE SITE:

- The Bridgewater Canal is sometimes described as **England's first canal**

- Opened on 17th July 1761, the Bridgewater Canal has a special place in history as the first canal in Britain to be built without following an existing watercourse, and so became a model for those that followed it

- Affectionately known as the “Dukes Cut” the Bridgewater Canal revolutionised transport in this country and marked the beginning of the golden canal era which followed from 1760 to 1830
- The Bridgewater Canal Company Limited (BCCL) is part of the Peel Group and owns and operates the Bridgewater Canal and towpath.
- The Bridgewater Canal is the **largest privately owned** Canal in the United Kingdom
- The **historic** 39 mile waterway celebrated its 250 year anniversary in 2011
- BCCL is a Statutory Undertaker and has statutory obligations to relating the **repair and maintenance** of the Canal and its components

Fig: Contextual Plan of the Bridgewater Canal Company



## PEEL'S ROLE

- The Bridgewater Canal was acquired in 1986
- Since this time, Peel have fulfilled a statutory obligation to keep the **250 year old waterway** open, navigable and safe
- Peel have worked with a series of partners along the waterway to bring forward appropriate and sensitive development and improvements that facilitates **sustainable use** whilst **preserving** the historic structures integrity
- The Canal requires a series of partnerships with local authorities, communities and others along its route
- There are numerous listed assets ancillary to the Canal of which are being restored – for example the **Grade II listed Medlock tunnel entrance** which was hidden for safety reasons
- Now Peel are in discussions with an adjacent developer as part of delivering a residential development on a site which has stood vacant for almost a decade – Peel were able to agree **improvements to the entrance** and has been described as one that is carefully considered and reflects the areas industrial heritage



*Fig: The Bridgewater Canal in Worsley, Salford*



*Fig: Medlock Tunnel Entrance Indicatives*

## THE BRIDGEWATER WAY

- The Bridgewater Way is a **regeneration project** which, when completed, will create a 65km (39 mile) multi-user recreation route for walkers and cyclist along the Bridgewater Canal and is currently 67% complete.
- The works include **improving the Canal towpath** by creating new access points and where possible widening the surface to allow cycling and making the towpath a safer and more appealing route.
- The Bridgewater Way is promoted by the Bridgewater Canal Trust which is a **partnership** of 7 local authorities and **The Peel Group**. Funders and supporters include: Peel, Bridgewater Canal Company Ltd Heritage Lottery Fund, Mersey Basin Campaign, Sustrans, Big Lottery Fund, Arts Council England, Halton Borough Council, Manchester City Council, Salford City Council, Trafford Council and Wigan Council

### Completed sections of The Bridgewater Way

#### Runcorn

Waterloo Bridge to Acton Grange Bridge in Moore. This section connects Brindley Arts Centre, Norton Priory, Daresbury Science and Innovation Campus and Moore Village.

#### Salford

A57 Liverpool Road to Worsley Village.

#### Leigh

Marsland Green Lane Bridge to King Street Bridge in Leigh Town Centre

#### Trafford

Sale to Stretford at Waters meeting. Springfield Primary School has its own "traffic free" school entrance on the Canal towpath. And then on to Watersmeeting in Stretford.

There is also a section complete between Kellogg's Canal Arm and Barton Aqueduct.



Fig: The Bridgewater Towpath Before Improvements



Fig: The Bridgewater Way After Improvements



Fig: The Bridgewater Way

## PEEL'S ROLE IN PROJECT DELIVERY

- Further examples of Peel and the Bridgewater Canal Company Ltd working in partnership with adjacent developers to regenerate the historic banks of the waterway are:



*Fig: Potato Wharf, Castlefield*

### Potato Wharf, Castlefield, Manchester:

- High quality residential development on **vacant land** adjacent to the Canal at Castlefield in the Castlefield Conservation Area
- Located between the **Grade II listed viaduct** and the **historic Bridgewater Canal Basin**

### Excelsior Mill, Castlefield, Manchester:

- £31m investment to **regenerate a vacant plot** adjacent to the Canal site into high quality residential uses
- The scheme provides a solution for the brownfield site which has been vacant since the building partially collapsed in July 2015 and had to be demolished
- The scheme lies adjacent to the **Castlefield Conservation Area**
- The design complements the buildings heritage, with the old-fashioned printing trays in some of the ornamentation around the building entrances
- Active frontages secured onto the historic canal towpath



*Fig: Excelsior Mill after partial collapse*



*Fig: Excelsior Mill Indicative*

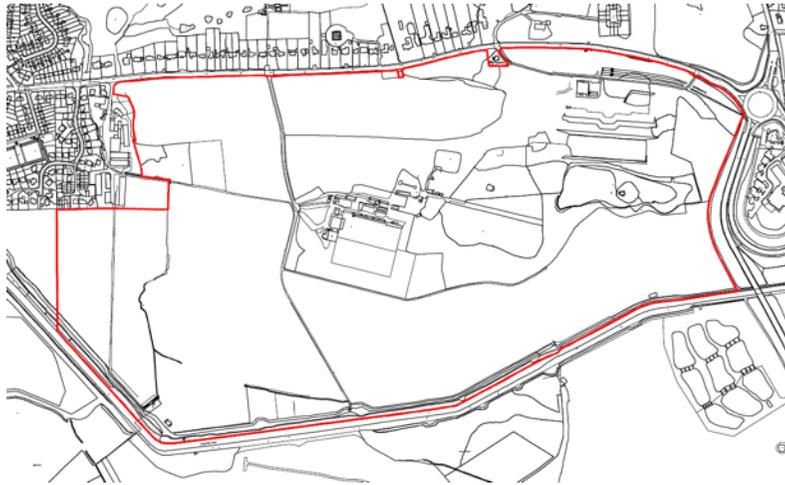
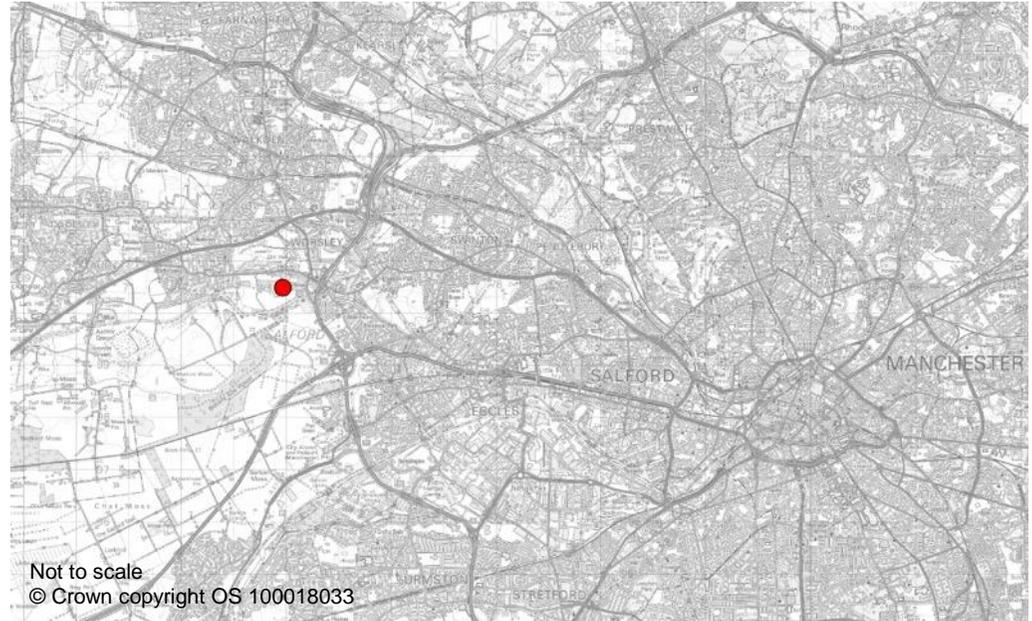


Fig: Site Red Edge



Not to scale  
© Crown copyright OS 100018033

Fig: Site Context

## ABOUT THE SITE:

- Historic **156 acre** Worsley New Hall Estate
- In 1845 Worsley Hall was constructed for the Francis Egerton, 1<sup>st</sup> Earl of Ellesmere
- During the early 20<sup>th</sup> century the site was split into marginal uses and as such the historic structures deteriorated
- Peel commenced the **stabilisation of historic features** within the estate and began to purchase back the marginalised land, ensuring the development was delivered as a single project which was **vital for the restoration**
- Restoration of the site is currently ongoing as a partner with the Royal Horticultural Society (RHS)
- The **largest investment project** the RHS have undertaken in its **211 year history**
- Restoration includes walled gardens, tree-lined garden approach and a reworking of the lost terraces which sit between the lake and the former site of Worsley New Hall



Fig: Aerial view of the site



Fig: Grade II Listed Head Gardeners Cottage 1961



Fig: North east view of the classroom



Fig: Indicative view of the walled garden



Fig: Aerial view of the foundations of Worsley New Hall which was demolished in 1945. Peel have undertaken a significant amount of archaeological surveys in partnership with Salford University to help inform the garden



Fig: Inside the welcome building



Fig: Indicative aerial view of arrivals approach

## PEEL'S ROLE

- The site was acquired in 1986 as part of the wider historic Bridgewater estate
- Throughout the 1990's and 2000's the site was managed as a tenanted estate
- Passionate to **restore** the site, ideas were circulated including a forest park and a racecourse
- Peel approached the RHS in 2015 and proposed the site as a potential 5<sup>th</sup> National Garden. RHS selected the site and entered a partnership with Peel and Salford City Council
- RHS secured full planning permission In **June 2017**
- The development will be delivered in two phases, with an initial direct investment of £30m by 2023, **adding £13.8m per annum to the local economy** by 2029
- The project will **create 140 jobs in the garden and a further 180 in the local economy** and there will be **opportunities for local people to learn new skills through training, apprenticeships and volunteering**

## ABOUT THE SITE:

- **Former industrial dockland area** that once housed Manchester's docks employing up to 5000 people on the docklands alone
- Manchester docks closed in 1982 due to a decrease in demand and **became derelict**, acting as a car park for the Lowry arts centre
- **50 acre regeneration site** through a 10 year masterplan project
- MediaCityUK, Manchester, a joint venture between the Peel Land and Property Group and Legal & General Capital (LGC) is the **most significant media development in the country** – a bespoke community for the creative and digital industries.
- MediaCityUK is home to the BBC, ITV Coronation Street, the University of Salford and more than 200 occupiers both large and small
- Features on of the biggest HD studio complexes in Europe and a spectacular waterfront piazza. MediaCityUK includes a range of residential accommodation including low-rise town houses, mid-range and high-rise serviced luxury apartments
- Today **7000 people living, working and studying in MediaCityUK** with 250 media, creative and digital companies led by BBC, ITV and Dock 10

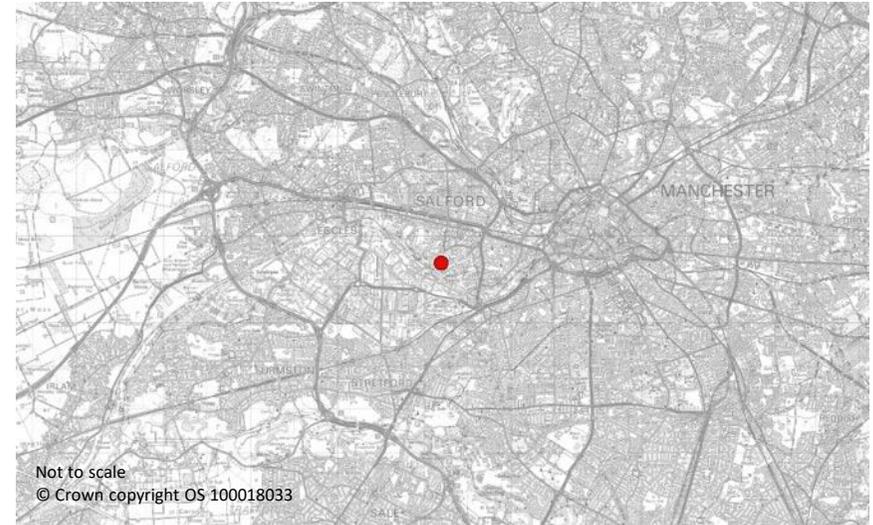


Fig: Contextual Plan



Fig: Site Aerial

## PEEL'S ROLE

- Recognising the need to redevelop the area, Peel submitted an outline application for the redevelopment of 15.1 hectares of land to provide mixed use development
- Starting in 2007, the first phase of the joint venture was completed in 2010 with Peel investing £650 million to ensure the regeneration of the derelict historic land
- Peel, working with Salford City Council and the Central Salford Urban Regeneration Company, managed to secure the relocation of the BBC to MediaCityUK
- MediaCityUK provides a major economic boost to Greater Manchester
- Plans have been approved to double the size of the development by 2030, with a further £1bn of private investment to come



*Fig: MediaCityUK before and after regeneration*

### Timeline – key moments at MediaCityUK:

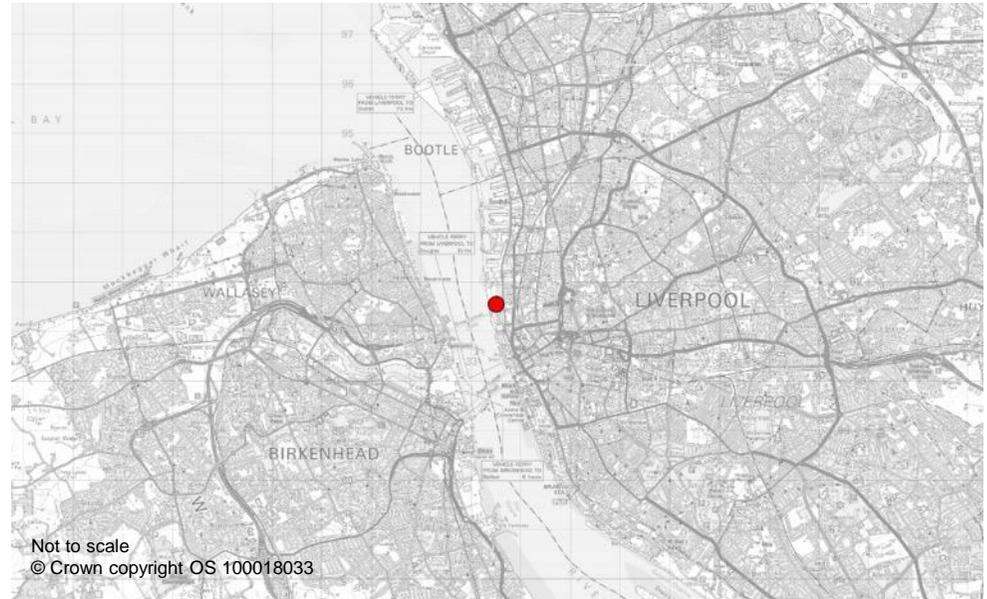
- June 2007 – construction at MediaCityUK commences via Peel's construction partner, Bovis Lend Lease
- December 2010 – initial infrastructure completed
- January 2011 – dock10 studios become operational
- May 2011 – BBC begins move of 3,200 staff into three buildings
- October 2011 – University of Salford opens its new media academy
- March 2013 – ITV completes move of 700 staff
- January 2014 – Coronation Street records first episode at MediaCityUK
- March 2015 – Legal and General Capital take 50% stake in MediaCityUK
- September 2016 – completion of Tomorrow (last building in phase one)
- September 2016 – planning approval for further expansion of MediaCityUK over the next 10 years

*Fig: MediaCityUK Timeline*





*Fig: Red Edge Plan of Liverpool Waters*



*Fig: Contextual Plan*

## ABOUT THE SITE:

- The **regeneration** of 60 hectares of **historic dockland** to create a market leading, high quality, mixed use waterfront in central Liverpool
- From the Victoria Clock Tower and the Leeds Liverpool Canal to the East Waterloo Dock and the Dock Boundary Wall, Liverpool Waters is home to a number of **historically important features**
- The vibrant history of Liverpool was recognised by the decision to grant the city **UNESCO World Heritage Status in 2004**
- With an estimated value of £5 billion, Liverpool Waters is the **largest** single development opportunity in the city, covering some 150 acres of land and docklands
- Spanning 2.3 km of the city's famous waterfront, Liverpool Waters would see the creation of a new mixed-use city with **2 million sq.m. of residential, business and leisure space** residing within 5 new dynamic neighbourhoods, **bringing life back to Liverpool's historic docklands** and almost **half** of it within the city's **World Heritage Site**.

## PEEL'S ROLE

- After acquiring The Mersey Docks and Harbour Company in 2006, The Peel Group set to work on Liverpool Waters, an ambitious 30-year vision to **comprehensively transform** the city's northern docks
- Working in partnership with Liverpool City Council, the UK Government and other stakeholders, Liverpool Waters secured outline planning permission in 2013
- The gravity of adding Liverpool Waters to the city's existing waterfront offer will see Liverpool competing with the likes of Hamburg, Boston, Toronto and Barcelona in terms of the scale and diversity of its waterfront offer and associated economy
- Also included in the proposals is the relocation of Everton Football Club Stadium subject to full planning.
- The Liverpool Waters team is in ongoing dialogue with **Heritage England**, **UNESCO** and **DCMS**; and continue to work pro-actively to **preserve** the city's **World Heritage Status**



Fig: The site of Everton Football Club's New Stadium

- As well as **investing in existing historical features** such as the Bascule Bridge, the Victoria Clock Tower, the Dock Boundary Wall and a number of smaller buildings across the site, officials from Liverpool Waters sit on the **Liverpool World Heritage steering group** and also host a **conservation management group** which includes Historic England and Liverpool City Council amongst its members



Fig: Liverpool Waters CGI



Known locally as the 'Dockers Clock', the Victoria Clock Tower is one of Liverpool Waters most loved features.



In 2008, the Liverpool Waters team invested £600,000 to restore the Bascule Bridge. Originally built in 1932, the bridge is an iconic feature of the dock road.



Fig: Site Aerial

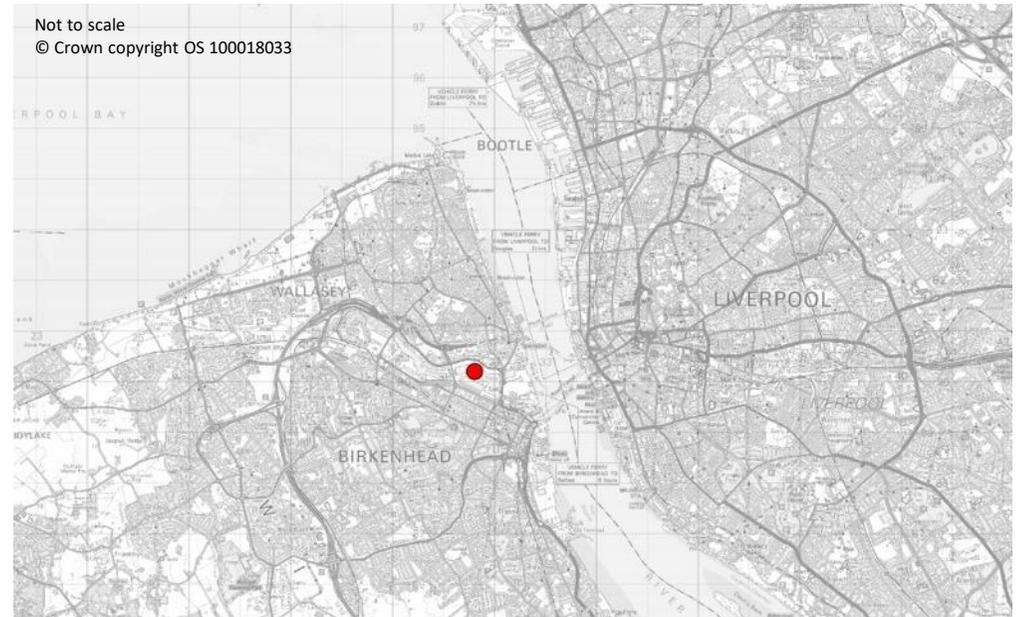


Fig: Contextual Plan

## ABOUT THE SITE:

- Wirral Waters, located on the Wirral peninsular, is one of the **largest regeneration projects in the UK** and aims to become **the most sustainable**
- It is centred on the Wirral dock system on the banks of the River Mersey, overlooking Liverpool's world class waterfront.
- At its heart, Wirral Waters seeks to use the unique water assets of the city to drive regional growth across all sectors; for trade, jobs, energy, transport, play and for placemaking
- Wirral Waters will **transform the derelict docks** in Birkenhead into a world class waterfront that is alive with activity on land and in the water
- Peel have also worked in partnership with Wirral Met College, Skills Funding Agency, Department for Education, and Homes and Communities Agency to deliver a new 38,000 sq ft Wirral Met College with construction courses focused on the built environment



*Fig: Site Aerial*



*Fig: Wirral Met College*

## PEEL'S ROLE

- Since the vision was born in 2006 an enormous amount of work has been undertaken by Peel to progress through the planning system to ensure delivery
- Peel worked diligently and enthusiastically with the Council and other key stakeholders to ensure that **the regeneration is in the best interests of the local people** to create a brighter and better future for them with prospects and opportunities
- Peel secured outline planning permission for entire regeneration site in May 2012
- The **regeneration masterplan** for Wirral Waters consists of seven regeneration phases including 13,000 residential units for the local communities, education, offices, culture and amenity uses
- The Wirral Met College, delivered as part of the Wirral Waters Scheme, has recently won the Royal Institute of British Architects (RIBA) North West Regional Award and then the National Award
- An investment in **excess of £4.5 billion** spread over the next 30 years that will bring new jobs and employers, a wider choice of homes, new shops and attractions, sports and leisure events and safe and secure access to the waters edge

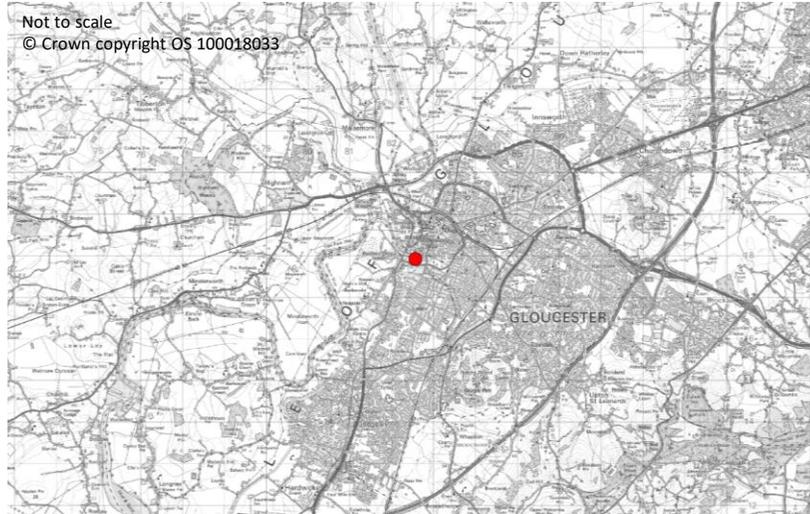


Fig: Site Context

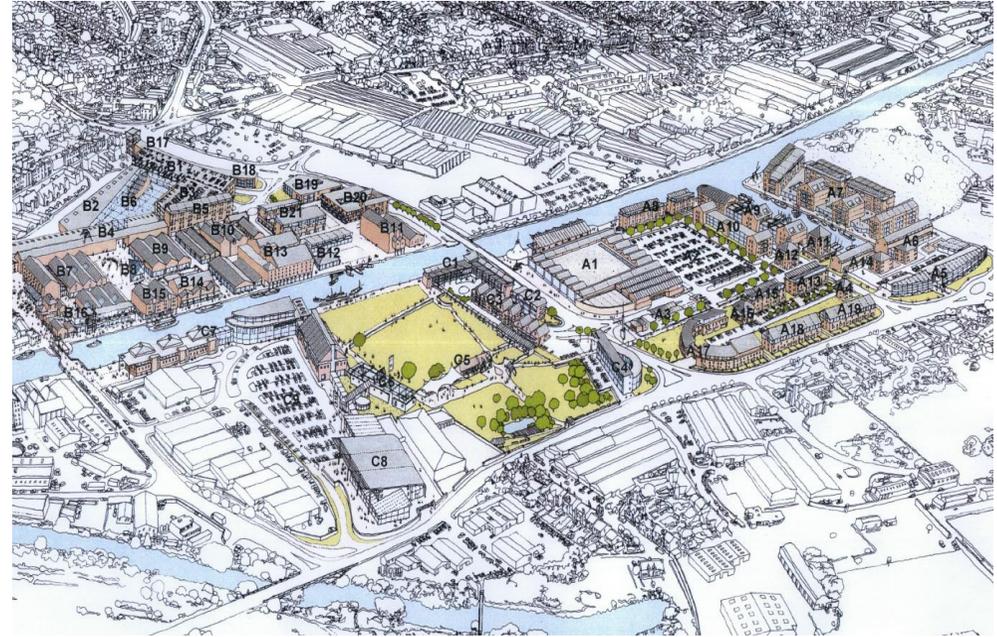


Fig: Indicative Site Masterplan

## ABOUT THE SITE:

- Located in the Cotswolds between the West Country and the Midlands
- Gloucester Quays is **one of the largest mixed use waterside regeneration developments** in the UK with an investment exceeding **£400 million**
- 60 acre development which commenced in 2005 provides over 1.6m sq ft of retail and leisure space
- The regeneration project **enhanced the waterfront facilities** whilst **conserving the heritage and environment**
- **A unique architectural waterside setting**
- Many of the existing **historic dockside** buildings have been **sympathetically refurbished** and with the contemporary design of the new buildings provide an attractive environment for both shoppers and tourists
- The site contains **14 listed buildings** including Llanthony Secunda Priory, a **Grade I listed building** and a **Scheduled Ancient Monument** which were reused alongside other buildings of conservation interest



Fig: Site Aerial



Fig: Gloucester Quays Outlet Centre

### PEEL'S ROLE

- Recognising the under-utilised land adjacent the Gloucester and Sharpness Canal, Peel submitted a planning application to **regenerate the historic dockland** in March 2002
- Planning permission was approved in November 2004
- However, the application was called in by the Secretary of State for a Public Inquiry in December 2005 with planning permission finally being approved in June 2006 and site clearance began in 2007
- The site opened in 2009 and despite the sector enduring a period of sustained decline, the destination now attracts 7 million visitors each year and continues to see a growth in sales as a major destination for shoppers, families and tourists from across the South West
- Since the beginning of the development, Peel have facilitated the delivery of 3,500 jobs to an area which had once **fallen into disrepair** but has now been **brought back to life**
- Peel are **committed to the regeneration of the area** have recently pledged to open the door to **a further £100m of investment** into the area of the next 3 years

Fig: Site Masterplan

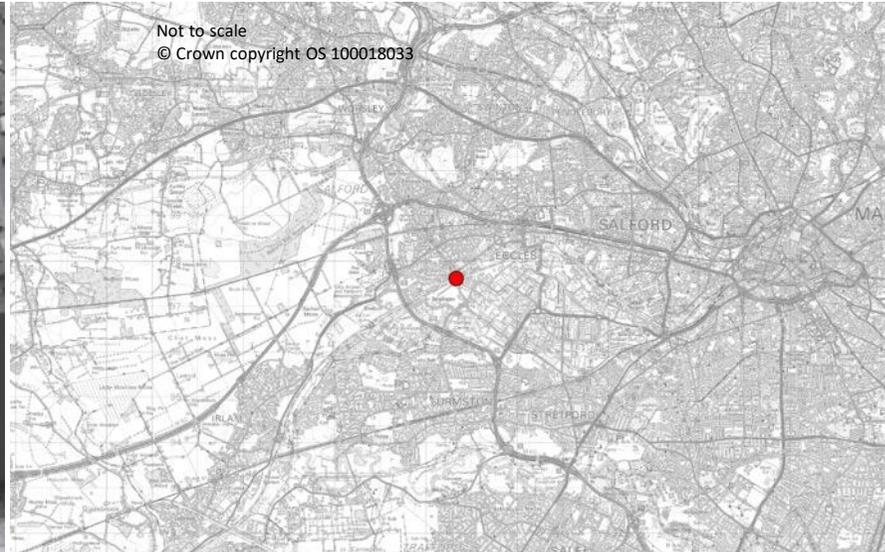


Fig: Site Context

## ABOUT THE SITE:

- Peel are proposing to create a heritage destination focused around the worlds only Swing Aqueduct and surrounding listed structures
- The Grade II\* Listed Barton Swing Aqueduct, Swing Road Bridge and Control Tower were built in 1894 to replace Brindley's 1761 stone aqueduct which is a historic crossing point of Peel's Manchester Ship Canal, formally the River Irwell, by the Bridgewater Canal.
- The wider area includes the **Grade I** listed All Saints Church designed by Edward Welby Pugin and the **Grade II** listed Presbytery
- The structures form part of the Barton-upon-Irwell **conservation area** which spans the Salford and Trafford authority border
- Proposals include the **reinstatement of a former towpath** through the swing aqueduct, **landscape improvements**, **improved connectivity** and **historical interpretation** with the potential for an archive and tourist centre



*Fig: The historic walkways along the Swing Aqueduct and the old crossing of the stone aqueduct*



*Fig: The Barton Bridges Heritage Area is located less than half a mile from Intu Trafford City, just to the north of B&Q on the edge of Trafford CITY.*

## PEEL'S ROLE

- Due to the development of the Intu Trafford Centre and the proposed expansion of Trafford CITY, the opportunity has emerged to transform the site into **heritage destination** focused around the **historic listed structures and assets**
- The vision for the Barton Bridges Heritage Area is to develop a destination visitor attraction based on the interpretation of **the unique history of the area**
- The vision is based on coordinated development of a **number of opportunity sites and historic assets** in a staged manner which can be delivered over time.
- The project has recently been accepted into programme entry and is now at the Business Case stage for a bid for the Mayors Challenge Fund to **reinstate** the **historic** walkway across the swing aqueduct and provide the community with a continuous off road multiuser route from Wigan to Manchester and out to Altrincham
- Peel are also planning to repaint the swing bridge at the Barton-upon-Irwell conservation area as part of the wider heritage destination offer
- This will allow the **listed assets** and the **wider conservation area** to be **returned back to the community** for the sustainable future



**Peel L&P**  
REALISING POSSIBILITY

30 August 2019

Ms Karen L Ridge  
c/o Ms Helen Skinner  
Inquiries & Major Casework Team  
The Planning Inspectorate  
3/J Kite Wing  
Temple Quay House, 2 The Square  
Temple Quay  
Bristol BS1 6PN

Dear Ms Ridge,

## **HULTON PARK**

Over the past 50 years, Peel has built, almost from scratch, an unparalleled record in the North West of turning regeneration visions into reality and of pioneering new markets – from early mill conversions and retail schemes, through major investment in our ports and airports, to iconic waterfront regeneration initiatives. During the past 10 years, despite the recession and a slow recovery, over £5 billion was invested in our projects across the Ocean Gateway corridor from Liverpool to Manchester.

As a business we believe our contribution and approach to the Northern Powerhouse and tackling the North-South divide is unique. We take great pride in the positive legacy we are creating. Placemaking and major development are neither quick nor simple, but we take a long term approach, investing in challenging areas and leading where others follow. We have much more to do and are well placed to deliver on our £50 billion investment programme.

Hulton Park is a special opportunity for myself and Peel, and for Bolton and the wider region. The idea of bringing the Ryder Cup to Greater Manchester is very personal to me and as I reach my later years, God willing I will see it as one of the great legacies that Peel will create for the region within my lifetime. It has been many years in the making and has my personal backing and that of the company's Board.

We have spent many years talking to partners and building support for hosting one of the world's great sporting events, the Ryder Cup, along with a programme of other major golf events. Greater Manchester does not have a world class golf destination. Hulton Park would be the perfect addition to the region's world-famous sporting pedigree, adding to its football, cricket, rugby and cycling offer. Hulton Park, as a parkland course, would also have a clear synergy with the North West golf coast and its renowned links courses.

The project carries the weighty support of partners across the region who recognise the potential to create a world class sporting and tourism venue and help build a legacy to help tackle some of the major challenges around skills, infrastructure, productivity, wages, participation and health. The proposed Academy and other community facing aspects of the scheme will, alongside working with local training and skills providers, help deliver a transformational local impact.

The project represents not only a compelling economic and social proposition, but the chance to deliver a bold regenerative vision befitting of Hulton Park, for restoring the Park's heritage and opening it up to the public, delivering exemplar sustainability and creating a new community. It has been designed as a whole and the residential community is central to the overall concept, mix of uses and the funding of the project. We have thus resisted many requests to drop the housing element.

If this project opportunity is lost, there is no Plan B. As a responsible landowner we would have to revisit the possibilities, but who knows what they would be. This development safeguards and restores the Park as a single entity, keeping the majority and core of the site undeveloped forever, whilst bringing huge economic and social benefits. I see no credible alternative that gets close to achieving the same.

We recognise that the project has been assessed as "not viable" following the Government methodology and applying "red book" principles. A project of this nature is very difficult to value at day one. The location is untested for the quality of development we propose and the values we seek to achieve. It may take many years before a profit is achieved, if at all. Peel's business has been built on creating new markets and delivering quality destinations. To cite the example of the Trafford Centre, it was deemed £120m "unviable" when construction started, against a total cost of £350m, but later became worth in excess of £1bn. However, many of our largest investments remain "unviable" on face value many years into their phased delivery – MediaCityUK in Salford, Liverpool John Lennon Airport and the £400m Port of Liverpool/Liverpool2 investment to name but three. Peel is able to take a more strategic view on its long term investments, of the legacy they will create, the opportunities they create and the value they add.

We have every confidence that Hulton Park can be a successful investment for both Peel and the local area. In the context of past and future investments, Hulton Park would be within our capabilities and far from our largest or most ambitious project. I am certain that if planning permission is granted, we have an excellent chance of being selected to host the Ryder Cup and that we would deliver a world class sporting and heritage legacy. Peel stands behind the project and will ensure its delivery.

I fully recognise the local community has some concerns. We take very seriously the responsibilities that come with such a project. We have invested in making sure the proposals are well formulated, using the best advice and expertise available to us, and will deliver benefits for the local area wherever possible. We have set out commitments to implement and manage the development responsibly. It will be something that local people will be proud of and benefit from.

The future of the Hulton Park project rests in the hands of Government and our sporting partners. I hope that this letter helps to convey the importance of this project and our commitment to its delivery. I would be grateful if you bring it to the attention of the Secretary of State.

The enclosed Peel L&P Statement provides more on the background and our approach to delivering the project.

Yours sincerely,



**JOHN WHITTAKER**  
Chairman  
Peel Group

## Appendix 2: Policy appraisal of the Proposed Development

### Introduction

1. The tables below have been prepared to assess each relevant adopted and emerging policy against the Proposed Development. The following adopted policy documents have been assessed:
  - The Revised National Planning Policy Framework (Adopted February 2019)
  - The Bolton Core Strategy (Adopted March 2011)
  - The Bolton Allocations Plan (Adopted December 2014)
  - Greater Manchester Minerals Plan (Adopted April 2013)
2. The Emerging Greater Manchester Spatial Framework (Consultation Draft January 2019) is at an early stage of preparation and cannot therefore be afforded any material weight in the determination of planning applications. As such, only site-specific policies in that document have been identified.
3. The tables present the relevant policy wording, the relevance of the policy to the Proposed Development, the compliance of the Proposed Development with each policy and my assessment of the weight to be attached to each policy. To clarify, the relevance of the policy and the weight to be afforded to each policy are assessed in isolation, whereby one does not influence the outcome of the other.
4. The weighting has been determined based on the following:
  - Full weight;
  - Substantial weight;
  - Limited weight; or
  - No material weight.

**The Revised National Planning Policy Framework (Adopted February 2019)**

Paragraph Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
Paragraph 7	The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs	Relevant to this appeal as the NPPF seeks to promote sustainable development	The scheme represents sustainable development across the social, economic and environmental dimensions. (See paragraph 8 for further detail)	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.
Paragraph 8	<p>Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):</p> <p>a) <b>an economic objective</b> – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;</p> <p>b) <b>a social objective</b> – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and</p> <p>c) <b>an environmental objective</b> – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.</p>	Relevant to this appeal as the NPPF seeks to promote economic, social and environmental sustainable development.	<p>The scheme represents sustainable development across the social, economic and environmental dimensions.</p> <p><u>Economic Dimension</u></p> <p>The proposed development provides Bolton with an unparalleled opportunity to capitalise upon its position within Greater Manchester to establish a world-leading golf and leisure resort, host one of the largest and highest profile global sporting events, deliver a long-term investment programme to increase sports participation, support local businesses, and strengthen the visitor economy. It represents a once-in-a-generation opportunity growth opportunity, which is aligned with local, regional and national policy objectives, including in respect of growing and re-balancing the economy. It will deliver “<i>unique</i>” and “<i>transformational</i>” benefits as part of a long-term legacy, with the potential to change lives and open up new opportunities for local benefits. The proposed development will strengthen and diversify the economy in a sustainable manner, particularly in respect of an enhanced tourist offer. It provides an opportunity to raise the international profile of the region and city region, and to align activities with inward investment priorities across key economic sectors, and to boost local producer businesses linked to a growing visitor economy. It can provide a focal point for enhanced tourism and business development across the North West.</p> <p><u>Social Dimension</u></p> <p>The proposed development will support a strong, healthy and vibrant community, helping to meet housing needs and supporting social, health and cultural well-being, including:</p> <ul style="list-style-type: none"> <li>• a cultural legacy, as a result of a substantial package of interventions and investment which will enable the Registered Park and heritage assets within it to be restored to their former condition after decades of decline.</li> <li>• a sporting legacy, including an exceptional level of opportunities for sports participation and volunteering;</li> <li>• a health and wellbeing legacy resulting from the ongoing health benefits of regular exercise, with associated savings for health services;</li> </ul>	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.

Paragraph Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
			<ul style="list-style-type: none"> <li>• an education legacy, with children being introduced to the sport via coaching lessons which will have a positive impact from an educational perspective; and</li> <li>• a place-making and community legacy, engendering feelings of connectedness to the local area and developing a sense-of-place.</li> </ul>			
			<p><u>Environmental Dimension</u></p> <p>The proposed development will result in a sustainable form of development where the adverse impacts from the Proposed Development are reduced as far as possible, and where the development would deliver significant benefits for the local and wider area..</p>			
Paragraph 11	<p>Plans and decisions should apply a presumption in favour of sustainable development.</p> <p>For <b>plan-making</b> this means that:</p> <p>(a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;</p> <p>(b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:</p> <p>(i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or</p> <p>(ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.</p> <p>For <b>decision-taking</b> this means:</p> <p>(c) approving development proposals that accord with an up-to-date development plan without delay; or</p>	<p>The ‘decision-taking’ section of this paragraph is relevant to this appeal as all development proposals must be deemed to accord with an up-to-date development plan.</p>	<p>The presumption in favour of sustainable development is the ‘golden thread’ running through the NPPF for both plan making and decision taking. The proposed development is of significant scale and entails areas of substantial built development on what is predominantly an undeveloped Site. It also entails other significant interventions through the creation of the golf facilities, involving alterations to the existing landscape. However, as a reflection of the uses proposed, the careful, iterative design process which has been undertaken and the fundamental principles which underpin the project – to breathe new life in to a valued asset and realise significant benefits for the local area and wider region – very few significant adverse effects are identified. Rather, when appraising the proposals against a broad range of social, economic and environmental considerations, informed by the approach endorsed by the NPPF, significant and wide-ranging benefits are found to arise. The proposals represent sustainable development and therefore directly align with the support afforded to such development within national and indeed local policy.</p> <p>The following sections of this summary outline the extent to which the proposed development accords with the adopted development plan and to which it is consistent with the policies established in the NPPF.</p>	Yes	Full Weight	<p>Reflects most recent National Planning Policy position and therefore should be applied full weight.</p>

Paragraph Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
	<p>(d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:</p> <p>(i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or</p> <p>(ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.</p>					
Paragraph 59	To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.	Relevant to this appeal as the proposal includes the provision of housing.	The new homes which are included within the proposed development will make a meaningful contribution towards meeting the needs of present and future generations in the Borough. They will contribute positively to housing supply, helping to meet the urgent housing needs in Bolton in the context of a longstanding and growing shortfall of new homes, the need for a step-change in housing delivery, and a chronic shortage of land in both the short- and longer-term. It will help to redress the imbalance in Bolton's housing stock, attracting much-needed working age families who can underpin the economic growth and vitality of the Borough. The Site itself is suitable for residential development and is in a sustainable location, and the new homes will be accompanied by necessary infrastructure, such as high quality public open space and schools places. It will result in a sustainable new community, with accessible services and facilities that meet its needs.	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.
Paragraph 64	Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups. Exemptions to this 10% requirement should also be made where the site or proposed development: (a) provides solely for Build to Rent homes;	Relevant to this appeal as the proposal includes the provision of housing.	The S106 Agreement will secure the provision of 10% affordable housing provision at discount market rate in line with the requirement at paragraph 64 of the Framework, and also establishes the trigger points for future re-appraisals of viability which could result in higher levels of affordable housing provision	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.

Paragraph Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
	<p>(b) provides specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for the elderly or students);</p> <p>(c) is proposed to be developed by people who wish to build or commission their own homes; or</p> <p>(d) is exclusively for affordable housing, an entry-level exception site or a rural exception site.</p>					
Paragraph 80	<p>Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential</p>	<p>Relevant to the appeal as the scheme comprises elements of development which boost investment and support economic growth.</p>	<p>The development of a world class golf facility at Hulton Park capable of hosting such a prestigious tournament, the staging of the Ryder Cup tournament at Hulton Park (and other professional tournaments as a consequence), and the ‘Ryder Cup commitment’ programmes that are associated with the tournament, will generate major social and economic beneficial impacts. The project is anticipated to result in total capital investment of over £240m. This represents one of the largest development projects and private sector investments in the North West region.</p> <p>A large proportion of the identified beneficial impact is attributed to the legacy of the project. It is calculated (please refer to Mr Tongs evidence), that there will be £1.2bn contribution to the GVA. The scale of effects – c.£1.2bn overall or the equivalent of c.£56m each year for 20 years – is transformational, particularly in the context of Bolton – in which a significant proportion of the impact (c.15-20%, or c.£200m GVA) – and the wider region’s social and economic needs. The Proposed Development provides Bolton with an unparalleled opportunity to capitalise upon its position within Greater Manchester to establish a world-leading golf and leisure resort, host one of the largest and highest profile global sporting events, deliver a long-term investment programme to increase sports participation, support local businesses, and strengthen the visitor economy. It represents a once-in-a-generation opportunity which will generate transformational economic benefits as part of a long term legacy, both in the immediate area and regionally. It provides an opportunity to raise the international profile of the city region and wider region, to align activities with inward investment priorities across key economic sectors, and to boost local producer businesses linked to a growing visitor economy. It can provide a focal point for enhanced tourism and business development across the North West, as well as a social and recreational hub for the local area.</p>	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.
Paragraph 86	<p>Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing</p>	<p>Relevant to the appeal as the scheme comprises elements of development</p>	<p>The NPPF sets out a clear preference for town centre uses to be located within existing centres. <u>Hotel Complex</u></p>	Yes	Full Weight	Reflects most recent National Planning Policy position and

Paragraph Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
	<p>centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.</p>	<p>which are classified as town centre uses.</p>	<p>This applies to all of the principal uses proposed within the hotel complex, including the hotel itself and the associated spa and conference facilities. The inclusion of the hotel complex within the proposal is a direct response to the expected Ryder Cup bid criteria and is critical to maximise the prospects of a successful outcome for a bid to host the event at the Site. In this respect, the hotel complex is not ‘footloose’. Its delivery in an off-site town centre or edge-of-centre location would not contribute positively to the standard of the venue and its attractiveness as a golf resort. Based on the bidding criteria and the characteristics of other successful venues, this could significantly reduce the prospects of the Site being selected as the venue for the Ryder Cup through the competitive bidding process and hinder the efforts to restore the Registered Park. As such, whilst alternative sites may be available in a town centre or edge-of-centre location, they would be unable to accommodate or deliver either the hotel complex or the golf resort as a whole. Such sites would not be suitable to meet the identified need. It is therefore considered that the requirements of a sequential approach are satisfied.</p> <p><u>Clubhouse &amp; Academy</u></p> <p>The provision of retail facilities in the clubhouse and Academy is a direct, local response to the need and demand arising from the operation of the golf resort. The proposed retail units will focus on the provision of golf-related products and services. There is therefore a direct relationship between the function and operation of the golf resort and the inclusion of the proposed retail outlets. The retail floorspace is required to support the operation of the golf resort, serving customers with a particular range of goods which are specific to the nature of the use of the clubhouse and Academy. The retail floorspace is entirely associated with the wider function of – and cannot therefore reasonably be disaggregated from – the golf resort. It is self-evident that there will not be available, suitable sites within or on the edge of any designated centre that could serve this purpose (as they are not in immediacy of the golf resort) nor would be capable of accommodating the development as a whole. As such, the sequential test is satisfied.</p> <p><u>Local Centre</u></p> <p>The delivery of a Local Centre at the Site is a direct response to the need and demand arising from the new homes at the Site. It is an integral part of creating a sustainable mixed community within the Western Fields area. The scale of the uses proposed is commensurate with that of the residential development, such that it is of only neighbourhood significance. Given that the sole basis for including it within the proposed development is to serve the residential development at the Site no sequentially preferable sites would be suitable. Therefore the sequential test is satisfied.</p>			<p>therefore should be applied full weight.</p>

Paragraph Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
Paragraph 87	When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.	Relevant to the appeal as the scheme comprises elements of development which are classified as town centre uses.	Please see paragraph 86.	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.
Paragraph 89	When assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500m <sup>2</sup> of gross floorspace). This should include assessment of: (a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and (b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).	Relevant to the appeal as the scheme comprises elements of development which are classified as town centre uses.	The adopted CS does not establish a locally set threshold for an impact assessment, such that the default assessment of 2,500sqm applies. <u>Hotel Complex</u> The proposed hotel complex will provide up to 10,469sqm of net internal floorspace. It will not undermine the operation of any existing or planned developments in existing town centres, nor will it impact on the overall vitality or viability of those centres. It will enhance the quality of the visitor experience in Bolton, bringing in new domestic and international visitors who can boost the tourist economy in the local market area and support new jobs in this sector. It is anticipated that the proposed development will have positive economic impacts for other leisure and hotel facilities in the area. This is particularly the case given that the Ryder Cup is a global 'mega event' which will attract significant numbers of visitors to the area during the tournament and boost the tourist profile of the area on the world-stage over the longer-term. It is considered that the proposed development is directly consistent with local and national planning policy in this respect. <u>Clubhouse &amp; Academy</u> The retail areas in the clubhouse and Academy will provide a combined total of 613sqm of floorspace. It therefore falls substantially before the 2,500sqm threshold, such that there is no requirement for an impact assessment. Nevertheless, even if such a test were required, as highlighted above the proposed retail floorspace is entirely associated with and commensurate in scale to the golf resort, which negates or at least substantially reduces the prospect of any adverse impact on trading patterns or future investment. <u>Local Centre</u> The Local Centre will provide up to 1,382sqm of floorspace. It therefore falls substantially below the 2,500sqm threshold, such that there is no requirement for an impact assessment. In any event, the Local Centre is a direct response to the need and demand arising from the new homes at the Site and is of only neighbourhood significance. It is not expected that the amount of retail floorspace within the Local Centre would exceed 1,000sqm. The scale of turnover is therefore likely to be very limited, such that it would not have a material impact on the operation of other retail outlets in nearby town centres.	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.

Paragraph Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
Paragraph 91	<p>Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:</p> <p>a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;</p> <p>b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas; and</p> <p>c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.</p>	<p>Relevant to this appeal as the policy seeks to create sporting facilities to promote healthy lifestyles.</p>	<p>The scheme proposes the provision of a Ryder Cup standard championship golf facility of international quality and associated sporting and recreational assets. The proposal will provide a high quality recreational asset and support improvements to health, social and cultural well-being. The scheme has been designed to be safe and accessible. The scheme will promote social interaction through the creation of a new community and through participation in activities created by the scheme e.g. golf, walking along the trails.</p>	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.
Paragraph 92	<p>To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:</p> <p>(a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;</p> <p>(b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;</p> <p>(c) guard against the unnecessary loss of valued facilities and services, particularly where this</p>	<p>Relevant to this appeal as the policy seeks to integrate the location of housing, economic uses and community facilities.</p>	<p>The scheme proposes the provision of a Ryder Cup standard championship golf facility of international quality and associated sporting and recreational assets. The proposal will provide a high quality recreational asset and support improvements to health, social and cultural well-being.</p>	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.

Paragraph Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
	<p>would reduce the community's ability to meet its day-to-day needs;</p> <p>(d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and</p> <p>(e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.</p>					
Paragraph 96	<p>Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.</p>	<p>Relevant to this appeal as the policy seeks to create sporting facilities to promote healthy lifestyles.</p>	<p>The scheme proposes the provision of a Ryder Cup standard championship golf facility of international quality and associated sporting and recreational assets. The proposal will provide a high quality recreational asset and support improvements to health, social and cultural well-being. The proposal includes high quality public open space, recreational facilities for the residents, and the creation of the 'Hulton Trail' to provide public access.</p>	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.
Paragraph 98	<p>Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.</p>	<p>Relevant to this appeal as it is a policy which seeks to protect public rights of way.</p>	<p>The proposal includes the re-routing, upgrading and extension of the Public Right of Way Network, including the creation of a new 'Hulton Trail'.</p>	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.
Paragraph 102	<p>Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:</p> <p>(a) the potential impacts of development on transport networks can be addressed;</p> <p>(b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;</p>	<p>Relevant to this appeal as development will impact on local transport networks.</p>	<p>The Transport Assessment demonstrates that, following mitigation, the project will have an overall beneficial effect on the local highway network. It concludes that the development is accessible and sustainable, that suitable and safe access can be provided and that the residual traffic impacts of the proposals are not severe. Accordingly, it is considered that the transport aspects of the proposal are consistent with the objectives of the NPPF.</p> <p>The project will deliver part of or contribute to new local road infrastructure of benefit to the area.</p> <p>As above, the public right of way network will be enhanced.</p>	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.

Paragraph Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
	<p>(c) opportunities to promote walking, cycling and public transport use are identified and pursued;</p> <p>(d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and</p> <p>(e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.</p>					
Paragraph 110	<p>Within this context, applications for development should:</p> <p>(a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;</p> <p>(b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;</p> <p>(c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;</p> <p>(d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and</p>	<p>Relevant to this appeal as it is a policy requiring consideration of transport within scheme design.</p>	<p>The design (where detailed at this stage) takes into full account all users, and the need to prioritise pedestrians and cyclists where possible. A range of cycle-related facilities and infrastructure are proposed within the scheme, including the provision of changing facilities within the clubhouse and academy areas and the hotel.</p> <p>The internal Hulton Park Estate road network will be designed to accommodate cyclists on-road, with low vehicle speeds.</p> <p>Hulton Park is currently well served by a range of bus routes which will connect the proposed golf resort with Westhoughton, Over Hulton, Bolton, Wigan and a range of other destinations, including Daisy Hill and Atherton railway stations, which lie on the Manchester to Wigan railway line.</p> <p>Inclusive design aims to promote access for all by removing the physical barriers that prevent everyone to participate equally, confidently and independently in everyday activities. This objective is of great importance to Peel and has particular prominence in this development given the undulating topography of the site and the desire to create a high-quality landmark development which promotes inclusivity. The siting of the proposed buildings, internal and external level changes and materials, provision of appropriate space for different functions and access allowances (both internally and externally) as well as adequate parking, have all been considered in parallel. The sloping nature of the site means that ramps and external stairs will have to be incorporated into the architectural and public realm design. Disabled parking will be provided close to building entrances, and provision will be in line with the local Council's adopted standards.</p> <p>Servicing arrangements have been integrated in to the design.</p>	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.

Paragraph Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
	(e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.					
Paragraph 111	All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.	Relevant to this appeal as the application incorporated a travel plan.	<p>A comprehensive <i>Transport Assessment</i> (TA) and two <i>Travel Plans</i> – one each in respect of the residential development and the golf resort – were prepared by i-Transport and submitted alongside the planning application.</p> <p>The TA assessed the baseline conditions of the highway network within the vicinity of the Site and proposed various enhancements to the local highway network which seek to enhance its capacity, thereby reducing congestion.</p> <p>The <i>Travel Plans</i> prepared in respect of the residential development and golf resort will seek to encourage sustainable transport. In particular:</p> <ul style="list-style-type: none"> <li>• In relation to the residential development, a range of measures will be implemented including the appointment of a travel plan co-ordinator, personalised travel planning sessions for residents, walking and cycling initiatives, new bus routes and accessible bus stops and promotion of car sharing.</li> <li>• In relation to the golf resort, measures will include the appointment of a travel plan coordinator, personalised travel planning sessions, a website outlining sustainable travel options and links to journey planning websites, and promotion of sustainable travel and zero travel options (e.g. working at home) for staff.</li> <li>• Realistic Travel Plan targets will be set for both the residential development and golf resort, and an action plan with penalties will be drafted in the event that targets are not met which will be provided through a mitigation budget of £45,000 and £15,000 respectively.</li> </ul> <p>Overall, the TA concludes that the impacts of the development on the local highway network will not be severe; rather, they will be beneficial, delivering a significant improvement in the level of congestion experienced at Chequerbent roundabout. It is therefore concluded that the proposed development is acceptable in respect of transport and access matters.</p>	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.
Paragraph 124	The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.	Relevant to this appeal as requires development to adopt good design.	<p>The proposed development will contribute positively to the achievement of high quality and inclusive design, creating a safe, accessible and visually attractive environment which responds to the local character, history and identity of the Site. A comprehensive design development strategy was conducted, drawing on detailed evaluation of the constraints and opportunities of the site, as discussed in the Design and Access Statement.</p> <p>The Project has been through a thorough iterative design process in order to minimise harm and maximise benefits to the Registered Park and Garden, its built heritage assets, ecology and woodland resources. A series of design strategies have been developed which establish the main layout and configuration of the site, they include the siting of buildings, movement and access, landscape and ecology principles and responses to site constraints and opportunities. Additionally the design of the scheme</p>	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.

Paragraph Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
			<p>draws on the guidance provided in the English Heritage 2007 document 'Golf in Historic Parks and Landscapes' and above all aims to minimise interventions in the most historically significant parts of Park.</p> <p>The final design strategies combine to offer a masterplan that is sensitive to the green belt location and offers a recreational and ecological benefit to the local and regional community.</p> <p>The design of the Hulton Park proposals was undertaken in parallel with an extensive consultation process. From the outset, Peel has endeavoured to build a relationship and rapport with the local community and has adopted an open approach to consultation (in accordance with Paragraph 128 of the NPPF). In addition to local residents, Peel has also sought to establish a constructive relationship with Bolton Council, statutory consultees and community groups.</p>			
Paragraph 127	<p>Planning policies and decisions should ensure that developments:</p> <p>a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;</p> <p>b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;</p> <p>c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);</p> <p>d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;</p> <p>e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and</p> <p>f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the</p>	<p>Relevant to this appeal as requirement to develop well-functioning, visually attractive places with strong character and which promote safe, inclusive and accessible design.</p>	<p>Please refer to response to Paragraph 124 above.</p>	<p>Yes</p>	<p>Full Weight</p>	<p>Reflects most recent National Planning Policy position and therefore should be applied full weight.</p>

Paragraph Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
	quality of life or community cohesion and resilience.					
Paragraph 128	Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.	Relevant to this appeal as provides expectation to work with local community on evolution of design.	Peel has endeavoured to build a relationship with the local community and has adopted an open, transparent and inclusive approach to engagement. A concerted effort has been made to enable all stakeholders to feel equally involved in the process and to work collaboratively with the local community regarding the content and design of the proposed development. The engagement process utilised a multi-faceted and multi-platform approach to maximise opportunities for participation. Local residents were able to receive information in a variety of ways and feedback from the community has been adopted into scheme proposals wherever possible.	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.
Paragraph 130	Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.	Relevant as need to demonstrate that the development consists of outstanding and innovative designs, which help raise design standards.	Please refer to response to Paragraph 124 above.	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.
Paragraph 131	In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.	Relevant as need to demonstrate that the development consists of outstanding and innovative designs, which help raise design standards.	The proposed development comprises sustainable design which will conserve and enhance the natural environment, use resources efficiently, and support the health and well-being of local residents. Key buildings target the highest standards of sustainable performance.	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.
Paragraph 133	The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.	Relevant as site is located within the Green Belt.	The proposed development will, as a whole, have a moderate impact on the openness of the Green Belt. The majority of this impact will derive from the residential component of the scheme, which in itself causes a substantial impact. The clubhouse, hotel complex and academy facilities will each have a moderate impact on openness, with the effects offset to a degree by the proposed demolition of a number of existing residential properties and agricultural buildings. Views of the clubhouse, maintenance buildings and hotel will largely be contained within the Site. Other proposed ancillary structures such as bridges over watercourses, maintenance building and the halfway house will not have any notable adverse impact on openness. The re-grading of land to create the championship-grade and practice golf courses and some areas of residential development will preserve the openness of the Green Belt, as will the provision of the surface roads, tracks, pathways, car parking facilities and the underpass between the golf course to the south and Academy to the north. There will remain a significant degree and extent of openness across the majority of the site, excluding the residential areas. Harm is, however, acknowledged.	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.

Paragraph Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
Paragraph 141	Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.	Relevant as site is located within the Green Belt.	The Proposed Development will generate much greater access to and beneficial use of the Green Belt than presently exists. In respect of providing opportunities for outdoor sport and recreation, the Proposed Development will convey very significant benefit to public enjoyment of the historic core and grounds. The proposal includes high quality public open space, recreational facilities, the creation of the 'Hulton Trail' to provide public access, restoring the historic landscape, garden and assets, and enhancing biodiversity.	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.
Paragraph 143	Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances and the development includes inappropriate development.	Relevant as site is located within the Green Belt.	A series of considerations weigh in favour of the proposed development and weigh against the acknowledged harm to the Green Belt and the limited identified any other harm. These include: restoration and enhancement of designated heritage assets, the absence of alternatives, the economic and tourism benefits associated with the Proposed Development, the significant and ongoing contribution of social value to the communities of Bolton, Greater Manchester and nationally, providing greater access to and beneficial use of the Green Belt than presently exists, meeting housing needs, reducing highway congestion, and the net environmental enhancements to the site. Together these and other evidenced considerations clearly outweigh the acknowledged harm and represent very special circumstances justifying the grant of planning permission and ensuring accordance with Green Belt policy	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.
Paragraph 144	When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.	Relevant as site is located within the Green Belt.	Please refer to the response to Paragraphs 133 and 143 above.	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.
Paragraph 145	A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are: a) buildings for agriculture and forestry; b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it; c) the extension or alteration of a building provided that it does not result in disproportionate	Relevant as site is located within the Green Belt.	The majority of the proposed buildings represent inappropriate development, however very special circumstances are proven. It is argued that the maintenance building, footbridges, halfway house and the underpass linking the main course to the Academy facilities do not represent inappropriate development as they fall under criterion (b).	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.

Paragraph Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
	<p>additions over and above the size of the original building;</p> <p>d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;</p> <p>e) limited infilling in villages;</p> <p>f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and</p> <p>g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:</p> <ul style="list-style-type: none"> <li>– not have a greater impact on the openness of the Green Belt than the existing development; or</li> <li>– not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.</li> </ul>					
Paragraph 153	<p>In determining planning applications, local planning authorities should expect new development to:</p> <p>a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and</p> <p>b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.</p>	Relevant as scheme seeks to minimise energy consumption.	<p>The proposed development comprises sustainable design which will conserve and enhance the natural environment, use resources efficiently, and support the health and well-being of local residents. Key buildings target the highest standards of sustainable performance.</p> <p>The proposed development does not currently include provision for decentralised, renewable or low carbon energy provision. The viability appraisal in respect of the proposed development demonstrates that the value of the residential development – without provision for such energy generation – is insufficient to provide the necessary cross-funding to deliver the golf resort. The inclusion of energy generation would further increase development costs.</p>	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.
Paragraph 163	<p>When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:</p>	Relevant to appeal as required to minimise flood risk	<p>With the exception of existing water features, such as the Mill Dam Stream and Carr Brook, the Site is of only low risk from tidal, fluvial or surface water flooding. A comprehensive drainage strategy, including SUDS which are integrated with the design of the proposed development, will ensure that there is no increase in flood risk either at the Site or downstream. The project will enhance the drainage regime for the site.</p>	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.

Paragraph Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
	<p>a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;</p> <p>b) the development is appropriately flood resistant and resilient;</p> <p>c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;</p> <p>d) any residual risk can be safely managed; and</p> <p>e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.</p>					
Paragraph 170	<p>Planning policies and decisions should contribute to and enhance the natural and local environment by:</p> <p>a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);</p> <p>b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;</p> <p>c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;</p> <p>d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;</p> <p>e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into</p>	<p>Relevant as required to demonstrate how the development contributes towards and enhances the natural and local environment.</p>	<p>The Project has been through an iterative design process to minimise adverse effects on landscape character and the visual resource, and to maximise benefits. The design of the scheme draws on the advice provided in English Heritage’s ‘Golf in Historic Parks and Landscapes’ and includes minimising intervention in the most historically significant part of Park, careful location of new built elements away from the most sensitive parts of the Park, minimising earth movement as far as possible, retaining surviving trees and clumps from the existing Eames/Webb design, increasing woodland planting to screen development outside the park, and restocking the Park with parkland trees to enhance and conserve the historic parkland character, maximising areas of ‘rough’ and minimising areas of close-mown grass, restoring historic features of the Park, restoring views and walks with the Park, introduction of a new building as a focus of the Parkland and estate, ensuring access and circulation follows the historic pattern and restoring drives and boundaries, locating residential development in the least sensitive areas in areas well enclosed by woodland, and minimising lighting.</p> <p>Great care has been taken in locating the golf course and buildings into the wider parkland. The Park and Gardens are in decline due to the lack of investment in the landscape from the previous owner of the site. Likewise the historic features and assets have also decayed due to the lack of maintenance by the previous owner of the site.</p> <p>The Great Park is one of the most historically sensitive areas within Hulton Park as it is an example of historic designed landscape by Emes and Webb. Therefore great care has been taken to preserve its special qualities including:</p> <ul style="list-style-type: none"> <li>• Retaining parkland trees wherever possible</li> <li>• Woodland loss has been minimised wherever possible</li> <li>• A new generation of parkland trees will be planted to replace lost historic specimens and ensure that there will be a succession of mature vegetation when the existing trees reach their safe biological life and have to be removed</li> </ul>	<p>Partial In conflict with the aspect of the policy relating to BMV agricultural land, albeit to a limited degree</p>	<p>Full Weight</p>	<p>Reflects most recent National Planning Policy position and therefore should be applied full weight.</p>

Paragraph Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
	<p>account relevant information such as river basin management plans; and</p> <p>f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.</p>		<ul style="list-style-type: none"> <li>• The locations of the new parkland trees have chosen following review of the historic survey plans to ensure the original design intent set out by Emes and Webb is faithfully restored</li> <li>• All woodlands will be brought into active management, with invasive species removed to enhance biodiversity</li> </ul> <p>A net gain would result due to the creation of new habitats and the long-term management of existing woodlands, which are currently in decline. The compensatory provision included within the Proposed Development includes:</p> <ul style="list-style-type: none"> <li>• Tree, woodland and hedgerow planting which will provide: <ul style="list-style-type: none"> <li>– 3,226 additional specimen trees.</li> <li>– An increase in woodland planting of c.1ha on-site and equivalent to c.5.36ha off-site (illustrated via the proposed planting adjacent to the Gorse Wood to the north of the Site).</li> <li>– c.3km of additional hedgerow planting (replacement ratio of c.2:1).</li> </ul> </li> <li>• Alternative species roosts for bats and barn owls (five bat hotels and three barn owl boxes), and the creation of new ponds for Great Crested Newts and Common Toads which will enhance the species' conservation status.</li> <li>• An extensive programme of habitat enhancement and management of the woodlands, which will be implemented via the ILHMP</li> </ul> <p>A comprehensive review of the site in respect of ground conditions has concluded that the site is suitable for the use proposed and is not subject to any significant constraints. This includes Geo-Environmental and Geotechnical Phase I Assessments and Mining Assessment.</p> <p>The proposals also include provisions for the restoration and enhancement of existing water features, including the Northern Lake. This includes draining and de-silting and the reconstruction of lake edges to enable planting of diverse range of marginal/aquatic species.</p> <p>An Agricultural Land Classification and Soil Resources assessment has been undertaken in respect of the Site and identifies that the only part of the Site which is comprised of "best and most versatile agricultural land", defined as land in grades 1, 2 and 3a of the Agricultural Land Classification, is an 2.8ha area to the west of the Back o' th' Lawn Wood. This land is proposed for development as part of the golf course and will therefore remain open and available for prospective future agricultural use. As such, the proposed development will not result in the loss of any best and most versatile agricultural land – it could potentially be restored to agricultural land in the future. However, it is acknowledged that this is not proposed by the Applicant and that the effect of the Proposed Development will be that 2.8ha of BMV agricultural land will no longer be in agricultural use. The Proposed Development is in conflict with paragraph 170 of the Framework in this regard. However, the extent of harm is limited given that the area of land in question is</p>			

Paragraph Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
			relatively small and that the land will remain open and available for prospective future use, such that the harm is reversible.			
Paragraph 171	Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework <sup>53</sup>  <i>Footnote 53: Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.</i>	Relevant as site is former agricultural land.	An Agricultural Land Classification and Soil Resources assessment has been undertaken in respect of the Site and identifies that the only part of the Site which is comprised of “best and most versatile agricultural land”, defined as land in grades 1, 2 and 3a of the Agricultural Land Classification, is an 2.8ha area to the west of the Back o’ th’ Lawn Wood. This land is proposed for development as part of the golf course and will therefore remain open and available for prospective future agricultural use. As such, the proposed development will not result in the loss of any best and most versatile agricultural land – it could potentially be restored to agricultural land in the future. However, it is acknowledged that this is not proposed by the Applicant and that the effect of the Proposed Development will be that 2.8ha of BMV agricultural land will no longer be in agricultural use. The Proposed Development is in conflict with paragraph 170 of the Framework in this regard. However, the extent of harm is limited given that the area of land in question is relatively small and that the land will remain open and available for prospective future use, such that the harm is reversible	Partial	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.
Paragraph 175	When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused; b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest; c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly	Relevant as site located in proximity to sites of Biological Importance.	The proposed development will result in disruption to habitats at the Site. However, a range of mitigation measures will be implemented including replacement habitat provision. The biodiversity impact of the proposed development has been carefully assessed by Environment Bank, using the DEFRA pilot methodology for calculating habitat value. The assessment identifies that the proposed development will have a net positive residual impact on the Site. There will not be impact on any SSSI and no loss or deterioration of irreplaceable habits.  Please refer to the evidence of Mr Hesketh.	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.

Paragraph Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
	<p>exceptional reasons and a suitable compensation strategy exists; and</p> <p>d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.</p>					
Paragraph 178	<p>Planning policies and decisions should ensure that:</p> <p>a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation);</p> <p>b) after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and</p> <p>c) adequate site investigation information, prepared by a competent person, is available to inform these assessments.</p>	<p>Relevant as required to demonstrate that the development is acceptable and does not give rise to unacceptable impacts on or from contamination to the ground.</p>	<p>The Site is suitable for the uses proposed. Notwithstanding, a series of mitigation measures will be implemented during the construction phase of the Proposed Development to ensure that it does not cause any significant adverse impacts in respect of ground conditions issues. They will be controlled through the implementation of a CEMP and further site investigation work and a detailed remediation strategy. These measures would provide suitable mitigation.</p>	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.
Paragraph 180	<p>Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:</p> <p>a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;</p> <p>b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and</p>	<p>Relevant as required to demonstrate that the development is acceptable and does not give rise to unacceptable impacts on health and quality of life, and limits the impact of light pollution.</p>	<p>The residential development can be designed to ensure that the new homes have a satisfactorily level of amenity. Mitigation measures are proposed to ensure that the potential for any significant adverse impacts on existing properties within the vicinity of the Site are removed.</p> <p>External lighting proposals have been formulated to ensure that the proposed development can be safely operated, achieves a satisfactory level of amenity for new and existing residents, and minimises the impact of light spill on the Registered Park and ecological habitats. There will be no residual significant adverse impacts as a result of the external lighting proposals.</p>	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.

Paragraph Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
	c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.					
Paragraph 181	Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.	Relevant as required to demonstrate that the development is acceptable and does not give rise to unacceptable impacts on air quality.	No significant impacts on local air quality from the construction and operation of the Proposed Development will result.  Construction management measures such as the Construction Environmental Management Plan ('CEMP') will avoid significant effects on air quality arising from dust emissions. The Interim CEMP will provide a sound framework to develop a more detailed CEMP prior to each phase of the Proposed Development and would be secured through a planning condition.  The Proposed Development is acceptable in respect of air quality issues	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.
Paragraph 184	Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value <sup>61</sup> . These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations	Relevant as site has significant heritage assets including Registered Park and Garden status.	The proposed development provides the Registered Park with a viable use consistent with its conservation, providing a means of sustaining and enhancing its significance. The listed Dovecote will be restored and its setting notably enhanced. The protection and enhancement of the historic character of the Site has been central to the formulation of the proposal, and the role it can play in contributing to its future economic vitality. The design of the proposal has directly reflected the value, historic significance and character of the Site.  Please refer to the evidence of Mr Miele for further detail.	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.
Paragraph 189	In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with	Relevant as site has significant heritage assets including Registered Park and Garden status.	The significance of the designated heritage assets has been fully appraised and the appropriate weight afforded to their conservation in the formulation of the proposals and the assessment of effects. The listed Dovecote will be preserved and enhanced, whilst the listed property at 791-793 Manchester Road will be unaffected. The Registered Park will experience both positive and negative effects, but when considered overall – including the effects on assets within the RPG, such as the Dovecote – the cumulative effect is significantly beneficial.  Please refer to the evidence of Mr Miele for further detail.	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.

Paragraph Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
	archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.					
Paragraph 192	In determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness.	Relevant as site has significant heritage assets including Registered Park and Garden status.	The proposed development provides the Registered Park with a viable use consistent with its conservation, providing a means of sustaining and enhancing its significance. The listed Dovecote will be restored and its setting notably enhanced. The protection and enhancement of the historic character of the Site has been central to the formulation of the proposal, and the role it can play in contributing to its future economic vitality. The design of the proposal has directly reflected the value, historic significance and character of the Site.  Please refer to the evidence of Mr Miele for further detail.	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.
Paragraph 193	When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.	Relevant as site has significant heritage assets including Registered Park and Garden status.	The Applicant's vision is to return the Registered Park to a working and productive landscape that once again makes a meaningful contribution to the vitality of the area and in doing so provides the means of retaining and enhancing its heritage significance, whilst conveying wider substantial and lasting benefits. The Proposed Development will provide this sustainable future for Hulton Park.  The design of the Proposed Development has been iterative and has evolved in full appreciation of the Site's historic significance. Informed by detailed evaluation, the Proposed Development minimises potential adverse impacts arising from interventions and identifies critical opportunities for positive enhancement.  The Proposed Development will have a major beneficial impact on the listed Dovecote through its retention, renovation and notable improvements to setting; the proposed hotel on the site of the former Hulton Hall will reinstate the central design focus of the Registered Park, giving it renewed coherence to the designed landscape and enhancing its significance; the pleasure grounds will be reclaimed for leisure and recreational uses and their relationship with the site of the former Hulton Hall reinstated; the woodland plantations will be subject to phased management and restoration to their former condition; the lakes will be de-silted and restored to their original form, depth and size. Many other features of the Registered Park will be subject to restoration and a programme of long-term conservation management will be put in place, made viable by ongoing investment and the presence of an active use on the Site.  The residential development is located in less sensitive areas of the Registered Park and beyond its boundaries, in order to minimise the impact on significance. This impact is outweighed by beneficial interventions in these areas, such as the introduction of new woodland.	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.

Paragraph Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
			Great weight should be applied to the beneficial effects of the proposal on the historic landscape and assets. Please refer to the evidence of Mr Miele for further detail.			
Paragraph 196	Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.	Relevant as site has significant heritage assets including Registered Park and Garden status.	The cumulative effects on designated heritage assets is found to be moderate / minor beneficial; hence less than substantial harm does not arise when the designated assets are considered as a whole. Please refer to the evidence of Mr Miele for further detail.	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.
Paragraph 197	The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.	Relevant as site contains a range of non-designated heritage assets.	In respect of non-designated heritage assets, where the NPPF expects a balanced judgement to be applied when appraising effects, there would be an overall positive effect taking in to account the significance of each. Minor and negligible adverse effects would be experienced by some non-designated assets through harm or loss, for instance in the demolition of Hulton Cottage. However, the majority of the assets would experience neutral or beneficial effects, with a number experiencing a major beneficial effect. This includes, for instance, the restoration of the pleasure grounds and the two lakes in the centre of the Registered Park. The Heritage Impact Assessment also highlights the major contribution that the non-designated assets make to the significance of the Registered Park and that the cumulative net beneficial effects they will experience is important in that context. Please refer to the evidence of Mr Miele for further detail.	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.
Paragraph 199	Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.	Relevant as site comprises a range of heritage assets.	Information will be gathered on the significance of assets through a programme of research, recording and evaluation, and will be actively shared, both through resources on-site and publication. This can be secured by planning condition.	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.
Paragraph 200	Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.	Relevant as site has significant heritage assets including Registered Park and Garden status.	The significance and setting of heritage assets will be considerably enhanced and better revealed as a result of structural repairs, landscape restoration, improved management, managed public access and interpretation. In particular the setting of the listed Dovecote will be notably enhanced. Please refer to the evidence of Mr Miele for further detail.	Yes	Full Weight	Reflects most recent National Planning Policy position and therefore should be applied full weight.

**The Bolton Core Strategy (Adopted March 2011)**

Policy Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
Strategic Objective 1	To maximise access to health facilities, sporting and recreation facilities, and to supplies of fresh food, especially for those living in the most deprived areas, and to increase opportunities for walking and cycling.	Relevant as policy seeks to maximise provision of sporting and recreation facilities and opportunities for walking and cycling (Hulton Trail).	The scheme proposes the provision of a Ryder Cup standard championship golf facility of international quality and associated sporting and recreational assets. The proposal includes the re-routing, upgrading and extension of the Public Right of Way Network, including the creation of a new 'Hulton Trail'.	Yes	Full Weight	A policy of the adopted development plan. Whilst preceding the NPPF the policy can be considered consistent with it.
Strategic Objective 5	To ensure that Bolton takes full economic advantage of its location in the Greater Manchester City Region.	Relevant as policy seeks to maximise economic opportunities for Bolton.	The Hulton Park proposal constitutes the creation of a sporting hub of international standard and quality in the form of a championship-grade golf resort. The resort is designed specifically to underpin a bid to host the Ryder Cup, the most prestigious and highest profile golf event and one of the biggest sporting events in the world. With this scale and profile comes the ability to secure significant social and economic benefit for the host location, in the immediate local area, but also regionally. That benefit can be lasting, providing a legacy associated with ongoing use of the highest quality of facilities and the ability to trade on the Ryder Cup experience, and the wide-ranging legacy initiatives that derive from the Ryder Cup.	Yes	Full Weight	A policy of the adopted development plan. Whilst preceding the NPPF the policy can be considered consistent with it.
Strategic Objective 6	To ensure that transport infrastructure supports all the aspects of the spatial vision, and that new development is in accessible locations and makes the best use of existing infrastructure.	Relevant as proposal will be integrated into existing and new transport infrastructure.	The Site is highly accessible by sustainable transport modes and is particularly well served by bus stops on the A6 and Newbrook Road. A rail line is approximately 300 meters south of the Site and there are two train stations – Hag Fold and Atherton – approximately 500 meters to the southeast and southwest of the Site respectively. These stops provide access to train services to destinations such as Southport, Chester, Wigan, Salford Manchester, Huddersfield, Stalybridge and Kirkby.  Please refer to the Transport Assessment and the evidence of Mr Eggleston for further detail.	Yes	Full Weight	A policy of the adopted development plan. Whilst preceding the NPPF the policy can be considered consistent with it.
Strategic Objective 8	To ensure that Bolton provides minerals to support economic growth in an environmentally sustainable way.	Relevant as site designated as minerals safeguarding area.	The possibility of mineral extraction in future years is not precluded for the larger part of the Site which is proposed as a golf resort, given that it will remain open and undeveloped. Please refer to Minerals Assessment for further detail.	Yes	Full Weight	A policy of the adopted development plan. Whilst preceding the NPPF the policy can be considered consistent with it.
Strategic Objective 9	To reduce crime and the fear of crime, and improve road safety by ensuring that neighbourhoods are attractive and well designed.	Relevant as includes creation of new neighbourhoods.	The proposed development takes into account the need to reduce crime and fear of crime. A <i>Crime Impact Statement</i> has been prepared in respect of the proposed development by Greater Manchester Police. It informs that it is "...acceptable in principle, from a crime prevention perspective...", but provides recommendations for further measures, such as CCTV and building security, which it is proposed will be secured via a planning condition.	Yes	Full Weight	A policy of the adopted development plan. Whilst preceding the NPPF the policy can be considered consistent with it.
Strategic Objective 11	To conserve and enhance the best of Bolton's built heritage and landscapes, and improve the quality of open spaces and the design of new buildings.	Relevant as policy seeks to conserve and enhance historical buildings and	The proposed development will provide a sustainable future for a designated heritage asset of national importance, which has experienced decades of decline and is at risk of further deterioration. The proposed development includes extensive positive interventions of benefit to the heritage assets,	Yes	Full Weight	A policy of the adopted development plan. Whilst preceding the NPPF the policy

Policy Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
		landscapes, and entails new buildings.	including the restoration and re-use of a listed building, and restoration of plantations, lakes and other key historic structures. A Conservation Plan provides for the long term maintenance and management of the Registered Park. The new buildings are of high design quality. Please refer to the evidence of Mr Miele and Mr Marks for further detail.			can be considered consistent with it.
Strategic Objective 12	To protect and enhance Bolton's biodiversity.	Relevant as the project has the potential to impact on biodiversity.	A range of mitigation measures will be implemented which will serve to enhance the biodiversity value of the Site. Please refer to the evidence of Mr Hesketh for further detail.	Yes	Full Weight	A policy of the adopted development plan. Whilst preceding the NPPF the policy can be considered consistent with it.
Strategic Objective 13	To reduce the likelihood and manage the impacts of flooding in Bolton, and to minimise potential flooding to areas downstream.	Relevant to all development	The proposed development is at low risk of flooding and will not exacerbate the risk of flooding in the surrounding local area. Please refer to the Flood Risk Assessment and the Environmental Statement	Yes	Full Weight	A policy of the adopted development plan. Whilst preceding the NPPF the policy can be considered consistent with it.
Strategic Objective 14	To provide housing that meets the needs of everybody, reflecting the needs of an ageing population and a growth in the number of households.	Relevant as proposal includes housing.	The scheme incorporates a residential development providing up to 1,036 new homes. This will make a notable contribution to meeting local housing need.		Full Weight	A policy of the adopted development plan. Whilst preceding the NPPF the policy can be considered consistent with it.
Policy H1	The council and its partners will: 1. Support the development of new health facilities in accessible town centre locations, and in renewal areas. 2. Ensure that new developments contribute appropriately through planning contributions to meet the health needs that they generate.	Relevant as proposal will contribute appropriately through planning contributions to meeting the health needs it generates.	It is proposed (via planning obligation) to make a contribution towards the provision of health facilities to serve residents of the development.	Yes	Full Weight	A policy of the adopted development plan. Whilst preceding the NPPF the policy can be considered consistent with it.
Policy P4	The council and its partners will: 1. Maintain an adequate landbank of aggregates to make a contribution towards the maintenance of Greater Manchester's share of the regional production of aggregates. 2. Identify sites, preferred areas, or areas of search for gritstone mainly in the northern, upland parts of the borough; for sand, gravel and coal they will be identified mainly in the southern lowland parts of the borough. 3. Safeguard known resources of minerals, and existing and planned infrastructure that supports mineral exploitation including facilities for	Relevant as the site is in a minerals safeguarding area	The Minerals Assessment demonstrates that the proposed development will not compromise potential future extraction of mineral resources.	Yes	Full Weight	A policy of the adopted development plan. Whilst preceding the NPPF the policy can be considered consistent with it.

Policy Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
	manufacturing and the handling, processing and distribution of substitute recycled and secondary aggregate material.					
Policy P5	<p>The council and its partners will ensure that developments take the following into account:</p> <ol style="list-style-type: none"> <li>1. Accessibility by different types of transport, prioritising pedestrians, cyclists, public transport users over other motorised vehicle users.</li> <li>2. The design of developments to enable accessibility by public transport.</li> <li>3. Freight movement for industrial and storage uses.</li> <li>4. Servicing arrangements.</li> <li>5. Parking, including parking for cycles and powered two-wheelers, in accordance with the parking standards set out in Appendix 3.</li> <li>6. The transport needs of people with disabilities.</li> <li>7. The requirement for a Transport Assessment and Travel Plan with major trip generating developments.</li> </ol>	Relevant as policy requires new developments to be accessible to different types of transport.	<p>The Transport Assessment demonstrates the accessibility of the application site. The Design and Access Statement explains how such matters have been reflected in the design.</p> <p>Please refer to the evidence of Mr Eggleston for further detail.</p>	Yes	Full Weight	A policy of the adopted development plan. Whilst preceding the NPPF the policy can be considered consistent with it.
Policy S1	<p>The council and its partners will:</p> <ol style="list-style-type: none"> <li>1. Ensure that the design of new development will take into account the need to reduce crime and the fear of crime.</li> <li>2. Promote road safety in the design of new development.</li> <li>3. Target expenditure on road safety to locations with the worst safety record.</li> </ol>	Relevant as policy aims to ensure that new developments are safe, reduce crime and fear through good design and promote road safety.	<p>The proposed development takes into account the need to reduce crime and fear of crime. A <i>Crime Impact Statement</i> has been prepared in respect of the proposed development by Greater Manchester Police. It informs that it is “...acceptable in principle, from a crime prevention perspective...”, but provides recommendations for further measures, such as CCTV and building security, which it is proposed will be secured via a planning condition.</p> <p>The Transport Assessment addresses road safety and demonstrates the access arrangements and effect on local highway networks will not generate any issues with regard to safety.</p>	Yes	Full Weight	A policy of the adopted development plan. Whilst preceding the NPPF the policy can be considered consistent with it.
Policy CG1	<p>The council and its partners will:</p> <ol style="list-style-type: none"> <li>1. Safeguard and enhance the rural areas of the borough from development that would adversely affect its biodiversity including trees, woodland and hedgerows, geodiversity, landscape character, recreational or agricultural value; or its contribution to green infrastructure, reducing flood risk and combating climate change.</li> <li>2. Safeguard and enhance biodiversity in the borough by protecting sites of urban biodiversity including trees, woodland and hedgerows from adverse development, and improving the quality</li> </ol>	Relevant as policy aims to safeguard, enhance and protect rural areas, biodiversity, parks and gardens as well as reduce flood risk.	<p>The proposed development will have adverse impacts on the arboricultural quality of the Site in the short and medium term, as a result of the reduction in average tree maturity. However, woodland management will have an immediate positive effect and will halt the current decline in the remaining woodland. The proposed mitigation planting would give rise to a net increase in canopy cover and eventually arboricultural quality as new trees develop and as new woodland connectivity develops functionality.</p> <p>The impacts of the proposed development on landscape character will be contained and the effect on the wider area will not be significant. A range of mitigation measures will be implemented which will serve to enhance the biodiversity value of the Site.</p>	Partial In conflict with the aspect of the policy relating to BMV agricultural land, albeit to a limited degree	Full Weight	A policy of the adopted development plan. Whilst preceding the NPPF the policy can be considered consistent with it.

Policy Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
	<p>and interconnectivity of wildlife corridors and habitats.</p> <p>3. Safeguard and enhance parks, gardens, allotments, civic spaces, cemeteries and playing fields and improve the quality and multi-functional benefits of these assets.</p> <p>4. Allow some development on informal green spaces in the urban area, provided that it allows for the improvement of remaining green spaces and helps to meet the strategic objectives for housing.</p> <p>5. Reduce the risk of flooding in Bolton and other areas downstream by minimising water run-off from new development and ensuring a sequential approach is followed, concentrating new development in areas of lowest flood risk.</p> <p>6. Work towards minimising energy requirements, improving energy efficiency, lessening the reliance on fossil fuel-based energy and reducing carbon dioxide (CO2) emissions.</p> <p>7. Maximise the potential for renewable energy development and encourage proposals that contribute towards the renewable energy targets set out in the Regional Spatial Strategy.</p>		<p>The proposed development is at low risk of flooding and will not exacerbate the risk of flooding in the surrounding local area.</p> <p>Policy CG1 of the CS seeks to safeguard rural areas from development which would adversely affect, inter alia, agricultural value. The Application was accompanied by an <i>Agricultural Land Classification</i> report. It demonstrates that only 2.8ha part of the Site comprises 'best and most valuable' (BMV) agricultural land, and this is proposed to form part of the golf course. It will therefore remain open and available for prospective future agricultural use. The potential benefit of the land to agriculture is not therefore lost – it could potentially be restored to agricultural land in the future. It is acknowledged that this is not proposed by the Applicant and that the effect of the Proposed Development will be that 2.8ha of BMV agricultural land will no longer be in agricultural use. The Proposed Development is in conflict with CS Policy CG1 in this regard. However, the extent of harm is limited given that the area of land in question is relatively small and that the land will remain open and available for prospective future use, such that the harm is reversible.</p>			
Policy CG2	<p>The council and its partners will:</p> <p>1. Ensure that all development proposals contribute to the delivery of sustainable development, being located and designed so as to mitigate any adverse effects of the development and adapt to climate change by incorporating high standards of sustainable design and construction principles.</p> <p>The following two policies (CG2.2 and CG2.3) are applicable unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable. Scheme viability shall also take into account:</p> <ul style="list-style-type: none"> <li>The reduction in energy bills from the renewable energy technology over its life time.</li> </ul>	Relevant as policy requires development proposals to contribute to the delivery and achievement of sustainable development.	<p>The proposed development comprises sustainable design which will conserve and enhance the natural environment, use resources efficiently, and support the health and well-being of local residents. Key buildings target the highest standards of sustainable performance. This includes commitments in respect of the following which will be the subject of planning conditions, as set out in the submitted <i>BREEAM and Sustainability</i> report:</p> <ol style="list-style-type: none"> <li>The clubhouse, academy building, and hotel complex within the Golf Resort Development, which will be required to achieve as a minimum a 'very good' Building Research Establishment Environmental Assessment Methodology (BREEAM) rating;</li> <li>The Golf Resort Development, which will be required to achieve the Golf Environmental Organisation (GEO) Certified® Development 'Sustainable Golf' accreditation</li> <li>The residential development, which will be required to achieve a 'very good' rating under BREEAM Communities 2012.</li> </ol>	Yes	Full Weight	A policy of the adopted development plan. Whilst preceding the NPPF the policy can be considered consistent with it.

Policy Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
	<ul style="list-style-type: none"> <li>• The equivalent cost on the environment for the additional carbon dioxide generated by not installing the renewable energy technology.</li> </ul> <p>2. Ensure that all proposals for 5 or more residential units, or 500m2 or greater non-residential units:</p> <p>a) Achieve Level 3 of the Code for Sustainable Homes or the “very good” BREEAM rating (or any subsequently adopted set of national sustainable construction standards).</p> <p>b) Incorporate appropriate decentralised, renewable or low carbon energy sources to reduce the CO2 emissions of predicted regulated and unregulated energy use by at least 10%. The most appropriate technology for the site and the surrounding area should be used. For the purposes of calculating the CO2 emissions, an energy assessment which includes a carbon budget should be provided for the proposed development.</p> <p>c) Demonstrate the sustainable management of surface water run-off from developments. On brownfield sites the rate of run-off should be 50% less than conditions before development. On greenfield sites the rate of run-off should be no worse than the original conditions before development. The following policy clause will be implemented once the City Region investment fund has been established:</p> <p>3. Ensure that all proposals for 5 or more residential units, or 500m2 or greater non-residential units:</p> <p>a) Achieve the minimum targets for carbon reduction as outlined in the AGMA Decentralised Energy Study (table shown below).</p> <p>b) Connect to existing or planned/potential decentralised and/or power schemes, where appropriate. Where these minimum standards can not be met on site, the use of allowable solutions and contribution into the City Region investment fund will be allowed.</p>		<p>The proposed development does not currently include provision for decentralised, renewable or low carbon energy provision. The viability appraisal submitted to BMBC in respect of the proposed development demonstrates that the value of the residential development – without provision for such energy generation – is insufficient to provide the necessary cross-funding to deliver the golf resort. The inclusion of energy generation would further increase development costs.</p>			

Policy Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
Policy CG3	<p>The council and its partners will:</p> <ol style="list-style-type: none"> <li>1. Expect development proposals to display innovative, sustainable designs that contribute to good urban design.</li> <li>2. Conserve and enhance local distinctiveness, ensuring development has regard to the overall built character and landscape quality of the area.</li> <li>3. Require development to be compatible with the surrounding area, in terms of scale, massing, grain, form, architecture, street enclosure, local materials and landscape treatment including hard and soft landscaping and boundary treatment. Historical associations should be retained where possible.</li> <li>4. Conserve and enhance the heritage significance of heritage assets and heritage areas, recognising the importance of sites, areas and buildings of archaeological, historic, cultural and architectural interest and their settings.</li> <li>5. Ensure development is designed in an inclusive manner which is accessible and legible to all, regardless of age, gender, background or disability.</li> <li>6. Encourage the incorporation of design measures into new developments that allow adaptation and resilience to the impacts of climate change and extreme weather events and also to reduce the threat of fuel poverty, through the careful selection of aspect, layout and massing, and by making buildings increasingly energy efficient.</li> <li>7. Maintain and respect the landscape character of the surrounding countryside and its distinctiveness. Any soft landscaping and landscape enhancement schemes should enhance biodiversity and be compatible with the nearby landscape character types identified by the Landscape Character Assessment.</li> </ol>	<p>Relevant as policy aims to conserve and enhance existing heritage assets and landscape character, whilst expecting innovative and sustainable designs that contribute to good urban design.</p>	<p><u>Sustainable Urban Design</u></p> <p>The proposed development will contribute positively to the achievement of high quality and inclusive design, creating a safe, accessible and visually attractive environment which responds to the local character, history and identity of the Site. A comprehensive design development strategy was conducted, drawing on detailed evaluation of the constraints and opportunities of the site, as discussed in the Design and Access Statement.</p> <p>The Project has been through a thorough iterative design process in order to minimise harm and maximise benefits to the Registered Park and Garden, its built heritage assets, ecology and woodland resources. A series of design strategies have been developed which establish the main layout and configuration of the site, they include the siting of buildings, movement and access, landscape and ecology principles and responses to site constraints and opportunities. Additionally the design of the scheme draws on the guidance provided in the English Heritage 2007 document 'Golf in Historic Parks and Landscapes' and above all aims to minimise interventions in the most historically significant parts of Park.</p> <p><u>Local Distinctiveness &amp; Surrounding Area</u></p> <p>The final design strategies combine to offer a masterplan that is sensitive to its context and offers a recreational and ecological benefit to the local and regional community.</p> <p><u>Heritage Assets</u></p> <p>Policy CG3 of the adopted CS is the key policy of the local Development Plan in respect of the impact of development on heritage assets. The Applicant's vision is to return the Registered Park to a working and productive landscape that once again makes a meaningful contribution to the vitality of the area and in doing so provides the means of retaining and enhancing its heritage significance, whilst conveying wider substantial and lasting benefits. The Proposed Development will provide this sustainable future for Hulton Park.</p> <p>The design of the Proposed Development has been iterative and has evolved in full appreciation of the Site's historic significance. Informed by detailed evaluation, the Proposed Development minimises potential adverse impacts arising from interventions and identifies critical opportunities for positive enhancement.</p> <p>The Proposed Development will have a major beneficial impact on the listed Dovecote through its retention, renovation and notable improvements to setting; the proposed hotel on the site of the former Hulton Hall will reinstate the central design focus of the Registered Park, giving it renewed coherence to the designed landscape and enhancing its significance; the pleasure grounds will be reclaimed for leisure and recreational uses and their relationship with the site of the former Hulton Hall reinstated; the woodland plantations will be subject to phased management and restoration to their former condition; the lakes will be de-silted and restored to their original form, depth and size. Many other features of the Registered Park will be subject to restoration and a</p>	Yes	Full Weight	A policy of the adopted development plan. Whilst preceding the NPPF the policy can be considered consistent with it.

Policy Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
			<p>programme of long-term conservation management will be put in place, made viable by ongoing investment and the presence of an active use on the Site.</p> <p>The residential development is located in less sensitive areas of the Registered Park and beyond its boundaries, in order to minimise the impact on significance. This impact is outweighed by beneficial interventions in these areas, such as the introduction of new woodland.</p> <p>Overall, significantly positive outcomes for the heritage significance of the Site are consistent with and gain support from this policy.</p> <p><u>Inclusive Design</u></p> <p>Inclusive design aims to promote access for all by removing the physical barriers that prevent everyone to participate equally, confidently and independently in everyday activities. This objective is of great importance to Peel and has particular prominence in this development given the undulating topography of the site and the desire to create a high-quality landmark development which promotes inclusivity. The siting of the proposed buildings, internal and external level changes and materials, provision of appropriate space for different functions and access allowances (both internally and externally) as well as adequate parking, have all been considered in parallel. The sloping nature of the site means that ramps and external stairs will have to be incorporated into the architectural and public realm design. Disabled parking will be provided close to building entrances, and provision will be in line with the local Council's adopted standards.</p> <p><u>Climate Change &amp; Design</u></p> <p>The proposed development comprises sustainable design which will conserve and enhance the natural environment, use resources efficiently, and minimise the risk of flooding. Key buildings target the highest standards of sustainable performance.</p> <p><u>Landscape Character</u></p> <p>The Project has been through an iterative design process to minimise adverse effects on landscape character and the visual resource, and to maximise benefits. The design of the scheme draws on the advice provided in English Heritage's 'Golf in Historic Parks and Landscapes' and includes minimising intervention in the most historically significant part of Park, careful location of new built elements away from the most sensitive parts of the Park, minimising earth movement as far as possible, retaining surviving trees and clumps from the existing Eames/Webb design, increasing woodland planting to screen development outside the park, and restocking the Park with parkland trees to enhance and conserve the historic parkland character, maximising areas of 'rough' and minimising areas of close-mown grass, restoring historic features of the Park, restoring views and walks with the Park, introduction of a new building as a focus of the Parkland and estate, ensuring access and circulation follows the historic pattern and restoring drives and boundaries, locating residential development in the least sensitive areas in areas well enclosed by woodland, and minimising lighting.</p> <p><u>Overall Compliance</u></p>			

Policy Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
			The proposed development is therefore found to be consistent with Policy CG3. Please refer to the evidence of Mr Miele for further detail.			
Policy CG4	<p>The council and its partners will:</p> <ol style="list-style-type: none"> <li>1. Ensure that new development is compatible with surrounding land uses and occupiers, protecting amenity, privacy, safety and security.</li> <li>2. Development should not generate unacceptable nuisance, odours, fumes, noise or light pollution, nor cause detrimental impacts upon water, ground or air quality.</li> <li>3. Development proposals on land that is (or is suspected to be) affected by contamination or ground instability must include an assessment of the extent of the issues and any possible risks. Development will only be permitted where the land is, or is made, suitable for the proposed use.</li> </ol>	Relevant as policy seeks to ensure that new development is compatible with surrounding land uses, confirming that new development should not generate unacceptable nuisances.	<p>A series of technical assessments prepared in support of the appeal scheme have concluded that the Site is suitable for the use proposed. Notwithstanding, a series of mitigation measures will be implemented during the construction phase of the development to ensure that the proposed development does not cause any significant adverse impacts in respect of ground conditions, noise, air quality and light issues.</p> <p>Please refer to the Environmental Statement for further detail.</p>	Yes	Full Weight	A policy of the adopted development plan. Whilst preceding the NPPF the policy can be considered consistent with it
Policy IPC1	<p>The council will seek to ensure that developers make reasonable provision or contribution towards the cost of appropriate physical, social and green infrastructure required by the proposed development and/or to mitigate the impact of that development. In doing so, the council will ensure that a scheme is made acceptable in planning terms and achieves the objectives of sustainable development.</p> <p>In determining planning applications the council will apply a threshold of 15 dwellings in assessing whether planning contributions will be required from proposed housing developments. For all other forms of development a size threshold of 0.4 hectares will be applied to sites.</p> <p>For new residential development specific contributions will be sought for:</p> <ul style="list-style-type: none"> <li>• Affordable housing.</li> <li>• Open space provision and maintenance.</li> <li>• Health and well-being.</li> <li>• Education.</li> <li>• Community facilities.</li> </ul>	Relevant as policy seeks to ensure that new development includes an obligation for the provision of appropriate physical, social and green infrastructure required by the proposed development	It is proposed (via planning obligation) to make a contribution towards the provision of health facilities, affordable homes, highway infrastructure, education, open space, a local centre, local employment, and woodland planting. This will be agreed with the Council.	Yes	Full Weight	A policy of the adopted development plan. Whilst preceding the NPPF the policy can be considered consistent with it

Policy Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
	<p>For all types of development, including housing, contributions will be sought for additional types of infrastructure necessary to remedy site-specific deficiencies that arise from development or any other mitigation or compensatory measures required.</p> <p>These may include where relevant:</p> <ul style="list-style-type: none"> <li>• Off-site access and transport of all types including public transport, cycling and walking.</li> <li>• Biodiversity where a development would have an adverse effect on a feature of biodiversity interest.</li> <li>• Green infrastructure where a development would have an adverse effect on existing green infrastructure; this would be in addition to the requirement on residential development for open space.</li> <li>• Flood protection and mitigation measures including those to address the adverse effects of surface water run-off, where a flood risk assessment shows it to be necessary.</li> <li>• Mitigation or compensation against air quality impacts in Air Quality Management Areas.</li> <li>• Contributions to the public realm improvements within Bolton town centre.</li> <li>• The pursuit of any other material policy considerations or site specific matters, for example contributions towards the wider plans to restore the Manchester, Bolton and Bury Canal.</li> </ul> <p>The council also expects public art from all development above one hectare in area or from the construction of buildings containing the threshold of 2500m<sup>2</sup> of floor space.</p> <p>Within Bolton town centre it is anticipated that the council will primarily seek contributions to secure high quality improvements to the public realm.</p>					

Policy Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
	The above policy is applicable unless it can be demonstrated by the applicant that the scheme would not be viable if contributions were sought or offered.					
Policy SC1	<p>The council and its partners will:</p> <ol style="list-style-type: none"> <li>1. Identify a range of housing sites for additional provision of 694 dwellings per annum between 2008 and 2026.</li> <li>2. At least 80% of housing development will be on previously developed land in accordance with the Regional Spatial Strategy; the Transforming Estates programme will provide up to 20% of housing development on Greenfield land.</li> <li>3. Ensure that 35% of new housing is affordable, broken down into 75% for social renting and 25% for intermediate housing. All developments which incorporate open market housing and with a capacity of 15 or more dwellings should ensure that provision of affordable housing is made. On previously developed land 15% of total provision should be affordable and in the case of Greenfield land 35%. A lower proportion and/or a different tenure split may be permitted where it can clearly be demonstrated that development would not be financially viable and affordable housing provision is being maximised.</li> <li>4. Ensure that for market and social rented housing, about 50% of dwellings are 3-bedroomed or larger, and no more than 20% (for market housing) or 10% (social rented) are 1-bedroomed. Ensure that for intermediate housing about 20% of dwellings are 3-bedroomed, and no more than 40% are 1-bedroomed.</li> <li>5. Ensure that new housing has a density of at least 30 dwellings per hectare, and achieve higher densities where possible taking into account local character.</li> </ol>	Relevant as council is required to identify a range of new housing sites for additional provision of dwellings, including suitably affordable housing.	<p>Dealing with each paragraph in turn:</p> <ol style="list-style-type: none"> <li>1. The housing requirement is out-of-date, as I address elsewhere in my evidence. In any event, this is a policy of intent, which the Proposed Development does not conflict with.</li> <li>2. This is also out-of-date, as it does not reflect the Framework and up-to-date consideration of housing need, and in light of the 5 year housing land supply position. However, this is a borough-wide policy applying for the whole plan period and regardless of being predominantly greenfield development, the Proposed Development does not generate a conflict.</li> <li>3. The particular expectations of the policy are out-of-date, but in any event allowance is made for situations where it is not viable to meet those expectations, which apply in this case. Hence, no conflict arises.</li> <li>4. Again this is a borough wide, plan period policy, not suited to adjudging specific proposals. However, the Proposed Development will be contribute a mix of homes which responds to the general expectations of this policy.</li> <li>5. The net density of the residential proposals falls marginally below the 30dph figure, but this is reflective of the Site's context and the appropriate housing mix. In any event, such a density requirement is not consistent with the Framework.</li> </ol>	Yes	Limited to No weight	Whilst the policy forms part of the adopted development plan, it is rendered out-of-date due to its inconsistency with the requirements of the NPPF in respect of, inter alia, meeting housing needs and the dated evidence it would have relied upon. It is still accepted there is an affordable housing need, which the proposal responds to
Policy OA4	<p>The council and its partners will:</p> <ol style="list-style-type: none"> <li>1. Concentrate sites for new housing within the existing urban area.</li> <li>2. Renew the buildings of Ladybridge High School.</li> </ol>	Parts 1, 3 and 4 are relevant as the policy seeks to conserve and enhance the character of Hulton Park, includes housing and involves	<p>In relation to the relevant parts of the policy:</p> <ol style="list-style-type: none"> <li>1. As noted in relation to Policy SC1 the housing policies of the Local Plan are out of date. Housing needs cannot be met purely by concentrating housing within the existing urban area.</li> </ol>	Yes	In part, full weight, in part limited Weight	Whilst the policy forms part of the adopted development plan, is the first element of the policy is rendered out-of-date due to its inconsistency with the requirements of the NPPF in

Policy Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
	<p>3. Maintain current Green Belt boundaries, except around Cutacre, where a boundary adjustment to allow economic development will be considered.</p> <p>4. Conserve and enhance the character of the existing physical environment, especially the conservation areas at Deane and Chorley New Road, and the historic registered Hulton Park.</p> <p>5. Ensure that development in West Bolton has particular regard to the overall density, plot sizes, massing and materials of the surroundings – these features should be retained where possible.</p> <p>6. Ensure that development respects the large amounts of open space and lower density development in West Bolton. Development should take special care to incorporate high quality soft landscaping using native plant species, particularly those identified in the Landscape Character Appraisal.</p>	development in the Green Belt.	<p>3. The development involves inappropriate development in the Green Belt but very special circumstances are proven. In any event the proposal does not in itself entail changes to Green Belt boundaries.</p> <p>4. The appeal scheme is a specific development proposal seeking to conserve and enhance the quality and sustainable future use of Hulton Park. It proposes to regenerate the site through provision of a championship grade golf resort which is designed to restore and enhance the historic value of the registered park. Please refer to the evidence of Mr Miele for further detail.</p>			respect of, inter alia, meeting housing needs and the dated evidence it would have relied upon.

#### The Bolton Allocations Plan (Adopted December 2014)

Policy Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
Policy P8AP	The council and its partners will permit development proposals affecting public rights of way, provided that the integrity of the right of way is retained.	Relevant as proposal will protect, enhance and extend PROW.	The proposal includes the re-routing, upgrading and extension of the Public Right of Way Network, including the creation of a new 'Hulton Trail'. The proposal will maintain and indeed enhance the integrity of the right of way network.	Yes	Full Weight	A policy of the adopted development plan. Whilst preceding the NPPF the policy can be considered consistent with it.
Policy CG7AP	<p>The council will not permit inappropriate development in the Green Belt. Inappropriate development includes any development which does not maintain the openness of land or which conflicts with the purposes of including land within the Green Belt, and the erection of new buildings except for:</p> <p>1. Agriculture and forestry;</p> <p>2. Provision of appropriate facilities for outdoor sport and outdoor recreation, and for cemeteries which preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;</p>	Relevant as proposal constitutes a facility for outdoor sport and recreation.	<p>Some aspects of the proposed development are considered to be appropriate development in the Green Belt (golf course, roads, paths and car parks and ancillary structures) and comply with exception 2 of Policy CG7AP ("facilities for outdoor sport"). However, it is acknowledged that other elements of the scheme (residential development, hotel complex, clubhouse and Academy), are inappropriate development under the policy.</p> <p>As the policy is constructed in this way without regard to the proving of very special circumstances which can justify the approval of inappropriate development, the proposal conflicts with the terms of the policy.</p>	Partial	Limited Weight	<p>Designation of the site within the Green Belt by the policy is to be afforded full weight, but that the weight to be applied to the construct of the policy in respect of inappropriate development is lessened</p> <p>It is a policy of an adopted development plan, which postdates the 2012 NPPF but predates the 2019 NPPF. The policy, when read alongside its reasoned justification which acknowledges very special circumstances, accords with national Green Belt policy. The policy in isolation however states that all inappropriate development will not be permitted; this does not reflect the NPPF allowance for</p>

Policy Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
	<p>3. The extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;</p> <p>4. The replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;</p> <p>5. Limited infilling in villages at Hart Common and Scot Lane End as shown on the Proposals Map</p> <p>Limited infilling or the partial or complete redevelopment of previously developed sites, whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purposes of including land within it than the existing development.</p>		<p>The reasoned justification to the policy [paragraph 143] does however recognise that very special circumstances may justify the grant of planning permission.</p> <p>Very special circumstances are proven in this case.</p>			<p>exceptional instances where very special circumstances are proven.</p> <p>Policy CG7AP is therefore out-of-date.</p>

### The Greater Manchester Minerals Plan (Adopted April 2013)

Policy Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
Objective 2	To safeguard potentially economically viable mineral resources and infrastructure from sterilisation, protect minerals related infrastructure and encourage the appropriate use of high quality materials.	Relevant as site allocated as Minerals Safeguarding area under Bolton Allocations Plan.	<p>The proposal will not sterilise the future extraction of potentially economically viable mineral resources. The larger part of the Site which is proposed as a golf resort, will remain open and undeveloped, thus not precluding opportunities for future minerals-related development.</p> <p>Please refer to Minerals Safeguarding Assessment.</p>	Yes	Full weight	Whilst a dated plan the policy can be considered to accord with national policy in the NPPF.
Policy 8	<p>Prior Extraction of Mineral Resources within Mineral Safeguarding Areas all non-mineral development proposals within the Mineral Safeguarding Area (see maps 4, 5, 6 &amp; 7) should extract any viable mineral resources present in advance of construction. Proposals for prior extraction of minerals will be permitted provided the proposal is in accordance with Policy 2 Key Planning and Environmental Criteria.</p> <p>Proposals for non-mineral development within the Mineral Safeguarding Areas that do not allow for</p>	Relevant as site allocated as Minerals Safeguarding area under Bolton Allocations Plan.	<p>A <i>Mineral Safeguarding Assessment</i> has been prepared by AECOM in respect of the proposed development. The assessment confirms that there are safeguards across the Site for the extraction of Surface Coal, Sand and Gravel, Sandstone and Brick Clay</p> <p>The assessment considers the extraction of the relevant minerals against the four tests identified within Policy 8 of the GMMP. It sets out that in respect of all minerals, the need for the development outweighs that of extracting the minerals. The assessment also clearly demonstrates that mineral extraction would not be environmentally acceptable or economically viable prior to the construction works taking place on the Site. This is primarily due to existing ecological and historic value of the Site. In respect of all the minerals identified within the Site, it is confirmed that the quality of the provision is of a poor standard; therefore the extraction of minerals from the site would not be economically viable. Moreover, the possibility of mineral extraction in future</p>	Yes	Full weight	Whilst a dated plan the policy can be considered to accord with national policy in the NPPF.

Policy Ref.	Policy Wording	Relevance to this Appeal	Compliance of the Appeal scheme	Accordance	Weight to be attached	Reason for Weighting
	<p>the prior extraction of minerals will only be permitted where:</p> <ol style="list-style-type: none"> <li>1. The need for the development outweighs the need to extract the mineral; or</li> <li>2. It can be clearly demonstrated that it is not environmentally acceptable or economically viable to extract the mineral prior to non-mineral development taking place; or;</li> <li>3. It can be clearly demonstrated that the mineral is either not present or of no economic value or too deep to extract in relation to the proposed development; or;</li> <li>4. The development is limited or temporary and would not prevent minerals extraction taking place in the future.</li> </ol>		<p>years is not precluded for the larger part of the Site which is proposed as a golf resort, given that it will remain open and undeveloped.</p>			

## **Appendix 3: Hulton Park Golf Business Plan 2025 – 2036**

# **HULTON PARK GOLF BUSINESS PLAN 2025 - 2036**

**European Tour Properties**

**July 2019**

## **Contents**

*Page No.*

- 1. Introduction to Hulton Park Golf Resort**
- 2. Objectives, SWOT and Summary Financials**
- 3. Market Background**
- 4. Golf Market**
- 5. Financials**
- 6. References**

# 1 INTRODUCTION TO HULTON PARK GOLF RESORT

## 1.1. Project background and objectives: genesis

An idea was born to create an ambitious, dynamic and sustainable project located in the heart of the North West England, in Bolton, Lancashire. The project, a high-end golf, residential community and lifestyle resort, new to region, combines a tourist **resort** (hotel and tourist accommodation), **permanent housing, golf and sports facilities**, as well as amenities (shops and services).

Golf is viewed very favourable in England with a strong presence in the North West region and hence, the Peel Group wish to launch an industry-leading project in which tourism, golf and accommodation converge. This development, which is currently seeking planning permission, will be a venue where golf meets business in a uniquely conducive environment. The Golf Club will bring passion and enthusiasm to the game of golf whilst creating a social environment for golfers and guests alike, creating a place to socialise, compete, conduct business and share experiences and skills through the game of golf.

## 1.2 Scheme Parameters

### **Project's components :**

- *18 hole Championship golf course*
- *6 hole academy course*
- *Driving Range and coffee shop*
- *Adventure golf*
- *Clubhouse with restaurant, meeting rooms, conference room and members room.*
- *Major Golf tournament with commitment to host a European Tour event on a regular basis from 2025 to 2035*
- *Competitions and society outings*
- *Golf School for children aged from 5 to 17 years of age*
- *Academy offering wide range of instructional courses*
- *4\* hotel with 142 bedrooms, conference facilities and spa*
- *Residential Community bordering the golf courses*
- *Restaurants and other leisure facilities*

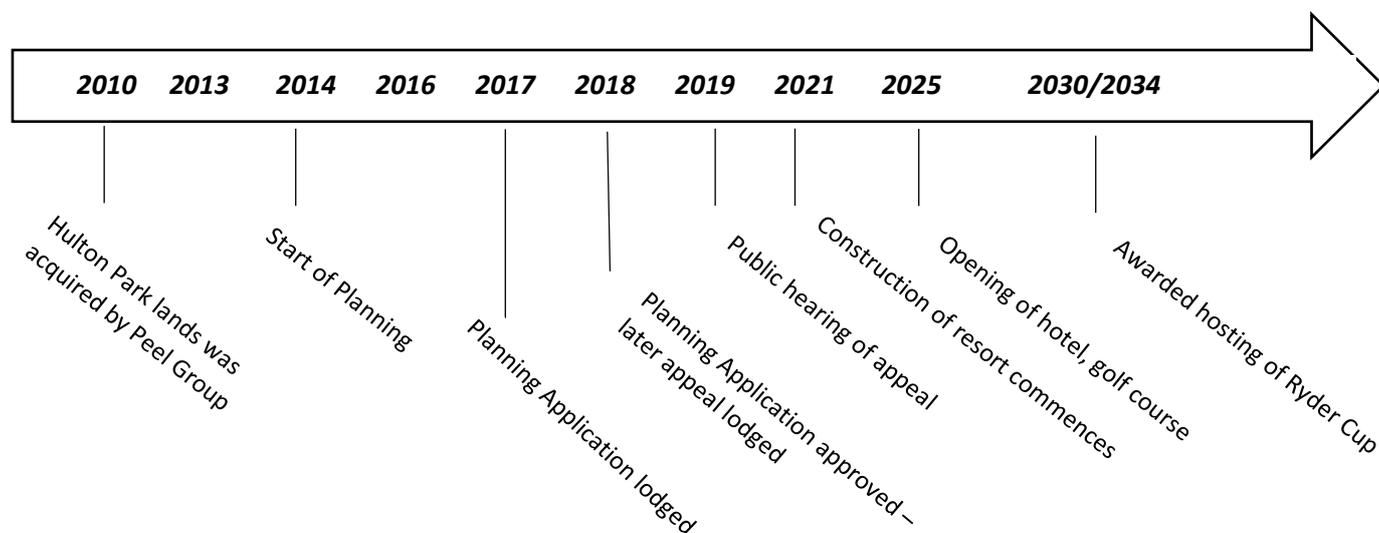
## 1.3 Methodology

### **An ambitious project for the North West Region:**

- By its physical size - the site is 662 acres in size and will comprise a golf complex, commercial activities, tourist facilities and permanent housing
- By the amount of the overall investment and business potential
- A new conceptual project for the region and for Peel Group
- The bringing to life again and promotion of Hulton Park as a new golf destination

## 1.4 General Provisional Timeline

### General Provisional Timeline for Hulton Park Golf Resort



## 1.5 Summary of site location, accessibility and characteristics

### **An outstanding geographical location – Hulton Park Golf is:**

- Located in Bolton, a community which spans 55 km<sup>2</sup>, has a population of 140,000 with wider metropolitan having 260,000 inhabitants.
- 10 miles northwest of Manchester and surrounded by several smaller towns and villages that form the Metropolitan Borough of Bolton.
- Well served by the local road network and national routes and rail links.
- 20 miles from Manchester airport and 25 miles from Liverpool airport.
- Within 1 hours drive of 15 highly rated links and park land golf courses.
- Has strong development potential as Manchester City is 3<sup>rd</sup> fastest growing city in United Kingdom.

### **Greater Manchester is:**

- Sporting Capital of the UK with football, aquatics, regional athletics, velodrome and Old Trafford Cricket ground
- Home to world class universities
- Good value in real estate terms compared with London where property prices are 4 times more expensive, yet salaries are only 1/3 higher at £33k versus £25k in Manchester
- Second strongest economy after London with GVA of 3.8% versus other core cities GVA of 2%

## Manchester - The main trade route in North West England



	- Manchester	- 13 miles
	- Liverpool	- 28 miles
	- East Midlands	- 100 miles
	- Birmingham	- 108 miles
	- A6/ Manchester	- 13 miles
	- M60/Sheffield	- 53 miles
	- M61/Blackpool	- 40 miles
	- M62/Leeds	- 49 miles
	- St Helen's Central	- 16 miles
	- Liverpool	- 28 miles
	- Birmingham	- 99 miles
	- Kings Cross	- 220 miles

## 2 OBJECTIVES, SWOT AND SUMMARY FINANCIALS

Set amongst rolling countryside, Hulton Park golf course will be regarded as a premier golf facility in England which will be open to and encourage use by its members, green fee visitors and public. Its overriding ambition is to ensure everyone who visits has a truly memorable experience. The new facility intends to place a great deal of emphasis on encouraging involvement from individuals, families (both those living within the resort and without), corporate, juniors and overall to increase participation in the sport of golf.

### 2.1 Objectives

The vision, strategy and objectives of Hulton Park Golf Resort are:

- Develop an upscale golf, residential community, hotel and leisure venue, which will be a compelling destination for residents, guests and golfers alike.
- Offer a differentiated product from existing local golf venues and one which will compete with other high-quality golf resorts within the region, within England and further afield in Europe.
- Offering a comprehensive professional and structured approach to golf ensuring all golfers, including members and guests, are treated as individuals and can avail of a wide array of professional golf services available within the Club
- Supporting the growth of tourism and golf within the region
- Introduce schools and junior programmes aimed at growing the game of golf and attracting the widest possible audience to the sport
- Promoting the health benefits associated with golf, especially for older people
- The development of the golf facilities within Hulton Park which are wholly complementary to the development of the entire site
- Support the on-site residential community development and attract Socio Economic groups A, B and C to the locality
- Delivering services to and revenues from an active membership who avail of wide array of services on offer – there will be no membership joining fees except for Corporate Membership
- Developing a golf destination which will attract prestigious golf tournaments supported by The European Tour
- Enlarging the product offering to give clients a true golf resort experience. The business will also grow into new or enlarged tourism markets which includes family, MICE, health awareness, and international
- Branding and marketing will be dual purpose to:
  - Create a distinct and high-quality identity for Hulton Park ensuring the golf facility is regarded as the best
  - Promote a lifestyle, activity-rich environment for the residents, members and guests capitalising on the excellent facilities and service which will be available at Hulton Park
- Capitalise on the enormous energy and vision of the promotional team within Peel Group
- Membership of the European Tour Properties network, this giving the venue access to the European Tour Properties brand, sales and marketing channels across Europe and further afield with reciprocal membership programme in place to benefit the venue and its members.

## 2.2 SWOT of Hulton Park

<b>Strengths</b>	<b>Weaknesses</b>
<ul style="list-style-type: none"> <li>• Exciting new residential community, golf and lifestyle project</li> <li>• All plans prepared and submitted</li> <li>• Broad product range including hotels, accommodation, golf and leisure</li> <li>• Powerful brand behind the project</li> <li>• Location and accessibility of the courses</li> <li>• New standards in lifestyle supported by quality infrastructure and extended range of facilities</li> <li>• Integration of the golf course with surrounds</li> <li>• Sustainably designed housings</li> <li>• Value added services (accommodation, clubhouse, restaurants)</li> <li>• Access to cities and airports</li> <li>• Secure location</li> <li>• Premium construction standards</li> <li>• Located within a dynamic business community which is key to local success</li> </ul>	<ul style="list-style-type: none"> <li>• Planning approval under review</li> <li>• Potentially lacking in “local” demand for accommodation/leisure within the immediate area</li> <li>• Capital Investment required</li> <li>• No similar high-end resort close by to make the venue a destination</li> </ul>
<b>Opportunities</b>	<b>Threats</b>
<ul style="list-style-type: none"> <li>• High expectation for the project</li> <li>• Established and successful owner</li> <li>• Economic growth within Greater Manchester area</li> <li>• ET tournament opportunities</li> <li>• Ability to attract 4*/5* hotel brands which will attract high end guests through S&amp;M activities</li> <li>• Benefits from onsite accommodation</li> <li>• The luxury market is less price sensitive</li> <li>• Local Authority is supportive of the project</li> <li>• Strategic synergies between onsite facilities</li> <li>• Longevity of product</li> <li>• Service differentiation</li> <li>• Economies of scale</li> <li>• Statistics show numbers playing golf are on the increase</li> <li>• Increasing ease of access through transport links (air/ road/high speed train)</li> </ul>	<ul style="list-style-type: none"> <li>• Golf market is not as dynamic as Scotland or other regions with only 10% of UK golf courses located in area despite land size</li> <li>• Region is well established within England but will require international promotion</li> <li>• Golf residences are new concept to the local market</li> <li>• Existing low-cost golf course membership availability at other local golf courses</li> <li>• Possible economic and social changes between concept and completion</li> </ul>

## 2.3 Summary Financials for Golf Hotel and Tourist Resort

The project is based on diverse yet complimentary products which includes a **4/5 Star Hotel & spa** (142 rooms), a **golf complex** (1 championship golf course, academy, adventure, driving range etc) and a residential community with in excess of 1,000 units.

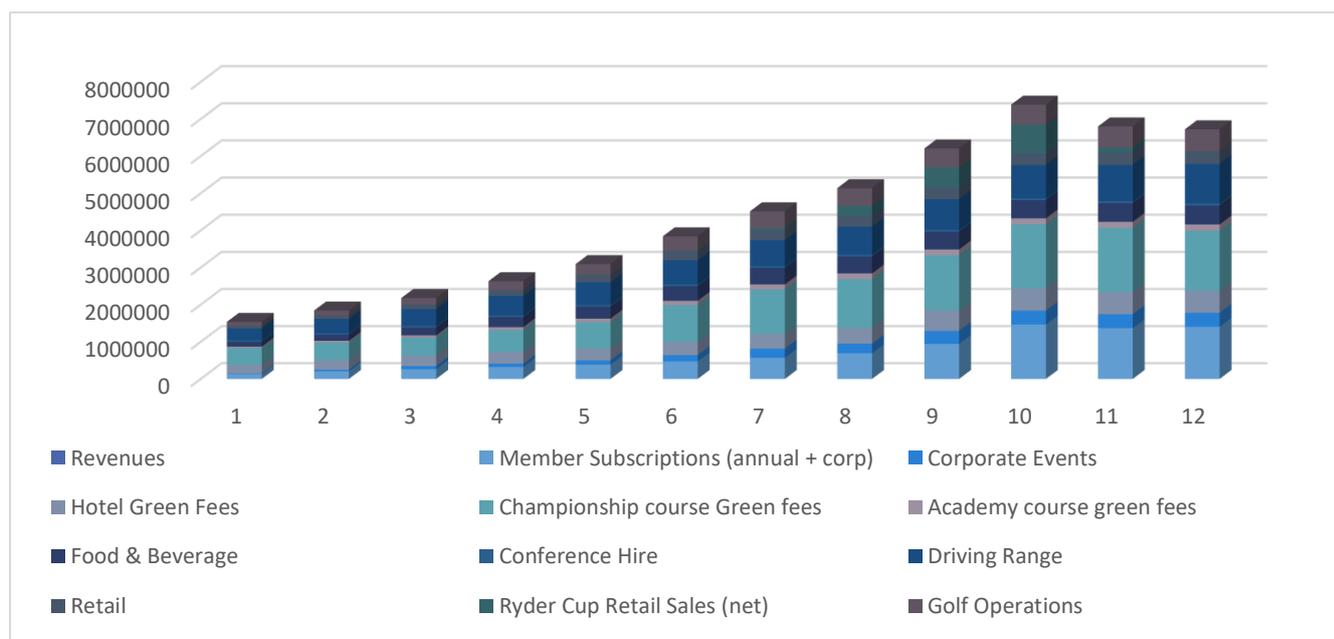
There is a mutually beneficial relationship from having a residential community as part of this project. The housing will be primarily targeted towards the socio-economic group ABC1 which is currently under represented within the local catchment area – 47% of households within 20 minutes drive from the resort fall within this group – this is below the national average of 53.5%. As Greater Manchester continues to grow, demand also grows for the residential community planned for Hulton Park which currently plans to construct 1,036 units and which will comprise 46% four or five bed, 29% three bed, 25% one-two bed. In addition to accommodating the above, the resident community will

- Support golf membership sales
- Enjoy on-site facilities which will be available to everyone however the residential community will be the primary target group to take advantage of the amenities
- Enjoy the undeniably peaceful and pleasant surrounds that will be Hulton Park
- Provide demand for local services which creates local employment and a heart beat within the resort
- Have access to activities and events throughout the year making it an enjoyable place to live for the residential community and underpinning the success of the resort
- Be subject to rules and limitations on what homeowners can and can't do which work for the residents and the resort as a whole. These rules enforce continuity and consistency throughout the resort allowing it to retain its original look and feel and protecting its desirability.

Detailed financials are contained in the Appendix and summarized below

The overall Turnover & Gross Operating Profit (GOP) of the golf operating assets (golf courses, driving range, retail and golf F&B) are estimated to exceed £6 m by year ten post opening the resort.

## Gross Golf Revenues in £ (golf courses and related services)



### - Summary Financial Projections from the 12-year business plan are as follows:

For the golf courses, driving range, restaurants, academy etc., indicative financial projections are detailed below (all amounts shown are in £000):

### Profit & Loss Summary for 18-hole Golf Facility with short course academy, driving range, clubhouse etc.

Golf	2030	2034
	£000	£000
Revenue	£52,406	£53,005
Less: costs	£47,119	£47,118
Profit	£ 5,287	£ 5,887

## Fundamental Assumptions underlying these Financial Projections

- It is assumed construction of the golf courses and entire project will commence in 2021 with the golf courses opening in 2025.
- Business Plans are prepared for 12 years to give optimal recognition from hosting the Ryder Cup
- The business plan is built upon the premise that Peel Group and Hulton Park will primarily seek to grow the game of golf within the North West Region of England providing all, both

golfers and non-golfers, with access to world class facilities and amenities which are affordable

- It is assumed Hulton Park will host a European Tour event annually or biannually e.g. The British Masters. Discussions are underway on ownership structure for this Tournament and no financial costs or benefits arising from these discussions is included within the current business planning process with the exception of a tournament sanction fee.
- Peel Group has indicated a strong desire to host The Ryder Cup. As yet, no decisions have been made as to who will host the 2030 and 2034 Ryder Cups.
- **European Tour Properties has no influence or input as to who will host the Ryder Cup – this will be decided between The European Tour and its partners. References to hosting the Ryder Cup in this document are purely for discussion purposes and do not confer any preference or privilege to Hulton Park.**
- Capital costs are those as provided by Peel Group indexed at 2% per annum
- There will be no membership joining fees enabling all golfers and new to the sport participants easy access to the Club and its extended range of facilities
- Extensive tuition and learning golf programmes will be introduced from the start of operations and seek to promote the health and wellness benefits arising from playing golf
- It is assumed the hotel and other onsite facilities will be constructed in tandem with the golf courses and be available for use from January 2025

### 3 MARKET BACKGROUND

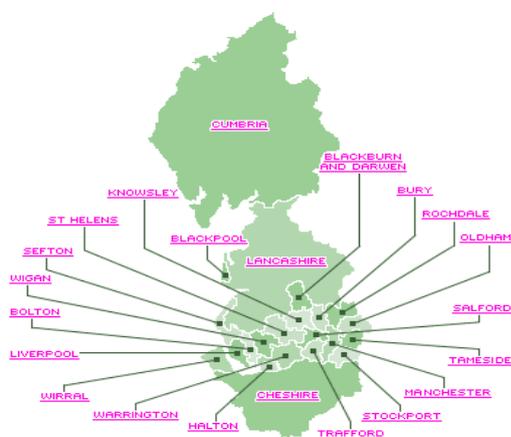
#### 3.1 Demographics

##### Manchester Population 2019

The Community of Manchester and Greater Manchester

- Manchester is the 6<sup>th</sup> largest city in the United Kingdom with an estimated population of 530,000 in 2016
- Greater Manchester area is the second most populous urban area in the United Kingdom with a population of more than 2.7 m
- Third largest economy in the United Kingdom
- Third most visited city in the country by foreigners after London and Edinburgh
- Identified as one of the biggest demographic growth areas in England.

##### Population density (inhab./km<sup>2</sup>):



##### Average yearly growth of population (2015-2035 forecast)

Year	Population	Growth Rate (%)	Growth
2035	3,028,104	0.63%	93,831
2030	2,934,273	0.71%	101,688
2025	2,832,585	0.74%	102,509
2020	2,730,076	0.74%	20,002
2019	2,710,074	0.72%	77,160
2015	2,632,914	0.74%	95,144

United Kingdom + 0.6%

## 3.2 Economic Profile

### National Economic Analysis

UK economic growth has held up better than expected after the Brexit vote, particularly as regards consumer spending and services. Economic growth is positive but sluggish. Virtually all assessments of the regional economic impacts of Brexit agree that those impacts are negative. However, there is some disagreement about whether Greater Manchester and the wider North are likely to be hit harder, or less hard, than other parts of the UK. The Government's own economic analysis forecast that UK GDP would be 1.4 % lower over 15 years if the UK remains in the European Economic Area, 4.9 % lower if a free trade deal is agreed, and 7.6 % lower if the UK leaves the EU without a deal and reverts to World Trade Organisation.

### 2019 key economic performance indicators for England are :

- Economic Growth	+1.7%
- Historically low unemployment rate	+3.9%
- Inflation (low but rising due to weaker sterling rate)	+2.5%
- Interest Rates	0.75%
- Consumer spending	+4.0%
- Housing Market	+9.0%

### Greater Manchester and Hulton Park

The economy of Manchester is amongst the strongest in England with indicators showing Manchester as one of the fastest growing cities in the UK.

- Population	2.8m
- Economic growth	+2.2%
- Unemployment rate	7.2%
- Average wage	£25,500
- Residential property price inflation	+11%
- Average Price of House	£203,441
- Sport (people employed in sport)	18,100
- International Visitors	1.15m spending £7.5 bn

### Hulton Park

• Requirements for new homes in Greater Manchester	+227,200 new homes
• Bolton area housing requirement	+7% housing
• Living within 20 minutes drive of Hulton Park	655,000 people
• Socio Economic grouping A, B and C1	47% of households

## A vibrant economy

The Greater Manchester economy generates £56 billion of gross value added (GVA) on an annual basis and accounts for nearly 40% of GVA in the North West.

- There are 1.4 million people working in Greater Manchester in around 105,000 businesses
- Around 110,000 additional jobs are forecast within Greater Manchester for the period 2014–24 by the Greater Manchester Economic Forecasting Model (GMFM).
- GVA is forecast to rise by 2.8% per year between 2014 and 2024 increasing to more than £72 billion by the end of this period.

## 3.3 A popular tourist destination

North West of England is a strong tourist destination with over 14 million domestic overnight trips in 2017. 159 million tourism day visits are taken to the region, worth €5.8 billion, equating to 12% of England’s day visit market. The North West sees a good spread across the seasons with football the main driver for winter visits. Around 7% of all overseas visits to the UK include a stay in the North West which makes it the third most popular area after London and South East. The majority of stays are for 1 – 3 nights.

### Major districts and cities/towns in Greater Manchester Region



## Tourist map for North West England



North of England cities (>250 000 inhabitants)	Number of inhabitants
Birmingham	1,073,045
Leeds	751,485
Sheffield	552,698
Bradford	522,452
Manchester	503,127
Liverpool	466,415
Newcastle	280,177
<b>Within local area</b>	
Bolton	200,000
Sale	134,000
Rochdale	108,000
Stockport	106,000

### 3.4 Tourist highlights for North West of England:

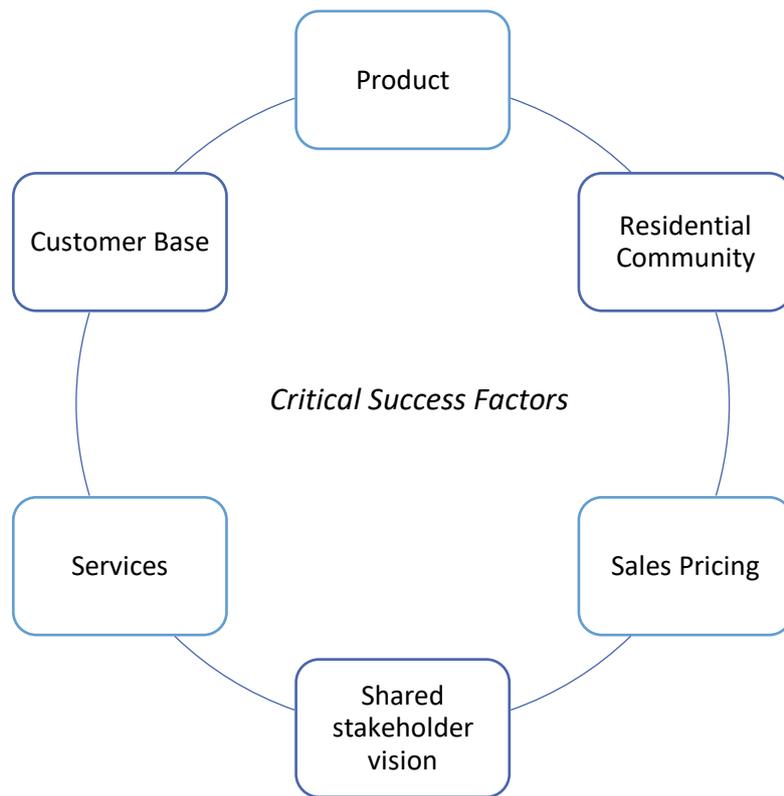
- Top free attractions – Chester Zoo and Windermere Lakes
- Museums - Merseyside Maritime Museum, World Museum Liverpool, Tate Liverpool
- Music fans – Cavern Club, Beatles Experience, Beatles Story
- Horse Racing – Aintree
- Football – Anfield and Manchester Stadiums
- Golf - There are many premier golf courses in North West including Hillside Golf Club, St Anne’s Old Links and those along England’s Golf Coast – Royal Birkdale, Royal Lytham & St. Anne’s and Royal Liverpool
- Biking/ Walking: Immense pine forests and many lakes, perfect landscapes for a broad range of outdoors activities including Peak District National Park, Yorkshire Dales, North York Moors National Park
- Cultural Activities: Large choice of castles, restaurants, museums... for visitors and locals alike to enjoy – Hadrians Wall, Museum of Science and Industry, Bolton Castle

### 3.5 Critical Success Factors:

The Critical Success Factors for Hulton Park Golf Resort:

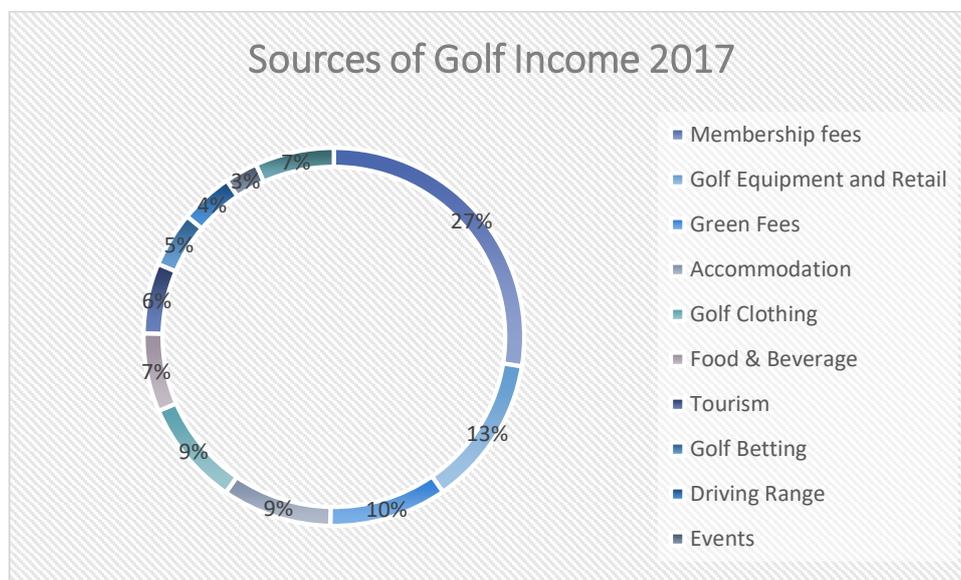
<b>Mix of Customer Base:</b>	<ul style="list-style-type: none"> <li>- Right mix of residents, visitors, hotel guests, members, corporate business, events, green fees</li> <li>- Right mix of customers (private v corporate; national v international; member v green fee; locals v English nationals, short stay v long stay holidays)</li> </ul>
<b>Product:</b>	<ul style="list-style-type: none"> <li>- Differentiated product and service</li> <li>- High quality of design and construction</li> <li>- Value added because of the highly recognised product positioning, quality real estate, 4* hotel, spa, clubhouse, service, wellness, food and beverage etc.</li> </ul>
<b>Services:</b>	<ul style="list-style-type: none"> <li>- Standardised, high quality and integrated</li> </ul>
<b>Residential Community:</b>	<ul style="list-style-type: none"> <li>- Modern construction techniques</li> <li>- Sustainably designed housing</li> <li>- Access to hotel, residential and golf membership</li> </ul>
<b>Sales &amp; Pricing Policy:</b>	<ul style="list-style-type: none"> <li>- Value Added Strategy</li> <li>- Local networking and promotion</li> <li>- Resort Ambassadors</li> <li>- Digital-based marketing presence</li> <li>- Defined target groups</li> <li>- Dynamic sales and revenue generation management</li> <li>- Tournament strategy</li> </ul>
<b>Shared Stakeholder vision:</b>	<ul style="list-style-type: none"> <li>- To realise vision; owners, employees, members and guests along with other stakeholders must have a shared vision and share in venue success</li> </ul>

## The Critical Success Factors for Hulton Park Golf Resort



## 4 GOLF MARKET

Golf is of considerable importance to the UK being consistently among the top five most popular sports. With a participation rate of 3.3% for those playing once in four weeks and 7.4% playing at least once in the last year, it suggests 4 million people plus are playing golf at least once per year. Key Sources of Golf Income generated from the golf industry are summarised in chart below:



### 4.1 The game of golf in England

England offers great golfing opportunities all year long and is considered to be one of the greatest countries in Europe to play golf due to its extensive variety of courses, prices, landscapes and “mixed” weather conditions.

#### The English Golf offer:

- 1,900 golf courses in England
- Golf supply is roughly distributed between 70% member owned and 27% commercial courses with 3% municipal courses.
- 656,000 registered players in 2018.
- 70% are male and 30% female, among them approximately 10% are junior players.
- 2 million casual players.

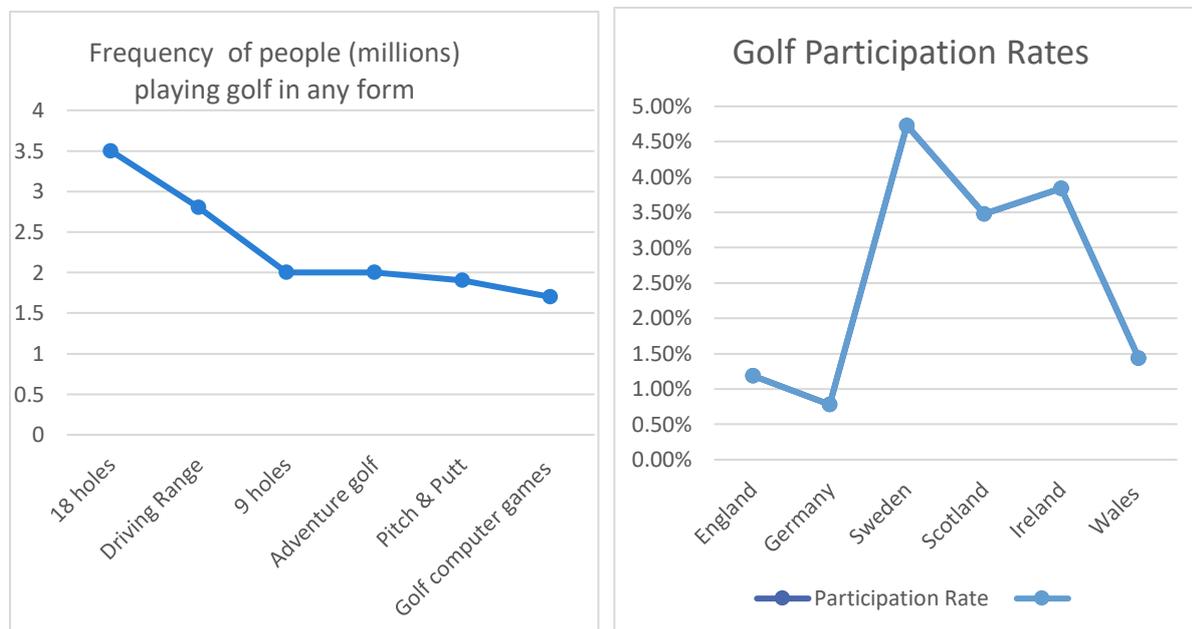
#### A significant growth:

- England has enjoyed continued growth for over 20 years and is quite confident that it will continue, albeit at a slower pace
- Golf numbers during the early part of this decade had declined however recent statistics indicate that close to 1 million people play golfer in some format weekly.
- Weakness is dearth of female and young golfers.
- England Golf is running a number of high-profile campaigns to promote the game and change the image.

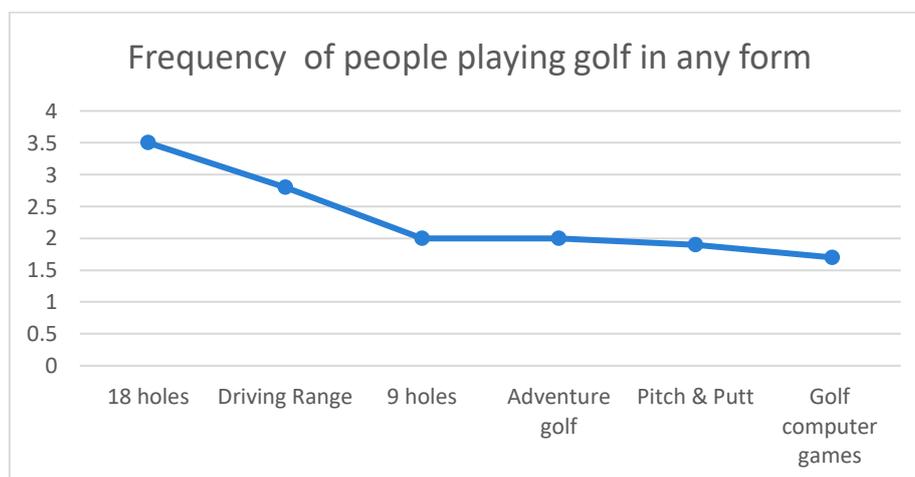
## 4.2 Golf Activity in England

In 2015, the European Tour commissioned a study to establish the level of golf activity in the UK including emerging formats and new forms of play. In the UK, 9.3m adults play annually one form of golf in its widest definition. A summary of the report findings are as follows:

- With many different kinds of golf available, the appeal of the sport has widened. English Golf participation rates, whilst good, are behind our closest neighbours and other European countries.



- Full length golf is now a core section of the golf market rather than the definition of golf
- Golf courses continue to be dominated by older males however women and younger people have a stronger presence
- Faster forms of golf are allowing for increased involvement

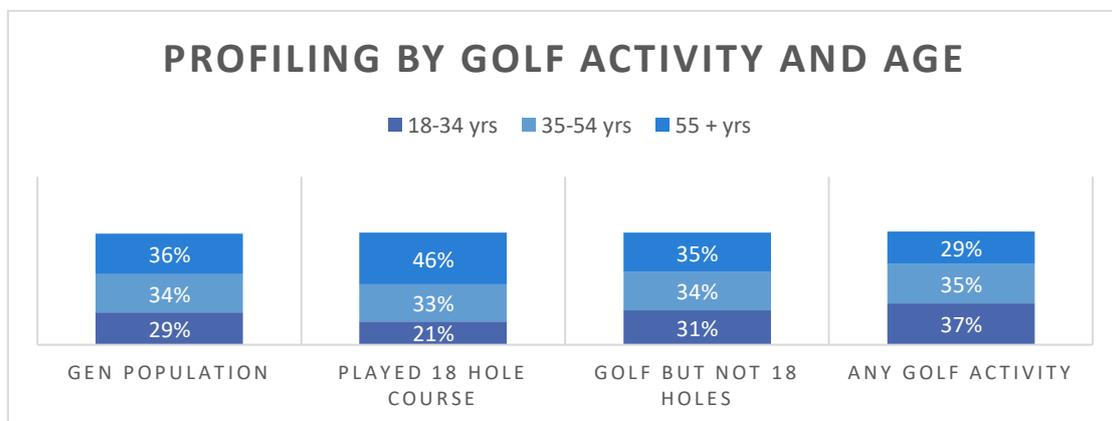


## UK Youth / Millennials Golf Trends

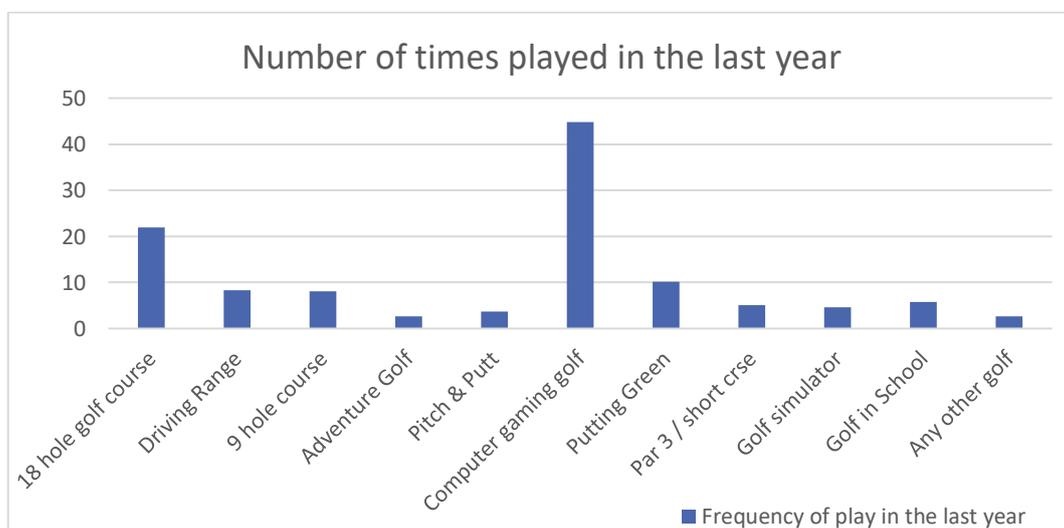
The European Tour commissioned study also looked at young people’s **interests in and perceptions** of golf in the UK. Key findings are:

- Young golfers tend to be much more sporty than the general population.
- Playing 18 hole courses was predominately male, older, white and in the top socio-economic groups
- Those engaging in other golf activity (not 18 hole) were far more reflective of the population as a whole – more likely to be female, younger, less white and from a broader socio-economic background.
- Golf is good for different ages, different abilities and men and women to play together
- Golf is the 5th most popular sport in the United Kingdom

The British Journal of Sports Medicine research highlighted those that play golf live five years longer than those that don’t play, while the sport has been shown to have self-esteem and self-worth benefits. The age profile for golf activity is detailed in the chart below:



Sports Marketing Surveys Inc went further to analyse the frequency of golf participation – the following summarises the findings:



Source: Sports Marketing Suverys Inc

### 4.3 Golf Tourism in North West England

There are 2,500 golf courses in the UK. Within this, there appears to be 56 golf courses in the Greater Manchester area, 24 within close proximity to the city and only a few in the North West. The nearest high-end venue to Hulton Park is The Mere Golf Resort and Spa.

#### **The proposed development at Hulton Park will benefit all surrounding golf venues as**

- It will be a new high-end golf course to add to the existing ones and capable of hosting major golf championships.
- Have a second 6-hole short course for beginners or those with time/work pressures.
- It will offer complete range of services, entertainment and activities on one unique site, available day and night
- Be one of the first travel destination of its kind in North West England in terms of quality golf courses couple with lifestyle activities and targeted at growing golf participation from junior through to older generation.
- Position the resort as a “way of life”, not just a property development

#### **Types of golf tourists the complex is targeting**

##### **British players**

- 50% of tourists will be national with a further 20% from Scotland, Ireland and Wales.

North West of England has 15 high end links courses within one hours drive of each other plus top-quality inland golf courses. The venue will be targeting green fee and guest clients alike along with corporate members, golf societies and local tournaments, hotel guests and golf packages.

##### **International tourists**

10% - 15% will be from USA with the remainder from Europe, mainly Germany and Sweden where Germany has 645,000 registered players and Sweden 469,000 registered players.

Occasional players from Middle East and Asia also play the courses in the area.

#### **4 international airports in the vicinity to provide access for both national and international golfers:**

- Manchester (28 M passengers)
- Liverpool (5 M passengers)
- Leeds (4 M passengers)
- Birmingham (13 M passengers)

### Map of leading golf courses located within 1 hours drive from Hulton Park



### Golf Venues located within one hours drive from Hulton Park

Club	Lowest Green Fee	Highest Green Fee
Hillside Golf Club, Southport	£65	£190
Formby Golf Club, Liverpool	£90	£165
St Anne's Old Links Golf Club Lytham Saint Annes	£55	£85
West Lancashire Golf Club,	£55	£240
Southport and Ainsdale Golf Club	£65	£150
Royal Liverpool Golf Club, Wirral	£100	£200
Hesketh Golf Club, Southport	£65	£85
Royal Birkdale Golf Club, Southport	£175	£275
Royal Lytham & St. Annes Golf Club	£140	£250
Houghwood Golf, Saint Helens	£50	£60
Wallasey Golf Club, Wallasey	£45	£90
Fleetwood Golf Club, Fleetwood		
Delamere Forest Golf Club	£75	£115
Macdonald Portal Hotel, Golf & Spa	£35	£55
<b>European Tour Destination Venues</b>		
<i>Le Golf National</i>	200	110,0
<i>Terre Blanche (83)</i>	180	99,0
<i>Bom Successo (Portugal)</i>	59	32,5
<i>PGA Catalunya (Espagne)</i>	300	165,0
<i>Troia Resort (Portugal)</i>	102	56,1

#### 4.4 North West and its golf courses:

- 1/3 most populated region in England with 7m people
- 275 golf courses
- 3 golf courses in World Top 100 – Royal Birkdale, Royal Lytham + St Anne’s and Royal Liverpool

The Lancashire and Cheshire Golf Unions, within which Hulton Park will reside, encompass the countries of Lancashire, Cheshire, Merseyside and Greater Manchester – this is a large area but has approx. 10% of total golf courses in Great Britain. The breakdown of ownership of golf courses in the area in 2011 was as follows:

Course type	%	Total	9 hole	18 hole	27 hole	36 hole
Private Members	69	171	27	144		
Municipal	12	30	7	23		
Pay and Play	10	24	8	16		
Resort	9	24	9	13	1	1
<b>Total</b>		249	51	196	1	1

- There are 3.8m casual golfers in Great Britain and Ireland and their participation along with the registered golfers in rounds played has remained steady (80% of Europe’s non-registered golfers are in GB and Ireland).
- The English Golf market reported declining numbers of registered golfers however, the English Golf Union has noticed an increase in the number of casual golfers. It appears English golfers feel there is no need to be registered with some preferring to play golf as casual golfers on a green fee basis.

### The main competitors to Hulton Park Golf Club will be

Course Name	Join Fee	Subs	Green Fees (H)	Green Fees (L)
<b>Mere Golf Resort &amp; Spa</b>	Waiving	£2,365	£85	€60
<b>Pleasington (Blackburn)</b>	£1,250	£1,224	£65	£55
<b>Southport &amp; Ainsdale</b> (S&A – no 7-day available)	£2,400	£1,400	£150	£65
<b>Hesketh Golf Club</b>	£1,885	£1,233	£75	£40
<b>Hillside Golf Club</b>	£2,500 (6day)	£1,405	£190	£65
<b>Formby Hall Golf Club</b> (2015)	£3,900	£1,300	£140	£60
<b>Marriott Worsley Park</b>	0	£985	£70	£70
<b>Mottram Hall</b>	£1,250	£1,250	£60	£40
<b>Shrigley Hall</b>		£699	£35	£20
<b>Carden Park Hotel</b>		£864	£75	£50

## 4.5 A strong local supply welcomes a new flagship:

### Why Hulton Park Golf Resort represents a powerful opportunity?

- This golf destination is lacking a major resort with critical size.
- The region receives strong support from Golf and Tourism tour operators who are positively disposed towards golf courses in the area.
- No new golf course has been constructed in this area in recent times.
- Peel Group reputation as Master Developers.
- Strong interest in hosting The British Masters and The Ryder Cup.
- Good road, rail and flight accessibility
- Welcoming to golfers of all ability and none with equality for all within the club
- Free kids coaching during holidays
- Adapt faster fun formats to play e.g. golfsixes
- Relaxed dress code

### **Major customer expectations the project must fulfil:**

- Provide an opportunity to play on a top-class course which potentially will host The Ryder Cup
- Provide onsite comfortable, spacious and quiet accommodation with high service standards in the 4\* category
- Provide secondary activities around golf aimed at catering for all the family and growing the sport by attracting children and lapsed golfers. Also provide entertainment, food and beverage, wellness and retail services
- Provide customised services to ensure guest stays are hassle-free with shuttles between airports and train stations, transfers between golf courses, golf reservations, assistance with equipment, golf buggies, catering etc.

## **4.6 Golf Club Membership in England on the rise**

Golf club membership is on the rise in England - since 2016, membership numbers on average are up by 24 from 460 to 484 members.

- Facilities and services offered by English golf clubs are improving with golf the fifth-largest participation sport in England and that 3.7m people played a round of golf in 2018.
- 2 million people in England play golf at least twice a month.
- The highest areas of increase in golf club memberships are with adult men. Adult female members per club are at an average of 70.
- A higher percentage of members are playing at older ages due to health benefits and availability of time.
- Whilst seven-day membership is still by-and-far the most popular form of golf membership in England, one reason for the increase in membership number may well be down to more flexible membership structures.
- Social media, e-newsletters and other communication to members, shorter format competitions and flexible memberships are helping grow membership.
- Many clubs are including additional activities within their club to generate additional income streams and cashflow.
- In total, 34% of golf clubs offer flexible memberships; e.g. weekend-only memberships and points/credits systems are ways of modern, busy workers being able to join clubs at affordable costs to them.

The chart below details the percentage of Golf Clubs offering different memberships:



The Hulton Business plan focuses on five key membership categories namely 7-day, 5-day, family, junior/intermediary and corporate.

Hulton Park will apply no membership joining fees for the above categories, with the exception of Corporate – this is to provide easy and immediate access to golf membership for those wishing to be part of The Hulton Park family.

#### 4.7 Tournament Strategy

An important part of Hulton Park’s golf development strategy is to host European Tour events attracting strong player participation from both European Tour and PGA players. In addition, Peel Group has made no secret of its desire to host The Ryder Cup. As yet, no decisions have been made as to who will host the 2030 and 2034 Ryder Cup.

**European Tour Properties has no influence or input as to who will host the Ryder Cup – this will be decided between The European Tour and its associates. References to hosting the Ryder Cup in this document as purely for discussion and do not confer any preference or privilege to Hulton Park.**

Hosting a European Tour event is clearly a commercial decision

- Commerciality is affected by a number of key parameters including media exposure, regularity of event hosting (tournaments need to be held for a number of years to support visitor attraction status), green fee yields and sponsors who like to host a new event which has no sponsor legacy.
- Whilst there is limited data on the direct financial benefits of hosting a European Tour event, we do know that hosting a European Tour event
  - Rapidly increases the credibility and awareness of recently built courses
  - Hosting an event commands a price premium within the venue’s locality
  - Perceived quality of the course is higher with golf revenues commanding a premium
  - The TV/social media coverage brings better media and marketing opportunities to a venue and the area
  - Has a beneficial effect on the corporate golf market
  - Is a defensive position to take against competitor golf venues
  - By placing an ET event at a venue, the Tour is creating equity value within the venue hence the Tour has clear standards in a wide range of parameters on operating the golf business

on an on-going basis which in return generates repeat return custom of @ 70% from golfers

Sheffield Hallam University Sports Industry Research Centre undertook an Economic Impact & Benefits Study on the 2014 Ryder Cup which was hosted at Gleneagles Golf Course in Scotland. A summary of these benefits is detailed below:

<b>2014 – Gleneagles, Scotland</b>	<b>Estimated</b>	<b>Actual</b>
No of visitors	180,000	250,000 (21% from 96 different countries)
Total Direct Impact on Scotland	£100m	£106m
7,500 employed staff working at the event (1,500 temporary jobs created) Reached 500m homes in 200 territories		61% of visitors were in the 45 yrs. age group upwards
350,000 children introduced to golf		

Source: Sheffield Hallam University Sports Industry Research Centre, Economic Impact & Benefits Study 2014

## Ryder Cup 2018 – Economic Impact

Sheffield Hallam University Sports Industry Research Centre undertook a similar Economic Impact & Benefits Study on the 2018 Ryder Cup. This research indicates the direct economic impact of Ryder Cup 2018 on the Paris region was estimated at €76m.

The net benefit to France from visitor and organization spending attributable to Ryder Cup 2018 was €60.4m – Figure 1 below. This was the direct expenditure by event-specific visitors residing outside France and by organisers using monies originating from outside France.

Figure 1 summarises the Direct Economic Impact and excludes expenditure originating from within the host economy and by anyone who would ordinarily have been in the area regardless of The Ryder Cup.

**Figure 1: Direct Economic Impact from Ryder Cup 2018**

<b>Category</b>	<b>Paris Region</b>	<b>France</b>
Visitor Spend	€65.31m	€62.84m
Organisational Spend	€10.96m	(€2.47m)
<b>Total</b>	<b>€76.27m</b>	<b>€60.38m</b>

For the avoidance of doubt, the expenditure included by attendees and organisers in above financials under each destination is defined below:

<b>Origin of Spending</b>	<b>Destination of expenditure</b>	<b>Destination of expenditure</b>
	<b>Paris Region</b>	<b>France</b>
Paris Region	Excluded	Excluded
Rest of France	Included	Excluded
Outside France	Included	Included

The spending by all spectators, event attendees and organizations, spending regardless of the source of funds, amounted to €124m – Figure 2. When the future development of 100 municipal golf facilities inspired by the bid to host the event plus spending by FFG and French authorities on course and infrastructure upgrades is included the total economic activity in France was estimated at €235.7m - this includes spending by all attendees including visitors, French residents, non-event specific visitors and organisers spend.

**Figure 2: Gross Economic Activity to Paris and France attributable to The Ryder Cup**

Category	Paris	France
Spectators	€57.781m	€59.066m
Other Attendees & Organisers	€61.664m	€64.506m
<b>Total Attendee &amp; Organiser spend</b>	<b>€119.445m</b>	<b>€123.572m</b>
Investment in 100 municipal golf facilities	€7.150m	€65.000m
<b>Total attendee, organizer and golf spend</b>	<b>€126.595m</b>	<b>€188.572</b>
Output Multiplier (indirect + Induced) ***		1.25
<b>Total Economic Activity</b>		<b>€235.715m</b>

**Comments on spectator attendance:**

- Admissions over Ryder Cup week amounted to c.275,000 of which spectators accounted for c.228,000 which were attributable to some 88,000 different people. The remainder were media, officials, volunteers, sponsors, suppliers and other event related personnel. 71,000 spectators resided outside the Paris Region with approx. 57,000 spectators visiting France specifically for the Ryder Cup and of these almost 11,000 were on an extended stay either pre or post event.
- Some seven in ten international spectators who visited Paris for the event expressed a desire to return to the region for a short break or leisure in the next year, fueled by their Ryder Cup experiences.
- The total spending by resident and non-resident spectators visiting specifically for the Ryder Cup is estimated at €59m for France and the corresponding figures for the direct economic impact on Paris is €58m.
- Spectators arrived from more than 90 countries with almost half of those visiting France residing in the UK (49%). The most prevalent places of domicile amongst other visiting spectators were: the USA, Germany, Netherlands, Ireland, Belgium, Switzerland, Spain, Sweden and Denmark.
- The majority of spectators visiting France made use of commercial accommodation and stayed for an average of 3.5 nights in connection with their visit. In total, spectators generated 220,000 commercial bed nights in the Paris region which included visitors who extended their stay beyond Ryder Cup week.

In summary, almost two-thirds of spectators were visitors to France for The Ryder Cup (65%) with a further 16% visiting Paris from elsewhere in France, the remainder (19%) resided in the Paris region.

The direct economic impact of Ryder Cup 2018 on the Paris region is estimated at €76.3m. This compares with a direct economic impact on the UK of £53m and a corresponding figure for Scotland of €28m arising from hosting the 2014 Ryder Cup at Gleneagles.

Ultimately the event was responsible for more than €236m of economic activity in France - this compares with £106m for Scotland following the Ryder Cup 2014.

It is also worth noting the French Golf Federation has recorded a growth in golf members for three consecutive years of more than 0.5% per year which is very positive both locally and when compared other European golf federations statistics. The French Golf Federation also launched an extensive programme to promote golf through the following initiatives:

- Outreach operations for young audiences were set up through “my golf book” for nearly 5000 classes throughout France who used these educational notebooks with golf as a support for teaching subjects such as Mathematics, Geography, French and English
- Junior Ryder Cup at Disneyland Paris hosted 5,000 young people a day for 2 days
- A roadshow for 4 months all over France was launched to introduce wider audiences to golf
- A Medical Forum at the Louis Vuitton Foundation which brought together nearly 250 experts to discuss the physical and mental health benefits of golf;
- Ambassador program: by creating videos with leading actors, writers, and sportsmen, French Golf Federation were able to reach more than 2 million people and make golf more popular.

## 5 FINANCIALS

### PROFIT & LOSS

For the purposes of this financial summary, we have reviewed the financial results generated by Hulton Park assuming the golf course hosts the 2034 Ryder Cup – this provides the optimal period to apply for and be awarded the hosting of this prestigious tournament. We again wish to reiterate assuming Hulton Park will host the Ryder Cup in either 2030 or 2034 does not give the venue any priority to accessing the tournament and is included in these financial projections at the request of Peel Group.

Growing from a Zero base, Revenues will rise to exceed £6m by 2034 and remain constantly in excess of £6m into the future. Summary revenues and costs are as follows:

#### Hosting the Ryder Cup in 2034 at Hulton Park

	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036
REVENUES	£1,321	£1,739	£2,367	£3,095	£3,875	£5,438	£5,153	£5,176	£5,586	£5,891	£6,234	£6,530
COSTS	£2,597	£2,975	£3,438	£3,882	£3,942	£4,086	£4,173	£4,261	£4,349	£4,443	£4,481	£4,491
P&L	(£1,276)	(£1,236)	(£1,070)	(£ 787)	( £67)	£1,352	£ 979	£ 914	£1,236	£1,448	£1,753	£2,039

The above assumes all golf facilities will be open from January 2025. These facilities include

- *18-hole Championship golf course*
- *6-hole academy course*
- *Driving Range and coffee shop*
- *Adventure golf*
- *Clubhouse with restaurant, meeting rooms, conference room and members room.*

**Total golf rounds** played on all courses will be as follows

	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036
<b>Total for 18 holes</b>	8,097	9,999	12,990	16,552	20,224	26,698	29,661	30,215	31,813	32,531	33,369	33,783
Comprising:												
Members	2,325	2,700	3,600	4,500	5,700	7,675	8,525	9,600	11,400	13,725	14,925	15,400
Events	150	400	800	800	1,000	1,400	2,000	2,000	2,000	2,000	2,000	2,000
Hotel	2,422	2,624	2,690	3,377	3,424	4,373	4,461	3,640	3,713	3,156	3,219	3,283
Green fees	3,000	4,000	5,000	6,000	7,000	9,000	10,000	10,500	11,000	11,500	11,500	11,500
Others												
6 hole academy	5,000	6,000	7,500	9,000	10,500	12,500	14,000	15,000	15,000	15,000	15,000	15,000
Adventure	26,250	28,875	31,763	34,939	38,433	42,276	46,503	51,154	61,896	68,086	74,894	

## GROWTH IN HEADLINE INCOME RATES OVER 10 YEARS

Hulton Park Golf facility will be primarily targeted at growing the game of golf, attracting new participants to the sport as well as the return of lapsed golfers. The venue is a family facility with amenities in place to attract all ages from 2 years old to 102 years of age. A major focus of all golf tuition at Hulton Park will be to grow the game along traditional lines and by attracting female and junior golfers. English golf statistics highlight the deficit of female and junior golfers when compared with our European counterparts hence the drive to attract a wider audience to golf by offering an extended range of golf amenities attractive priced.

	2025	2035
FAMILY MEMBERSHIP ANNUAL SUBSCRIPTION	£3,500	£4,845
7 DAY MEMBERSHIP ANNUAL SUBSCRIPTION	£2,000	£2,768
CORPORATE MEMBERSHIP (ANNUAL)	£8,000	£11,074
AVERAGE GREEN FEE RATES		
CORPORATE EVENTS	£100	£150
HOTEL	£80	£135
GREEN FEE	£90	£140
6 HOLE ACADEMY	£8	£11.42

## DRIVING RANGE

Hulton Park will have one of the North West's top golf practice and tuition centres providing golfers of all abilities and ages with the opportunity and facilities to develop their game of golf.

	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036
LESSONS PER DAY	8	12	20	24	24	24	24	26	26	26	26	26
LESSON RATE	£30	£30	£30	£32	£32	£32	£33	£33	£34	£35	£35	£35
BASKETS PER DAY	22	29	36	43	50	50	50	50	50	50	50	50
AVE RATE	£4.30	£4.30	£4.30	£4.40	£4.55	£4.55	£4.58	£4.63	£4.82	£4.82	£4.80	£4.90
ADVENTURE GOLF ROUND PER DAY	75	83	91	100	110	121	133	146	161	177	195	214
RATE PER ROUND	£7.00	£7.21	£7.43	£7.65	£7.88	£8.11	£8.36	£8.61	£8.87	£9.13	£9.41	£9.69
DEPT P&L	£45K	£76K	£108K	£144K	£181K	£210K	£247K	£292K	£349K	£404K	£471K	£544K

## GOLF OPERATIONS

Golf operations relates to the hire of golf clubs, buggies and power caddies.

	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036
DEPT P&L	(£54K)	(£46K)	(£25K)	£13K	£64K	£122K	£169K	£181K	£207K	£221K	£238K	£271K

<b>GOLF OPERATIONS CHARGE OUT RATES</b>	<b>2025</b>	<b>2036</b>
CLUB HIRE CHARGE	£25	£35
BUGGY HIRE RATE	£35	£48
POWER CADDY HIRE FEE	£18	£24

## RETAIL

On site will be a fully stocked professional shop with golfing equipment, accessories, clothing and footwear. The shop will stock a wide range of apparel and equipment to cater for all golfers.

	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036
DEPT P&L	(£42K)	(£37K)	(£34K)	(£30K)	£8K	£32K	£85K	£98K	£111K	£119K	£128K	£134K

<b>RETAIL SPEND</b>	<b>2025</b>	<b>2036</b>
SALES PER 18 HOLE RD	£10	£13.84
SPEND PER 6 HOLE	£4	£5.54
SPEND PER BASKET	£1	£1.38
CASUAL SALES	£25	£35

## FOOD AND BEVERAGE

Food and beverage will be open 7 days a week. Set in a friendly, welcoming atmosphere, the bar and restaurant will offer a wide selection of delicious comfortable food favourites as well as wholesome healthy options that appeal to all.

	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036
DEPT P&L	(£86K)	(£81K)	(£44K)	(£23K)	(£26K)	£32K	£81K	£83K	£101K	£102K	£112K	£111K

<b>SPEND</b>	<b>2025</b>	<b>2036</b>
PER 18 HOLES	£15	£20.76
PER 6 HOLES	£4	£5.54
HALWAY & BUGGY ROUND SPEND	£2	£2.77
CASUAL DINERS	£12	£16.61

## SUMMARY

Hulton Park is an exciting and vibrant golf and real estate project which has great potential and will compliment the already existing broad range of sporting facilities located in the greater manchester area

## **REFERENCES:**

SPORTS MARKETING SURVEY: STATE OF GOLF IN THE UK  
SYNGENTA: GROWING GOLF IN THE UK  
ENGLAND GOLF: CLUB MEMBERSHIP KEY FINDINGS 2018  
PETER LUNN AND ELISH KELLY: GOLF IN IRELAND  
KPMG: GOLF PARTICIPATION REPORT FOR EUROPE 2018

### **Important Notice**

This document is being delivered for information purposes only to a limited number of parties. The information has been based upon information provided by The Peel Group and its advisers and has not been independently verified. Neither European Tour Properties, nor any of its associations, nor any of their respective directors, employees, or advisors makes any expressed or implied representation or warranty and no responsibility or liability is accepted by any of them with respect to the accuracy or completeness of the information set forth in this business plan and nothing contained herein is, or shall be relied upon as, a promise or representation regarding historic or current market conditions or any future events or performance of the market.



# Hulton Park Golf Resort 12 Year Business Plan 2025 - 2036

HULTON PARK

GOLF COURSE BUSINESS PLAN

This excel file contains the following spreadsheets

**Worksheet**

1	<i>Variables</i>
2	<i>Capital Expenditure Programme</i>
3	<i>Ryder Cup 2030</i>
4	<i>Ryder Cup 2034</i>
5	<i>Fixed Costs</i>
6	<i>Variable Costs</i>
7	<i>Staff Costs</i>
8	<i>Retail</i>
9	<i>Food and Beverage P&amp;L</i>
10	<i>Golf Operations</i>
11	<i>Driving Range</i>



**1. VARIABLES**

**Key Variables**

Indexation	3%
All amounts are in	Sterling

**Ryder Cup 2030**

Membership Joining Fees	£ -
Corporate Membership	£ 8,000.00
Green Fee	£80 - £140

**Ryder Cup 2034**

Membership Joining Fees	£ -
Corporate Membership	£ 8,000.00
Green Fee	£80 - £150

**CapEx**

Construction and fitout costs	£ 52,261,000.00
-------------------------------	-----------------

**Income**

Income is based upon projected yields generated at High End Golf Courses operating within the European Tour Properties network and hosting major golf tournaments.  
Hotel Occupancy Rates are as provided by Avison Young and grow by 2% annually post 2030

**Costs**

Costs are quoted at present day values  
Salary scales are in line with those utilised in Hotel Business Plan

Inflation	3%
Hulton Park will host a European Tour tournament each year from 2025 onwards	£ 150,000.00

**Funding**

No provision or allowance is included in these projections for funding which may be available towards the capital cost of this project.

**Tournament Strategy**

It is assumed that Hulton Park will host a major golf tournament similar to the Ryder Cup in either years 2030 or 2034 and will also host other European Tour tournaments as part of an overall tournament hosting strategy. The tournament costs to the venue are included in these financial projections and does not take into account any funding which may be available from public/private sectors and partners.

**European Tour Properties has no influence or input as to who will host the Ryder Cup – this will be decided between The European Tour and its associates.**

**References to hosting the Ryder Cup in this document are purely for discussion purposes and do not confer any privilege or preference to Hulton Park**

Capital Expenditure

Depreciation

Capital Programme of Works

Capital Programme of Works	Gross Area	Cost per sqm	Gross Cost	Annual Depreciation charge	Depreciation												
					2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	
Maintenance Facility			£ 1,980,000	2%	£ 39,600	£ 39,600	£ 39,600	£ 39,600	£ 39,600	£ 39,600	£ 39,600	£ 39,600	£ 39,600	£ 39,600	£ 39,600	£ 39,600	£ 39,600
Greenkeeping Machinery			£ 1,034,000	10%	£ 51,700	£ 103,400	£ 103,400	£ 103,400	£ 103,400	£ 103,400	£ 103,400	£ 103,400	£ 103,400	£ 103,400	£ 103,400	£ 51,700	£ -
Golf course, Infrastructure and Prof Costs			£ 34,617,000	2%	£ 692,340	£ 692,340	£ 692,340	£ 692,340	£ 692,340	£ 692,340	£ 692,340	£ 692,340	£ 692,340	£ 692,340	£ 692,340	£ 692,340	£ 692,340
Clubhouse			£ 9,636,000	3%	£ 240,900	£ 240,900	£ 240,900	£ 240,900	£ 240,900	£ 240,900	£ 240,900	£ 240,900	£ 240,900	£ 240,900	£ 240,900	£ 240,900	£ 240,900
Golf Academy			£ 4,994,000	2%	£ 99,880	£ 99,880	£ 99,880	£ 99,880	£ 99,880	£ 99,880	£ 99,880	£ 99,880	£ 99,880	£ 99,880	£ 99,880	£ 99,880	£ 99,880
<b>Total Capital Expenditure</b>			<b>£ 52,261,000</b>		<b>£ 1,124,420</b>	<b>£ 1,176,120</b>	<b>£ 1,124,420</b>	<b>£ 1,072,720</b>									

Capital Cashflow

Maintenance Facility	£ 1,980,000
Greenkeeping Machinery	£ 1,034,000
Golf course, Infrastructure and Prof Costs	£ 34,617,000
Clubhouse	£ 9,636,000
Golf Academy	£ 4,994,000
<b>Total</b>	<b>£ 52,261,000</b>

Gross Cost	2023	2024
Maintenance Facility	£ 990,000	£ 990,000
Greenkeeping Machinery		£ 1,034,000
Golf course, Infrastructure and Prof Costs	£ 17,308,500	£ 17,308,500
Clubhouse	£ 4,818,000	£ 4,818,000
Golf Academy	£ 2,497,000	£ 2,497,000
<b>Total</b>	<b>£ 25,613,500</b>	<b>£ 26,647,500</b>



Ryder Cup 2030

3. Ryder Cup 2030

Hulton Park  
Traditional Model of Membership, green fees, hotel, and other income

Profit and Loss Account

	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036
<b>Revenues</b>												
Member Subscriptions (annual + corp)	€ 126,250	€ 222,738	€ 324,901	€ 456,214	€ 662,643	€ 1,081,023	€ 974,645	€ 1,042,318	€ 1,181,263	€ 1,301,511	€ 1,427,911	€ 1,508,815
Corporate Events	£ 15,000	£ 41,200	£ 84,872	£ 87,418	£ 112,551	£ 196,000	£ 280,000	£ 260,000	£ 267,800	£ 275,834	£ 284,109	£ 292,632
Hotel Green Fees	£ 193,741	£ 216,209	£ 228,304	£ 295,232	£ 342,389	£ 524,779	£ 535,274	£ 436,784	£ 445,520	£ 390,052	£ 409,789	£ 430,524
Championship course Green fees	£ 270,000	£ 370,800	£ 477,405	£ 590,073	£ 709,071	£ 1,080,000	£ 1,200,000	£ 1,260,000	£ 1,359,600	£ 1,464,042	£ 1,507,963	£ 1,553,202
Academy course green fees	£ 40,000	£ 51,000	£ 65,663	£ 81,159	£ 97,526	£ 119,585	£ 137,954	£ 152,242	£ 156,809	£ 161,513	£ 166,359	£ 171,349
Food & Beverage	£ 125,992	£ 164,234	£ 212,531	£ 267,297	£ 324,298	£ 393,209	£ 445,770	£ 458,538	£ 478,710	£ 490,879	£ 504,326	£ 514,011
Conference Hire	£ 37,850	£ 38,986	£ 40,155	£ 41,360	£ 42,601	£ 43,879	£ 45,195	£ 46,551	£ 47,947	£ 49,386	£ 50,867	£ 52,393
Driving Range	£ 327,890	£ 388,887	£ 457,493	£ 531,550	£ 607,731	£ 649,442	£ 698,928	£ 757,046	£ 827,703	£ 896,620	£ 977,509	£ 1,064,415
Retail	£ 67,534	£ 88,343	£ 117,176	£ 150,781	£ 186,913	£ 238,307	£ 270,457	£ 284,438	£ 303,092	£ 316,869	£ 332,007	£ 344,835
Ryder Cup Retail Sales (net)	£ 11,250	£ 22,500	£ 180,000	£ 360,000	£ 495,000	£ 715,000	£ 110,000					
Golf Operations	£ 105,673	£ 134,144	£ 179,031	£ 234,058	£ 293,718	£ 397,011	£ 454,498	£ 478,243	£ 517,132	£ 544,006	£ 573,984	£ 598,158
<b>Total Income</b>	<b>£ 1,321,179</b>	<b>£ 1,739,039</b>	<b>£ 2,367,530</b>	<b>£ 3,095,141</b>	<b>£ 3,874,440</b>	<b>£ 5,438,235</b>	<b>£ 5,152,720</b>	<b>£ 5,176,160</b>	<b>£ 5,585,575</b>	<b>£ 5,890,713</b>	<b>£ 6,234,823</b>	<b>£ 6,530,335</b>
<b>European Tour Tournament Costs</b>												
Staff Costs: Golf Course	£ 566,187	£ 583,172	£ 704,101	£ 793,631	£ 703,875	£ 724,992	£ 746,138	£ 768,522	£ 791,578	£ 815,325	£ 839,785	£ 851,925
Staff Costs: Retail	£ 88,200	£ 101,304	£ 117,386	£ 134,342	£ 138,372	£ 142,523	£ 146,799	£ 151,203	£ 155,739	£ 160,411	£ 165,223	£ 170,180
Staff Costs: F&B	£ 133,800	£ 165,377	£ 193,108	£ 227,123	£ 284,386	£ 292,436	£ 293,159	£ 301,230	£ 302,196	£ 310,296	£ 311,505	£ 319,641
Staff Costs: Golf Operations	£ 74,190	£ 93,702	£ 115,076	£ 131,883	£ 138,851	£ 182,761	£ 191,958	£ 202,186	£ 212,989	£ 224,400	£ 236,455	£ 225,725
Staff Costs: Driving Range	£ 158,040	£ 185,123	£ 217,917	£ 252,511	£ 288,985	£ 297,654	£ 306,584	£ 315,781	£ 325,255	£ 335,013	£ 345,063	£ 355,415
Variable Cost of Sales	£ 36,435	£ 44,995	£ 58,455	£ 74,485	£ 91,008	£ 120,142	£ 133,473	£ 135,967	£ 143,157	£ 146,388	£ 150,160	£ 152,025
Fixed Cost of Sales	£ 1,390,536	£ 1,651,233	£ 1,881,612	£ 2,118,116	£ 2,146,376	£ 2,175,484	£ 2,205,465	£ 2,236,345	£ 2,268,152	£ 2,300,913	£ 2,282,957	£ 2,266,013
<b>Total Costs</b>	<b>£ 2,597,388</b>	<b>£ 2,974,907</b>	<b>£ 3,437,655</b>	<b>£ 3,882,091</b>	<b>£ 3,941,853</b>	<b>£ 4,085,991</b>	<b>£ 4,173,576</b>	<b>£ 4,261,235</b>	<b>£ 4,349,065</b>	<b>£ 4,442,747</b>	<b>£ 4,481,148</b>	<b>£ 4,490,924</b>
<b>Net Profit/(Loss)</b>	<b>-£ 1,276,209</b>	<b>-£ 1,235,868</b>	<b>-£ 1,070,124</b>	<b>-£ 786,950</b>	<b>-£ 67,413</b>	<b>£ 1,352,243</b>	<b>£ 979,145</b>	<b>£ 914,925</b>	<b>£ 1,236,509</b>	<b>£ 1,447,966</b>	<b>£ 1,753,676</b>	<b>£ 2,039,412</b>
Membership joining fees	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -
<b>Earnings before Taxation</b>	<b>-£ 1,276,209</b>	<b>-£ 1,235,868</b>	<b>-£ 1,070,124</b>	<b>-£ 786,950</b>	<b>-£ 67,413</b>	<b>£ 1,352,243</b>	<b>£ 979,145</b>	<b>£ 914,925</b>	<b>£ 1,236,509</b>	<b>£ 1,447,966</b>	<b>£ 1,753,676</b>	<b>£ 2,039,412</b>

Revenues

	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036
<b>Membership Joining/Annual Corporate Fees</b>												
Family	5	5	5	10	10	10	10	10	10	10	10	5
Cumulative No of Members	5	10	15	25	35	45	55	65	75	85	95	100
Joining Fees	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -
Proceeds	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -
<b>7-Day Membership</b>	20	20	20	20	30	30	10	10	20	10	10	0
Cumulative No of Members	20	40	60	80	110	140	150	160	180	190	200	200
Joining Fees	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -
Proceeds	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -
<b>5-Day Membership</b>	20	20	20	25	25	30	30	10	5	5	5	5
Cumulative No of Members	20	40	60	85	110	140	170	180	185	190	195	200
Joining Fees	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -
Proceeds	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -
<b>Intermediate / Junior</b>	5	10	10	15	15	15	5	5	5	5	5	5
Cumulative No of Members	5	15	25	40	55	70	75	80	85	90	95	100
Joining Fees	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -
Proceeds	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -
<b>Total Joining Fee Proceeds</b>	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -
<b>Corporate Membership</b>	5	5	5	5	10	35	10	5	5	5	5	5
Cumulative No of Members	5	10	15	20	30	65	75	80	85	90	95	100
Joining Fees	£ 8,000	£ 8,240	£ 8,487	£ 8,742	£ 9,004	£ 9,274	£ 9,552	£ 9,839	£ 10,134	£ 10,438	£ 10,751	£ 11,074
Proceeds	£ 40,000	£ 41,200	£ 42,436	£ 43,709	£ 90,041	£ 324,597	£ 95,524	£ 49,195	£ 50,671	£ 52,191	£ 53,757	£ 55,369
<b>Cumulative Membership</b>												
Family Membership	5	10	15	25	35	45	55	65	75	85	95	100
7 Day Membership	20	40	60	80	110	140	150	160	180	190	200	200
5 Day Membership	20	40	60	85	110	140	170	180	185	190	195	200
Intermediate/Concessionary	5	15	25	40	55	70	75	80	85	90	95	100
Corporate	5	10	15	20	30	65	75	80	85	90	95	100
<b>Total No. of Members</b>	50	105	160	225	305	415	470	500	535	560	585	600

Annual Subscriptions

	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036
<b>Annual Subscriptions</b>												
Family	5	5	5	10	10	10	10	10	10	10	10	5
Cumulative Membership	5	10	15	25	35	45	55	65	75	85	95	100
Annual Subscription	£ 3,500	£ 3,605	£ 3,713	£ 3,825	£ 3,939	£ 4,057	£ 4,179	£ 4,305	£ 4,434	£ 4,567	£ 4,704	£ 4,845
Annual Subscriptions Received	£ 17,500	£ 36,050	£ 55,697	£ 95,614	£ 137,875	£ 182,586	£ 229,855	£ 279,796	£ 332,527	£ 388,170	£ 446,852	£ 484,482
7 Day Membership	20	20	20	20	30	30	10	10	20	10	10	0
Cumulative Membership	20	40	60	80	110	140	150	160	180	190	200	200
Annual Subscription	£ 2,000	£ 2,060	£ 2,122	£ 2,185	£ 2,251	£ 2,319	£ 2,388	£ 2,460	£ 2,534	£ 2,610	£ 2,688	£ 2,768
Annual Subscriptions Received	£ 40,000	£ 82,400	£ 127,308	£ 174,836	£ 247,612	£ 324,597	£ 358,216	£ 393,560	£ 456,037	£ 495,814	£ 537,567	£ 553,694
5 Day Membership	20	20	20	20	20	30	20	10	5	5	5	5
Cumulative Membership	20	40	60	80	100	130	150	160	165	170	175	180
Annual Subscription	£ 1,250	£ 1,288	£ 1,326	£ 1,366	£ 1,407	£ 1,449	£ 1,493	£ 1,537	£ 1,583	£ 1,631	£ 1,680	£ 1,730
Annual Subscriptions Received	£ 25,000	£ 51,500	£ 79,568	£ 109,273	£ 140,689	£ 188,382	£ 223,885	£ 245,975	£ 261,271	£ 277,264	£ 293,982	£ 311,453
Intermediate/Junior	5	10	10	15	15	15	5	5	5	5	5	5
Cumulative Membership	5	15	25	40	55	70	75	80	85	90	95	100
Annual Subscription	£ 750	£ 773	£ 796	£ 820	£ 844	£ 869	£ 896	£ 922	£ 950	£ 979	£ 1,008	£ 1,038
Annual Subscriptions Received	£ 3,750	£ 11,588	£ 19,892	£ 32,782	£ 46,427	£ 60,862	£ 67,165	£ 73,792	£ 80,757	£ 88,072	£ 95,754	£ 103,818
<b>Family</b>	£ 17,500	£ 36,050	£ 55,697	£ 95,614	£ 137,875	£ 182,586	£ 229,855	£ 279,796	£ 332,527	£ 388,170	£ 446,852	£ 484,482
<b>7 Day membership</b>	£ 40,000	£ 82,400	£ 127,308	£ 174,836	£ 247,612	£ 324,597	£ 358,216	£ 393,560	£ 456,037	£ 495,814	£ 537,567	£ 553,694
<b>5 Day membership</b>	£ 25,000	£ 51,500	£ 79,568	£ 109,273	£ 140,689	£ 188,382	£ 223,885	£ 245,975	£ 261,271	£ 277,264	£ 293,982	£ 311,453
<b>Intermediate</b>	£ 3,750	£ 11,588	£ 19,892	£ 32,782	£ 46,427	£ 60,862	£ 67,165	£ 73,792	£ 80,757	£ 88,072	£ 95,754	£ 103,818
<b>Total Annual Subscriptions</b>	€ 86,250	€ 181,538	€ 282,465	€ 412,504	€ 572,603	€ 756,426	€ 879,121	€ 993,123	€ 1,130,592	€ 1,249,320	€ 1,374,154	€ 1,453,446

Rounds Played

	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036
<b>Family Members</b>												
Family Members	5	5	5	10	10	10	10	10	10	10	10	5
Cumulative No of Members	10	10	15	25	35	45	55	65	75	85	95	100
Rounds played per member	35	35	35	35	35	35	35	35	35	35	35	35
Annual Rounds played	350	350	525	875	1225	1575	1925	2275	2625	2975	3325	3500
<b>7 Day Members</b>												
7 Day Members	20	20	20	20	30	30	10	10	20	10	10	0
Cumulative No of Members	40	40	60	80	110	140	150	160	180	190	200	200
Rounds played per member	25	25	25	25	25	25	25	25	25	25	25	25
Annual Rounds played	1000	1000	1500	2000	2750	3500	3750	4000	4500	4750	5000	5000
<b>5 Day Members</b>												
5 Day Members	20	20	20	25	25	30	30	10	5	5	5	5
Cumulative No of Members	40	40	60	85	110	140	170	180	185	190	195	200
Rounds played per member	20	20	20	20	20	20	20	20	20	20	20	20
Annual Rounds played	800	800	1200	1700	2200	2800	3400	3600	3700	3800	3900	4000
<b>Intermediate</b>												
Intermediate	5	10	10	15	15	15	5	5	5	5	5	5
Cumulative No of Members	5	15	25	40	55	70	75	80	85	90	95	100
Rounds played per member	15	15	15	15	15	15	15	15	15	15	15	15
Annual Rounds played	75	225	375	600	825	1050	1125	1200	1275	1350	1425	1500
<b>Corporate</b>												
Corporate	5	5	5	5	10	20	0	0	0	0	0	0
Cumulative No of Members	5	10	15	20	30	50	50	50	50	50	50	50
Rounds played per member	60	60	60	60	60	60	60	60	60	60	60	60
Annual Rounds played	300	600	900	1200	1800	3000	3000	3000	3000	3000	3000	3000

Member, Hotel and Other Income

			Membership Joining Fees												
	Cost per placement	Indexation	Base Cost	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036
<b>Membership Joining Fee</b>															
Family		3%		£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -
7 Day membership		3%		£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -
5 Day membership		3%		£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -
Intermediate/Concessionary		3%		£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -
Corporate		3%	£ 8,000	£ 8,000	£ 8,240	£ 8,487	£ 8,742	£ 9,004	£ 9,274	£ 9,552	£ 9,839	£ 10,134	£ 10,438	£ 10,751	£ 11,074
<b>Corporate Events</b>															
Number of Events				5	10	20	20	25	35	40	40	40	40	40	40
Size of Event				30	40	40	40	40	40	50	50	50	50	50	50
Rounds played				150	400	800	800	1000	1400	2000	2000	2000	2000	2000	2000
Fee per round (excludes F&B)	€ 160	3%	€ 100	£ 100	£ 103	£ 106	£ 109	£ 113	£ 140	£ 140	£ 130	£ 134	£ 138	£ 142	£ 146
Income				£ 15,000	£ 41,200	£ 84,872	£ 87,418	£ 112,551	£ 196,000	£ 280,000	£ 260,000	£ 267,800	£ 275,834	£ 284,109	£ 292,632
<b>Hotel</b>															
Number of Rooms			142												
Room nights per annum			51830												
Multiple Occupancy Factor				1	1	1	1	1	1	1	1	1	1	1	1
Sleepers per annum				51,830	51,830	51,830	51,830	51,830	51,830	51,830	51,830	51,830	51,830	51,830	51,830
Occupancy Rates		2%		62%	68%	69%	72%	73%	75%	77%	78%	80%	81%	83%	84%
Sleepers per Year				32,290	34,985	35,866	37,525	38,043	38,873	39,650	40,443	41,252	42,077	42,918	43,777
Course Availability (closed for 3 months)				0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75
Sleepers who can avail of golf course				24,218	26,239	26,900	28,144	28,532	29,154	29,737	30,332	30,939	31,558	32,189	32,833
% of sleepers playing golf				10%	10%	10%	12%	12%	15%	15%	12%	12%	10%	10%	10%
Number of golf rounds				2,422	2,624	2,690	3,377	3,424	4,373	4,461	3,640	3,713	3,156	3,219	3,283
Green Fee	£ 100.00	3%	€ 80	£ 80	£ 82	£ 85	£ 87	£ 100	£ 120	£ 120	£ 120	£ 120	£ 124	£ 127	£ 131
Income				£ 193,741	£ 216,209	£ 228,304	£ 295,232	£ 342,389	£ 524,779	£ 535,274	£ 436,784	£ 445,520	£ 390,052	£ 409,789	£ 430,524
<b>Green Fees</b>															
Rounds on 18 hole course				3,000	4,000	5,000	6,000	7,000	9,000	10,000	10,500	11,000	11,500	11,500	11,500
Green Fee rate (Mix of high & low season)		3%	90	£ 90	£ 93	£ 95	£ 98	£ 101	£ 120	£ 120	£ 120	£ 124	£ 127	£ 131	£ 135
Gross Revenues				£ 270,000	£ 370,800	£ 477,405	£ 590,073	£ 709,071	£ 1,080,000	£ 1,200,000	£ 1,260,000	£ 1,359,600	£ 1,464,042	£ 1,507,963	£ 1,553,202
<b>Total Rounds</b>															
Annually on 18 hole course				8,097	9,999	12,990	16,552	20,224	26,698	29,661	30,215	31,813	32,531	33,369	33,783
Total Rounds				8,097	9,999	12,990	16,552	20,224	26,698	29,661	30,215	31,813	32,531	33,369	33,783
<b>Academy Golf</b>															
Rounds				5,000	6,000	7,500	9,000	10,500	12,500	14,000	15,000	15,000	15,000	15,000	15,000
Price per round		3%		8.00	£ 8.50	£ 8.76	£ 9.02	£ 9.29	£ 9.57	£ 9.85	£ 10.15	£ 10.45	£ 10.77	£ 11.09	£ 11.42
Revenues				40,000.00	£ 51,000	£ 65,663	£ 81,159	£ 97,526	£ 119,585	£ 137,954	£ 152,242	£ 156,809	£ 161,513	£ 166,359	£ 171,349
<b>Food &amp; Beverage Spend</b>															
No of rounds availing of F&B				75%	75%	75%	75%	75%	75%	75%	75%	75%	75%	75%	75%
Food Spend per round		3%	£10	£ 12	£ 62	£ 66	£ 68	£ 70	£ 72	£ 74	£ 76	£ 78	£ 81	£ 83	£ 86
Beverage Spend per round		3%	£5	£ 5	£ 31	£ 33	£ 34	£ 35	£ 36	£ 37	£ 38	£ 39	£ 40	£ 42	£ 43
Gross Revenues				£ 17	£ 93	£ 98	£ 101	£ 104	£ 108	£ 111	£ 114	£ 118	£ 121	£ 125	£ 129
<b>Conference Room Hire</b>															
Room Hire for 100 days	Days	100	3%	£ 200.00	per day										
F&B spend for 100 days average 50 delegates	Ave	17	3%	£ 15.00	margin pp										
				70%	occupancy										
				£ 20,000	£ 20,600	£ 21,218	£ 21,855	£ 22,510	£ 23,185	£ 23,881	£ 24,597	£ 25,335	£ 26,095	£ 26,878	£ 27,685
				£ 17,850	£ 18,386	£ 18,937	£ 19,505	£ 20,090	£ 20,693	£ 21,314	£ 21,953	£ 22,612	£ 23,290	£ 23,989	£ 24,709
				£ 37,850	£ 38,986	£ 40,155	£ 41,360	£ 42,601	£ 43,879	£ 45,195	£ 46,551	£ 47,947	£ 49,386	£ 50,867	£ 52,393



Ryder Cup 2034

4. Ryder Cup 2034

Hulton Park												
Traditional Model of Membership, green fees, hotel, and other income												
Profit and Loss Account												
	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036
<b>Revenues</b>												
Member Subscriptions (annual + corp)	£ 126,250	£ 206,000	£ 262,573	£ 322,354	£ 385,487	£ 472,404	£ 568,667	£ 690,267	£ 942,160	£ 1,464,608	£ 1,367,435	£ 1,404,997
Corporate Events	£ 15,000	£ 41,200	£ 84,872	£ 87,418	£ 112,551	£ 168,000	£ 250,000	£ 260,000	£ 350,000	£ 375,000	£ 375,000	£ 375,000
Hotel Green Fees	£ 231,369	£ 261,372	£ 273,173	£ 293,601	£ 306,609	£ 349,853	£ 392,535	£ 436,784	£ 580,104	£ 639,042	£ 651,823	£ 664,859
Championship course Green fees	£ 450,000	£ 463,500	£ 477,405	£ 590,073	£ 709,071	£ 990,000	£ 1,200,000	£ 1,312,500	£ 1,485,000	£ 1,725,000	£ 1,725,000	£ 1,610,000
Academy course green fees	£ 40,000	£ 51,000	£ 65,663	£ 81,159	£ 97,526	£ 119,585	£ 137,954	£ 152,242	£ 156,809	£ 161,513	£ 166,359	£ 171,349
Food & Beverage	£ 125,992	£ 164,234	£ 212,531	£ 267,297	£ 324,298	£ 393,209	£ 445,770	£ 458,538	£ 478,710	£ 490,879	£ 504,326	£ 514,011
Conference Hire	£ 37,850	£ 38,986	£ 40,155	£ 41,360	£ 42,601	£ 43,879	£ 45,195	£ 46,551	£ 47,947	£ 49,386	£ 50,867	£ 52,393
Driving Range	£ 327,890	£ 388,887	£ 457,493	£ 531,550	£ 607,731	£ 649,442	£ 698,928	£ 757,046	£ 827,703	£ 896,620	£ 977,509	£ 1,064,415
Retail	£ 67,534	£ 88,343	£ 117,176	£ 150,781	£ 186,913	£ 238,307	£ 270,457	£ 284,438	£ 303,092	£ 316,869	£ 332,007	£ 344,835
Ryder Cup Retail Sales (net)				£ 4,500	£ 11,250	£ 137,500	£ 412,500	£ 550,000	£ 687,500	£ 825,000	£ 137,500	
Golf Operations	£ 105,673	£ 134,144	£ 179,031	£ 234,058	£ 293,718	£ 397,011	£ 454,498	£ 478,243	£ 517,132	£ 544,006	£ 573,984	£ 598,158
<b>Total Income</b>	<b>£ 1,527,558</b>	<b>£ 1,837,665</b>	<b>£ 2,170,071</b>	<b>£ 2,604,151</b>	<b>£ 3,077,754</b>	<b>£ 3,959,190</b>	<b>£ 4,876,503</b>	<b>£ 5,426,609</b>	<b>£ 6,376,156</b>	<b>£ 7,487,923</b>	<b>£ 6,861,809</b>	<b>£ 6,800,018</b>
<b>European Tour Tournament Costs</b>												
European Tour Tournament Costs	£ 150,000	£ 150,000	£ 150,000	£ 150,000	£ 150,000	£ 150,000	£ 150,000	£ 150,000	£ 150,000	£ 150,000	£ 150,000	£ 150,000
Staff Costs: Golf Course	£ 566,187	£ 583,172	£ 704,101	£ 793,631	£ 703,875	£ 724,992	£ 746,138	£ 768,522	£ 791,578	£ 815,325	£ 839,785	£ 851,925
Staff Costs: Retail	£ 88,200	£ 101,304	£ 117,386	£ 134,342	£ 138,372	£ 142,523	£ 146,799	£ 151,203	£ 155,739	£ 160,411	£ 165,223	£ 170,180
Staff Costs: F&B	£ 133,800	£ 165,377	£ 193,108	£ 227,123	£ 284,386	£ 292,436	£ 293,159	£ 301,230	£ 302,196	£ 310,296	£ 311,505	£ 319,641
Staff Costs: Golf Operations	£ 74,190	£ 93,702	£ 115,076	£ 131,883	£ 138,851	£ 182,761	£ 191,958	£ 202,186	£ 212,989	£ 224,400	£ 236,455	£ 225,725
Staff Costs: Driving Range	£ 158,040	£ 185,123	£ 217,917	£ 252,511	£ 288,985	£ 297,654	£ 306,584	£ 315,781	£ 325,255	£ 335,013	£ 345,063	£ 355,415
Variable Cost of Sales	£ 36,435	£ 44,995	£ 58,455	£ 74,485	£ 91,008	£ 120,142	£ 133,473	£ 135,967	£ 143,157	£ 146,388	£ 150,160	£ 152,025
Fixed Cost of Sales	£ 1,390,536	£ 1,651,233	£ 1,881,612	£ 2,118,116	£ 2,146,376	£ 2,175,484	£ 2,205,465	£ 2,236,345	£ 2,268,152	£ 2,300,913	£ 2,282,957	£ 2,266,013
<b>Total Costs</b>	<b>£ 2,597,388</b>	<b>£ 2,974,907</b>	<b>£ 3,437,655</b>	<b>£ 3,882,091</b>	<b>£ 3,941,853</b>	<b>£ 4,085,991</b>	<b>£ 4,173,576</b>	<b>£ 4,261,235</b>	<b>£ 4,349,065</b>	<b>£ 4,442,747</b>	<b>£ 4,481,148</b>	<b>£ 4,490,924</b>
<b>Net Profit/(Loss)</b>	<b>-£ 1,069,830</b>	<b>-£ 1,137,242</b>	<b>-£ 1,267,583</b>	<b>-£ 1,277,940</b>	<b>-£ 864,099</b>	<b>£ 126,802</b>	<b>£ 702,927</b>	<b>£ 1,165,374</b>	<b>£ 2,027,091</b>	<b>£ 3,045,177</b>	<b>£ 2,380,661</b>	<b>£ 2,309,095</b>
Membership joining fees	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -
<b>Earnings before Taxation</b>	<b>-£ 1,069,830</b>	<b>-£ 1,137,242</b>	<b>-£ 1,267,583</b>	<b>-£ 1,277,940</b>	<b>-£ 864,099</b>	<b>£ 126,802</b>	<b>£ 702,927</b>	<b>£ 1,165,374</b>	<b>£ 2,027,091</b>	<b>£ 3,045,177</b>	<b>£ 2,380,661</b>	<b>£ 2,309,095</b>

Revenues

	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036
<b>Membership Joining/Annual Corporate Fees</b>												
Family	5	5	5	5	5	10	10	10	15	15	10	5
Cumulative No of Members	5	10	15	20	25	35	45	55	70	85	95	100
Joining Fees	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -
Proceeds	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -
<b>7-Day Membership</b>	20	20	10	10	10	10	15	30	40	20	5	
Cumulative No of Members	20	40	50	60	70	80	90	105	135	175	195	200
Joining Fees	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -
Proceeds	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -
<b>5-Day Membership</b>	20	10	5	5	5	5	5	10	15	25	10	5
Cumulative No of Members	20	30	35	40	45	50	55	65	80	105	115	120
Joining Fees	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -
Proceeds	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -
<b>Intermediate / Junior</b>	5	5	5	5	5	5	10	10	15	20	10	5
Cumulative No of Members	5	10	15	20	25	30	40	50	65	85	95	100
Joining Fees	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -
Proceeds	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -
<b>Total Joining Fee Proceeds</b>	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -
<b>Corporate Membership</b>												
Family	5	5	5	5	5	5	5	5	10	35	10	5
Cumulative No of Members	5	10	15	20	25	30	35	40	50	85	95	100
Joining Fees	£ 8,000	£ 8,240	£ 8,487	£ 8,742	£ 9,004	£ 9,274	£ 9,552	£ 9,839	£ 10,134	£ 10,438	£ 10,751	£ 11,074
Proceeds	£ 40,000	£ 41,200	£ 42,436	£ 43,709	£ 45,020	£ 46,371	£ 47,762	£ 49,195	£ 101,342	£ 365,336	£ 107,513	£ 55,369
<b>Cumulative Membership</b>												
Family Membership	5	10	15	20	25	35	45	55	70	85	95	100
7 Day Membership	20	40	50	60	70	80	90	105	135	175	195	200
5 Day Membership	20	30	35	40	45	50	55	65	80	105	115	120
Intermediate/Concessionary	5	10	15	20	25	30	40	50	65	85	95	100
Corporate	5	10	15	20	25	30	35	40	50	85	95	100
<b>Total No. of Members</b>	55	100	130	160	190	225	265	315	400	535	595	620

Annual Subscriptions

	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036
<b>Annual Subscriptions</b>												
Family	5	5	5	5	5	10	10	10	15	15	10	5
Cumulative Membership	5	10	15	20	25	35	45	55	70	85	95	100
Annual Subscription	3% £ 3,500	£ 3,605	£ 3,713	£ 3,825	£ 3,939	£ 4,057	£ 4,179	£ 4,305	£ 4,434	£ 4,567	£ 4,704	£ 4,845
Annual Subscriptions Received	£ 17,500	£ 36,050	£ 55,697	£ 76,491	£ 98,482	£ 142,011	£ 188,063	£ 236,751	£ 310,359	£ 388,170	£ 446,852	£ 484,482
<b>7 Day Membership</b>	20	20	10	10	10	10	15	30	40	20	5	
Cumulative Membership	20	40	50	60	70	80	90	105	135	175	195	200
Annual Subscription	3% £ 2,000	£ 2,060	£ 2,122	£ 2,185	£ 2,251	£ 2,319	£ 2,388	£ 2,460	£ 2,534	£ 2,610	£ 2,688	£ 2,768
Annual Subscriptions Received	£ 40,000	£ 82,400	£ 106,090	£ 131,127	£ 157,571	£ 185,484	£ 214,929	£ 258,274	£ 342,028	£ 456,671	£ 524,127	£ 553,694
<b>5 Day Membership</b>	20	10	5	5	5	5	5	10	15	25	10	5
Cumulative Membership	20	30	35	40	45	50	55	65	80	105	115	120
Annual Subscription	3% £ 1,250	£ 1,288	£ 1,326	£ 1,366	£ 1,407	£ 1,449	£ 1,493	£ 1,537	£ 1,583	£ 1,631	£ 1,680	£ 1,730
Annual Subscriptions Received	£ 25,000	£ 38,625	£ 46,414	£ 54,636	£ 63,310	£ 72,455	£ 82,091	£ 99,927	£ 126,677	£ 171,251	£ 193,188	£ 207,635
<b>Intermediate/Junior</b>	5	5	5	5	5	5	10	10	15	20	10	5
Cumulative Membership	5	10	15	20	25	30	40	50	65	85	95	100
Annual Subscription	3% £ 750	£ 773	£ 796	£ 820	£ 844	£ 869	£ 896	£ 922	£ 950	£ 979	£ 1,008	£ 1,038
Annual Subscriptions Received	£ 3,750	£ 7,725	£ 11,935	£ 16,391	£ 21,103	£ 26,084	£ 35,822	£ 46,120	£ 61,755	£ 83,179	£ 95,754	£ 103,818
<b>Family</b>	£ 17,500	£ 36,050	£ 55,697	£ 76,491	£ 98,482	£ 142,011	£ 188,063	£ 236,751	£ 310,359	£ 388,170	£ 446,852	£ 484,482
<b>7 Day membership</b>	£ 40,000	£ 82,400	£ 106,090	£ 131,127	£ 157,571	£ 185,484	£ 214,929	£ 258,274	£ 342,028	£ 456,671	£ 524,127	£ 553,694
<b>5 Day membership</b>	£ 25,000	£ 38,625	£ 46,414	£ 54,636	£ 63,310	£ 72,455	£ 82,091	£ 99,927	£ 126,677	£ 171,251	£ 193,188	£ 207,635
<b>Intermediate</b>	£ 3,750	£ 7,725	£ 11,935	£ 16,391	£ 21,103	£ 26,084	£ 35,822	£ 46,120	£ 61,755	£ 83,179	£ 95,754	£ 103,818
<b>Total Annual Subscriptions</b>	€ 86,250	€ 164,800	€ 220,137	€ 278,645	€ 340,466	€ 426,033	€ 520,905	€ 641,072	€ 840,819	€ 1,099,271	€ 1,259,922	€ 1,349,628

	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036
<b>Rounds Played</b>												
<b>Family Members</b>	5	5	5	5	5	10	10	10	15	15	10	5
Cumulative No of Members	10	10	15	20	25	35	45	55	70	85	95	100
Rounds played per member	35	35	35	35	35	35	35	35	35	35	35	35
Annual Rounds played	350	350	525	700	875	1225	1575	1925	2450	2975	3325	3500
<b>7 Day Members</b>	20	20	10	10	10	10	10	15	30	40	20	5
Cumulative No of Members	40	40	50	60	70	80	90	105	135	175	195	200
Rounds played per member	25	25	25	25	25	25	25	25	25	25	25	25
Annual Rounds played	1000	1000	1250	1500	1750	2000	2250	2625	3375	4375	4875	5000
<b>5 Day Members</b>	20	10	5	5	5	5	5	10	15	25	10	5
Cumulative No of Members	30	30	35	40	45	50	55	65	80	105	115	120
Rounds played per member	20	20	20	20	20	20	20	20	20	20	20	20
Annual Rounds played	600	600	700	800	900	1000	1100	1300	1600	2100	2300	2400
<b>Intermediate</b>	5	5	5	5	5	5	10	10	15	20	10	5
Cumulative No of Members	5	10	15	20	25	30	40	50	65	85	95	100
Rounds played per member	15	15	15	15	15	15	15	15	15	15	15	15
Annual Rounds played	75	150	225	300	375	450	600	750	975	1275	1425	1500
<b>Corporate</b>	5	5	5	5	10	20	0	0	0	0	0	0
Cumulative No of Members	5	10	15	20	30	50	50	50	50	50	50	50
Rounds played per member	60	60	60	60	60	60	60	60	60	60	60	60
Annual Rounds played	300	600	900	1200	1800	3000	3000	3000	3000	3000	3000	3000
	2325	2700	3600	4500	5700	7675	8525	9600	11400	13725	14925	15400

**Member, Hotel and Other Income**

	Cost per placement	Indexation	Base Cost	Membership Joining Fees											
				2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036
<b>Membership Joining Fee</b>															
Family		3%		£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	
7 Day membership		3%		£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -		
5 Day membership		3%		£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -		
Intermediate/Concessionary		3%		£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -		
Corporate		3%	£ 8,000	£ 8,000	£ 8,240	£ 8,487	£ 8,742	£ 9,004	£ 9,274	£ 9,552	£ 9,839	£ 10,134	£ 10,438	£ 10,751	£ 11,074
<b>Corporate Events</b>															
Number of Events				5	10	20	20	25	35	40	40	50	50	50	50
Size of Event				30	40	40	40	40	40	50	50	50	50	50	50
Rounds played				150	400	800	800	1000	1400	2000	2000	2500	2500	2500	2500
Fee per round (excludes F&B)	£	160	3%	£ 100	£ 103	£ 106	£ 109	£ 113	£ 120	£ 125	£ 130	£ 140	£ 150	£ 150	£ 150
Income				£ 15,000	£ 41,200	£ 84,872	£ 87,418	£ 112,551	£ 168,000	£ 250,000	£ 260,000	£ 350,000	£ 375,000	£ 375,000	£ 375,000





5. FIXED COSTS

Fixed Costs

Expenses

	Base Cost	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036
<b>Fixed Costs</b>													
<b>Greenkeeping</b>													
	Per Hole												
Course Maintenance	3% £ 10,000	£ 185,400	£ 190,962	£ 196,691	£ 202,592	£ 208,669	£ 214,929	£ 221,377	£ 228,019	£ 234,859	£ 241,905	£ 249,162	£ 256,637
6 hole Academy Course	3% £ 6,000	£ 36,000	£ 37,080	£ 38,192	£ 39,338	£ 40,518.32	£ 41,734	£ 42,985.88	£ 44,275	£ 45,603.72	£ 46,972	£ 48,380.99	£ 49,832
	£ 10,000	£ 221,400	£ 228,042	£ 234,883	£ 241,930	£ 249,188	£ 256,663	£ 264,363	£ 272,294	£ 280,463	£ 288,877	£ 297,543	£ 306,469
<b>Accommodation</b>													
Electricity	3% £ 48,000	£ 49,440	£ 50,923	£ 52,451	£ 54,024	£ 55,645	£ 57,315	£ 59,034	£ 60,805	£ 62,629	£ 64,508	£ 66,443	£ 68,437
Gas	3% £ 24,000	£ 24,720	£ 25,462	£ 26,225	£ 27,012	£ 27,823	£ 28,657	£ 29,517	£ 30,402	£ 31,315	£ 32,254	£ 33,222	£ 34,218
Insurance	3% £ 36,000	£ 37,080	£ 38,192	£ 39,338	£ 40,518	£ 41,734	£ 42,986	£ 44,275	£ 45,604	£ 46,972	£ 48,381	£ 49,832	£ 51,327
Water	3% £ 36,000	£ 37,080	£ 38,192	£ 39,338	£ 40,518	£ 41,734	£ 42,986	£ 44,275	£ 45,604	£ 46,972	£ 48,381	£ 49,832	£ 51,327
Council Tax	3% £ 72,000	£ 74,160	£ 76,385	£ 78,676	£ 81,037	£ 83,468	£ 85,972	£ 88,551	£ 91,207	£ 93,944	£ 96,762	£ 99,665	£ 102,655
Cleaning	3% £ 36,000	£ 37,080	£ 38,192	£ 39,338	£ 40,518	£ 41,734	£ 42,986	£ 44,275	£ 45,604	£ 46,972	£ 48,381	£ 49,832	£ 51,327
Clubhouse Maintenance	3% £ 12,000	£ 12,360	£ 12,731	£ 13,113	£ 13,506	£ 13,911	£ 14,329	£ 14,758	£ 15,201	£ 15,657	£ 16,127	£ 16,611	£ 17,109
Other	3% £ 24,000	£ 24,720	£ 25,462	£ 26,225	£ 27,012	£ 27,823	£ 28,657	£ 29,517	£ 30,402	£ 31,315	£ 32,254	£ 33,222	£ 34,218
	£ 288,000	£ 296,640	£ 305,539	£ 314,705	£ 324,147	£ 333,871	£ 343,887	£ 354,204	£ 364,830	£ 375,775	£ 387,048	£ 398,659	£ 410,619
<b>Office Services</b>													
Office Costs	3% £ 10,000	£ 10,300	£ 10,609	£ 10,927	£ 11,255	£ 11,593	£ 11,941	£ 12,299	£ 12,668	£ 13,048	£ 13,439	£ 13,842	£ 14,258
IT	3% £ 12,000	£ 12,360	£ 12,731	£ 13,113	£ 13,506	£ 13,911	£ 14,329	£ 14,758	£ 15,201	£ 15,657	£ 16,127	£ 16,611	£ 17,109
Website	3% £ 12,000	£ 12,360	£ 12,731	£ 13,113	£ 13,506	£ 13,911	£ 14,329	£ 14,758	£ 15,201	£ 15,657	£ 16,127	£ 16,611	£ 17,109
Telephone & Comms	3% £ 18,000	£ 18,540	£ 19,096	£ 19,669	£ 20,259	£ 20,867	£ 21,493	£ 22,138	£ 22,802	£ 23,486	£ 24,190	£ 24,916	£ 25,664
Other	3% £ 12,000	£ 12,360	£ 12,731	£ 13,113	£ 13,506	£ 13,911	£ 14,329	£ 14,758	£ 15,201	£ 15,657	£ 16,127	£ 16,611	£ 17,109
	£ 64,000	£ 65,920	£ 67,898	£ 69,935	£ 72,033	£ 74,194	£ 76,419	£ 78,712	£ 81,073	£ 83,505	£ 86,011	£ 88,591	£ 91,249
<b>Professional &amp; Other</b>													
Audit & Taxation	3% £ 12,000	£ 12,360	£ 12,731	£ 13,113	£ 13,506	£ 13,911	£ 14,329	£ 14,758	£ 15,201	£ 15,657	£ 16,127	£ 16,611	£ 17,109
Legal	3% £ 10,000	£ 10,300	£ 10,609	£ 10,927	£ 11,255	£ 11,593	£ 11,941	£ 12,299	£ 12,668	£ 13,048	£ 13,439	£ 13,842	£ 14,258
Marketing	3% £ 100,000	£ 103,000	£ 106,090	£ 109,273	£ 112,551	£ 115,927	£ 119,405	£ 122,987	£ 126,677	£ 130,477	£ 134,392	£ 138,423	£ 142,576
Credit Card & Financial Charges	3% £ 36,000	£ 37,080	£ 38,192	£ 39,338	£ 40,518	£ 41,734	£ 42,986	£ 44,275	£ 45,604	£ 46,972	£ 48,381	£ 49,832	£ 51,327
ET Properties	3% £ 100,000	£ 103,000	£ 106,090	£ 109,273	£ 112,551	£ 115,927	£ 119,405	£ 122,987	£ 126,677	£ 130,477	£ 134,392	£ 138,423	£ 142,576
Other Charges	3% £ 12,000	£ 12,360	£ 12,731	£ 13,113	£ 13,506	£ 13,911	£ 14,329	£ 14,758	£ 15,201	£ 15,657	£ 16,127	£ 16,611	£ 17,109
	£ 270,000	£ 278,100	£ 286,443	£ 295,036	£ 303,887	£ 313,004	£ 322,394	£ 332,066	£ 342,028	£ 352,289	£ 362,857	£ 373,743	£ 384,955
<b>Depreciation</b>													
Depreciation	3%	£ 1,124,420	£ 1,176,120	£ 1,176,120	£ 1,176,120	£ 1,176,120	£ 1,176,120	£ 1,176,120	£ 1,176,120	£ 1,176,120	£ 1,176,120	£ 1,176,120	£ 1,072,720
	£ -	£ 1,124,420	£ 1,176,120	£ 1,176,120	£ 1,176,120	£ 1,176,120	£ 1,176,120	£ 1,176,120	£ 1,176,120	£ 1,176,120	£ 1,176,120	£ 1,124,420	£ 1,072,720
<b>Total Costs</b>		£ 1,986,480	£ 2,064,042	£ 2,090,679	£ 2,118,116	£ 2,146,376	£ 2,175,484	£ 2,205,465	£ 2,236,345	£ 2,268,152	£ 2,300,913	£ 2,282,957	£ 2,266,013
Percentage of Costs incurred each year		70%	80%	90%	100%	100%	100%	100%	100%	100%	100%	100%	100%
<b>Total Costs charged to Profit &amp; Loss Account</b>		£ 1,390,536.00	£ 1,651,233	£ 1,881,612	£ 2,118,116	£ 2,146,376	£ 2,175,484	£ 2,205,465	£ 2,236,345	£ 2,268,152	£ 2,300,913	£ 2,282,957	£ 2,266,013
<b>Less</b>													
Retail Fixed Costs		£ 22,002	£ 24,207	£ 34,292	£ 46,354	£ 56,050	£ 64,014	£ 38,523	£ 34,822	£ 36,373	£ 37,698	£ 39,111	£ 40,428
F&B Fixed Costs		£ 78,000	£ 80,340	£ 82,750	£ 85,233	£ 87,790	£ 90,423	£ 93,136	£ 95,930	£ 98,808	£ 101,772	£ 104,825	£ 107,970
Golf Ops Fixed Costs		£ 85,900	£ 87,100	£ 88,336	£ 89,609	£ 90,920	£ 92,271	£ 93,662	£ 95,095	£ 96,571	£ 98,091	£ 99,657	£ 101,269
Driving Range Fixed Costs		£ 124,800	£ 127,980	£ 131,255	£ 134,629	£ 138,104	£ 141,683	£ 145,370	£ 149,167	£ 153,078	£ 157,106	£ 161,255	£ 165,529
		£ 310,702	£ 319,627	£ 336,634	£ 355,825	£ 372,864	£ 388,392	£ 370,691	£ 375,014	£ 384,829	£ 394,668	£ 404,848	£ 415,196
<b>Total Costs charged to Profit &amp; Loss Account</b>		£ 1,079,834	£ 1,331,606	£ 1,544,978	£ 1,762,291	£ 1,773,513	£ 1,787,092	£ 1,834,774	£ 1,861,331	£ 1,883,322	£ 1,906,245	£ 1,878,108	£ 1,850,817



**6 VARIABLE COSTS**

**Variable Costs**  
**Expenses**

	Base % Cost	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036
<b>Scenario One</b>													
<b>Variable Costs</b>													
Golf Operations	£ 4.50	£ 36,435	£ 44,995	£ 58,455	£ 74,485	£ 91,008	£ 120,142	£ 133,473	£ 135,967	£ 143,157	£ 146,388	£ 150,160	£ 152,025
		£ 36,435	£ 44,995	£ 58,455	£ 74,485	£ 91,008	£ 120,142	£ 133,473	£ 135,967	£ 143,157	£ 146,388	£ 150,160	£ 152,025



7. STAFFING COSTS

Staffing Plan

	No of Staff	Index	Base Cost	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038
<b>Greenkeeping</b>																	
Course Superintendent	1	3%	£ 50,000	£ 51,500	£ 53,045	£ 54,636	£ 54,684	£ 56,325	£ 58,014	£ 59,704	£ 61,495	£ 63,340	£ 65,240	£ 67,197	£ 65,356	£ 67,317	£ 69,336
Course Superintendent Assistant	1	3%	£ 35,000	£ 36,050	£ 37,132	£ 38,245	£ 38,279	£ 39,427	£ 40,610	£ 41,793	£ 43,047	£ 44,338	£ 45,668	£ 47,038	£ 48,449	£ 49,903	£ 51,400
Mechanics	2	3%	£ 25,000	£ 51,500	£ 53,045	£ 54,636	£ 54,684	£ 56,325	£ 58,014	£ 59,704	£ 61,495	£ 63,340	£ 65,240	£ 67,197	£ 69,213.40	£ 71,290	£ 73,428
Greenkeepers	8	3%	£ 18,000	£ 148,320	£ 152,770	£ 157,353	£ 157,490	£ 162,215	£ 167,081	£ 171,948	£ 177,106	£ 182,419	£ 187,892	£ 193,529	£ 199,334.60	£ 205,315	£ 211,474
Greenkeepers (Seasonal)	4	3%	£ 9,000	£ 37,080	£ 38,192	£ 39,338	£ 39,373	£ 40,554	£ 41,770	£ 42,987	£ 44,277	£ 45,605	£ 46,973	£ 48,382	£ 49,833.65	£ 51,329	£ 52,869
Part time Assistant	2	3%	£ 8,000	£ 16,480	£ 16,974	£ 17,484	£ 17,499	£ 18,024	£ 18,565	£ 19,105	£ 19,678	£ 20,269	£ 20,877	£ 21,503	£ 20,914	£ 21,541	£ 22,188
Gardeners	2	3%	£ 15,000	£ 30,900	£ 31,827	£ 32,782	£ 32,810	£ 33,795	£ 34,809	£ 35,822	£ 36,897	£ 38,004	£ 39,144	£ 40,318	£ 41,528.04	£ 42,774	£ 44,057
				£ 371,830	£ 382,985	£ 394,474	£ 394,819	£ 406,664	£ 418,864	£ 431,064	£ 443,995	£ 457,315	£ 471,035	£ 485,166	£ 494,629	£ 509,468	£ 524,752
<b>Management</b>																	
Director of Golf	1	3%	£ 55,000	£ 56,650	£ 58,350	£ 60,100	£ 60,152	£ 61,957	£ 63,816	£ 65,674	£ 67,645	£ 69,674	£ 71,764	£ 73,917	£ 71,892	£ 74,048	£ 76,270
Assistant	1	3%	£ 24,000	£ 24,720	£ 25,462	£ 26,225	£ 27,012	£ 27,823	£ 28,657	£ 29,517	£ 30,402	£ 31,315	£ 32,254	£ 33,222	£ 34,218	£ 35,245	£ 36,302
Accounts Assistant	1	3%	£ 20,000	£ 20,600	£ 21,218	£ 21,855	£ 21,874	£ 22,530	£ 23,206	£ 23,882	£ 24,598	£ 25,336	£ 26,096	£ 26,879	£ 26,142	£ 26,927	£ 27,734
				£ 101,970	£ 105,029	£ 108,180	£ 109,038	£ 112,309	£ 115,679	£ 119,073	£ 122,645	£ 126,325	£ 130,114	£ 134,018	£ 132,252	£ 136,220	£ 140,306
<b>Golf Operations</b>																	
Golf Services Manager	1	3%	£ 30,000	£ 30,900	£ 31,827	£ 32,782	£ 32,810	£ 33,795	£ 34,809	£ 35,822	£ 36,897	£ 38,004	£ 39,144	£ 40,318	£ 41,528.04	£ 42,773.88	£ 44,057.10
Golf Ops Staff/Marshals/Starters	6	3%	£ 17,500	£ 108,150	£ 111,395	£ 114,736	£ 114,837	£ 118,282	£ 121,830	£ 125,379	£ 129,140	£ 133,014	£ 137,005	£ 141,115	£ 145,348.15	£ 149,708.59	£ 154,199.85
Part time staff	3	3%	£ 11,000	£ 33,990	£ 35,010	£ 36,060	£ 36,091	£ 37,174	£ 38,289	£ 39,405	£ 40,587	£ 41,804	£ 43,059	£ 44,350	£ 45,680.85	£ 47,051.27	£ 48,462.81
				£ 173,040	£ 178,231	£ 183,578	£ 183,739	£ 189,251	£ 194,928	£ 200,606	£ 206,624	£ 212,823	£ 219,207	£ 225,784	£ 232,557	£ 239,534	£ 246,720
				80%	80%	90%	90%										
<b>Membership</b>																	
Membership Manager	1	3%	£ 30,000	£ 30,900	£ 31,827	£ 32,782	£ 32,810	£ 33,795	£ 34,809	£ 35,822	£ 36,897	£ 38,004	£ 39,144	£ 40,318	£ 41,528.04	£ 42,774	£ 44,057
				£ 30,900	£ 31,827	£ 32,782	£ 32,810	£ 33,795	£ 34,809	£ 35,822	£ 36,897	£ 38,004	£ 39,144	£ 40,318	£ 41,528	£ 42,774	£ 44,057
<b>Sales &amp; Marketing</b>																	
Sales Manager	1	3%	£ 30,000	£ 30,900	£ 31,827	£ 32,782	£ 32,810	£ 33,795	£ 34,809	£ 35,822	£ 36,897	£ 38,004	£ 39,144	£ 40,318	£ 41,528.04	£ 42,774	£ 44,057
				£ 30,900	£ 31,827	£ 32,782	£ 32,810	£ 33,795	£ 34,809	£ 35,822	£ 36,897	£ 38,004	£ 39,144	£ 40,318	£ 41,528	£ 42,774	£ 44,057
<b>Direct employment costs</b>																	
				£ 674,032	£ 694,253	£ 733,438	£ 734,843	£ 586,563	£ 604,160	£ 621,782	£ 640,435	£ 659,648	£ 679,437	£ 699,821	£ 709,937	£ 731,235	£ 753,173
<b>Social, BIK &amp; Other</b>																	
Employers NI, Pension, Health etc		20%		£ 134,806	£ 138,851	£ 146,688	£ 146,969	£ 117,313	£ 120,832	£ 124,356	£ 128,087	£ 131,930	£ 135,887	£ 139,964	£ 141,987	£ 146,247	£ 150,635
<b>Total employment costs</b>																	
				£ 808,838	£ 833,104	£ 880,126	£ 881,812	£ 703,875	£ 724,992	£ 746,138	£ 768,522	£ 791,578	£ 815,325	£ 839,785	£ 851,925	£ 877,483	£ 903,807
Percentage of Costs incurred each year																	
				70%	70%	80%	90%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
<b>Total Costs charged to Profit &amp; Loss Account</b>																	
				£ 566,187	£ 583,172	£ 704,101	£ 793,631	£ 703,875	£ 724,992	£ 746,138	£ 768,522	£ 791,578	£ 815,325	£ 839,785	£ 851,925	£ 877,483	£ 903,807



8. PROSHOP/RETAIL

Hulton Park

Pro Shop

Profit and Loss Account

		2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036
<b>Revenues</b>													
Shop Sales	Per Round	£ 100,968	£ 127,709	£ 169,638	£ 220,209	£ 274,893	£ 367,469	£ 421,030	£ 445,397	£ 478,999	£ 502,739	£ 529,085	£ 550,693
Driving Range Sales	Per Basket	£ 21,600	£ 29,664	£ 38,192	£ 47,206	£ 56,726	£ 58,427	£ 60,180	£ 61,986	£ 63,845	£ 65,761	£ 67,733	£ 69,765
Casual Sales		£ 12,500	£ 19,313	£ 26,523	£ 34,148	£ 42,207	£ 50,718	£ 59,703	£ 61,494	£ 63,339	£ 65,239	£ 67,196	£ 69,212
Proshop cost of sales	50%	£ 67,534	£ 88,343	£ 117,176	£ 150,781	£ 186,913	£ 238,307	£ 270,457	£ 284,438	£ 303,092	£ 316,869	£ 332,007	£ 344,835
<b>Total Sales</b>		<b>£ 67,534</b>	<b>£ 88,343</b>	<b>£ 117,176</b>	<b>£ 150,781</b>	<b>£ 186,913</b>	<b>£ 238,307</b>	<b>£ 270,457</b>	<b>£ 284,438</b>	<b>£ 303,092</b>	<b>£ 316,869</b>	<b>£ 332,007</b>	<b>£ 344,835</b>
<b>Gross Profit</b>													
		£ 67,534	£ 88,343	£ 117,176	£ 150,781	£ 186,913	£ 238,307	£ 270,457	£ 284,438	£ 303,092	£ 316,869	£ 332,007	£ 344,835
<b>Staff Costs</b>													
Accommodation		£ 12,000	£ 12,360	£ 12,731	£ 13,113	£ 13,506	£ 13,911	£ 14,329	£ 14,758	£ 15,201	£ 15,657	£ 16,127	£ 16,611
IT and Office Services		£ 6,000	£ 6,180	£ 6,365	£ 6,556	£ 6,753	£ 6,956	£ 7,164	£ 7,379	£ 7,601	£ 7,829	£ 8,063	£ 8,305
Professional fees & Credit card chgs		£ 4,002	£ 5,667	£ 15,196	£ 26,685	£ 35,790	£ 43,147	£ 17,030	£ 12,685	£ 13,571	£ 14,212	£ 14,920	£ 15,511
<b>Total Costs</b>		<b>£ 110,202</b>	<b>£ 125,511</b>	<b>£ 151,678</b>	<b>£ 180,696</b>	<b>£ 194,422</b>	<b>£ 206,538</b>	<b>£ 185,322</b>	<b>£ 186,025</b>	<b>£ 192,112</b>	<b>£ 198,110</b>	<b>£ 204,334</b>	<b>£ 210,608</b>
<b>Net Profit/(Loss)</b>		<b>-£ 42,668</b>	<b>-£ 37,169</b>	<b>-£ 34,502</b>	<b>-£ 29,915</b>	<b>-£ 7,509</b>	<b>£ 31,770</b>	<b>£ 85,134</b>	<b>£ 98,413</b>	<b>£ 110,980</b>	<b>£ 118,760</b>	<b>£ 127,673</b>	<b>£ 134,227</b>

Revenues

		2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036		
<b>Total Rounds</b>															
Annually on 18 hole course		8,097	9,999	12,990	16,552	20,224	26,698	29,661	30,215	31,813	32,531	33,369	33,783		
Total Rounds		8,097	9,999	12,990	16,552	20,224	26,698	29,661	30,215	31,813	32,531	33,369	33,783		
<b>Academy Golf</b>															
Rounds		5,000	6,000	7,500	9,000	10,500	12,500	14,000	15,000	15,000	15,000	15,000	15,000		
Total Rounds		5,000	6,000	7,500	9,000	10,500	12,500	14,000	15,000	15,000	15,000	15,000	15,000		
<b>Golf Course</b>															
Spend per 18 hole Round		3% £ 10.00	£ 10.30	£ 10.61	£ 10.93	£ 11.26	£ 11.59	£ 11.94	£ 12.30	£ 12.67	£ 13.05	£ 13.44	£ 13.84		
<b>Driving Range Shop Spend</b>															
Spend per Academy Golf Round		3% £ 4.00	£ 4.12	£ 4.24	£ 4.37	£ 4.50	£ 4.64	£ 4.78	£ 4.92	£ 5.07	£ 5.22	£ 5.38	£ 5.54		
Per Basket		3% £ 1.00	£ 1.03	£ 1.06	£ 1.09	£ 1.13	£ 1.16	£ 1.19	£ 1.23	£ 1.27	£ 1.30	£ 1.34	£ 1.38		
<b>Casual Sales</b>															
Walk ins		3%	500	750	1000	1250	1500	1750	2000	2000	2000	2000	2000		
Average Spend		3% £ 25.00	£ 25.75	£ 26.52	£ 27.32	£ 28.14	£ 28.98	£ 29.85	£ 30.75	£ 31.67	£ 32.62	£ 33.60	£ 34.61		
<b>Staff Costs</b>															
Staff Salaries	6	3%	£ 17,500.00	£ 105,000.00	£ 105,525.00	£ 108,690.75	£ 111,951.47	£ 115,310.02	£ 118,769.32	£ 122,332.40	£ 126,002.37	£ 129,782.44	£ 133,675.91	£ 137,686.19	£ 141,817
Social Insurance		20%	£ 21,000.00	£ 21,105.00	£ 21,738.15	£ 22,390.29	£ 23,062.00	£ 23,753.86	£ 24,466.48	£ 25,200.47	£ 25,956.49	£ 26,735.18	£ 27,537.24	£ 28,363.36	
<b>% of costs incurred each year</b>			70%	80%	90%	100%									
<b>Credit Card</b>															
% of purchases paid for by credit card			25%	25%	25%	25%	25%	25%	25%	25%	25%	25%	25%		
Credit Card charges		3%	£ 4,001.69	£ 5,667.13	£ 15,195.75	£ 26,685.37	£ 35,790.47	£ 43,147.40	£ 17,030.26	£ 12,684.57	£ 13,571.12	£ 14,212.49	£ 14,920.45	£ 15,511.47	
<b>Ryder Cup Tournament Sales 2030</b>															
Tournament Sales		£ 25,000	£ 50,000	£ 400,000	£ 800,000	£ 1,100,000	£ 1,300,000	£ 200,000	£ -	£ -	£ -	£ -	£ -		
Pro shop Cost of Sales		55%	£ 13,750	£ 27,500	£ 220,000	£ 440,000	£ 605,000	£ 715,000	£ 110,000	£ -	£ -	£ -	£ -		
Direct Costs		£ 11,250	£ 22,500	£ 180,000	£ 360,000	£ 495,000	£ 715,000	£ 110,000	£ -	£ -	£ -	£ -	£ -		
<b>Ryder Cup Tournament Sales 2034</b>															
Tournament Sales					£ 10,000	£ 25,000	£ 250,000	£ 750,000	£ 1,000,000	£ 1,250,000	£ 1,500,000	£ 250,000	£ -		
Pro shop Cost of Sales					£ 5,500	£ 13,750	£ 137,500	£ 412,500	£ 550,000	£ 687,500	£ 825,000	£ 137,500	£ -		
Direct Costs					£ 4,500	£ 11,250	£ 137,500	£ 412,500	£ 550,000	£ 687,500	£ 825,000	£ 137,500	£ -		



**9. FOOD & BEVERAGE**

**Hulton Park**  
**Food & Beverage P&L**

**Profit and Loss Account**

				2025	2026	2027	2028	2029	2029	2030	2031	2032	2033	2034	2035
<b>Revenues</b>															
	Per cover	Indexation													
Food & Beverage - 18 holes	75%		3%	£ 91,089	£ 115,862	£ 150,521	£ 191,799	£ 234,344	£ 309,365	£ 343,692	£ 350,115	£ 368,629	£ 376,950	£ 386,662	£ 391,463
Food & Beverage - 6 holes	50%			£ 15,000	£ 18,540	£ 23,870	£ 29,504	£ 35,454	£ 43,473	£ 50,150	£ 55,344	£ 57,005	£ 58,715	£ 60,476	£ 62,291
Halfway House	50%	£ 2.00	3%	£ 8,097	£ 10,299	£ 13,380	£ 17,049	£ 20,831	£ 27,499	£ 30,550	£ 31,121	£ 32,767	£ 33,507	£ 34,370	£ 34,797
Buggy Sales	50%	£ 2.00	3%	£ 8,097	£ 10,299	£ 13,380	£ 17,049	£ 20,831	£ 27,499	£ 30,550	£ 31,121	£ 32,767	£ 33,507	£ 34,370	£ 34,797
Casual diners		£ 12.00		£ 63,000	£ 86,520	£ 111,395	£ 137,684	£ 165,450	£ 170,413	£ 200,601	£ 206,619	£ 212,817	£ 219,202	£ 225,778	£ 232,551
<b>Total Sales</b>				<b>£ 185,282</b>	<b>£ 241,520</b>	<b>£ 312,545</b>	<b>£ 393,084</b>	<b>£ 476,909</b>	<b>£ 578,249</b>	<b>£ 655,544</b>	<b>£ 674,321</b>	<b>£ 703,985</b>	<b>£ 721,880</b>	<b>£ 741,656</b>	<b>£ 755,899</b>
Food & Drink Cost of Sales		32%	3%	£ 59,290	£ 77,286	£ 100,015	£ 125,787	£ 152,611	£ 185,040	£ 209,774	£ 215,783	£ 225,275	£ 231,002	£ 237,330	£ 241,888
<b>Direct Costs</b>				<b>£ 59,290</b>	<b>£ 77,286</b>	<b>£ 100,015</b>	<b>£ 125,787</b>	<b>£ 152,611</b>	<b>£ 185,040</b>	<b>£ 209,774</b>	<b>£ 215,783</b>	<b>£ 225,275</b>	<b>£ 231,002</b>	<b>£ 237,330</b>	<b>£ 241,888</b>
<b>Gross Profit</b>				<b>£ 125,992</b>	<b>£ 164,234</b>	<b>£ 212,531</b>	<b>£ 267,297</b>	<b>£ 324,298</b>	<b>£ 393,209</b>	<b>£ 445,770</b>	<b>£ 458,538</b>	<b>£ 478,710</b>	<b>£ 490,879</b>	<b>£ 504,326</b>	<b>£ 514,011</b>
Staff Costs			3%	£ 133,800	£ 165,377	£ 193,108	£ 227,123	£ 284,386	£ 292,436	£ 293,159	£ 301,230	£ 302,196	£ 310,296	£ 311,505	£ 319,641
Accommodation			3%	£ 24,000	£ 24,720	£ 25,462	£ 26,225	£ 27,012	£ 27,823	£ 28,657	£ 29,517	£ 30,402	£ 31,315	£ 32,254	£ 33,222
IT and Office Services			3%	£ 12,000	£ 12,360	£ 12,731	£ 13,113	£ 13,506	£ 13,911	£ 14,329	£ 14,758	£ 15,201	£ 15,657	£ 16,127	£ 16,611
Advertising and Promotions			3%	£ 18,000	£ 18,540	£ 19,096	£ 19,669	£ 20,259	£ 20,867	£ 21,493	£ 22,138	£ 22,802	£ 23,486	£ 24,190	£ 24,916
Professional fees			3%	£ 6,000	£ 6,180	£ 6,365	£ 6,556	£ 6,753	£ 6,956	£ 7,164	£ 7,379	£ 7,601	£ 7,829	£ 8,063	£ 8,305
Cleaning			3%	£ 12,000	£ 12,360	£ 12,731	£ 13,113	£ 13,506	£ 13,911	£ 14,329	£ 14,758	£ 15,201	£ 15,657	£ 16,127	£ 16,611
Replacements			3%	£ 6,000	£ 6,180	£ 6,365	£ 6,556	£ 6,753	£ 6,956	£ 7,164	£ 7,379	£ 7,601	£ 7,829	£ 8,063	£ 8,305
<b>Total Costs</b>				<b>£ 211,800.0</b>	<b>£ 245,717</b>	<b>£ 256,762</b>	<b>£ 292,687</b>	<b>£ 351,916</b>	<b>£ 361,992</b>	<b>£ 364,802</b>	<b>£ 375,023</b>	<b>£ 378,202</b>	<b>£ 388,583</b>	<b>£ 392,140</b>	<b>£ 402,695</b>
<b>Net Profit/(Loss)</b>				<b>-£ 85,808</b>	<b>-£ 81,483</b>	<b>-£ 44,231</b>	<b>-£ 25,390</b>	<b>-£ 27,618</b>	<b>£ 31,217</b>	<b>£ 80,968</b>	<b>£ 83,515</b>	<b>£ 100,508</b>	<b>£ 102,296</b>	<b>£ 112,186</b>	<b>£ 111,316</b>

<b>Revenues</b>				2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036
<b>Total 18 hole rounds</b>															
Annually on 18 hole course				8,097	9,999	12,990	16,552	20,224	26,698	29,661	30,215	31,813	32,531	33,369	£ 33,783
Total Rounds				8,097	9,999	12,990	16,552	20,224	26,698	29,661	30,215	31,813	32,531	33,369	£ 33,783
% Growth in Rounds					23%	30%	27%	22%	32%	11%	2%	5%	2%	3%	1%

<b>Academy Golf</b>				2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036
<b>Rounds</b>															
				5,000.00	6,000.00	7,500.00	9,000.00	10,500.00	12,500.00	14,000.00	15,000.00	15,000.00	15,000.00	15,000.00	15,000.00

# DRAFT

## Food & Beverage Spend (18 holes)

No of rounds availing of F&B  
 Food Spend per round  
 Beverage Spend per round  
 Gross Revenues

			75%	75%	75%	75%	75%	75%	75%	75%	75%	75%	75%	75%	75%
	3%	£10	£ 60,726	£ 77,241	£ 100,348	£ 127,866	£ 156,230	£ 206,243	£ 229,128	£ 233,410	£ 245,753	£ 251,300	£ 257,775	£ 260,976	
	3%	£5	£ 30,363	£ 38,621	£ 50,174	£ 63,933	£ 78,115	£ 103,122	£ 114,564	£ 116,705	£ 122,876	£ 125,650	£ 128,887	£ 130,488	
			£ 91,089	£ 115,862	£ 150,521	£ 191,799	£ 234,344	£ 309,365	£ 343,692	£ 350,115	£ 368,629	£ 376,950	£ 386,662	£ 391,463	

## Food & Beverage Spend (6 holes)

No of rounds availing of F&B  
 Food spend per round  
 Revenues  
 Beverage Spend per round  
 Revenues

			50%	50%	50%	50%	50%	50%	50%	50%	50%	50%	50%	50%	50%
	3%	£4	£ 4,00	£ 4,12	£ 4,24	£ 4,37	£ 4,50	£ 4,64	£ 4,78	£ 4,92	£ 5,07	£ 5,22	£ 5,38	£ 5,54	
			£ 10,000	£ 12,360	£ 15,914	£ 19,669	£ 23,636	£ 28,982	£ 33,433	£ 36,896	£ 38,003	£ 39,143	£ 40,317	£ 41,527	
	3%	£2.00	£ 2,00	£ 2,06	£ 2,12	£ 2,19	£ 2,25	£ 2,32	£ 2,39	£ 2,46	£ 2,53	£ 2,61	£ 2,69	£ 2,77	
			£ 5,000	£ 6,180	£ 7,957	£ 9,835	£ 11,818	£ 14,491	£ 16,717	£ 18,448	£ 19,002	£ 19,572	£ 20,159	£ 20,764	

## Casual diners

Casual diners  
 Covers per annum  
 Average F&B spend  
 Total Revenues

Days open

	350	Per day		15	20	25	30	35	35	40	40	40	40	40	40
				5,250	7,000	8,750	10,500	12,250	12,250	14,000	14,000	14,000	14,000	14,000	14,000
		3%	£12	£ 12,00	£ 12,36	£ 12,73	£ 13,11	£ 13,51	£ 13,91	£ 14,33	£ 14,76	£ 15,20	£ 15,66	£ 16,13	£ 16,61
				£ 63,000	£ 86,520	£ 111,395	£ 137,684	£ 165,450	£ 170,413	£ 200,601	£ 206,619	£ 212,817	£ 219,202	£ 225,778	£ 232,551

£ 16 4 £ 64

## Staff Costs

Chef  
 F&B Supervisor  
 Kitchen Staff  
 F&B services  
 Seasonal Staff  
 Total Staff Costs  
 Social Insurance  
 Gross Staff Costs  
 % of costs incurred each year

	3%	£ 35,000																	
£18000 x 2	3%	£ 36,000																	
£16,000 x 4	3%	£ 64,000																	
£16,000 x 4	3%	£ 64,000																	
£8,000 x 3	3%	£ 24,000																	
	3%	£ 223,000	£ 223,000	£ 229,690	£ 229,891	£ 236,587	£ 236,988	£ 243,696	£ 244,299	£ 251,025	£ 251,830	£ 258,580	£ 259,587	£ 266,368					
	20%		£ 44,600	£ 45,938	£ 45,978.14	£ 47,317.34	£ 47,397.66	£ 48,739.27	£ 48,859.84	£ 50,205.07	£ 50,365.99	£ 51,716.05	£ 51,917.47	£ 53,273.57					
	20%		£ 267,600	£ 275,628	£ 275,869	£ 283,904	£ 284,386	£ 292,436	£ 293,159	£ 301,230	£ 302,196	£ 310,296	£ 311,505	£ 319,641					
				50%	60%	70%	80%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%



## 10. GOLF OPERATIONS

## Hulton Park

## Club Hire P&amp;L

## Profit and Loss Account

	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036
<b>Revenues</b>												
Club Hire	£ 13,573	£ 16,994	£ 22,271	£ 28,317	£ 34,798	£ 44,949	£ 51,637	£ 55,543	£ 58,727	£ 61,191	£ 63,872	£ 66,218
Buggy Rental Sales	£ 70,847	£ 90,115	£ 120,584	£ 158,262	£ 199,169	£ 270,817	£ 309,893	£ 325,154	£ 352,619	£ 371,396	£ 392,394	£ 409,184
Power Caddy Rentals	£ 21,254	£ 27,035	£ 36,175	£ 47,479	£ 59,751	£ 81,245	£ 92,968	£ 97,546	£ 105,786	£ 111,419	£ 117,718	£ 122,755
<b>Total Sales</b>	<b>£ 105,673</b>	<b>£ 134,144</b>	<b>£ 179,031</b>	<b>£ 234,058</b>	<b>£ 293,718</b>	<b>£ 397,011</b>	<b>£ 454,498</b>	<b>£ 478,243</b>	<b>£ 517,132</b>	<b>£ 544,006</b>	<b>£ 573,984</b>	<b>£ 598,158</b>
<b>Gross Profit</b>	<b>£ 105,673</b>	<b>£ 134,144</b>	<b>£ 179,031</b>	<b>£ 234,058</b>	<b>£ 293,718</b>	<b>£ 397,011</b>	<b>£ 454,498</b>	<b>£ 478,243</b>	<b>£ 517,132</b>	<b>£ 544,006</b>	<b>£ 573,984</b>	<b>£ 598,158</b>
<b>Staff Costs</b>												
Accommodation	3% £ 25,000	£ 25,750	£ 26,523	£ 27,318	£ 28,138	£ 28,982	£ 29,851	£ 30,747	£ 31,669	£ 32,619	£ 33,598	£ 34,606
Other costs	3% £ 15,000	£ 15,450	£ 15,914	£ 16,391	£ 16,883	£ 17,389	£ 17,911	£ 18,448	£ 19,002	£ 19,572	£ 20,159	£ 20,764
Deprn	3% £ 45,900	£ 45,900	£ 45,900	£ 45,900	£ 45,900	£ 45,900	£ 45,900	£ 45,900	£ 45,900	£ 45,900	£ 45,900	£ 45,900
<b>Total Costs</b>	<b>£ 160,090</b>	<b>£ 180,802</b>	<b>£ 203,412</b>	<b>£ 221,492</b>	<b>£ 229,772</b>	<b>£ 275,032</b>	<b>£ 285,621</b>	<b>£ 297,281</b>	<b>£ 309,560</b>	<b>£ 322,491</b>	<b>£ 336,112</b>	<b>£ 326,994</b>
<b>Net Profit/(Loss)</b>	<b>-£ 54,417</b>	<b>-£ 46,659</b>	<b>-£ 24,382</b>	<b>£ 12,565</b>	<b>£ 63,946</b>	<b>£ 121,979</b>	<b>£ 168,878</b>	<b>£ 180,962</b>	<b>£ 207,572</b>	<b>£ 221,515</b>	<b>£ 237,872</b>	<b>£ 271,163</b>

Revenues

Club Hire Charge

			2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2033	2034
No of 18 rounds			8,097	9,999	12,990	16,552	20,224	26,698	29,661	30,215	31,813	32,531	33,369	33,783
% of rounds hiring clubs		3%	3%	3%	3%	3%	3%	3%	3%	3%	3%	3%	3%	3%
Club Hire Charge	3%	£	25.00	£ 25.75	£ 26.52	£ 27.32	£ 28.14	£ 28.98	£ 29.85	£ 30.75	£ 31.67	£ 32.62	£ 33.60	£ 34.61
		£	6,072.57	£ 7,724.15	£ 10,335.80	£ 13,565.31	£ 17,071.62	£ 23,212.86	£ 26,562.25	£ 27,870.35	£ 30,224.50	£ 31,833.95	£ 33,633.74	£ 35,072.95
No of Academy Rounds			5,000	6,000	7,500	9,000	10,500	12,500	14,000	15,000	15,000	15,000	15,000	15,000
% of rounds hiring clubs		15%	15%	15%	15%	15%	15%	15%	15%	15%	15%	15%	15%	15%
Club Hire Charge	3%	£	10.00	£ 10.30	£ 10.61	£ 10.93	£ 11.26	£ 11.59	£ 11.94	£ 12.30	£ 12.67	£ 13.05	£ 13.44	£ 13.84
Club Hire Charge		£	7,500.00	£ 9,270.00	£ 11,935.13	£ 14,751.81	£ 17,726.76	£ 21,736.39	£ 25,075.10	£ 27,672.16	£ 28,502.33	£ 29,357.40	£ 30,238.12	£ 31,145.26

Buggy Rental

No of 18 hole rounds			8,097	9,999	12,990	16,552	20,224	26,698	29,661	30,215	31,813	32,531	33,369	33,783
% hiring buggy		25%	2,024	2,500	3,247	4,138	5,056	6,675	7,415	7,554	7,953	8,133	8,342	8,446
Buggy Charge	3%	£	35.00	£ 36.05	£ 37.13	£ 38.25	£ 39.39	£ 40.57	£ 41.79	£ 43.05	£ 44.34	£ 45.67	£ 47.04	£ 48.45

Power Caddy Rental

No of 18 holes			8,097	9,999	12,990	16,552	20,224	26,698	29,661	30,215	31,813	32,531	33,369	33,783
% of rounds hiring power caddies		15%	15%	15%	15%	15%	15%	15%	15%	15%	15%	15%	15%	15%
Power Caddy Charge	3%	£	17.50	£ 18.03	£ 18.57	£ 19.12	£ 19.70	£ 20.29	£ 20.90	£ 21.52	£ 22.17	£ 22.83	£ 23.52	£ 24.22
Power Caddy Revenues		£	21,254	£ 27,035	£ 36,175	£ 47,479	£ 59,751	£ 81,245	£ 92,968	£ 97,546	£ 105,786	£ 111,419	£ 117,718	£ 122,755

Staff Costs

Golf Operations

Golf Ops Staff/Marshals/Starters	6	6%	£ 17,500	£ 111,300	£ 117,978	£ 125,057	£ 125,481	£ 133,010	£ 140,991	£ 148,972	£ 157,910	£ 167,384	£ 177,427	£ 188,073	£ 178,669
Part time staff	3	3%	£ 12,000	£ 37,080	£ 38,192	£ 39,338	£ 39,373	£ 40,554	£ 41,770	£ 42,987	£ 44,277	£ 45,605	£ 46,973	£ 48,382	£ 47,056
			£ 148,380	£ 156,170	£ 164,395	£ 164,854	£ 173,564	£ 182,761	£ 191,958	£ 202,186	£ 212,989	£ 224,400	£ 236,455	£ 225,725	
			50%	60%	70%	80%	90%								

Accommodation

ESB		3%	12,000	12,360	12,731	13,113	13,506	13,911	14,329	14,758	15,201	15,657	16,127	16,611
Insurance		3%	3,000	3,090	3,183	3,278	3,377	3,478	3,582	3,690	3,800	3,914	4,032	4,153
Water		3%	3,000	3,090	3,183	3,278	3,377	3,478	3,582	3,690	3,800	3,914	4,032	4,153
Buggy Maintenance		3%	3,000	3,090	3,183	3,278	3,377	3,478	3,582	3,690	3,800	3,914	4,032	4,153
Cleaning		3%	1,000	1,030	1,061	1,093	1,126	1,159	1,194	1,230	1,267	1,305	1,344	1,384
Other		3%	3,000	3,090	3,183	3,278	3,377	3,478	3,582	3,690	3,800	3,914	4,032	4,153
Total Recharge			25,000	25,750	26,523	27,318	28,138	28,982	29,851	30,747	31,669	32,619	33,598	34,606

Capital Investment and Depreciation

Purchase of buggies and power caddies		459000	10%	45,900.00	45,900.00	45,900.00	45,900.00	45,900.00	45,900.00	45,900.00	45,900.00	45,900.00	45,900.00	45,900.00	45,900.00
Depreciation charge for year				45,900.00	45,900.00	45,900.00	45,900.00	45,900.00	45,900.00	45,900.00	45,900.00	45,900.00	45,900.00	45,900.00	45,900.00



## 11. DRIVING RANGE

Hulton Park															
Driving Range P&L															
Profit and Loss Account															
			2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	
<b>Revenues</b>															
Driving Range		3%	£ 92,880	£ 123,840	£ 154,800	£ 190,080	£ 229,320	£ 229,320	£ 230,832	£ 233,352	£ 242,928	£ 242,928	£ 246,960	£ 246,960	
Lesson Commission		3%	£ 8,640	£ 12,960	£ 21,600	£ 27,648	£ 27,648	£ 27,648	£ 28,512	£ 30,888	£ 31,824	£ 32,760	£ 32,760	£ 32,760	
Adventure Golf		3%	£ 183,750	£ 208,189	£ 235,878	£ 267,250	£ 302,794	£ 343,065	£ 388,693	£ 440,389	£ 498,961	£ 565,323	£ 640,511	£ 725,699	
Room rental		3%	£ 20,000	£ 20,600	£ 21,218	£ 21,855	£ 22,510	£ 23,185	£ 23,881	£ 24,597	£ 25,335	£ 26,095	£ 26,878	£ 27,685	
<b>Total Sales</b>			<b>£ 305,270</b>	<b>£ 365,589</b>	<b>£ 433,496</b>	<b>£ 506,832</b>	<b>£ 582,272</b>	<b>£ 623,219</b>	<b>£ 671,918</b>	<b>£ 729,227</b>	<b>£ 799,048</b>	<b>£ 867,106</b>	<b>£ 947,109</b>	<b>£ 1,033,103</b>	
Coffee Shop Income	1.0 per basket	3%	£ 21,600	£ 22,248	£ 22,915	£ 23,603	£ 24,311	£ 25,040	£ 25,792	£ 26,565	£ 27,362	£ 28,183	£ 29,029	£ 29,899	
Coffee Shop Costs		30%	£ 6,480	£ 6,674.40	£ 6,874.63	£ 7,080.87	£ 7,293.30	£ 7,512.10	£ 7,737.46	£ 7,969.58	£ 8,208.67	£ 8,454.93	£ 8,708.58	£ 8,969.84	
<b>Coffee shop gross profit</b>			<b>£ 15,120</b>	<b>£ 15,574</b>	<b>£ 16,041</b>	<b>£ 16,522</b>	<b>£ 17,018</b>	<b>£ 17,528</b>	<b>£ 18,054</b>	<b>£ 18,596</b>	<b>£ 19,154</b>	<b>£ 19,728</b>	<b>£ 20,320</b>	<b>£ 20,930</b>	
Range Ball sold as pa	£6 a box	1250 BOX	3%	£ 7,500	£ 7,725	£ 7,957	£ 8,195	£ 8,441	£ 8,695	£ 8,955	£ 9,224	£ 9,501	£ 9,786	£ 10,079	£ 10,382
				<b>£ 7,500</b>	<b>£ 7,725</b>	<b>£ 7,957</b>	<b>£ 8,195</b>	<b>£ 8,441</b>	<b>£ 8,695</b>	<b>£ 8,955</b>	<b>£ 9,224</b>	<b>£ 9,501</b>	<b>£ 9,786</b>	<b>£ 10,079</b>	<b>£ 10,382</b>
<b>Gross Profit</b>			<b>£ 327,890</b>	<b>£ 388,887</b>	<b>£ 457,493</b>	<b>£ 531,550</b>	<b>£ 607,731</b>	<b>£ 649,442</b>	<b>£ 698,928</b>	<b>£ 757,046</b>	<b>£ 827,703</b>	<b>£ 896,620</b>	<b>£ 977,509</b>	<b>£ 1,064,415</b>	
<b>Staff Costs</b>															
Greenkeeping & Maint		3%	£ 10,000	£ 10,300	£ 10,609	£ 10,927	£ 11,255	£ 11,593	£ 11,941	£ 12,299	£ 12,668	£ 13,048	£ 13,439	£ 13,842	
Accommodation		3%	£ 72,000	£ 74,160	£ 76,385	£ 78,676	£ 81,037	£ 83,468	£ 85,972	£ 88,551	£ 91,207	£ 93,944	£ 96,762	£ 99,665	
IT and Office Services		3%	£ 6,000	£ 6,180	£ 6,365	£ 6,556	£ 6,753	£ 6,956	£ 7,164	£ 7,379	£ 7,601	£ 7,829	£ 8,063	£ 8,305	
Advertising and Promotions		3%	£ 10,000	£ 10,300	£ 10,609	£ 10,927	£ 11,255	£ 11,593	£ 11,941	£ 12,299	£ 12,668	£ 13,048	£ 13,439	£ 13,842	
Professional fees		3%	£ 8,000	£ 8,240	£ 8,487	£ 8,742	£ 9,004	£ 9,274	£ 9,552	£ 9,839	£ 10,134	£ 10,438	£ 10,751	£ 11,074	
Depn		3%	£ 18,800	£ 18,800	£ 18,800	£ 18,800	£ 18,800	£ 18,800	£ 18,800	£ 18,800	£ 18,800	£ 18,800	£ 18,800	£ 18,800	
<b>Total Costs</b>			<b>£ 282,840</b>	<b>£ 313,103</b>	<b>£ 349,172</b>	<b>£ 387,140</b>	<b>£ 427,089</b>	<b>£ 439,337</b>	<b>£ 451,953</b>	<b>£ 464,948</b>	<b>£ 478,333</b>	<b>£ 492,119</b>	<b>£ 506,318</b>	<b>£ 520,944</b>	
<b>Net Profit/(Loss)</b>			<b>£ 45,050</b>	<b>£ 75,784</b>	<b>£ 108,321</b>	<b>£ 144,410</b>	<b>£ 180,642</b>	<b>£ 210,104</b>	<b>£ 246,974</b>	<b>£ 292,098</b>	<b>£ 349,370</b>	<b>£ 404,502</b>	<b>£ 471,190</b>	<b>£ 543,471</b>	

# DRAFT

## Revenues

			2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036
<b>Driving Range Utilization 100% Usage</b>														
No of Bays		24	24	24	24	24	24	24	24	24	24	24	24	24
Bay Usage per day		33	3	4	5	6	7	7	7	7	7	7	7	7
No of baskets per day		792	72	96	120	144	168	168	168	168	168	168	168	168
No of baskets per year	237600	300	21,600	28,800	36,000	43,200	50,400	50,400	50,400	50,400	50,400	50,400	50,400	50,400
% Utilization			9%	12%	15%	18%	21%	21%						

<b>Driving Range Rates</b>		<b>Usage Split</b>												
Small Bucket Price		60%	4.00	4.00	4.00	4.00	4.25	4.25	4.25	4.25	4.50	4.50	4.50	4.50
Large Bucket Price		20%	6.00	6.00	6.00	6.25	6.25	6.25	6.40	6.40	6.60	6.60	7.00	7.00
Members Bucket price		20%	3.50	3.50	3.50	3.75	3.75	3.75	3.75	4.00	4.00	4.00	4.00	4.00
<b>Blended Price</b>			4.30	4.30	4.30	4.40	4.55	4.55	4.58	4.63	4.82	4.82	4.90	4.90

<b>Lesson Rates and Commission Rates</b>														
30 minutes lesson			30.00	30.00	30.00	32.00	32.00	32.00	33.00	33.00	34.00	35.00	35.00	35.00
Lessons per Day			8.00	12.00	20.00	24.00	24.00	24.00	24.00	26.00	26.00	26.00	26.00	26.00
Commission is 10%		10%	£ 240	£ 360	£ 600	£ 768	£ 768	£ 768	£ 792	£ 858	£ 884	£ 910	£ 910	£ 910
Commission annually		360	£ 8,640	£ 12,960	£ 21,600	£ 27,648	£ 27,648	£ 27,648	£ 28,512	£ 30,888	£ 31,824	£ 32,760	£ 32,760	£ 32,760

<b>Adventure Golf</b>														
Fee per round		3%	£ 7	£ 7.21	£ 7.43	£ 7.65	£ 7.88	£ 8.11	£ 8.36	£ 8.61	£ 8.87	£ 9.13	£ 9.41	£ 9.69
Rounds per day		10%	75	83	91	100	110	121	133	146	161	177	195	214
Total Annual Rounds		350	26250	28875	31763	34939	38433	42276	46503	51154	56269	61896	68086	74894
Total Revenue			£ 183,750	£ 208,189	£ 235,878	£ 267,250	£ 302,794	£ 343,065	£ 388,693	£ 440,389	£ 498,961	£ 565,323	£ 640,511	£ 725,699

# DRAFT

## Staff Costs

Full Time	9	3%	£ 18,000	£ 162,000	£ 162,540	£ 167,416	£ 172,439	£ 177,612	£ 182,940	£ 188,428	£ 194,081	£ 199,904	£ 205,901	£ 212,078	£ 218,440
Parttime	5	3%	£ 11,500	£ 57,500	£ 57,845	£ 59,580	£ 61,368	£ 63,209	£ 65,105	£ 67,058	£ 69,070	£ 71,142	£ 73,276	£ 75,475	£ 77,739
Social Insurance		20%		£ 43,900	£ 44,077	£ 45,399	£ 46,761	£ 48,164	£ 49,609	£ 51,097	£ 52,630	£ 54,209	£ 55,835	£ 57,510	£ 59,236
<b>% of costs incurred each year</b>				60%		70%		80%		90%					

## Accommodation

ESB		3%	15,000	15,450	15,914	16,391	16,883	17,389	17,911	18,448	19,002	19,572	20,159	20,764
Gas		3%	4,000	4,120	4,244	4,371	4,502	4,637	4,776	4,919	5,067	5,219	5,376	5,537
Insurance		3%	9,000	9,270	9,548	9,835	10,130	10,433	10,746	11,069	11,401	11,743	12,095	12,458
Water		3%	5,000	5,150	5,305	5,464	5,628	5,796	5,970	6,149	6,334	6,524	6,720	6,921
Council Tax		3%	15,000	15,450	15,914	16,391	16,883	17,389	17,911	18,448	19,002	19,572	20,159	20,764
Cleaning		3%	12,000	12,360	12,731	13,113	13,506	13,911	14,329	14,758	15,201	15,657	16,127	16,611
Clubhouse Maintenance		3%	6,000	6,180	6,365	6,556	6,753	6,956	7,164	7,379	7,601	7,829	8,063	8,305
Other		3%	6,000	6,180	6,365	6,556	6,753	6,956	7,164	7,379	7,601	7,829	8,063	8,305
<b>Total Recharge</b>			<b>72,000</b>	<b>74,160</b>	<b>76,385</b>	<b>78,676</b>	<b>81,037</b>	<b>83,468</b>	<b>85,972</b>	<b>88,551</b>	<b>91,207</b>	<b>93,944</b>	<b>96,762</b>	<b>99,665</b>

## Range Balls

Range Ball	£6 a box	15000 bal	3%	£ 7,500	£ 7,725	£ 7,957	£ 8,195	£ 8,441	£ 8,695	£ 8,955	£ 9,224	£ 9,501	£ 9,786	£ 10,079	£ 10,382
------------	----------	-----------	----	---------	---------	---------	---------	---------	---------	---------	---------	---------	---------	----------	----------

## Capital Investment and Depreciation

Capital Spend	940000	2%	18,800.00	18,800.00	18,800.00	18,800.00	18,800.00	18,800.00	18,800.00	18,800.00	18,800.00	18,800.00	18,800.00	18,800.00	18,800.00
<b>Depreciation charge for year</b>			<b>18,800.00</b>												

## Appendix 4: Review of the housing requirement and housing need figures

1. In this appendix I undertake a review of the housing requirement and need figures for Bolton.

### The adopted Core Strategy requirement

2. The most recently adopted housing requirement figure for Bolton – 694 dwellings pa – is set out in the CS (Policy SC1). The CS was adopted in March 2011. It therefore pre-dates the requirements of the Framework, which was published originally in March 2012 and revised most recently in February 2019. It was instead prepared cognisant of the earlier requirements of *Planning Policy Statement 3*<sup>1</sup> (PPS3), which was superseded by the Framework, and pursuant to the now-revoked 2008 North West Regional Strategy<sup>2</sup> (RS).
3. The *Planning Statement* [CD 05a.1] set out why this CS requirement did not comply with the policies of the 2012 version of the Framework in this respect. It noted that various legal judgements have considered the change in policy which was introduced upon the publication of the Framework; for example:
  - The *Hunston* Court of Appeal judgement<sup>3</sup> [CD 12.15] stated that in identifying housing needs in accordance with the requirements of the Framework, it was not correct to have regard to the requirement figure in a revised Regional Strategy. It stated as follows: *“I am not persuaded that the inspector was entitled to use a housing requirement figure derived from a revoked plan, even as a proxy for what the local plan process may produce eventually...”* and that *“...The needs assessment, objectively arrived at, is not affected in advance of the production of the Local Plan, which will then set the requirement figure...”* (paragraph 25).
  - The *Gallagher* High Court judgement<sup>4</sup> [CD 12.16] also noted the different approach introduced by the Framework, which has the effect that previous approaches applied under the superseded PPS3 are outdated: *“The [Framework] indeed effected a radical change. It consisted in the two-step approach which paragraph 47 enjoined. The previous policy’s [PPS3] methodology was essentially of striking a balance. By contrast paragraph 47 required the OAN to be made first, and to be given effect in the Local Plan save only to the extent that that would be inconsistent with the other [Framework] policies...”*.
4. In simple terms, PPS3 and the Framework (2012) contained different approaches to meeting housing needs. PPS3 previously required local planning authorities to identify an “appropriate” level of housing. This approach was superseded by the introduction of

<sup>1</sup> Planning Policy Statement 3 (PPS3): Housing, Department for Communities and Local Government (2006)

<sup>145</sup> North West of England Plan Regional Spatial Strategy to 2021, Government Office for the North West (2008)

<sup>3</sup> City and District Council of St Albans v Hunston Properties and the Secretary of State for Communities and Local Government [2013] EWCA Civ 1610 (12 December 2013)

<sup>4</sup> Solihull Metropolitan Borough Council v Gallagher Estates Limited and Lioncourt Homes [2014] EWCA Civ 1610 (17 December 2014)

the Framework in 2012, which made clear that decision-makers should identify and plan to meet “full” housing needs.

5. The North West RS and subsequent CS both established requirements having regard to the ‘lower bar’ set out in PPS3. The North West RS first established a constrained ‘policy-on’ requirement in 2008, because it sought to prioritise regeneration over meeting full housing needs. This in turn informed the establishment of the CS requirement in 2011<sup>5</sup>. It is therefore evident that it is time expired and is not representative of the Borough’s current housing needs, identified in accordance with the requirements of the Framework (see below). This was acknowledged in an appeal decision issued in April 2016 in relation to the proposed development of 110 dwellings on land at Hill Lane in Blackrod<sup>6</sup>, which noted that:

*“The Council agree that the housing requirement figure within the Core Strategy was not derived to meet the FOAN for housing as required by paragraph 47 of the Framework.”* (paragraph 20)

6. Whilst the 2012 Framework has been superseded by the 2019 Framework, the same principles are still applicable. It makes clear local authorities should plan to meet the full identified housing needs of their area, unless it is not possible to do so having regard to other policies which indicate that development should be restricted. Indeed, it goes further in that it prescribes a ‘standard method’ for identifying the minimum housing needs which should be planned for (see below).

7. Moreover, it is evident that:

- The CS housing requirement (and other relevant policies) was established having regard to the Council’s ‘Transforming Estates’ programme. As noted at in the CS Inspector’s Report (paragraph 10 [CD 12.1]), this was a 10 year programme which sought to facilitate housing-focussed regeneration, particularly in a number of identified renewal areas comprised principally of Council estates. This enabled the CS to establish a constrained requirement which sought to promote the Transforming Estates programme. However, it has long since been abandoned, which has had a significant adverse effect on the delivery of new homes on brownfield sites in inner-urban areas.
- The CS requirement does not comply with specific policies of the 2019 version of the Framework. In particular:
  - (i) The CS requirement was derived using a methodology which is inconsistent with requirements of the updated Framework, which states that local planning authorities should identify housing needs using an assessment conducted using the ‘standard method’<sup>7</sup> which is prescribed in the PPG;

<sup>5</sup> In addition to other matters, such as the designation on 16 July 2008 of Greater Manchester as a Housing Growth Point (see paragraph 21 of the CS Inspectors Report [CD 12.1]).

<sup>6</sup> Appeal ref: APP/N4205/W/15/3136446

<sup>7</sup> The Framework [CD 11.5], paragraph 60.

- (ii) The CS requirement was adopted over eight years ago and has not been reviewed by the Council since then. It does not therefore comply with the Framework requirement to review strategic policies – including the local housing need figure – at least once every five years<sup>8</sup>;
  - (iii) The Council is not able to demonstrate a deliverable 5-year housing land supply as required by the Framework<sup>9</sup> (see below), such that relevant policies for the supply of new homes – including Policy SC1 – are out-of-date in accordance with Footnote 7 of the Framework;
8. The housing policies of the CS are clearly not compliant with the policies of the Framework. This conclusion has been reached by numerous planning appeals in Bolton in recent months, including that at Blackrod identified above.
9. As such, relevant policies for the supply of new homes in the CS – including Policy SC1 – are demonstrably out-of-date. This includes the affordable housing target, which I discuss further in Section 10 of my evidence.

### **The ‘standard method’ figure**

10. In such circumstances, the PPG<sup>10</sup> makes clear that the local housing need figure derived using the Government’s ‘standard method’<sup>11</sup> should apply when determining applications and appeals for residential development. The ‘standard method’ identifies that there is a minimum baseline need to deliver at least 787 dwellings pa in Bolton – 13.1% above the CS requirement. In the paragraphs below I set out the implications of this higher need figure for the land supply position in the Borough, in both the short- (i.e. the five year period) and longer-term.
11. I note, however, that the PPG makes clear that the ‘standard method’ provides only a “...*minimum starting point*...”<sup>12</sup> in determining the number of homes which may be required. It states as follows:
- “[The ‘standard method’] does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.”*  
(Reference ID: 2a-010-20190220)
12. The ‘true’ housing need in Bolton is therefore likely to be much higher than the ‘standard method’ figure. This is because, *inter alia*:
- The subnational household projections which underpin the ‘standard method’ are trend-based, i.e. they simply project forward trends experienced in the preceding years. Government has acknowledged that scale of growth which is

<sup>8</sup> The Framework [CD 11.5], paragraph 33.

<sup>9</sup> The Framework [CD 11.5], paragraph 67.

<sup>10</sup> PPG, paragraph 001 (Reference ID: 68-001-20190722)

<sup>11</sup> Paragraph 60 of the Framework [CD 11.5] and the PPG.

<sup>12</sup> PPG, paragraph 010 (Reference ID: 2a-010-20190220)

forecast by the projections is therefore “...constrained by supply. If new, additional homes are not supplied, then households cannot form as there would be nowhere for them to live. This means that actual household growth cannot exceed the number of additional homes which are actually supplied...”<sup>13</sup>. Given the extent to which the provision of new homes in Bolton has fallen short of needs over the last decade (see Section 10), the subnational household projections for the Borough do not accurately portray the full extent of the area’s housing need.

- The ‘standard method’ provides only a minimum starting point in determining the number of homes needed. The PPG makes clear that it “...does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour...”<sup>14</sup>. As such, Government has made clear that there will be circumstances where actual housing need is higher, including as a result of the economic ambition of an authority.
13. The scale of the need in Bolton and the resulting supply position must therefore be considered in this context, which I discuss further below in respect of the emerging development plan for the area.

### **The emerging Development Plan requirement**

14. The Council is collaborating with the other local planning authorities in Greater Manchester to prepare the GMSF. It will form the first part of a new development plan for Bolton which will, *inter alia*, establish a new housing requirement for the Borough. Upon adoption it will supersede the relevant policies of the existing development plan, including in particular Policy SC1 of the CS.
15. The Revised Draft GMSF simply adopts the ‘standard method’ figure as the proposed housing requirement for GM (201,000 dwellings across the plan period, equating to an average of 10,580 dwellings pa). It proposes a distribution of new development across the conurbation, with 13,800 dwellings (726 dwellings pa) to be delivered in Bolton. This is 8.22% below the ‘standard method’ figure for the Council, despite that figure being identified by the PPG as the minimum “starting point”.
16. It should be noted that the Revised Draft GMSF is the subject of substantial outstanding objection, including in respect of its proposed housing requirement. Indeed, the Applicant has submitted detailed representations to the *Revised Draft GMSF* [CD 11.13] which contend that, *inter alia*, the scale of housing delivery proposed is unsound because it falls far short of the need for new homes both across GM and in specific authorities. In summary:
- The adoption of the minimum starting point ‘standard method’ figure as the requirement for GM will:

<sup>13</sup> *Technical consultation on updates to national planning policy and guidance*, Ministry of Housing, Communities & Local Government (October 2018), paragraph 11 [CD 12.68]

<sup>14</sup> PPG, Reference ID: 2a-010-20190220

- (iv) 'lock in' and perpetuate the recessionary trends experienced during the economic downturn, during which low rates of housing provision exacerbated the housing crisis across the city-region;
  - (v) not support even the low rate of economic growth targeted by the Revised Draft GMSF, which has itself been suppressed and does not reflect the growth likely to occur as a result of planned and committed infrastructure and investments, including the Northern Powerhouse ambition;
  - (vi) not meet the need for affordable housing across the conurbation and does not provide the range of new homes which are needed.
- The proposed requirement for Bolton falls short of its minimum housing needs and is contrary to the spatial and economic strategy of the Revised Draft GMSF, which seeks to 'Boost Northern Competitiveness' via a higher rate of growth in the northern authorities including Bolton.
  - The proposed introduction of a "stepped" or "phased" requirement<sup>15</sup> is not justified given that a) it does not represent a significant increase on recent rates of delivery across GM, as required by the PPG<sup>16</sup> and b) the GMCA's own supply information demonstrates that a higher level of provision is achievable. The Applicant considers that the approach of the GMSF in this regard simply indicates that the GMCA is attempting to avoid dealing with the substantial undersupply of new homes, as required by the Framework.
  - No allocations for residential development are proposed in Bolton. This, in the context of a longstanding shortfall of new homes and coupled with the low overall amount of housing proposed (which falls short of identified housing needs), is contrary to the requirement set out in the Framework that authorities should support "...the Government's objective of significantly boosting the supply of homes..."<sup>17</sup>.
17. Detailed demographic and economic modelling undertaken by the Applicant has robustly demonstrated that the GMSF housing requirement needs to be at least 13,200 dpa as an absolute minimum and at least 15,000 dpa to deliver growth that is consistent with the GMSF vision and Northern Powerhouse Strategy. This would result in a requirement which is between 24.76% and 41.78% above the 'standard method' figure for GM.
18. I also note that a recent analysis of the scale of housing required across the north of England, undertaken on behalf of Homes for the North<sup>18</sup>, identified that c.13,500 new homes will be required across Greater Manchester to support growth ambitions. This

<sup>15</sup> Which proposes that the number of homes provided in the first few years of the plan period will be substantially below the minimum 'standard method' need figure.

<sup>16</sup> PPG, paragraph 021 (Reference ID: Reference ID: 68-021-20190722)

<sup>17</sup> The Framework [CD 11.5], paragraph 59.

<sup>18</sup> *The Role of Housing in the Northern Powerhouse: An analysis of the housing required to unlock the benefits of transport investment in the North of England*, Homes for the North (July 2019)

reinforces that the amount of new homes delivered across the city-region will need to significantly exceed the minimum 'standard method' figure.

## **Appendix 5: Critique of Housing Land Supply**

## **Critique of Housing Land Supply**

Land at and adjacent to Hulton Park, Bolton

**Application Ref: 00997/17**

**PINS Ref: APP/N4205/V/18/3208426**

On behalf of Peel Holdings (Land and Property)  
Ltd



# Contents

---

1. Introduction

---

2. Critique of the evidence base

---

3. Five year supply of deliverable sites

---

4. Critique of the housing strategy

---

5. Viability assessment of the supply

---

6. Meeting qualitative housing needs

---

7. Meeting affordable housing needs

---

8. Detailed site assessment

---

9. Conclusion

---

Appendix 1: Focus on Main Town Centres

---

Appendix 2: Funding initiatives

---

Appendix 3: List of Priority 1 Sites

---

Appendix 4: List of Active Sites

---

Appendix 5: Map of Active Sites

---

Appendix 6: Viability Assessment of the Supply – Technical Appendix

---

Appendix 7: Map of Live Sites

---

Appendix 8: Detailed Site Assessment

---

## **Contact**

Mike O'Brien  
mike.o'brien@turley.co.uk

## **Client**

Peel Holdings (Land & Property) Limited

## **Our reference**

PEEM3031

August 2019

# 1. Introduction

## Background

- 1.1 Bolton Metropolitan Borough Council (BMBC) adopted a Core Strategy in 2011 covering the period from 1 April 2008 up to 2026 [CD 11.2]. As this Report will show, housing delivery in Bolton since 2008 averages just 492 dwellings per annum (dpa), which is significantly below the adopted requirement of 694 dpa.
- 1.2 BMBC is collaborating with the other local planning authorities in Greater Manchester (GM) to prepare the Greater Manchester Spatial Framework (GMSF) [CD 11.13]. This will be a new strategic development plan for the city-region which will guide development up to 2037. The emerging housing requirement for BMBC is 726 dpa, whilst the standard methodology requirement for BMBC is higher at 787 dpa.
- 1.3 Based on completion figures in BMBC since adoption of the Core Strategy, increasing the number of houses to reach this level would represent a significant step change in the delivery of housing within Bolton.
- 1.4 This Report examines BMBC's claimed sources of housing supply to assess whether they will deliver the quantity and quality of housing which will ensure that the stated aims and aspirations of BMBC and the emerging GMSF are met. It demonstrates that housing delivery in Bolton has been consistently below the required level and that the claimed sources of supply, including the urban land supply, will not deliver the anticipated amount, nor the required size, type and tenure of homes within the plan period.
- 1.5 The key shortcomings include:
  - 1) Housing evidence: The claimed urban land supply is not supported by a Strategic Housing Land Availability Assessment (SHLAA), or any evidence which is sufficient to demonstrate that housing will be delivered as claimed.
  - 2) Housing supply: BMBC is unable to demonstrate a five year supply of housing and has failed the Housing Delivery Test.
  - 3) Housing strategy: The preference for brownfield sites and focus on town centre development places reliance on delivery of high density accommodation in areas which have not historically delivered housing, and which are, generally, more difficult to deliver.
  - 4) Viability Assessment: Much of the claimed supply is located in areas of marginal viability where suitability and deliverability have not been adequately demonstrated and therefore the contribution that urban supply will make to future housing needs is overstated.
  - 5) Range: The claimed supply is not capable of delivering enough of the required size, type and tenure of homes that fully meets Bolton and GM's specific needs.

## Report structure

1.6 This Report is structured as follows:

**Section 2: Critique of the evidence base** – This highlights fundamental gaps in the GMSF and BMBC evidence base.

**Section 3: Five year supply of deliverable sites** – This introduces an assessment of the five year housing land supply for BMBC.

**Section 4: Critique of the housing strategy** – This critiques the identified sources of housing supply to address the likelihood of their delivery.

**Section 5: Viability assessment of the supply** – In the absence of any published evidence of viability of the claimed housing supply this assesses the likely deliverability of a range of site typologies.

**Section 6: Meeting qualitative housing needs** – This considers whether the identified sites are likely to be sufficient to provide a mix of housing with regards to its type and size to meet Bolton's needs for an improved range of family homes.

**Section 7: Meeting affordable housing needs** – This presents BMBC's evidence on the calculated need for affordable housing in the context of historic delivery of housing of this tenure and the implications of the viability assessment of future supply.

**Section 8: Assessment of sites** – This assesses the developability of a range of sites included within the supply for Bolton.

**Section 9: Conclusion** – This draws together the findings of this Paper and sets out the shortcomings in the claimed supply of housing.

## 2. Critique of the evidence base

### Background

- 2.1 This section establishes the policy background in regards to the housing requirement for Bolton and challenges the evidence which is relied upon by BMBC to justify its claimed supply of housing.

### The adopted housing requirement

- 2.2 The most recently adopted housing requirement figure for Bolton – 694 dpa – is set out in the Core Strategy (CS) (Policy SC1), which was adopted in March 2011 [CD 11.2]. It therefore pre-dates the requirements of the NPPF, which was first published in 2012 and updated in February 2019 [CD 11.5]. It was instead prepared cognisant of the earlier requirements of Planning Policy Statement 3<sup>1</sup> (PPS3), which was superseded by the NPPF. The housing policies of the CS are clearly not compliant with the policies of the NPPF. This conclusion has been reached by a planning appeal in Bolton in recent months<sup>2</sup>. As such, relevant policies for the supply of new homes in the development plan – including Policy SC1 – are out-of-date, within the meaning of the NPPF.

### The ‘standard method’ figure

- 2.3 In circumstances where the adopted policies relevant to the supply of housing are out of date, the Planning Practice Guidance (PPG)<sup>3</sup> makes clear that the local housing need figure, derived using the Government’s ‘standard method’ (NPPF, paragraph 60 and PPG), should apply when determining applications and appeals for residential development. The ‘standard method’ identifies that there is a minimum baseline need to deliver at least 787 dpa in Bolton – 13.4% above the CS requirement.

### The emerging Development Plan requirement

- 2.4 The GMSF will form the first part of a new development plan for Bolton which will, *inter alia*, establish a new housing requirement for the Borough. Upon adoption it will supersede the relevant policies of the existing development plan, including in particular Policy SC1 of the CS.
- 2.5 The Revised Draft GMSF [CD 11.13] was published in January 2019 and simply adopts the ‘standard method’ figure as the proposed housing requirement for GM (201,000 dwellings across the plan period, equating to an average of 10,580 dpa). The calculation of need is set out within the Greater Manchester Strategic Housing Market Assessment (GMSHMA)<sup>4</sup>. The GMSHMA also includes additional calculations and evidence as to the breakdown of need for different sizes and types of housing and is cross-referenced in section 5 of this Report.
- 2.6 The Revised Draft GMSF [CD 11.13] proposes a distribution of the calculated need and therefore proposes new development across the conurbation, with 13,800 dwellings

<sup>1</sup> Planning Policy Statement 3 (PPS3): Housing, Department for Communities and Local Government (2006)

<sup>2</sup> APP/N4205/W/18/3207361 – Bowlands Hey, Westhoughton [CD 12.14]

<sup>3</sup> Planning Practice Guidance - Housing and economic needs assessment [CD 11.6.3]

<sup>4</sup> Greater Manchester Strategic Housing Market Assessment: GMCA (January 2019) [CD 12.8]

(726 dpa) to be delivered in Bolton. This is 1,220 dwellings, or 8.22%, below the 'standard method' figure for the authority of 15,020.

- 2.7 The GMSF remains at an early stage of preparation, is the subject of significant unresolved objections, including on behalf of the Applicant, and cannot be afforded any material weight at the present time.

### **Housing land supply evidence**

- 2.8 Chapter 7 of the Revised Draft GMSF "Homes for Greater Manchester" sets out the housing needs for the city region and how the identified land supply will meet those needs.
- 2.9 The Revised Draft GMSF is supported by a Topic Paper on Housing, including an Appendix entitled "Housing Land Supply Statement" (HLSS) [CD 12.7.2], which provides further detail on the claimed land supply for GM. This includes an accompanying spreadsheet which lists sites alongside basic ownership and trajectory information. The Greater Manchester Combined Authority (GMCA) has also published a map of these sites for the 10 authorities, including Bolton, with an indication of when they may be developed.
- 2.10 The GMSF table of sites identifies that there are 501 sites in the supply for Bolton, which it is claimed will deliver 12,317 dwellings between 2018 and 2037. Table 14 of the HLSS confirms that a small sites allowance for Bolton of 2,306 (including an allowance for losses) is to be added to the supply, which totals 14,623 dwellings.
- 2.11 The Housing Topic Paper [CD 12.7.1] states that each district has prepared its own Strategic Housing Land Availability Assessment (SHLAA). However, the evidence for Bolton has not been published and instead BMBC relies on the information provided with the Housing Topic Paper, and referred to above.
- 2.12 This limited content falls well short of comprising a SHLAA. This fails to comply with an important requirement of national policy and guidance and the information available. The latest SHLAA for Bolton dates from 2008 and is therefore inadequate to justify the claimed contribution of urban supply to meet the current need for housing (as to which see further below).
- 2.13 In July 2019 BMBC published a Housing Delivery Plan (HDP) [CD 12.6], which establishes a ten year plan and is based on the need to meet the emerging housing targets. The document considers the housing needs of households, their aspirations and expectations, demographic changes and the need for particular types of homes. The HDP also reviews land capacity opportunities and sets out the barriers to development and the required steps to encourage, promote and accelerate development; by showing how interventions can be used on a range of sites and tenures.
- 2.14 The proposed interventions are examined in detail in this report and it is considered that the level of detail falls well short of that required to demonstrate that delivery of housing will occur over the next ten years, at the rate BMBC estimates.

- 2.15 The Housing Delivery Test (HDT) was introduced within the revised NPPF as a mechanism to monitor the delivery of housing by measuring net additional dwellings against the relevant target for each Local Authority. All local planning authorities with a delivery performance of less than 95% must prepare an Action Plan, and those below 85%, will be required to include a 20% as part of the housing land supply calculation. As Bolton's performance is below 95%, they have prepared a Housing Delivery Test Action Plan (HDTAP) to:
- Analyse Bolton's Housing Trajectory
  - Identify the barriers to deliver
  - Address under-delivery through an Action Plan.
- 2.16 Tables 1 and 2 of the HDTAP identify that Bolton currently has a 4,962 dwelling requirement over the next 5 years and a 3.6 year supply (this is covered in more detail in section 3 of this report).
- 2.17 The HDATP also identifies several constraints to development, specifically the heavy reliance in the Borough on brownfield sites which are small to medium in size and mill sites in low value areas. The Action Plan specifically identifies at Paragraph 3.5.7 that many of these sites require significant expenditure before any income is generated.

### **Shortcomings of the housing land supply evidence**

- 2.18 NPPF 67 stipulates that *"strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment"* (NPPF 67).
- 2.19 The HLSS is just 17 pages long with an accompanying spreadsheet which lists the sites included within the claimed supply. This fails to include essential information on the size, availability, suitability and likely economic viability of sites, as required by paragraph 67 of the NPPF.
- 2.20 The PPG<sup>5</sup> stresses the importance of the assessment of land availability in the preparation of a plan and requires that an assessment should identify sites and broad locations with potential for development; assess their development potential; and assess their suitability for development and the likelihood of development coming forward (the availability and achievability).
- 2.21 It is of paramount importance that the sources of supply are tested accordingly. A failure to undertake this process thoroughly and robustly is likely to result in housing needs not being met. There is insufficient evidence available at present to demonstrate that the identified supply will be delivered.

<sup>5</sup> **CD 11.6.2:** PPG - Housing and Economic Land Availability Assessment, Paragraph: 001 Reference ID: 3-001-20190722

### **Suitability**

2.22 The PPG<sup>6</sup> provides guidance on assessing the suitability of sites which includes the re-appraisal of the suitability of previously allocated land, but also the following factors:

- *“site size, boundaries, and location;*
- *current land use and character;*
- *land uses and character of surrounding area;*
- *physical constraints (eg access, contamination, steep slopes, flood risk, natural features of significance, location of infrastructure/utilities);*
- *potential environmental constraints;*
- *consistency with the development plan’s policies;*
- *proximity to services and other infrastructure, such as public transport;*
- *where relevant, development progress (eg ground works completed, number of units started, number of units completed); and*
- *initial assessment of whether the site is suitable for a particular type of use or as part of a mixed-use development.”*

2.23 There is no evidence that the HLSS has systematically considered any of these points. The urban supply has acknowledged viability challenges, and there is no evidence that the market attractiveness of the claimed supply has been addressed.

### **Availability**

2.24 The PPG provides guidance on assessing availability of a site and states at paragraph 020 Reference ID: 3-020-20190722:

*“A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period.”*

2.25 The list of sites that has been published by the GMCA provides information on the ownership status of the sites included in the supply. Table 2.1 confirms that for 442 of the 501 sites identified in Bolton the identity of the owner is unknown or not stated, which equates to 65% of the claimed supply. The published information fails to demonstrate that there are “no legal or ownership problems”. It lacks even basic information regarding the identity or intentions of the relevant land owners.

<sup>6</sup> **CD 11.6.2:** PPG - Housing and Economic Land Availability Assessment Paragraph: 015 Reference ID: 3-015-20190722

**Table 2.1: Ownership status of the housing land supply identified in Bolton**

Ownership Status	Sites	Dwellings
Not in Public Ownership – Owner not Identified	181	7,119
No Ownership Information	261	885
Mixed Ownership	17	2,461
Public Ownership	42	1,852
<b>Total</b>	<b>501</b>	<b>12,317</b>

Source: GMCA HLSS, Turley analysis

### Developable

- 2.26 The Glossary of the NPPF (Annex 2) includes a definition of ‘developable’: “to be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be **available** and could be **viably** developed at the point envisaged” (emphasis added) [CD 11.5].
- 2.27 Viability is therefore a major factor in whether a site is achievable and developable. The PPG requires a plan-making body to assess the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period [CD 11.6.4].
- 2.28 The GMSF accepts that there are significant challenges in viably delivering much of the claimed supply<sup>7</sup>. There is however no supporting viability evidence to support the HLSS. There is therefore no available evidence on which to reasonably determine whether the claimed housing supply is developable.
- 2.29 The HDP also identifies that there are significant challenges in viably delivering much of the claimed supply<sup>8</sup>. The HDP identifies that it is “reasonable to assume” that only 75% of the 6,000 homes considered within the report can be delivered, even with correctly targeted intervention. Peel agrees, in principle, that not all the sites included within the supply are deliverable and consequently it is reasonable to include a reduction. However, there is limited reasoning or justification to conclude that 75% dwellings within the HDP will be delivered, particularly in light of the percentage of permissions which are currently developed, as highlighted in Table 18 of the HDP (33% over the last five years).

### Trajectory

- 2.30 NPPF paragraph 73 requires strategic policies to “include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites”.

<sup>7</sup> GMSF, page 9, paragraph 1.17 [CD 11.13]

<sup>8</sup> Paragraph 4.17 of the Housing Delivery Plan [CD 12.6]

- 2.31 Whilst the housing land supply data does indicate a trajectory there is no information about the underlying assumptions. The PPG<sup>9</sup> is clear that in relation to matters of judgment on the deliverability of housing sites, including windfall sites, these will need to be clearly and transparently set out.
- 2.32 As set out above, the HLSS [CD 12.7.2] is based on inadequate evidence and fails to meet the requirements set out in the NPPF and the PPG. In order to test the trajectory Turley has undertaken a review of the assumptions which underpin the claimed supply for BMBC. The published supply for Bolton consists of 501 sites which are assumed to deliver 12,317 dwellings between 2018 and 2037.
- 2.33 This supply is categorised by the GMCA into the following categories:

**Table 2.2: Breakdown of supply for Bolton**

	Total Sites	Dwellings
Under Construction	134	2,223
Full Planning Permission	210	1,923
Outline Planning Permission	18	2,309
Allocations (Not started)	64	2,862
Not permissioned	75	3,000
<b>Total</b>	<b>501</b>	<b>12,317</b>

*Source: GMCA HLSS, Turley analysis*

- 2.34 As set out in the table there are 134 sites which are currently ‘under construction’ which equates to 2,223 dwellings. The published information does not identify whether any of the 2,223 dwellings were delivered prior to 1 April 2018. If this was the case, the relevant dwellings should not be included within the urban land supply.
- 2.35 Of the 139 sites (5,862 dwellings) which have been included within the supply which do not benefit from any planning permission, 94 are brownfield sites equating to 4,220 dwellings. Of these brownfield sites 25 are identified within the GMSF supply as being in existing use which would be required to relocate or formally close, equating to 1,419 dwellings within the supply. A further 19 of the sites (equating to 1,496 dwellings) are assumed to be delivered within Bolton’s Town Centre boundary.
- 2.36 This evidence demonstrates that the supply is reliant on a portfolio of sites which will not be straightforward to deliver. Not least, a number of these are presently occupied and land assembly will be needed to deliver them. There is insufficient evidence to demonstrate that this significant component of the supply is deliverable, within the meaning of the NPPF, and should not be relied upon to deliver the emerging Local Plan’s housing requirements. In any case the standard method figure should be applied in the interim.

<sup>9</sup> CD 11.6.2: PPG - Housing and Economic Land Availability Assessment, Paragraph: 017 Reference ID: 3-017-20190722

2.37 Section 4 of the HDATP is titled Key Themes and Action Plan which establishes the following objectives, with a view to addressing under-delivery of housing:

1. Establishing housing growth as a strategic priority
2. Meeting the housing needs of our ageing population
3. Maximising land capacity opportunities
4. Land supply for housing
5. Making our town centres a catalyst for growth
6. Developing a skilled workforce
7. Developing software to improve our handling of data regarding sites, particularly housing delivery
8. Promoting Bolton as a great place to live/develop housing
9. Improve residential planning application processes

2.38 Each of the objectives are supplemented by identified 'tasks' which assist in achieving the 'expected outcome'. The tasks and outcomes for objectives 1, 2, 4, 6, 7, 8 and 9 relate to achieving strategic priorities, promoting Bolton as a location and improving the planning process. Whilst these objectives are welcomed they do not seek to address the underlying issue of viability of development within Bolton and are unlikely to have a significant impact on housing delivery in either the short or long term. For example the Action Plan identifies several methods which aim to speed up the delivery of sites such as shortening the expiry date on planning permissions. Although ensuring development occurs on sites quickly, shortening the expiry date on permissions from 3 years to 2 years may have the unintended result of reducing sites from the supply. Often the reasons for developers not making a quick start on site are not within their control, for example technical constraints, contractual obligations or viability constraints.

2.39 Objectives 3 and 5 follow on from the interventions proposed within the HDP and reference the need to secure Homes England funding of £12million to remediate and develop infrastructure for 28 Council owned sites, as well as £14million to improve sub-town centres. As identified in section 5 of this report when discussing the HDP interventions, the availability of this funding is limited and delivery on these sites will not occur if bids are unsuccessful.

### **Summary**

2.40 In the light of these shortcomings the housing land supply data for BMBC lacks even basic information to enable judgments regarding whether the land is suitable, available or viably deliverable for housing in the plan period (NPPF 67). There is therefore no credible information on which to base a housing trajectory (as required by NPPF paragraph 73) and justify the claims made by BMBC regarding the delivery of housing.

### 3. Five year supply of deliverable sites

- 3.1 Paragraph 73 of the NPPF states that *“Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.”*
- 3.2 BMBC’s latest position is recorded in the Housing Delivery Test Action Plan (HDTAP), published in August 2019 [CD 12.84]. The HDTAP identifies Bolton’s five year housing land supply with a base date of 1 April 2019, and concludes that BMBC can demonstrate only a 3.6 year supply of deliverable housing. BMBC therefore accept there is a deficiency in housing land supply position and this is also acknowledged in the Statement of Common Ground on Housing Issues.
- 3.3 This is based on a standard methodology derived housing requirement figure of 787 dpa. The shortfall in delivery since the beginning of the plan period in 2008 is 2,178 homes, which is equivalent to 3.1 years of supply against the Core Strategy requirement. This level of under delivery is serious and significant. The HDTAP also acknowledges that a 20% buffer should be added and has been applied at the end of the calculation, as per the PPG<sup>10</sup>, resulting in a five year requirement of 4,962, equivalent to 992 dpa. This calculation is robust and in line with policy and guidance.
- 3.4 The HDTAP identifies a five year supply of 3,583 dwellings (equivalent to 716 dpa), which consists of 2,791 dwellings on large sites (0.25ha and above), and 792 on small sites.
- 3.5 The HDTAP updates the position set out in the Annual Monitoring Report 2017/18 (AMR), published in January 2019. The AMR identified Bolton’s five year housing land supply with a base date of 1 April 2018, and concluded that BMBC could demonstrate only a 3.7 year supply of deliverable housing.
- 3.6 The issue of five year supply was considered as part of a recent appeal<sup>11</sup>, the decision on which was published on 21 August 2019. Paragraph 13 states:
- “It is common ground between the appellants and the Council that the Borough does not have a 5-year land supply for housing development. At the time of the inquiry, the most up-to-date published information was based on the position as at 1 April 2018. This showed a deliverable supply of 3.7 years, for the period 2018-23. At the inquiry, it was accepted that some adjustment to this figure was justified, to reflect current uncertainties over two particular sites. On this basis, it was agreed that the supply is now between 2.99 years and 3.36 years.”*
- 3.7 Although the supply position quoted in the HDTAP is calculated from a base date of 1 April 2019, the Inspector’s Decision and the evidence provided at the inquiry confirms that BMBC have applied incorrect assumptions in calculating the housing supply. It is

<sup>10</sup> PPG – Housing supply and delivery, Paragraph: 022 Reference ID: 68-022-20190722

<sup>11</sup> APP/N4205/W/18/3210299 [CD 12.83]

the view of Peel that the supply position falls somewhere between 2.99 and 3.6 year supply.

## 4. Critique of the housing strategy

### Introduction

- 4.1 The spatial strategy for GM, and therefore also for BMBC, aims to deliver inclusive growth across the city region by making the most of the key locations and assets<sup>12</sup>. Many elements of the spatial strategy including boosting the competitiveness of northern areas of the city region over the plan period. However, the specific housing strategy, including the stated preference for brownfield sites is likely to exacerbate existing issues in relation to the availability and affordability of new housing, and the lack of diversity within the existing housing stock.
- 4.2 This section specifically challenges the assertions made regarding the spatial strategy for the delivery of housing in Bolton, the context of which is established within Chapter 4 of the Revised Draft GMSF [CD 11.13].

### GMSF Housing Strategy

- 4.3 The Revised Draft GMSF acknowledges the risks of failing to meet identified needs within Paragraph 7.4, which states:
- “If insufficient new homes are provided to meet increasing demand, then there is a risk that affordability levels will worsen and people will not have access to suitable accommodation that meets their needs. The construction of new housing is also an important part of the economy, providing large numbers of jobs and often securing the redevelopment of derelict and underused sites.”<sup>13</sup>*
- 4.4 Paragraph 7.4 is correct. If housing need within GM is not met then it will have a severe, detrimental effect on housing prices and the economy of GM and the North West.
- 4.5 However, the inability to identify the correct housing requirement is merely the starting point for a series of further errors in failing to identify the correct locations and types of land for meeting housing need.
- 4.6 Chapter 4 of the GMSF establishes the spatial strategy for the City Region, identifying key themes and taking account of historic patterns of growth and areas of disparity.
- 4.7 Policy GM-Strat 6 confirms that within northern areas there will be a strong focus on urban regeneration and enhancing the role of the town centres. Whilst the aspirations for growth and regeneration are supported, the delivery aspirations have not been justified.
- 4.8 The main town centres are relatively unproven residential locations. Despite this the GMSF proposes around 12,000 new homes there<sup>14</sup>, almost one quarter of which is

<sup>12</sup> GMSF, page 41, paragraph 4.1 [CD 11.13]

<sup>13</sup> Revised Draft GMSF – Paragraph 7.4 [CD 11.13]

<sup>14</sup> GMCA, Housing Land Supply, List of Sites

projected for Bolton Town Centre. The Revised Draft GMSF is not accompanied by evidence to support the assumed significant and sustained increases in planned delivery. There is no evidence to demonstrate whether this land can be viably delivered.

- 4.9 These points are addressed in greater detail in Appendix 1 of this report. There has been media attention regarding resolutions to grant planning permission for new housing on two sites in Bolton Town Centre<sup>15</sup> at Committee Meetings in April for a total of 610 units. However, it should be noted that these two sites are included within the current list of housing sites, albeit with a slightly lower anticipated yield than detailed in the submitted applications. If BMBC are to meet the minimum housing requirement of 15,020 units, this will require all of the 501 sites coming forward, and more.
- 4.10 Paragraph 1.17 of the Revised Draft GMSF confirms that the GMCA are adopting a 'brownfield preference' policy and states *"we will do all that we can to make sure that brownfield sites are developed in the early part of the plan period"*.
- 4.11 The published list of sites which identifies the housing land supply for BMBC for 2018-2037 claims that 9,628 dwellings will be provided on brownfield land across 362 sites. This approach is misconceived. In particular, these assumptions ignore the following constraints.
- 1) The housing supply is dependent on sites being developed which have been available for several years without development coming forward and where ownership information is missing. As set out later in this section, Turley has undertaken an assessment of the sites relied upon from the most recent SHLAA, prepared in 2008, which demonstrates that a significant proportion are retained within the supply for GMSF.
  - 2) Many of these sites are currently in alternative uses with no certainty they will come forward or consideration of implications for current uses. This is explicit within the 'disclaimer' on page 4 of Annex 1 to the HLSS.
  - 3) The Revised Draft GMSF acknowledges the potential difficulties in developing brownfield sites in paragraph 4.10, which states:

*"Abnormal costs such as those associated with addressing land contamination can have a negative impact on the viability of developing brownfield sites, and so securing funding to support remediation will be a priority."*

Despite this, there is no evidence of consideration of whether such funding is sufficient. The various initiatives and funding packages which are being made available to assist with delivery across sites within GM are identified within Appendix 2 of this report. The analysis demonstrates that this is likely to be insufficient to deliver the quantum of housing that is relied upon, in the areas in

<sup>15</sup> <https://www.bolton.gov.uk/news/article/498/new-150m-neighbourhood-at-church-wharf-given-green-light>  
<https://www.bolton.gov.uk/news/article/499/green-light-for-35-million-residential-development>

which it is identified. There are serious doubts about the extent of funding support which could be provided to the GMCA. Simon Ridley of Ministry of Housing, Communities and Local Government (MHCLG) wrote to the GMCA confirming that in light of the reduction in housing numbers in the Revised Draft GMSF, the Housing Package may be reduced<sup>16</sup>.

- 4) Research undertaken by Turley has demonstrated that a large proportion of the claimed supply for BMBC is located in areas of marginal viability. This is explored fully in section 5 of this report.

4.12 It is therefore clear that the strong brownfield preference will mean that an insufficient number of new dwellings will be delivered in the plan period.

### Historic delivery

4.13 In order to highlight the significant step change in delivery that would be required from BMBC and the required level of investment needed to achieve the standard method figures, Turley has undertaken an assessment of historic delivery in Bolton.

### Past completions

4.14 Evidence produced by BMBC<sup>17</sup> provides figures on past delivery in Bolton. Turley has collated the figures for Bolton since the beginning of the current plan period on 1 April 2008 and these are provided in Table 4.1.

**Table 4.1: Bolton MBC - Past delivery (net completions)**

Year	Dwellings
2008/09	663
2009/10	463
2010/11	433
2011/12	588
2012/13	469
2013/14	407
2014/15	469
2015/16	513
2016/17	438
2017/18	483
2018/19	530
<b>Total</b>	<b>5,456</b>
<b>Average 2008-2019</b>	<b>496</b>

<sup>16</sup> <https://www.thisislancashire.co.uk/news/17504473.greater-manchester-could-lose-68m-of-funding-for-housing/>

<sup>17</sup> Bolton's Authority Monitoring Report 2017/18: Volume 2 Housing Land Requirements and Supply [CD 12.5]

Source: Bolton MBC (2019)

- 4.15 It is evident from Table 4.1 that the historic delivery in Bolton is significantly lower than that anticipated for the plan period within the Revised Draft GMSF. The average rate of delivery since the beginning of the CS plan period is 496 dpa, which is significantly below the annual adopted housing requirement of 694 dpa. The shortfall in delivery is therefore 2,178 homes which is equivalent to 3.1 years of supply against the CS requirement. To put this into context, in the eleven years since the beginning of the plan period, less than eight years of delivery has occurred. This is a serious and significant shortfall.
- 4.16 The housing requirement for Bolton, based on the standard methodology (1 April 2019), is 787 dpa. The average rate of delivery over the last ten years is therefore 291 units short of this annual figure. Delivery of housing in Bolton on the scale set out in the claimed trajectory in the GMSF will require a significant step change equivalent to an annual increase of 60%, compared to delivery over the last ten years.

#### **Bolton SHLAA (2008)**

- 4.17 The most recent SHLAA published for BMBC was undertaken by Roger Tym and Partners and was published in August 2008 [CD 12.2]. It is therefore a historic document which is inadequate to justify the claimed contribution of urban supply to meet the current need for housing. As well as identifying sites which already had planning permission for housing at the study base date (1 April 2007), almost 400 additional sites were assessed in terms of their 'suitability', 'availability' and 'achievability' for housing development. The document suggests that this was undertaken in accordance with the CLG's SHLAA Practice Guidance of July 2007.
- 4.18 The assessment involved scoring each site against 12 criteria in order to derive an initial overall score (out of 60) and assist in prioritising those sites which are subject to the fewest constraints. Accordingly those sites which scored 50 or above were categorised as Priority 1. This comprised 167 sites with a total yield of 8,865 dwellings. Sites achieving overall scores of between 40 and 50 performed less well against the assessment criteria due to more significant constraints. These were identified as Priority 2, and offer a yield of 5,564 dwellings.
- 4.19 Paragraph 8.12 of the SHLAA provides further context on the categorisation of the sites and the potential for development.

*"Sites in Priority 1, which have minimal constraints, are considered available for delivery within the first five years, and are clear candidates for allocation. Sites in Priority 2 have a limited level of constraint and so, as per the advice in the Guidance, they are not currently 'available'. However, the Priority 2 sites do not have 'very severe' constraints and so it is likely that they could be made available for delivery after the first five years. Priority 2 sites may therefore be suitable for allocation, depending on their individual circumstances and on specific measures being proposed to overcome their constraints. Sites in Priority 3 have severe constraints such that they are unlikely to be considered appropriate for development in the first ten years, and so they are unlikely to be primary candidates for allocation in that period."*

- 4.20 Paragraph 8.16 goes on to confirm that based on a Local Plan requirement of 694 dpa *“it is still possible to meet the 15-year dwelling requirement without having to dip into Priority 3 sites, or indeed Priority 2 sites. However, if the 15-year requirement were to be met using only PDL sources, a significant number of priority 2 sites would be needed”*.
- 4.21 The SHLAA was submitted with the CS for examination. The subsequent Inspector’s Report [CD 12.1] makes reference to the assessment of sites and confirmed that sites with planning permission together with Priority 1 sites were capable of meeting the requirements for a five year supply of land. The Inspector also confirmed that Priority 2 sites, where in accordance with the spatial strategy and not, for example, on Protected Open Land, may contribute to needs after 2016, and that the requirements of PPS 3 were met.
- 4.22 The CS was therefore adopted on the basis that Priority 1 sites could meet the bulk of the housing requirement, along with sites which are the subject of planning permission, and potentially a range of Priority 2 sites.
- 4.23 Turley has examined the list of Priority 1 sites and compared this with the list of sites published to support the supply of housing for the GMSF. Of the 167 Priority 1 sites (yield of 8,865 dwellings) included within the August 2008 SHLAA, 74 are still included within the GMSF supply. Those 74 sites were included in the 2008 SHLAA with a yield of 5,618 dwellings. A list of these sites is included as Appendix 3. It has therefore been demonstrated that the vast majority of dwellings identified for Priority 1 sites remain undeveloped after more than 11 years. This demonstrates that these sites should not have been relied upon to provide the housing supply for the CS and equally there is no evidence that they can be relied upon to meet housing needs over the GMSF plan period.

### **Current delivery**

- 4.24 Turley has undertaken analysis of active sites which are currently under construction within Bolton. The research principally involved identifying those sites which are included in the five year supply<sup>18</sup> as ‘under construction’ and identified 29 sites across Bolton. Turley has sourced the relevant planning application documents to identify the mix and tenure of each site. Whilst it is acknowledged that these sites are the subject of extant consents, it is apparent that a proportion have had permission for well over five years with limited or no completions in recent years.
- 4.25 The data has been collated in a single table, provided as Appendix 4 of this report. The information provides a snapshot in time of where the housebuilders are claimed by BMBC to be active as well as an overview of the mixes and splits which are deliverable.
- 4.26 The map provided at Appendix 5 plots the 29 sites on price band data obtained from the Land Registry (2018 House PricePaid data). It is evident from the map that with the exception of development within the Town Centre, the majority of current development is located in outer fringe areas of the borough, with very little on the edge of the Town Centres. The Map at Appendix 5 also highlights that the majority of

<sup>18</sup> Authority Monitoring Report 2017/18, Bolton MBC [CD 12.5]

the current sites are located within Land Registry House Price Paid 2018 bands of above £140,000. Further assessment of viability is provided in Section 5. This contrasts greatly with the location of the sites within the supply claimed by BMBC, many of which are located within the lower price bands.

- 4.27 This potentially explains the current lack of delivery of Priority 1 sites, which the SHLAA acknowledges are located in 'clusters', 'to the east and west of Bolton – within Neighbourhood Renewal Areas'<sup>19</sup>. These locations appear not to be viable and subsequent gap funding (for which there is no certainty) is likely to be required to encourage development here.
- 4.28 Section 5 of the HDP examines why the level of delivery expected within Bolton isn't currently occurring. The identified reasons are summarised as follows:
- Phasing of works and expenditure – sites requiring expensive infrastructure and phasing of works.
  - Size of development and pace of delivery;
  - Market values;
  - Developers paying more than a site is worth;
  - Construction costs;
  - Capacity and interest of developers; and
  - Lack of developer will.
- 4.29 The constraints to development, and the identified interventions, are considered further within Section 5 of this document.

### **Summary**

- 4.30 The GMSF housing strategy places great reliance on the delivery of housing without credible evidence that it is deliverable. It relies on significant and sustained delivery at unprecedented levels from the town centre where there has to date been little proven market for homes and viability is unknown. Additionally, the preference for brownfield sites and reliance on delivery of high density accommodation in areas which have not historically delivered housing risks exacerbating existing issues in relation to the availability and affordability of new housing and the lack of diversity within the existing housing stock.
- 4.31 A major step change in delivery as well as significant government funding is required and the Plan does not fully address these matters, meaning there is insufficient information to demonstrate that the housing land supply is deliverable or developable. It is therefore not possible to rely on the delivery of the identified housing supply for BMBC.

<sup>19</sup> Paragraph 6.27 – SHLAA (2008) [CD 12.2]

## 5. Viability assessment of the supply

### Background

- 5.1 The HLSS [CD 12.7.2] identifies 501 sites in Bolton, with a claimed delivery of 12,317 dwellings.
- 5.2 As set out in section 2 of this report, in order for sites to be regarded as “developable”, there must be a reasonable prospect that they “could be viably developed at the point envisaged”<sup>20</sup>. This is reinforced by Planning Practice Guidance for Viability (‘PPGV’), which requires plans to be tested against a proportionate assessment of viability that takes into account all relevant policies, and local and national standards (paragraph: 001 Reference ID: 10-001-20190509) [CD 11.6.4].
- 5.3 In this context paragraph 57 of the NPPF requires that:
- “All viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available.”*
- 5.4 PPGV<sup>21</sup> confirms that viability assessments should be used to ensure that policies are realistic, set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan. Assessment should also inform the iterative preparation of deliverable policies in order to remove the need for further viability assessment at the decision-making stage.
- 5.5 As previously highlighted, no viability assessment of the supply within the HLSS has been published, which is a fundamental omission. This is even more serious in the context of the GMSF which includes a preference for brownfield sites, which it is accepted will be challenging to develop, due to factors such as remediation costs, low market values and multiple land ownership.
- 5.6 Whilst there is no formal viability assessment of the urban land supply in Bolton, the HDP states that it provides a review of housing evidence from a range of sources. The HDP references “local housing markets of distinct character”, but provides no commentary in respect of the viability status of the different housing markets. However, it is clear from the HDP introduction, and throughout the document, that residential development in many areas of Bolton is regarded as suffering from a severe lack of viability, requiring the introduction of up to eleven forms of intervention.
- 5.7 Turley has identified that when excluding small sites, and those in the defined Town Centre, the HLSS data claims that 5,476 dwellings will be delivered on brownfield sites

<sup>20</sup> Glossary, NPPF [CD 11.5]

<sup>21</sup> CD 11.6.4: PPG – Viability, Paragraph: 002 Reference ID: 10-002-20190509

in Bolton during the GMSF plan period. This assumed delivery would comprise 4,606 houses and 870 apartments, which in total represents 45% of the claimed supply.

- 5.8 The majority of traditional new-build housing development (excluding apartments) is concentrated in greenfield locations in higher value areas on Bolton. However, the identified brownfield sites are most often located in lower value regeneration areas and are hindered by inherent costs relating to demolition, clearance and remediation relating to previous uses, most commonly industrial. The risks associated with relying on delivery in lower than average brownfield value locations and higher development costs raise additional concerns and further justifies the requirement for a viability assessment to be published by GMCA.

### **Assessing the viability of the urban land supply**

- 5.9 In the absence of any published viability evidence, Turley has undertaken an independent headline viability assessment of brownfield development in Bolton. The methodological and supporting technical evidence is provided within Appendix 6.
- 5.10 The methodology applied is consistent with the requirements set out in PPGV. It adopts a 'typology approach' to viability testing, which reflects ongoing development in low value areas of Bolton
- 5.11 Reflecting the assessment methodology recommended by PPGV, the site typologies are summarised within Table A7.1 within the Technical Appendix at Appendix 6.
- 5.12 The densities and associated dwelling mix are consistent with current scheme delivery in Bolton. The affordable housing allowance which has been applied is consistent with the BMBC CS, providing 15% affordable housing on brownfield sites, with a 75:25 tenure split for social rented and intermediate respectively.
- 5.13 For simplicity, viability testing has adopted a 1 hectare site typology on the basis that results generated can be applied on a pro-rata basis to schemes of a larger scale.

### **Viability testing**

- 5.14 Turley viability testing is provided on the basis of two appraisals, adopting differing sales value assessments with other assumptions remaining consistent. The first appraisal models current residential delivery in low value brownfield locations in Bolton by regeneration specialists, and the second model reflects the value at which development in such locations will be regarded as viable by national house builders.
- 5.15 Regeneration developers such as Gleeson Homes, Lovell Partnerships and Keepmoat Homes will tend to operate in low sales value locations, operating in a very specific market, which they understand and to which they have adjusted their business model away from that adopted by a traditional new build housing developer. Regeneration developers adopt wholesale cost restrictions within their operating model, product specification and house type/scheme modelling.
- 5.16 Regeneration developers will commonly include a very limited land value assessment within their scheme assessments, being prepared to adopt a very prolonged approach

to site purchase negotiations, effectively forcing land owners to accept limited values when no alternative purchasers come forward. From a viability perspective, a land owner must be assessed to receive a reasonable benchmark land value, and assessment on the basis of nominal land values is inappropriate to encourage the wholesale release of land for development.

- 5.17 Initial testing within Appraisal 1 adopts a value of £185 per square foot (psf) for market sale units, in line with current delivery in Bolton by Gleeson Homes.
- 5.18 Gleeson Homes have recently completed a scheme in Bolton, with achieved sale prices equating to an average of £169 psf, with the last sale listed on Land Registry in June 2018. A new scheme is currently being marketed with asking prices equating to £176-185 psf and the £185 psf value adopted is regarded as a reasonable representation of current delivery in low value brownfield locations. Appraisal 1 is attached at Annex 2 to the Technical Appendix at Appendix 6.
- 5.19 A number of sensitivity tests have also been undertaken in order to identify the point at which the scheme can generate a residual land value that is in line with the assessed benchmark land value. Appraisal 2 is attached at Annex 3 to the Technical Appendix at Appendix 6.

## Results

- 5.20 Appraisal 1 adopts an average market sale value of £185 psf and generates a negative residual land value of -£231,148 per hectare in comparison to a required benchmark land value of £462,485, indicating a viability deficit of -£693,633.
- 5.21 Therefore, the results of the viability testing at £185 psf sales value demonstrates that brownfield sites cannot be regarded as viable for the majority of national house builders in low value areas of Bolton.
- 5.22 It is clear that development in brownfield locations is not viable for those developers operating on a traditional house builder operating model. Only specialist developers, with very low costs and specialist operating models can operate viably when sales values equate to £185 psf, as tested.
- 5.23 Appraisal 2 adopts an average market sale value of £219 psf and generates a positive residual land value of £456,375 in comparison to a required benchmark land value of £462,485. This is a marginal deficit, of limited significance, and the scheme is regarded as viable, requiring limited adjustment by the developer or land owner.
- 5.24 Development at £219 psf is therefore regarded as viable in brownfield locations in Bolton. This is supported by current brownfield development by national housebuilders in Bolton, as set out within the map at Appendix 7, which shows schemes by Seddon Homes, Bellway, Jones Homes and Taylor Wimpey generating peak asking/achieved prices ranging from £227-256 psf, all in excess of the identified minimum of £219 psf.
- 5.25 Delivery in areas that cannot achieve values of £219 psf is regarded as being at risk. In such locations, development will rely on a limited number of regeneration developers or those Registered Providers that are prepared to undertake their own development.

Otherwise, sites are unlikely to be delivered, or will require reductions of affordable housing and other S106 contributions, below policy provision.

- 5.26 It is not possible to precisely assess the scope for development by specialist regeneration developers or Registered Providers but it is reasonable to assume that it would be highly unlikely that multiple developers would be prepared to commence development if they were to compete with each other. Whilst Gleeson Homes are shown to have two schemes in Bolton, one scheme has completed and, according to Land Registry data, the other has yet to achieve any sales completions. Gleeson Homes have moved from one scheme to the next, avoiding competition between sites.
- 5.27 New build housing in low value areas will generate higher sales than the prevailing tone of values, but such housing offers limited aspirational incentive to purchase, and demand levels must be anticipated to be lower than good quality new build housing in higher value areas where purchasers aspire to locate.
- 5.28 It is, therefore, highly unlikely that multiple (i.e. more than two) new build schemes will come forward at the same time.
- 5.29 HDP paragraph 5.36 provides commentary to reinforce our understanding, stating that *“developers sometimes limit the number of homes that they will develop in an area. The two reasons for this are to limit their exposure to the local market in event of falling prices and because too much development in an area provides choice for purchasers, which lead to lower prices”*. The HDP then goes on to say *“this is not an indication of the capacity of the active developers, but is a sign that there is an insufficient number of developers”*. This statement is regarded as an oversimplification, as developers will avoid direct competition where levels of purchaser demand is perceived to be limited.
- 5.30 From review of sales at the Lorne Court development by Gleeson Homes it is noted that 35 units sold over an 18 month sales period, equating to 24 units per annum, equating to 48 units from two outlets. Taking this as a reasonable proxy for low value brownfield delivery, a maximum delivery of 864 units is assessed during the 18 years remaining in the Revised Draft GMSF period to 2037.
- 5.31 In order to assess the areas of Bolton within which brownfield development can be regarded as viable or at risk, Turley has plotted the current maximum asking prices (or achieved prices where the scheme has recently completed) from the six schemes of scale that have been identified as recently delivering housing in Bolton against the average residential sales value generated within the postcode area of the site, as determined from Land Registry data.
- 5.32 The new developments are located in the postcode areas shown within Table 5.1, with Land Registry average sales values from 2018 also included.

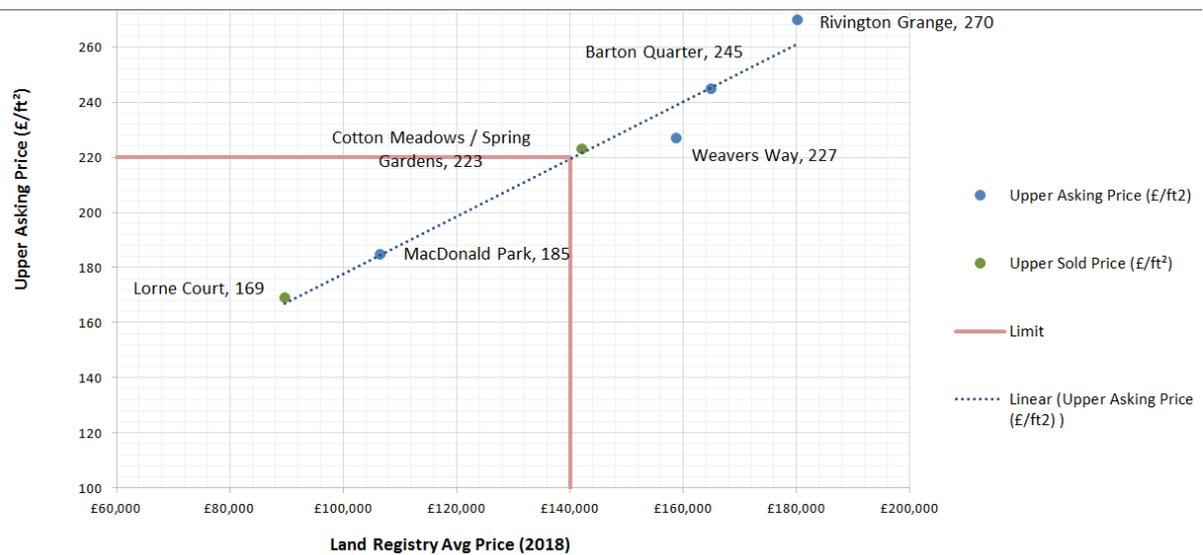
**Table 5.1: Bolton - Current Residential Development Average Postcode Values**

Developer	Development	Post Code	Land Registry Postcode Average Value (£)
Bellway Homes	Barton Quarter	BL6 5UE	£164,971
Jones Homes	Rivington Grange	BL6 6EA	£180,281
Seddon Homes	Weavers Way	BL5 2DH	£158,774
Bellway/ Taylor Wimpey	Cotton Meadows/ Spring Green	BL1 8UF	£142,128
Gleeson Homes	Lorne Court	BL4 7LW	£89,747
Gleeson Homes	MacDonald Park	BL4 9RA	£106,627

Source: Land Registry and Turley Research

5.33 The correlation between pricing and average postcode values is plotted within the following graph, with a linear trend line generated by Excel showing a “best fit” of the average pricing data.

**Figure 5.1: Asking/Achieved Prices:Land Registry Average Prices (2018)**



Source: Land Registry and Turley Research

5.34 The graph clearly shows the correlation between asking/achieved values and the average Land Registry average values of the postcode in which each scheme is located.

5.35 Schemes that generate low sales values are located in postcode locations that produce low average Land Registry sales values and vice versa for higher values. This is in line with expectations, with higher value units positioned in locations where the differential between new build pricing is not excessive when compared with re-sale values.

- 5.36 Upon the graph, the red “Limit” line provides a correlation between the assessed level of scheme viability at £219 psf and the minimum Land Registry average value that is required for a site to be regarded as appropriate and viable for development.
- 5.37 On the basis of the above analysis, a scheme that will generate sales values equating to £219 psf will be located in a postcode area that produces an average Land Registry sales value equating to more than £140,000.

### Housing Delivery Plan

- 5.38 As previously referenced, the Council has published a HDP in respect of the need to provide 726 new homes each year as per the housing requirement and distribution set out in the GMSF [CD 12.6]. HDP table 6 states that “*without intervention, new homes will be developed at approximately the same rate as that in the previous ten years (450 homes each year). Of these, 20% will be affordable*”. It is clear that the Council is placing heavy reliance upon interventions to meet housing need and it is regarded as essential for the proposed range of interventions to be appropriately assessed and costed.
- 5.39 HDP paragraph 3.45 states that of the 726 new homes to be provided each year, 37% (269) need to be specialist accommodation for older people; and 63% (457) need to be mainstream homes.
- 5.40 The provision of specialist accommodation will sit outside the development criteria of the majority of residential developers (big or small) and requires separate assessment to accommodate the individual nature of specialist development typologies relating to older person developments.
- 5.41 HDP Paragraph 3.59 states that “*25% of the 411 new main stream homes developed will be affordable (103) and 50% of the 315 homes developed for older people will be affordable (158 homes)*”.
- 5.42 A requirement for 50% of older person housing to be designated as affordable housing will fundamentally impact upon scheme viability, and appropriate viability modelling is required to assess the level of deficit and the necessary scale of intervention. Use Class C2 older person housing usually delivers nil affordable housing on the basis that it provides a residential institution, rather than a Class C3 dwelling house.
- 5.43 HDP paragraph 3.59 states a total affordable housing need equating to 416 units per annum, with the remaining 155 units to be “*provided by a change in tenure of existing homes, which can be achieved by purchasing homes from owner/occupiers or private landlords to provide affordable housing for either rent or shared ownership*”. This approach is regarded as highly unusual with significant cost implications. The HDP provides no clear assessment of the costs to be incurred in the purchase of market housing for use as affordable housing.
- 5.44 HDP Section 5 Scenario 1 provides bar graphs to show the breakdown of various development costs in comparison to market value in respect of a “*financially viable*” scheme. The scheme is stated to be viable, despite only producing a profit equating to 11.77% of development value. This falls significantly below the 15-20% of gross

development value as set out within paragraph 18 Planning Practice Guidance: Viability. We regard an appropriate developer return for speculative development in Bolton to equate to 20% on gross development value and it does not appear that the HDP has been drafted in line with market expectations.

5.45 HPD section 6 sets out eleven interventions, with eight (D1-D8) proposed to “*stimulate development*” and three (P1-P3) proposed to “*assist purchasers*”.

5.46 Brief commentary in respect of each intervention is set out below:

**Intervention D1: Homes England funding**

- The use of Homes England Funding should be encouraged, but there is no guarantee that bids for funding will be successful and this form of intervention is regarded as holding limited and unsubstantiated ability to overcome restrictions on development.
- The process of receiving funding from Homes England is a lengthy process which may slow the development of sites within the plan process.
- As set out Appendix 2, these funds are severely constrained and the impact on delivery of housing in the context of a requirement of 15,000 units is likely to be limited.

**Intervention D2: Developer guarantee 1 (underwrite costs)**

- This intervention proposes to provide guarantee payments if it proves that the sales value of completed units fall below the total costs incurred.
- As stated at HDP paragraph 6.12, developers “*plan for a profit between 15-20% of the value of the homes*” and the proposed intervention provides no guarantee that the scheme will generate a profit. Therefore, the effectiveness of the intervention is regarded as limited.

**Intervention D3: Developer guarantee 2 (off plan sales)**

- This intervention proposes to increase the pace of delivery by introducing a property company/investor purchaser to buy homes off plan for private rent.
- Whilst the investor may not purchase all of the units within a scheme, the disposal of a block of units is proposed to generate a level of certainty and enable the scheme to be constructed at a faster rate due to the guaranteed sale of a number of units. It is proposed that the Council will provide a rental guarantee to the investment purchaser.
- The bulk disposal of units to an investor will, however, impact upon the viability of the scheme as a bulk purchase for investment purposes will generate a lower per unit value than would be achieved on the open market. The reduction in value relates to two matters;
  - The capitalisation of rental value will, in all but exceptional circumstances, generate a lower value than market sale; and

- A bulk purchaser will naturally require a discount from the price that could be achieved from individual sales.
- In theory, Intervention D3 will increase the pace of delivery, but is likely to prove unattractive to developers due to the reduction of viability linked to the lower achieved value from the bulk investment sales.

**Intervention D4: Review of Section 106 agreement**

- This intervention proposes that the *“Council can consider renegotiating the terms of the Section 106 Agreement”*.
- The acknowledgement that Section 106 contributions and affordable housing requirements can impact on scheme viability is appreciated, but caution must be applied as the proposed intervention does not comply with NPPF or PPGV, which states that *“Where up-to-date policies have set out the contributions expected from development, planning applications that fully comply with them should be assumed to be viable”*<sup>22</sup>
- This is only relevant to schemes which are already approved but where development has stalled and subsequently will not aid in the delivery of sites which are unviable at the outset.

**Intervention D5: Older people**

- The HDP proposes that 37% of the total housing provision should provide specialist homes for older people, but HDP paragraph 6.32 states *“traditionally, this type of home is not developed without intervention”*.
- The proposed intervention mainly relates to the provision of guidance, with very limited reference to funding, and no indication is provided to show how the *“many developers, both housebuilders and registered providers”* who will *“often take the easier option of developing conventional family homes”* will be persuaded to develop specialist homes for older people.
- The provision of specialist housing for older people will only prove to be of interest to a limited number of specialist developers, and no clear monetary intervention other than a rental guarantee for residential care units is provided. The HDP provides no estimate of the scale of intervention required to encourage older person housing development, which is especially important when taking into account the proposed requirement for 50% affordable housing as referenced in HDP paragraph 3.59.

**Intervention D6: Design advice and construction risk assistance**

- This intervention proposes to provide design and construction risk guidance.
- This may be of a benefit to small developers, but the positive impact on overall delivery must be anticipated to be limited.

<sup>22</sup> CD 11.6.4: PPG – Viability, Paragraph: 006 Reference ID: 10-006-20190509

#### **Intervention D7: Sites in low value areas**

- Intervention D7 states that “*where the costs of development exceed the value of the completed homes, providing homes for affordable rent, is likely to be the only solution*”.
- This intervention relates to sites of low value. At paragraph 5.37 of this report, low value areas are shown to be those that generate average Land Registry sales values equating to less than £140,000.
- It is proposed that a “*typical subsidy requirement*” for sites in low value areas which provide affordable rental homes, would equate to £30,000 per home. However, this falls significantly below the shortfall relating to the provision of affordable rented homes stated at HDP paragraph 6.19, at £60,000 per home.
- It is essential that reasoned justification for the proposed level of subsidy is provided, along with a definition of “*low value areas*” and the scale of planned delivery within such areas.
- According to the assessment of low value areas carried out by Turley, 1,888 units in low value brownfield locations are assessed as being at risk of non-delivery due to lack of viability and, in line with HDP reasoning, are only likely to come forward on the basis of affordable rent delivery. On this basis, the total subsidy required will vary from £56,640,000 (1,888 x £30,000) to £113,280,000 (1,888 x £60,000). The HDP does not provide a clear indication of the level of costs attributed to this intervention.
- In addition to the points made above the fund is not in place currently, there is no guarantee or information about how much funding would be available and therefore how many houses could be developed. It is unlikely that the fund would be sufficient to deliver the level of housing required in Bolton.

#### **Intervention D8: Increase construction capacity and reduce costs**

- This intervention proposes the creation of a “*construction centre*” in order to increase the labour force and potentially reduce costs. In addition, modern methods of construction are promoted in order to reduce the costs of construction. It is, however, acknowledged that costs of modern methods of construction are currently higher than standard construction costs. The HDP suggests that the Council could invest in an existing manufacturer of modern methods housing.
- Whilst modern methods of construction are increasing in prominence, we have direct experience and understanding of the higher costs involved, and this intervention will provide little support for the majority of housing developers.

#### **Intervention P1: Bolton Shared Ownership**

- In order to assist purchasers, this intervention proposes to reduce the cost of purchase by promoting a shared ownership model.
- It is not, however, clear how the shared ownership provision will be generated from the “*existing stock*” as referenced within HDP paragraph 6.59. It appears

that the proposal is for the Council to purchase existing properties at market value and then convert them into shared ownership units at a cost of £60,000 for each existing property (and £100,000 per new build property). No supporting evidence or reasoning is provided to justify the costs as set out within HDP paragraph 6.65, or the total costs of implementing this intervention.

**Intervention P2: Deposit assistance**

- This intervention proposes grant, investment or deposit assistance in respect of rent to buy and shared ownership occupiers/purchasers, with the cost of intervention ranging from £10,000-£150,000 per home.
- Deposit assistance is likely to support levels of demand, enabling certain purchasers to buy a home after a period of rental (buy to rent), but no clarity is provided within the HDP in respect of the assessment of the required levels of investment for the different forms of incentives.

**Intervention P3 + D9: Custom build service**

- The proposed custom build service would offer assistance for those looking to build their own homes, or offer a custom build service.
- Demand for this type of property is limited and the intervention is expected to provide marginal benefits.
- This proposed intervention is unlikely to deliver high density, edge of centre development included within the Local Plan housing trajectory.

**Intervention D10: Community-led development**

- Similar to the custom build intervention, the impact of this intervention is regarded as marginal.
- Similar to community led development, the proposed intervention is unlikely to deliver high density, edge of centre development included within the Local Plan housing trajectory.

5.47 Section 7 of the HDP provides several examples of where the interventions can be combined on certain sites, with the aim of aiding delivery. Each example is considered below.

**Category A: Creams Mill, Little Lever**

5.48 HDP paragraph 7.21 states that this site is located in an area where sales values equate to £200 psf, which the HDP implies to be sufficient to support the development of new homes. This value is well below the £219 per sqf which has been identified by Turley as the minimum figure required to enable viable development, and therefore further information in respect of the assessment of scheme viability should be provided.

5.49 Proposed Intervention D2 (developer guarantee – underwrite costs) is included to cover the developer’s costs should the sales value fall below the total cost of development. However, this approach does not resolve the issue relating to high levels of initial expense relating to abnormal costs, which will generate a high finance burden.

- 5.50 The intervention does not guarantee the level of profit which will be required for a developer to proceed with the scheme.
- 5.51 It is, therefore, anticipated that Intervention D2 will provide insufficient benefit and the scheme will continue to be regarded as unviable. The HDP provides scenario summaries, indicating the level of subsidy required, however, no appraisals are provided to support the conclusions provided and this lack of transparency is regarded as inappropriate.
- 5.52 Paragraph 57 of the NPPF confirms that transparency in the preparation of all viability assessments is essential and Planning Practice Guidance: Viability elaborates on the NPPF by confirming the importance of transparency for improving data availability and accountability.

**Category B: Old Hall Street, Kearsley**

- 5.53 The DLP states that the development of 64 apartments in Kearsley is one of the most challenging types of development to stimulate, and proposes up to eight interventions.
- 5.54 The two main interventions are D2: Developer Guarantee 1: underwrite costs; and D3: Developer Guarantee 2: off plan sales.
- 5.55 As referenced in respect of the Creams Mill site, Intervention D2 will only ensure that the developer will not make a loss on their total development costs and is regarded as providing very limited impetus as a developer and their funder will require a strong expectation of profit before they will proceed.
- 5.56 Intervention D3 assumes the bulk sale of 16 homes to a rental investment purchaser, but the HDP provides no commentary in respect of the reduction in sales value which must be anticipated for this type of disposal. As above, appraisal summary tables are provided with no supporting transparent detail.

**Category C: Part Street, Westhoughton and Union Mill, Bolton**

- 5.57 This illustration proposes that the Council enters a joint venture and includes the site (valued at £2.5-£3m) at nil value in order to generate developer interest in the more difficult part of the development.
- 5.58 An appraisal summary table is provided with no supporting transparent data, and without further information, it is not possible to determine whether the proposed joint venture intervention would be regarded as viable.
- 5.59 This intervention does not appear to fall within the range of interventions as set out within HDP section 6.

**Total Financial Requirement**

- 5.60 HDP paragraph 7.86 concludes that the Council's total cost of interventions required to incentivise the delivery of new homes and the change in tenure of 155 new homes each year is £22,600,000.

- 5.61 It is impossible to establish how the total amount for capital funding, subsidy, investment and net operating costs have been assessed as no clear breakdown of the anticipated costs of each intervention has been provided.
- 5.62 It must be anticipated that scheme viability will vary across the Borough sub areas, as set out in HDP paragraph 2.3, but no indication of the main areas requiring interventions are included in the HDP.
- 5.63 The HDP is not supported by any appraisals to provide clarity in respect of the assumptions adopted in the wide scale assessment of scheme viability throughout Bolton, and this lack of transparency does not comply with NPPF or PPG.
- 5.64 It is assumed that the Council has received legal advice to confirm that each intervention is state aid compliant, and confirmation is requested.

### **Implications for Housing Land Supply**

- 5.65 The results of the viability assessment demonstrate that a significant element of the brownfield land supply identified within the HLSS will not be sufficiently viable to be of interest to those national house builders that do not specialise in regeneration projects. Therefore, there is a significant risk that the unit delivery as planned in the HLSS will fail.
- 5.66 The HLSS includes 40 brownfield sites that are located in areas where Land Registry average sales values fall below £140,000, the point at which it is assessed that new build sales values will fall below viable levels.
- 5.67 Only one of these 40 sites (Lorne Court HLSS Site Ref 1291-BOL) has recently been developed and, even then, by a regeneration specialist, and we are not aware that any other HLSS site is under construction.
- 5.68 Excluding the Lorne Court site, total brownfield HLSS unit delivery in Bolton (excluding town centre) postcode areas below £140,000 is proposed at 2,752 units, comprising 2,256 houses and 496 apartments.
- 5.69 Total HLSS brownfield unit delivery in Bolton is 5,476 units (excluding small sites). Therefore, on the basis of the above analysis, 50.3% of planned brownfield housing supply would be at risk due to lack of viability.
- 5.70 As earlier referenced, it is reasonable to assume that regeneration developers and Registered Providers would only deliver a limited amount of units, with such developers being very careful not to overload the market with new build units due to limited levels of demand in areas that do not generate aspirational demand.
- 5.71 Bolton is assessed as capable of supporting a maximum of two new build regeneration schemes at any one time (without public funding). On this basis, and in line with the sales rates achieved at the Gleeson Homes Lorne Court development, it is estimated Bolton has potential to deliver 864 units in postcode value areas below £140,000 during the Revised Draft GMSF period.

- 5.72 On this basis, 1,888 units in brownfield locations (2,752 units minus 864 units = 1,888 units) would be at greatest risk of non-delivery due to lack of viability. The units at risk equate to 15.3% of total supply in Bolton (excluding small sites) and 34.5% of HLSS brownfield delivery.
- 5.73 In light of this assessment it is clear that the strategy for the delivery of housing within Bolton in the period up to 2037 is unlikely to meet the housing requirement as calculated using the standard methodology.

## 6. Meeting qualitative housing needs

- 6.1 The residential development proposed within the Hulton Park project is located immediately adjacent to the golf resort as part of the creation of a comprehensive 'Ryder Cup community'. The physical attributes of the areas proposed for residential development facilitate the creation of a high quality built environment.
- 6.2 It is envisaged that the new homes will have a greater degree of visibility and a higher profile within the market as a result of their clear and close association with a regional golf destination and the Ryder Cup, and their proximity to the sporting lifestyle and other leisure recreational opportunities within the golf resort.
- 6.3 The detailed design and mix of the new homes will be confirmed through the reserved matters process. However, the proposed scheme provides for a variety of mid- and upper-market family homes. These would predominantly take the form of larger family housing with approximately 74% of the homes being 3 and 4-bedroom houses, 46% of which are 4+bedroom homes.
- 6.4 This section initially considers the limitations of the current housing stock in Bolton, before establishing the policy context and the evidenced quantitative need for different sizes, types and tenures of housing within Bolton over the longer term (15 years and beyond). This refers to and supplements the HDP<sup>23</sup> published by BMBC as appropriate for the purposes of this report and in relation to the Proposed Development. It also refers to the 2016 Housing Needs Assessment<sup>24</sup> (HNA) commissioned by BMBC, which included a survey of around 2,300 households.
- 6.5 The extent to which the identified supply will address the full range of needs is then critiqued, cross-referencing as appropriate to the detailed analysis of supply in the preceding sections, to reinforce the important contribution the Hulton Park project has the potential to offer in meeting an identified shortfall in supply.
- 6.6 It is demonstrated that the mix of homes provided for through the Hulton Park project will make an important contribution to not only the overall need for new homes but also the types and tenures of homes which are needed in Bolton and GM over the longer-term.

### Limitations of the Current Stock Profile

- 6.7 The Revised Draft GMSF acknowledges the need to diversify '*local housing markets that are often dominated by low-cost housing*', as a means of bringing '*more money into local economies*' and delivering '*more mixed and inclusive communities*'<sup>25</sup>.
- 6.8 Relative to the typical housing offer in England, there is a clear lack of diversity in the housing stock of GM, with a prevailing concentration of smaller, low value properties

<sup>23</sup> **CD 12.6:** Bolton Council Housing Delivery Plan (April 2019)

<sup>24</sup> Arc4 (2016) Bolton Housing Needs Assessment

<sup>25</sup> Paragraph 7.21 Revised Draft GMSF [**CD 11.13**]

and a distinct absence of larger, higher value housing for families. This is also the case in Bolton, where the 2016 HNA identified stakeholders' views that *'the stock profile'* is a weakness of the housing market due to *'high numbers of unsuitable and undesirable pre 1919 terraced housing located in pockets across the Borough'*<sup>26</sup>. This clearly remains an issue today, because<sup>27</sup>:

- Whilst the proportion of homes in Bolton that are detached, at 11%, is slightly higher than the GM average (10%), this remains lower than rates in the wider North West region (13%) and England as a whole (16%);
- Terraced houses make up a greater proportion of the housing stock in Bolton (37%) compared to GM as a whole (33%). This is especially relevant, considering that the prevalence of terraced housing in GM already exceeds the proportion recorded in the North West (32%) and England as a whole (26%).
- Bolton has a relatively low provision of houses with 3 or more bedrooms, this size of housing making up 51% of stock. This rate is lower than in GM (55%), the North West (60%) and England (58%).
- As such, there is a relatively high representation of smaller homes in Bolton, with 1 and 2-bed dwellings accounting for 46% of the area's total stock, in comparison with 43% in GM, 38% in the North West and 40% in England<sup>28</sup>. Two bedroom houses alone account for almost one third of the overall housing stock (31%), compared to 18% in England;
- There is evidence from the 2011 Census<sup>29</sup> that the size of housing available in Bolton is frequently not meeting the individual needs of households, with some 5,370 households (5%) having at least one fewer bedroom than required. Further analysis confirms that households with dependent children in Bolton are more than twice as likely to have fewer bedrooms than required, with around 12% of such households – equating to almost 4,170 families – classified as overcrowded;
- Whilst fewer than half (44%) of homes in England fall in the lowest Council Tax bands (A/B), the comparable figure for Bolton is 69%. This exceeds an already skewed GM average (65%) and suggests a significant prevalence of lower value housing; and
- In Bolton 16% are classified as Council Tax Band D and above, compared to GM and England averages of 17% and 34% respectively. Only around 3% of homes in Bolton are assigned to the highest Council Tax bands (F/G/H), which, whilst being

<sup>26</sup> Arc4 (2016) Bolton Housing Needs Assessment, paragraph 5.11

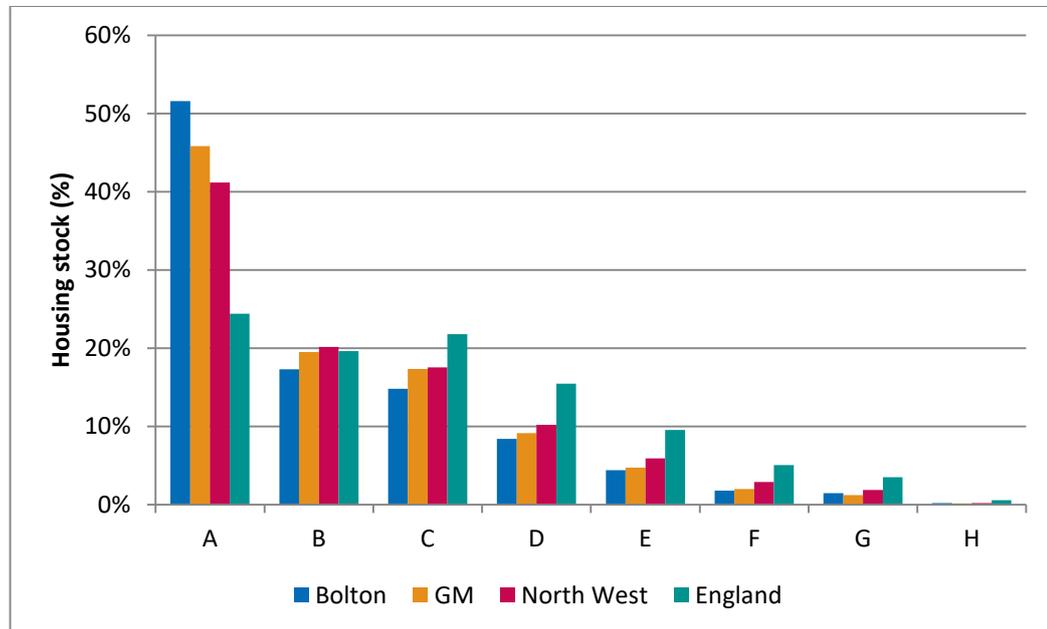
<sup>27</sup> Unless otherwise specified, all data included in bullet points sourced from VOA (2018) Council Tax: stock of properties, 2018

<sup>28</sup> Note that percentages included at this and the previous bullet do not sum to 100% due to a number of dwellings in each area having an unknown number of bedrooms.

<sup>29</sup> ONS via Nomis (2011) Census 2011: Table LC4105EW - Occupancy rating (bedrooms) by household composition

in line with GM (also 3%) offers notably few higher value properties relative to the North West (5%) and England (9%). This is shown at Figure 6.1.

**Figure 6.1: Dwelling stock by Council Tax band (2018)**



Source: VOA, 2018

- 6.9 Based on the above, the housing stock in Bolton is demonstrably skewed towards smaller and lower value housing, with a distinct absence of larger, higher value housing that is suitable for families. The HNA shows that this creates discrepancies between aspiration and reality, with 42% of moving households expressing a wish to move to a detached house but only half (21%) expecting to<sup>30</sup>. This is also manifest in local markets, with the majority of sub-areas – including Over Hulton – having insufficient detached houses relative to local aspirations<sup>31</sup>.
- 6.10 BMBC was subsequently encouraged by the authors of the HNA to ‘focus on delivering to address identified mismatches and reflect household aspirations’, with a clear view expressed that ‘development more reflective of household expectation would result in an increased emphasis on developing **larger detached family houses**’<sup>32</sup> (emphasis added). However, the recent supply of new homes in the Borough has actually served to exacerbate imbalances in the existing stock. The AMR (2017/18) confirms that almost half (48%) of new homes built in the Borough between 2008 and 2018 were flats, which has reinforced the relative overrepresentation of smaller homes and conflicts with the recent survey which found that only 4% of moving households desire a flat<sup>33</sup>. Only 30% of homes have been detached or semi-detached housing, signifying a particular undersupply of family homes in recent years which contrasts with the

<sup>30</sup> Arc4 (2016) Bolton Housing Needs Assessment, paragraph 7.11

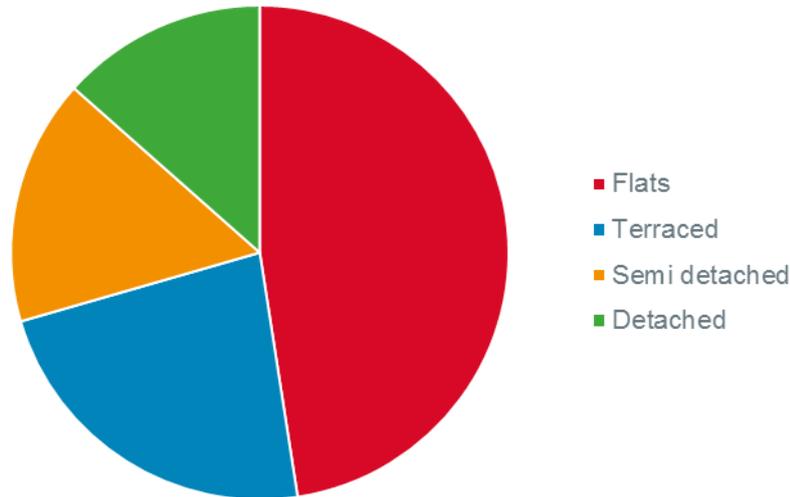
<sup>31</sup> *Ibid*, Table 5.8a

<sup>32</sup> *Ibid*, paragraphs 5.20 and 7.12

<sup>33</sup> *Ibid*, paragraph 7.11

overwhelming desire for such housing amongst recently surveyed households intending to move<sup>34</sup> (77%). This shortfall is particularly stark given the substantial overall shortage of housing delivery.

**Figure 6.2: Housing delivery by type, 2008/09 to 2017/18**



Source: BMBC AMR 2017/18

### **A Need for Different Types and Sizes of Housing**

6.11 The NPPF states that the planning system should:

*“...support strong, vibrant and healthy communities, by **ensuring that a sufficient number and range of homes can be provided** to meet the needs of present and future generations”<sup>35</sup> (emphasis added)*

6.12 In support of ‘building a strong, competitive economy’<sup>36</sup> it also confirms that:

*“Planning policies **and decisions** should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken **should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.**”<sup>37</sup> (emphasis added)*

6.13 To this end, the NPPF states that planning policies should:

<sup>34</sup> *Ibid*, Table 6.8

<sup>35</sup> **CD 11.5:** MHCLG (2019) National Planning Policy Framework, paragraph 8(b)

<sup>36</sup> *Ibid*, Chapter 6 title

<sup>37</sup> *Ibid*, paragraph 80

*“...seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment”<sup>38</sup>*

6.14 It further confirms that:

*“The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies”<sup>39</sup>*

6.15 The PPG provides guidance on approaches that can be taken when identifying the need for different types of housing, acknowledging that the standard method does not break down the minimum annual housing need figure into individual groups<sup>40</sup>. It reaffirms that such assessments of need should be reflected in planning policies and states that *“strategic policy-making authorities will need to consider the extent to which the identified needs of specific groups can be addressed in the area, taking account of:*

- *The overall level of need identified using the standard method (and whether the evidence suggests that a higher level of need ought to be considered);*
- *The extent to which the overall housing need can be translated into a housing requirement figure for the plan period; and*
- *The anticipated deliverability of different forms of provision, having regard to viability”<sup>41</sup>.*

6.16 As set out in section 2, the housing policies within the adopted CS are demonstrably out of date, predating the publication of the NPPF and PPG. It is however of note that Policy SC1 sets out BMBC's expectation that for market and social-rented housing, *‘about 50% of dwellings are 3-bedroomed or larger, and no more than 20% (for market housing) or 10% (social rented) are 1-bedroomed’<sup>42</sup>.*

6.17 The HDP provides a more recent assessment of the need for different types and sizes of housing in Bolton, albeit focussing on the period to 2035 rather than extending to 2037 like the Revised Draft GMSF<sup>43</sup>. As summarised in the table below, this indicates that 53% of all additional households – increasing to some 59% of those in need of market housing – will require at least three bedrooms, showing close alignment with Policy SC1 in this regard. This creates a sizeable need for houses, with a smaller need for bungalows and flats.

<sup>38</sup> *Ibid*, paragraph 81(c)

<sup>39</sup> *Ibid*, paragraph 61

<sup>40</sup> PPG – Housing needs of different groups, Paragraph: 001 Reference ID: 67-001-20190722

<sup>41</sup> *Ibid*

<sup>42</sup> **CD 11.2:** The Bolton Core Strategy (March 2011)

<sup>43</sup> **CD 12.6:** Bolton Council Housing Delivery Plan (April 2019) Table 5

**Table 6.1: Estimated Size and Type of Housing Required in Bolton (2018 – 2035)**

Required size	Market housing	All tenures	Required type	Market housing	All tenures
1 bed	4%	14%	House	64%	59%
2 beds	37%	32%	Bungalow	25%	23%
3 beds	45%	39%	Flat	10%	18%
4+ beds	14%	14%	Other	1%	1%
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>Total</b>	<b>100%</b>	<b>100%</b>

Source: BMBC Housing Delivery Plan, 2019

- 6.18 Reflecting the above and subsequent analysis, the HDP later summarises that the majority of housing (57%) needs to be ‘family-sized homes’<sup>44</sup>. It also highlights a specific need for various older persons’ housing products, which – though not directly comparable – is also reflected in the identified need for bungalows above.
- 6.19 However, as already considered in section 5, the extent to which the market could realistically deliver the required volume of these older person housing products does not appear to have been explored or tested in detail, with no consideration given as to the historic delivery of bungalows, extra care schemes, retirement homes or residential care accommodation. This is an unfortunate omission which creates uncertainty around whether the calculated need for such products can be met by the market, in the manner that the HDP assumes. Where the envisaged quantum of such units cannot be realistically delivered, older households would be less likely to move from their existing homes and this would subsequently limit the availability of family housing stock. The HNA similarly recognised that such a ‘lack of fluidity...has repercussions upon the overall operation of the housing market and the ability of households to trade up into properties released by older people’<sup>45</sup>. In the context of the HDP, such an eventuality would mean that the calculated need for family-sized housing (57%) underestimates the full need for these types of homes.
- 6.20 Furthermore, it is understood that this calculation draws upon the 2014-based household projections. Peel’s submissions to the Revised Draft GMSF have asserted that stronger household growth will be required to support a reasonable level of future economic growth across the conurbation. The evidence submitted to support representations [CD 12.10] identified that this would serve to elevate the proportionate need for houses across GM to 80% (noting this did not separately consider the need for bungalows), reflecting assumptions around the need to attract and retain a larger labour-force<sup>46</sup>. Turley has not modelled this scenario below GM level, although it is reasonable to assert that it would be likely to also further orientate need towards houses in Bolton relative to the trend-based projection.

<sup>44</sup> *Ibid*, Table 10

<sup>45</sup> Arc4 (2016) Bolton Housing Needs Assessment, paragraph 6.67

<sup>46</sup> **CD 12.10.3**: Paper 3: Planning for Growth. Representations to the Revised Draft Greater Manchester Spatial Framework submitted on behalf of the Peel Group (March 2019). Table 5.3

6.21 The proportionate split presented above is underpinned by the housing requirement proposed in the Revised Draft GMSF, which is referenced by BMBC within the HDP. Paragraph 2.3 of this report expresses the view that, for the purposes of assessing need in the context of this appeal, the standard method should be used to present a ‘*minimum*’ need. On this basis, the proportionate mix across all tenures shown at Table 6.1 has been applied to this need figure and extended to 2037<sup>47</sup>. This indicates that some 8,793 houses are needed across Bolton, equivalent to 463 houses per annum. Circa 8,078 homes with three or more bedrooms are suggested as being required, and this is considered to represent an *absolute minimum* figure given the applicant’s view that the standard method underestimates the full need for housing across GM.

**Table 6.2: Estimated Size and Type of Housing Required in Bolton (2018 – 2037)**

Size	%	Total need (2018-37)	Annual need	Type	%	Total need (2018-37)	Annual need
1 bed	14%	2,107	111	House	59%	8,793	463
2 beds	32%	4,834	254	Bungalow	23%	3,434	181
3 beds	39%	5,929	312	Flat	18%	2,648	139
4+ beds	14%	2,149	113	Other	1%	145	8
<b>Total</b>	<b>100%</b>	<b>15,020</b>	<b>791</b>	<b>Total</b>	<b>100%</b>	<b>15,020</b>	<b>791</b>

Source: BMBC Housing Delivery Plan; Turley analysis

### Importance of Providing Higher Value Family Housing

6.22 The introduction to the HDP states that ‘*the right housing supply is...crucial to support sustainable economic growth*’<sup>48</sup> (emphasis added).

6.23 The HNA similarly expressed the view, based on a household survey and stakeholder engagement, that:

*“Overall, in Bolton, executive housing provision will have a role in response to the need for diversification and expansion of the sub-regional economy and in contributing towards achieving wider population and economic growth objectives for the Region. Stakeholders highlighted a need for additional executive housing in Bolton...[with] strongest aspiration towards detached houses with three or four bedrooms”*<sup>49</sup>

6.24 It highlighted stakeholders’ perspectives around ‘*a lack of suitable high-end properties that attract more affluent people to the area*’ and a view that ‘*good quality executive*

<sup>47</sup> The approach taken assumes that the proportionate split is applied to the total output of the standard method. No separate consideration is given as to the potential demographic make-up of the element attributed to the affordability adjustment which sits separate and additional to the 2014-based projections.

<sup>48</sup> **CD 12.6:** Bolton Council Housing Delivery Plan (April 2019) paragraph 1.2

<sup>49</sup> Arc4 (2016) Bolton Housing Needs Assessment, paragraphs 4.111, 4.112 and 4.115

*housing is needed to encourage people to come to the area bringing much needed investment and to generate economic and employment growth'*<sup>50</sup>.

- 6.25 Despite this recognition within the HNA, and the clear statement in its introduction, the HDP does not explore the relationship between housing and the economy in Bolton. This is considered to represent a significant omission.
- 6.26 Housing plays an important role in the economy because, when accompanied by the necessary complementary investments in transport and quality of place it can help to drive economic growth.
- 6.27 There is credible evidence that the more available housing there is in an area, the more affordable it becomes making it easier for local industry to attract and retain the skills it needs<sup>51</sup>. The higher the quality of this housing, the more attractive a place is to potential workers (although this must be accompanied by other quality of place investments such as transport links, schools and leisure amenities) and the greater the capacity of a place to attract higher skilled workers<sup>52</sup>. Skilled labour, or human capital, is one of the key drivers of economic growth<sup>53</sup> and so it follows that housing can be a key driver of economic growth.
- 6.28 Research undertaken by the Centre for Urban and Regional Development Studies (CURDS) specifically sought to explore the idea that a 'creative class', recognised as a driver of economic growth and comprising those involved in the development of Knowledge Intensive Business Services (KIBS), have specific housing needs and aspirations, which, if met will help to attract mobile creative professionals to an area<sup>54</sup>. It was highlighted that these aspirations tended to lead to the creative class rejecting large parts of traditional housing markets, especially monotonously designed suburbs built to reflect the needs of another economic era. The result being a trend of such households tending to migrate out of urban conurbations to the outer suburbs, market towns and rural needs. This therefore reduced the potential wider benefits on economies and communities associated with creating higher value employment opportunities, with a growing body of academic evidence cited as confirming that: *"Good quality aspirational housing is increasingly a driver of economic success rather than a consequence of it"*<sup>55</sup>.

<sup>50</sup> *Ibid*, paragraphs 5.8 and 5.16

<sup>51</sup> **CD 12.18:** Glossop, C. Housing and economic development: Moving forward together. Centre for Cities, November 2008; Barker, K. Review of Housing Supply - Delivering Stability: Securing our future housing needs. HM Treasury March 2004

<sup>52</sup> **CD 12.24:** Frontier Economics. Assessing the productivity benefits of improving inter-city connectivity in Northern England - A report prepared for the National Infrastructure Commission. March 2016; Regeneris Consulting and Oxford Economics. The role of housing in the economy. July 2010

<sup>53</sup> **CD 12.21:** Romer, P., 1990. Human Capital and Growth: theory and evidence. Carnegie-Rochester Conference Series on Public Policy (32) (extract)

<sup>54</sup> **CD 12.22:** 'The Economic Role of Mobile Professional and Creative Workers and their housing and residential preferences: Evidence from North East England'. CURDS, University of Newcastle upon Tyne, 2007

<sup>55</sup> **CD 12.23:** Lee and Murie (2004) 'The role of housing in delivering a knowledge economy' Built Environment, 30, pg 244 – 245) cited in *Ibid*.

- 6.29 Importantly in the context of GM and Bolton’s housing market the CURDS research identified:

*“The housing stock in the northern regions of the UK is a product of the first and second stages of industrial development. This set of housing legacies does not meet the needs of the creative class...This insight suggests that, while it is an important overall policy objective, an over-concentration on brownfield sites could lead planners to overlook the locational attributes which have the greatest appeal to creative workers”<sup>56</sup>*

- 6.30 The position was advanced that policies across the north of England had, as a result, demonstrated limited success in creating sufficiently attractive living environments to significantly stem the flow of more affluent households from the conurbations.
- 6.31 The research drew upon a specific case study, at Wynyard; an executive housing development in the North East (Stockton-on-Tees) where it was demonstrated that the provision of this type of housing had proven successful in attracting and retaining highly skilled and entrepreneurial residents. This is summarised further below.

### **Case Study – Wynyard, Stockton-on-Tees**

Wynyard Park was used as case study development in the 2007 CURDS study cited above. It is an executive housing development in Stockton-on-Tees, noted as containing high specification housing within an exceptional residential environment. 70% of homes on the estate were in Council Tax bands G and H. At the time the research was undertaken it was noted anecdotally to be home to several of the region’s highest profile entrepreneurs.

A telephone survey of residents revealed that Wynyard had attracted a significant concentration of those working in Knowledge Intensive Business Services (KIBS) to a suburban/ semi-rural housing development, which at the time was home to around 700 households. The survey revealed that 58% of households included at least one adult knowledge worker. In addition, 42% of households contained at least one adult who owned or part owned a business, with almost half of these individuals running their businesses from home. Most of the business owners ran businesses which operated in markets beyond the North East.

The CURDS study confirmed that the residential search area for many of these people stretched from North Leeds/ York/ Harrogate up to Northumberland. The four most frequently cited factors that were important in determining a move to Wynyard were size of house, security, amenity and road accessibility. When it came to considering the ‘special qualities of Wynyard’ the survey identified the combination of countryside amenity (views, countryside, golf course, leafy), safety and accessibility. In the context of the Hulton Park proposal it is of specific note that the study identified that the golf course had represented an important factor in creating the amenity and contributing to what made ‘Wynyard’ ‘special’ for those who had moved to the estate, with about a third of households members of the golf course.

<sup>56</sup> *Ibid*, page 515

- 6.32 The Revised Draft GMSF acknowledges that GM is in competition to *‘attract and retain the skilled workers that will be critical to delivering high and sustained levels of economic growth’*<sup>57</sup>. The GM SHMA shows that many of the highly skilled occupations in GM are filled by people living elsewhere, with *‘a net inflow of more skilled workers’* in commuting terms<sup>58</sup>. The Greater Manchester Independent Prosperity Review (GMIPR) has recognised that the *‘skills level of a local population’* is affected by *‘graduate retention and migration patterns’*<sup>59</sup>. In turn, this is influenced by *‘key workers’ ability to realise their residential preferences within the city region’*, with the critical role of the housing offer having been identified by the seminal Manchester Independent Economic Review<sup>60</sup> (MIER) in 2009. Failing to address this issue risks deepening housing affordability problems in certain areas, or could *‘drive people from the city region altogether’*<sup>61</sup>.
- 6.33 In aiming to address this issue, the Revised Draft GMSF makes reference to the *‘attractive residential neighbourhoods’* of the conurbation, and states that the diversification of local markets that are *‘often dominated by low-cost housing...will...help to increase the options for skilled workers looking to move into or within Greater Manchester’*<sup>62</sup>. It highlights the role of the northern areas in this regard, with an expectation that Green Belt sites will:
- “...deliver a diverse mix of values and tenures that includes affordable homes as well as some higher value housing (relative to prevailing values in the local area), within a high quality environment. This will help to achieve a better spread of higher value housing and prosperity across Greater Manchester, whilst also delivering greater diversity within individual areas”*<sup>63</sup>
- 6.34 The GMCA has recently finalised the first Greater Manchester Housing Strategy since its establishment, and the election of the GM Mayor. It recognises that:
- “Many places in Greater Manchester need a better mix of properties for owner-occupation to meet modern expectations and give choice to households to encourage them to stay in their neighbourhood as their family grows”*<sup>64</sup>
- 6.35 The objective of delivering a greater mix of housing to address recognised deficiencies, including the need for larger family housing, is one which BMBC recognised. While the CS is out-of-date, Policy SC1 identified the quantitative and qualitative housing needs of the area, highlighting the need to increase the area’s provision of larger properties

<sup>57</sup> **CD 11.13:** GMCA, GMSF Revised Draft, (2019), paragraph 7.20

<sup>58</sup> **CD 12.8:** GM SHMA (2019) paragraph 4.56

<sup>59</sup> **CD 12.11:** Greater Manchester Independent Prosperity Review – Reviewers’ Report (2019) p46 (extract)

<sup>60</sup> **CD 12.12:** Manchester Independent Economic Review (2009) – “Understanding Labour, Markets, Skills and Talent” (extract)

<sup>61</sup> *Ibid*

<sup>62</sup> **CD 11.13:** GMCA, GMSF Revised Draft, (2019), paragraph 7.21

<sup>63</sup> *Ibid*, paragraph 7.21

<sup>64</sup> **CD 11.23:** GMCA, Greater Manchester Housing Strategy 2019 - 2024 (June 2019), paragraph 5.17

and rebalance the stock towards homes with 3 or more bedrooms<sup>65</sup>. The CS affirmed that the housing evidence base has demonstrated a clear *“requirement to construct more larger houses than has recently been the case”*<sup>66</sup>. This is reflected in Policy SC1.4 which sought to ensure that 50% or so of market and social rented dwellings are 3-bedroomed or larger.

6.36 The CS was influenced by BMBC's Transforming Estates (TE) programme. The TE programme was specifically referenced in SC1 and its role in shaping the policy in the CS is apparent from the CS Inspector's report<sup>67</sup>. The report confirmed BMBC's acceptance that, in view of the good number of flats completed since 2003 there should be a greater emphasis on providing larger dwellings to meet family needs<sup>68</sup>. It is also noted that the TE programme was expected to result in more family housing<sup>69</sup>.

6.37 More recently the continued recognition of the need for larger, higher-value homes is also highlighted by BMBC's Economic Strategy<sup>70</sup> (published in 2016 and covering the period to 2030). The Strategy sets out BMBC's ambition for the area to be one that:

*“Maximises the strengths of its assets: its people, businesses, institutions, and communities”*<sup>71</sup>

6.38 Housing is cited as a major component of this ambition, the strategy stating that meeting housing needs is key towards fulfilling its objective of working towards a *“Distinctive, attractive, and competitive Bolton”*<sup>72</sup>. In order to meet needs, it is identified that BMBC will have to *“support increased housing builds to provide enough homes of the right quality to meet Bolton's growth ambitions”*<sup>73</sup>. The Strategy recognises that this is key to *“attracting and retaining new talent”*<sup>74</sup>.

6.39 BMBC's 'Measures of Success', set out in Appendix 2 of the Economic Strategy, subsequently indicates that the rate of growth in provision of larger, higher-value homes is the key metric by which housing delivery in Bolton should be measured. The Strategy's Measure of Success for Housing is based on the proportion of Council Tax generated by Council Tax Band D and above dwellings as a proportion of the total Council Tax base<sup>75</sup>.

<sup>65</sup> **CD 11.2:** Bolton Council (2011) Local Development Framework – Bolton's Core Strategy Development Plan Document, Page 51

<sup>66</sup> *Ibid*, Page 50

<sup>67</sup> **CD 12.1:** Bolton Metropolitan Borough Council's Core Strategy DPD, Inspector's Report December 2010

<sup>68</sup> *Ibid*, paragraph 25

<sup>69</sup> *Ibid*, paragraph 25

<sup>70</sup> **CD 11.12:** Bolton Council (2016) The Bolton Economy: Our Strategy for Growth 2016-2030

<sup>71</sup> *Ibid*, Page 7

<sup>72</sup> *Ibid*, Page 22

<sup>73</sup> *Ibid*

<sup>74</sup> *Ibid*, Page 24

<sup>75</sup> *Ibid*, Page 31

- 6.40 BMBC state their ambition to raise this rate from 23.8% as of 2015, to 25% by 2020 and to 28% by 2030. In doing so, it is affirmed that the following Economic Strategy objectives will be supported:
- A strong, resilient, and hard-working Bolton;
  - An ambitious, skilled, and responsive Bolton;
  - A productive, thriving, and innovative Bolton; and
  - A healthier, wealthier, and more prosperous Bolton<sup>76</sup>.
- 6.41 As referenced earlier in this section, the latest Council Tax data suggests that the proportion of properties classified as Tax Band D and above remains at 16%, which is unchanged from that recorded in 2015. Whilst this does not provide a direct read across to the proportion of revenue from these properties, this reaffirms the progress which still needs to be made for BMBC to address its objective and provide a mix of homes which it considers will match its economic growth objectives.
- 6.42 The need to maintain progress in this specific regard and with reference to this particular typology of housing in no small part reflects the wider issues of sustained under-supply of homes identified already as a defining issue in Bolton. Looking again at the Inspector's Report of the CS it is of note that the potential issue of under-delivery linked to BMBC's spatial strategy was recognised albeit the Inspector concluded that *'there is no conflict between its focus on previously-developed land and securing an appreciable amount of family housing'*<sup>77</sup>.
- 6.43 In reality there has been an under-delivery of homes, the TE programme was not sustained and as a result the objectives of directing regeneration activities were not achieved. This places greater emphasis on sites which are able to deliver larger higher value homes.
- 6.44 The Revised Draft GMSF evidence base indicates that under a baseline forecast<sup>78</sup>, Bolton is anticipated to deliver 6,600 additional jobs between 2017 and 2037. The Revised Draft GMSF recognises that a higher level of job growth will be sought across GM, represented by a so-called Accelerated Growth Scenario. This forecast is not broken down by individual GM authorities but it is reasonable to assume would imply potentially stronger job growth in Bolton. Peel's representations to the Revised Draft GMSF [CD 12.10] include detailed analysis by Frontier Economics which demonstrates, as referenced above, that it is reasonable to expect GM to achieve higher levels of job growth than either the baseline or Accelerated Growth Scenario, again by implication this would suggest that Bolton would see stronger than baseline job growth.
- 6.45 Even where the latest baseline forecast is used, however, it is useful to understand the profile of employment opportunities likely to be created in Bolton, to consider the

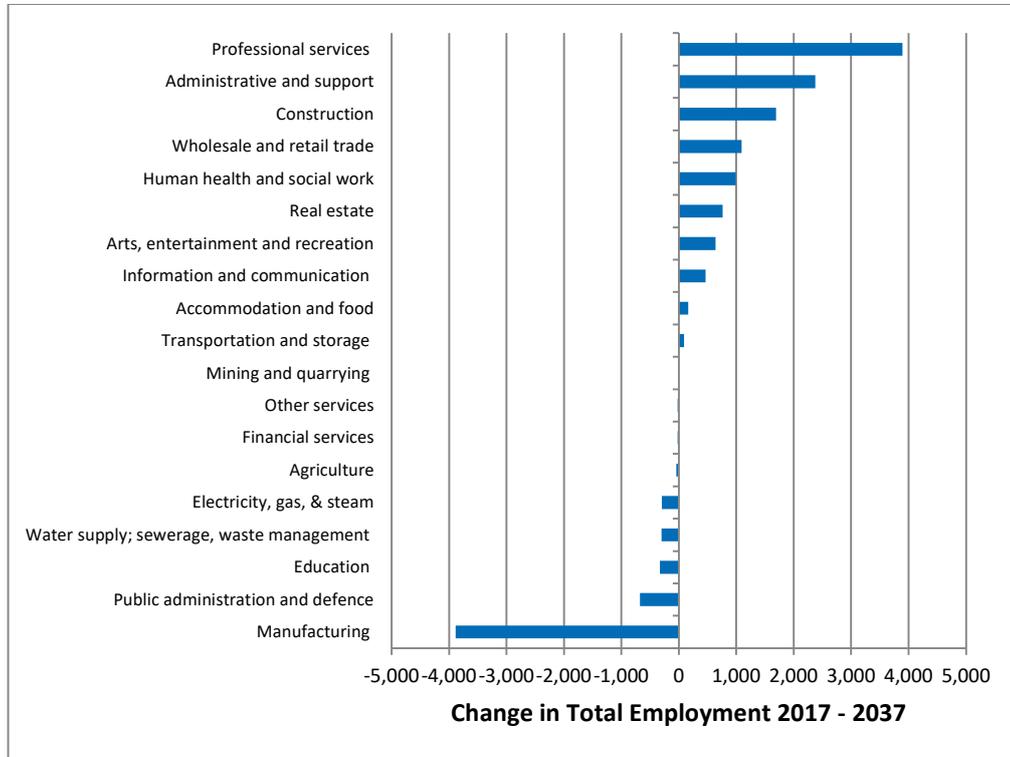
<sup>76</sup> *Ibid*

<sup>77</sup> Bolton Metropolitan Borough Council's Core Strategy DPD, Inspector's Report December 2010, paragraph 25

<sup>78</sup> Greater Manchester Forecasting Model 2018 version (January 2019)

relationship with the types of housing which will be required. Figure 6.3 profiles the breakdown of the forecast baseline job growth in Bolton by broad industrial sector.

**Figure 6.3: Forecast Change in Total Employment in Bolton by Sector**



Source: 2018 GMFM

- 6.46 It is evident that strong growth in professional services in particular is forecast in Bolton, with sizeable growth also forecast in the administrative and support sector.
- 6.47 The type of employment opportunities forecast to be created has implications for the profile of housing required, and the type of housing that households are able to afford.
- 6.48 The profile of job growth forecast by sector indicates that there will be a need for a wide range of different values of housing. With specific reference to the need for larger higher value housing, the growth of almost 4,000 additional jobs in professional services is important, and is likely to require highly qualified residents<sup>79</sup>. This sector also commands comparatively high wages<sup>80</sup>, reinforcing BMBC’s highlighted need for housing to accommodate higher income workers.
- 6.49 This reinforces the importance of maintaining and growing the population of skilled residents in Bolton as being critical to realising the full benefits of the forecast growth

<sup>79</sup> Over half (52%) of those working in “professional, scientific and technical activities” roles within Bolton at the 2011 Census had a degree level qualification or higher, compared to an average of 29% across all industrial sectors. This increases further at GM level, where 61% of the sector’s workforce had a degree level qualification or higher

<sup>80</sup> The 2018 Annual Survey of Hours and Earnings (ASHE) indicates that gross annual earnings for those working in “professional, scientific and technical activities” in the North West are typically 11% higher than the average across all sectors

in higher earning and skilled jobs. As BMBC recognises this will require the provision of housing to attract and retain this segment of the labour-force.

- 6.50 The Proposed Development will provide an important contribution towards BMBC's own objectives and its monitoring criteria. As set out at the start of the section, the proposed mix is orientated strongly towards the provision of larger higher value family housing. This recognises the opportunity presented through the wider development proposition to create a stronger market context for the new homes.
- 6.51 The delivery of these larger homes within a positive setting creates an important opportunity to attract and retain higher-skilled individuals thereby having a direct and positive impact on supporting BMBC's economic strategy and objectives.

### **Deficiencies in the Identified Supply**

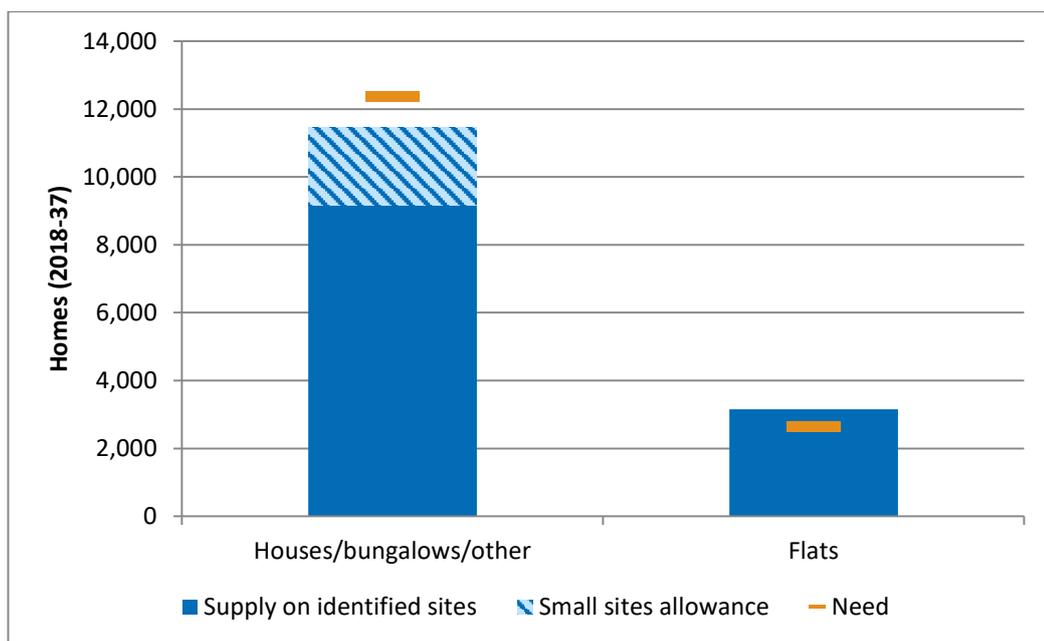
- 6.52 The above evidence clearly establishes a pressing need for new homes across Bolton, and in particular a need for family housing (3+ bedrooms) including larger higher value homes. This section considers the extent to which BMBC's identified sources of potential supply will provide for this need over the long-term.
- 6.53 In the recovered appeal into residential development at Broadoak, '*an identified deficiency in particular types of housing*' was recognised as '*a material consideration*' by the Inspector<sup>81</sup>. This was endorsed by the Secretary of State, who agreed that:
- "...the Council is not meeting the needs of the housing market as a whole, and...there are significant deficiencies in the number of larger/aspirational family homes, and wider issues with homelessness and affordability. While the Council is seeking to address this through the local plan process, the Secretary of State agrees...that at present individual schemes are the only way in which to begin to address such needs"*<sup>82</sup>
- 6.54 Reflecting on the analysis in the preceding sections it is clear that BMBC cannot demonstrate over the long-term that it has a deliverable supply of residential land to meet the full quantum or mix of housing needed, as set out at Table 6.2.
- 6.55 Firstly, in reflecting on the analysis in sections 2 and 3 of this report it is clear at an overall level the Revised Draft GMSF is not planning to provide for even the minimum need in Bolton based on the standard method. Paragraph 2.6 confirms that the proposed requirement for 726dpa is lower than the minimum need for 791dpa, or 15,020 homes in total, under the standard method as of 1 April 2018. This is reflected in the housing trajectory provided within the Revised Draft GMSF which identifies a total land supply of 12,317 homes across 501 sites across the borough with a further 2,306 homes on small sites, a total of 14,623 homes. This confirms an emerging shortfall in supply in totality across Bolton following the Revised Draft GMSF.

<sup>81</sup> Appeals at Worsley Road and Aviary Field, Broadoak (APP/U4230/W/13/2209607 and APP/U4230/W/17/3180726), 12 November 2018. Paragraph 375 of the Inspector's Report

<sup>82</sup> *Ibid*, paragraph 26 of the Secretary of State's letter

6.56 The consequences of this shortfall are more pronounced for certain housing types. The table of sites in the Revised Draft GMSF evidence base provides a limited breakdown of the 12,317 homes anticipated across 501 sites, distinguishing only between houses and flats<sup>83</sup>. It suggests that 9,158 houses could be provided on these sites, with 3,159 flats. The latter is almost 20% higher than the estimated need for 2,648 flats presented at Table 6.2, while the supply of houses would fail to meet the residual – and much larger – need for houses/bungalows<sup>84</sup>. This shortfall is not reconciled even when optimistically assuming that small sites exclusively provide houses, as illustrated in the following chart.

**Figure 6.4: Estimated Profile of Housing Supply Relative to Need**



Source: Turley analysis

6.57 Secondly, as set out in section 3 of this paper BMBC has consistently under-delivered against the adopted housing requirement. There is an implicit risk that this continues to occur in the intervening period, in the absence of the GMSF. The preceding sections demonstrate that the proposed identified supply of land by BMBC over the GMSF plan period carries significant risks in delivery. Specifically this highlights the delivery challenges to sites within the urban area. As the analysis in section 5 shows the majority of the homes on brownfield sites are anticipated to be houses (paragraph 5.7), this therefore further reduces the reasonable capacity in the supply to provide for against the need for three and four bedroom homes across Bolton.

6.58 It is noted from a review of active sites across Bolton as at April 2019 that there are 2,108 dwellings with an extant planning permission. Of those where the size of home is recorded it is observed that 928 have three or more bedrooms. This represents only

<sup>83</sup> CD 12.7.2: GM Housing Land Supply Statement (2019) Table 18

<sup>84</sup> The Revised Draft GMSF does not estimate the bungalows that could come forward on identified sites, but it is reasonable to anticipate that such products could only be delivered on sites deemed suitable for houses rather than flats

11% of the total need identified in Table 6.2, thereby indicating a significant level of unmet need for homes of this size as of today.

### **Summary**

- 6.59 The existing housing stock in Bolton and wider GM demonstrates deficiencies, reflecting a lack of diversity and specifically a distinct absence of larger, higher value housing for families. This reflects the historical legacy of development and the failure to provide adequate numbers of new homes of this type over recent years.
- 6.60 The HDP establishes a need to provide a range of new homes across Bolton. Some 53% of all households, and 59% of those requiring market housing, are estimated to need a home with at least three bedrooms. This creates a sizeable need for houses, and a relatively small need for flats. The ageing of the population is also assumed to generate a need for bungalows and other specialist older persons' housing products, albeit the deliverability of such products at this scale in Bolton has not been tested. It should be recognised that a failure to meet this specific need would likely discourage older people from moving, consequently growing the need for additional family-sized housing beyond the estimate made in the Housing Delivery Plan.
- 6.61 Reflecting on the analysis presented in the preceding sections it is apparent that BMBC's claimed supply is not capable of delivering the required mix of housing, in terms of the size and type of housing that GM and Bolton need over the longer-term.

## 7. Meeting affordable housing needs

- 7.1 The scheme proposes to deliver affordable homes as part of the housing mix and this represents 10% of the (gross) homes proposed at the site.
- 7.2 This will contribute towards meeting a need for affordable housing which has been evidenced by BMBC. The provision of affordable housing should be considered in the context of a sustained under-delivery of housing of this tenure against the assessed need across the borough.

### The Need for Affordable Housing

- 7.3 The Revised Draft GMSF acknowledges the extent of the housing crisis in GM, making reference to the increase in rough sleeping and the fact there are over 85,000 people on the local authority housing waiting lists in GM over 30,000 of whom are in priority need.
- 7.4 This is a longstanding issue in the conurbation, at least partially influenced by the loss of 92,612 homes to Right to Buy across GM since 1980<sup>85</sup>. Furthermore, 14,933 homes (around 6% of the total social housing stock) are now let at up to 80% of market rents, a rate at which the GMCA acknowledges may not be considered to be affordable to many. There are currently 13,203 fewer social rented homes across GM relative to 2012/13, a loss of over 5%<sup>86</sup>. A significant reduction in grant funding for affordable housing between 2010 and 2014 is likely to have impacted on this.
- 7.5 The Revised Draft GMSF aims to address issues around the affordability of new housing by targeting the delivery of at least 50,000 new affordable homes across GM over its plan period, with at least 30,000 being available for social rent or affordable rent.
- 7.6 This responds to evidence presented at Table 7.13 of the GM SHMA [CD 12.8], which follows the stepped calculation prescribed in the PPG and calculates a net need for 4,678 affordable homes across GM each year. It is noted that the GM SHMA identifies Greater Manchester '*as a housing market for strategic planning purposes*'<sup>87</sup> with the Revised Draft GMSF also suggesting a level of fluidity in how the total needs of the conurbation are met across individual authorities. This would infer that there is an expectation that the provision of affordable housing in one area of GM will be expected to contribute towards a wider need as well as a local need, although it is recognised that different GM authorities have different policies on the allocation of affordable housing to residents.

<sup>85</sup> GMCA Meeting (December 2018) Item 14: Continued City Centre Housing Developments and Use of Property Funds Surpluses

<sup>86</sup> *Ibid*

<sup>87</sup> CD 12.8 Greater Manchester Strategic Housing Market Assessment (January 2019), page 16

- 7.7 Table 7.13 of the GM SHMA [CD 12.8] also includes a disaggregation of the GM calculated need by individual authority with this identifying an annual need for 496 affordable homes in Bolton.
- 7.8 The HDP implies that a separate and more comprehensive calculation exists for the authority, however, and states that there is a need for 416 affordable homes each year in Bolton to resolve an identified imbalance between supply and demand<sup>88</sup>.
- 7.9 It is further implied that this need has been disaggregated below borough level, and while this is not presented in full it is notably referenced that Over Hulton has ‘a very small net imbalance with **very little supply**’<sup>89</sup> (emphasis added). It is reasonable to assume that the supply of new affordable homes in the sub-area will therefore make an important contribution towards addressing this deficiency and contributing towards the creation of mixed and inclusive communities.
- 7.10 The evidenced need for affordable housing across the borough reflects a sustained worsening of affordability issues in Bolton:
- There has been a marked increase in house prices over recent years, with the median price of a home in Bolton having increased by 22% over the past five years<sup>90</sup> (2013 – 2018). The GM SHMA estimated that 36% of households in Bolton are unable to access the housing market<sup>91</sup>;
  - There were 3,261 households in a reasonable preference category at the time that the GM SHMA was prepared<sup>92</sup>. Although the Housing Delivery Plan does not present a comparable estimate, it confirms that almost a third of applicants are aged under 30<sup>93</sup>; and
  - While not directly comparable to the Housing Register, the household survey referenced within the Housing Delivery Plan indicated that some 14,261 households in Bolton were in some form of housing need, equating to around 12% of the borough’s households. This increases amongst households currently living in the private rented sector (23%) and amongst larger families with couples (25%) or lone parents<sup>94</sup> (69%).

<sup>88</sup> CD 12.6: Bolton Council Housing Delivery Plan (April 2019) paragraph 2.22

<sup>89</sup> *Ibid*, paragraph 2.27

<sup>90</sup> ONS (2019) House price to workplace-based earnings ratio, Table 5a; respective years ending September

<sup>91</sup> GM SHMA [CD 12.8], Table 7.14

<sup>92</sup> This is used to estimate ‘current housing need’ within the GM SHMA [CD 12.8] calculation of affordable housing need and is set out on page 200. The GM SHMA confirms at paragraph 5.36 that in placing households into reasonable preference means that they have a priority need for a home. Reasonable preference can be awarded to people who are homeless, living in overcrowded households or who need to move on medical or welfare grounds.

<sup>93</sup> CD 12.6: Bolton Council Housing Delivery Plan (April 2019) paragraph 2.25

<sup>94</sup> *Ibid*, Tables 2 and 3

## Contribution of Affordable and Intermediate Housing Products

7.11 The Housing Delivery Plan confirms that both rented (65%) and intermediate housing (35%) will contribute towards meeting this need. While it does not present a full calculation, it provides a summary table which is replicated below<sup>95</sup>.

**Table 7.1: Annual Need for Affordable Housing in Bolton**

	1 bed	2 beds	3 beds	4+ beds	Total	%
Affordable rent	121	49	62	38	270	65%
Intermediate	66	26	34	20	146	35%
<b>Total</b>	<b>187</b>	<b>75</b>	<b>96</b>	<b>58</b>	<b>416</b>	<b>100%</b>

Source: BMBC Housing Delivery Plan

7.12 In terms of intermediate housing, the HDP explicitly references shared ownership as one such product that could meet affordable housing need, but confirms that this is simply an assumption for the purposes of the calculation. In the context of the NPPF, this clearly should not prejudice the contribution that other affordable housing products, including discounted market sale, could make towards meeting this evidenced need<sup>96</sup>.

7.13 The split between affordable rent and intermediate housing is consistent with, and therefore understood to originate from, the household survey completed to inform the 2016 HNA. It provides further detail which confirms that *'newly-forming households had a stronger preference for intermediate tenure options'* relative to existing households, as shown in the following table<sup>97</sup>. Furthermore, both existing and newly forming households were found to be able to afford intermediate tenure options at various price points<sup>98</sup>.

**Table 7.2: Tenure Preferences of Households in Need of Affordable Housing**

	Existing households in need	Newly forming households in need	Total
Affordable rent	68%	56%	65%
Intermediate	32%	44%	35%
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>

Source: Arc4, 2016

<sup>95</sup> *Ibid*, paragraph 2.23 and Table 12

<sup>96</sup> NPPF Annex 2, Glossary (p64)

<sup>97</sup> Arc4 (2016) Bolton Housing Needs Assessment, Table 6.6 and paragraph 6.16

<sup>98</sup> *Ibid*, Table C12

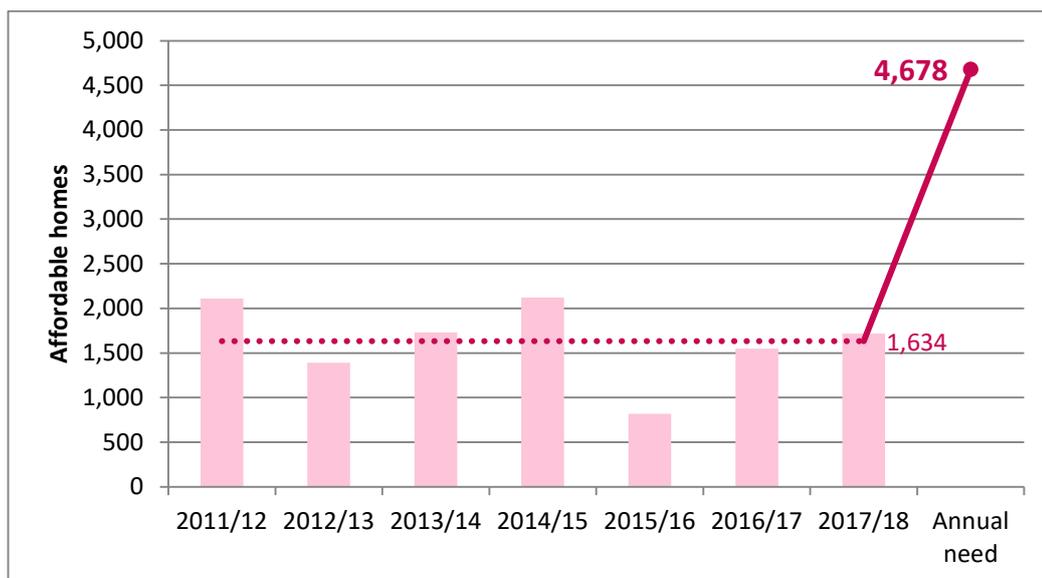
7.14 The HNA references the views of a stakeholder developing affordable home ownership products, who stated that *‘these were popular to all demographics including; singles, couples, families, divorcees and first time buyers’*<sup>99</sup>. In drawing together its analysis, therefore, the HNA clearly found there to be:

*“...potential scope for an intermediate tenure market in Bolton Metropolitan Borough. The final proportion of intermediate tenure dwellings to be delivered needs to be reconciled with the economic viability of delivering affordable housing on sites; the appetite of the HCA to fund intermediate tenure dwellings; and the ability of households to secure mortgages”*<sup>100</sup>

### Affordable Housing Supply

7.15 Meeting the GM SHMA’s calculated need in full would require a significant increase from past rates of affordable housing delivery, shown at Table 5.7 of the SHMA with no breakdown by product. Only 1,634 affordable homes have been completed annually across GM over the past seven years, on average, which would be required to almost treble to meet needs in full.

**Figure 7.1: Delivery of Affordable Housing in GM Relative to Annual Need**



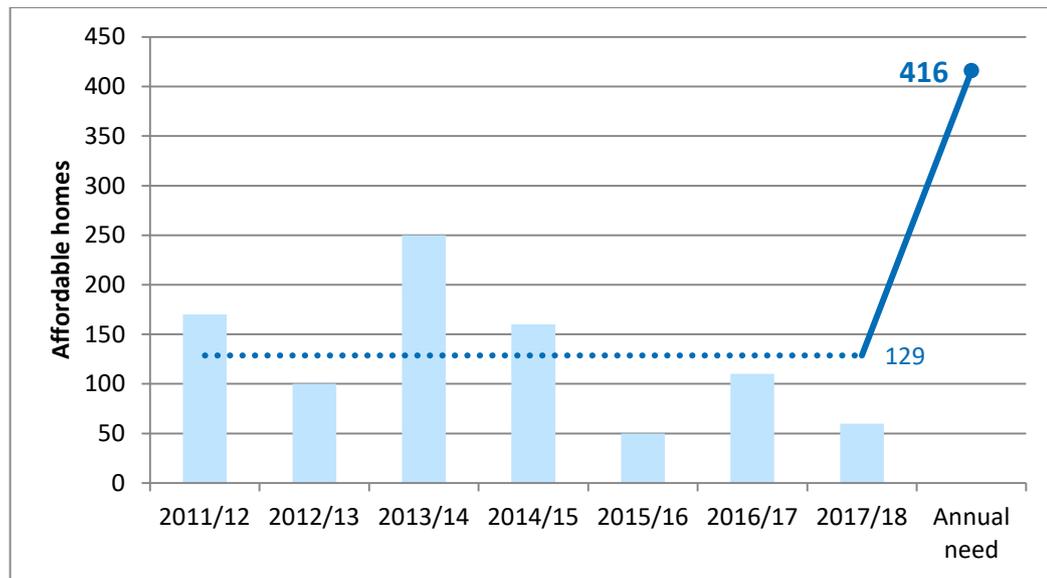
Source: GMCA

7.16 A similar boosting would be necessary in Bolton to meet its separately calculated need for 416 affordable homes per annum, or indeed the 496 such homes calculated as being needed in the GM SHMA. Only 129 affordable homes have been annually delivered on average in the borough over recent years, with a breakdown by affordable housing type again unavailable.

<sup>99</sup> *Ibid*, paragraph 4.97

<sup>100</sup> *Ibid*, paragraph C.49

**Figure 7.2: Delivery of Affordable Housing in Bolton Relative to Annual Need**



Source: GMCA

- 7.17 The profile of the housing land supply is critical to supporting the delivery of much-needed affordable housing. In Bolton, there is no evidence to suggest that BMBC’s current strategy is delivering the scale of affordable housing provision that is needed. Turley’s review of sites under construction in the borough demonstrates that only 187 affordable homes are being built across approximately 30 sites, sufficient to meet little more than a third of the need arising in Bolton during a single year. Affordable housing accounts for 17% of the homes being built on these sites, on average, and a continuation at this rate would require the provision of almost 2,500 homes each year in Bolton if its annual need for 416 affordable homes were to be met in full.
- 7.18 There is no evidence that the supply of land identified through the Revised Draft GMSF will be able to deliver the scale of affordable housing identified, due to viability issues. To the contrary, the Revised Draft GMSF acknowledges in various places the importance of securing “major” and as yet unidentified gap funding and Government support to deliver much of the urban supply (see for example paragraphs 1.17; 4.10 and 7.11). This is supported by the viability evidence that is presented in Section 5 of this report.

**Summary**

- 7.19 BMBC’s evidence base calculates a significant need for affordable housing in Bolton. This reflects evidence of a worsening of affordability which is creating issues for new households and lower income households to meet their housing needs in the borough. It confirms that both affordable rent and intermediate housing products can contribute towards meeting this need.
- 7.20 Examining evidence of historic delivery as well as a consideration of the viability issues for parts of the future identified supply suggests there is insufficient evidence to demonstrate that affordable housing need will be met in full.

7.21 The provision of 10% affordable homes will make an important contribution towards meeting the calculated need.

## 8. Detailed site assessment

- 8.1 As set out elsewhere in this report, the HLSS, which supports the Revised Draft GMSF, identifies a total housing land supply in Bolton, up to 2037, of 12,317 dwellings on 502 sites. Section 2 of this report has established that there is a serious risk that the claimed supply of housing would not be delivered. Section 5 of this report further demonstrates that a significant proportion of the supply is unlikely to be viably delivered.
- 8.2 In order to complement this trend based analysis Turley have also individually assessed a specific sample of sites, with a view to testing the likely delivery over the plan period. The sample of 31 sites comprises those which do not benefit from any form of planning permission or allocation and where the predicted yield is more than 30 dwellings. In total these sites are claimed to deliver a yield of 2,324 dwellings between 2023 and 2033. The assessment has been undertaken in the context of the policy background set out below and to reinforce Peel's fundamental concern that BMBC would be unable to deliver sufficient housing within the plan period.
- 8.3 Paragraph 67 of the NPPF requires that LPAs should identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.
- 8.4 Paragraph 73 requires strategic policies to *"include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites"*.
- 8.5 The Glossary to the NPPF also provides a definition of 'developable' which requires that *"To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged"*.
- 8.6 The Planning Practice Guidance (PPG)<sup>101</sup> requires *"strategic policy-making authorities will need to provide robust, up to date evidence to support plan preparation. Their judgments on deliverability of housing sites, including windfall sites, will need to be clearly and transparently set out"*.
- 8.7 The review of sites has identified several areas of concern and these are discussed within the remainder of this section. This should be read in conjunction with the Table included in Appendix 8 of this Report which sets out the detailed findings.

### Ownership

- 8.8 Of the sample of 31 sites, 14 are either completely or partially within public ownership. In order for these sites to be developed they will need to be disposed of and sold to a developer. This is often a complex and lengthy process which includes marketing and internal approval procedures/ processes. There are also a considerable number of

<sup>101</sup> Paragraph: 030 Reference ID: 3-030-20180913

publicly owned sites within the 5 year supply. The table in Appendix 8 also identifies that 10 of the sites are in mixed ownership, which is also likely to lengthen the marketing and approval processes required for disposal.

- 8.9 Additionally, 18 of the 31 sites reviewed are either fully or partially in active uses and a further 5 sites are currently in use as car parks, some of which are public or serve hospitals. Many of the sites in active uses have multiple land owners and active leases. An example of this is Site Reference 1036-BOL, which is in multiple uses including residential, industrial and commercial. The site is well let and leases have been signed on several properties within the last 18 months, some of which do not expire until 2028. The site is outside of the town centre boundary and is therefore not identified for development within the Town Centre Masterplan. The site is not available and units within it are actively being let with 10 year leases, it can therefore not be concluded that there is a reasonable prospect that this site will deliver residential development within the plan period.
- 8.10 The heavy reliance on sites in active use within the later part of the plan period is unrealistic and overly optimistic. BMBC would require all of these sites to deliver in order to meet the housing target to 2033.
- 8.11 Paragraph 5.37 of the HDP also acknowledges that there are sites which cannot be developed because there is no owner desire to deliver the site. The owner's intentions for sites which are in an active use should be established prior to inclusion within the housing trajectory to ensure that they are developable.

### **Town Centre Development**

- 8.12 The site review also highlighted that 18 of the 31 sites are located within the Bolton Town Centre Boundary, equating to 1,462 dwellings. This is in addition to the 1,455 dwellings across 29 sites within the town centre which have planning permission.
- 8.13 The aspirations for growth and regeneration of central areas and the main town centres are supported, but the delivery aspirations have not been justified and are overly optimistic. It is evident from the GMCA 2018 House PricePaid data that Bolton Town Centre is located in a low value area and subsequently will require significant investment in order to ensure delivery of these complex brownfield sites. This is further evidenced by the fact that 9 of the 18 town centre sites were identified as Priority 1 sites by BMBC in the 2008 version of the SHLAA. The delivery of the adopted CS housing requirement was dependent on Priority 1 Sites coming forward and yet 74 sites, with an estimated yield of 5,618 units, have not been developed.

### **Site Size**

- 8.14 Paragraphs 5.9 to 5.14 of the HDP identify that the size of development has an impact on the level of interest and the type of developer that is able to develop it, specifically stating:

*“Sites of very few homes will appeal to small, local builders. Sites between ten and 20 homes will appeal to local contractor developers. Sites of more than 50 homes will*

*appeal to some larger developers, although sites of 100 homes are likely to be the most popular size for the larger national house builders.*

*There are sizes of development that will not attract significant interest because they fall in the gap between different types of company, sites between 20 and 50 homes, for examples.”*

- 8.15 Of the 31 sites assessed by Turley, 20 are below a hectare in size and expected to deliver 1,069 units. The remaining 11 sites are all below 5 hectares in size. All 31 sites are expected to deliver at high densities irrespective of the area or identified housing need. The assumption that all of these sites will deliver at high densities is overly optimistic and inflexible and does not allow for the market to respond to changing market need and will not result in the delivery of a range of housing types.
- 8.16 The HDP evidence therefore suggests that there will be difficulty in delivering a significant proportion of these sites due to the high densities proposed. It is unlikely that these sites will be delivered by national housebuilders whose preference is for lower density family housing. Based on the evidence within the HDP many of the sites assessed by Turley would be within the ‘smaller homes’ category and therefore unlikely to attract significant interest.

### **Low Value Areas**

- 8.17 The review of sites undertaken by Turley has identified that when mapping the 31 sites on 2018 PricePaid Data (obtained from the Land Registry), 27 are located in areas where the average price is below £140,000. This therefore means that 87% of the sampled sites are located within areas that the viability assessment work has demonstrated are unlikely to be viable for traditional housebuilders. Additionally, 23 of the 27 sites also comprise brownfield land equating to 85% of the sites assessed. It is therefore clear that there is limited prospect of these developments being able to deliver affordable housing.
- 8.18 The delivery of affordable housing has been considered previously within this report however, the review of the trajectory undertaken has confirmed that the deliverable supply is heavily reliant on brownfield sites within in low value areas.
- 8.19 The HDP also considers the issue of low value areas, and this is addressed in full in section 5 of this report. Appendix 2 of the HDP includes a list of 120 sites, which it is stated are capable of delivering new dwellings with the inclusion of interventions. Several of these sites are included in the list of 31 sites assessed by Turley and are addressed individually in the table included in Appendix 8. For the majority of these it is concluded that the low values mean that the costs render the sites unviable.
- 8.20 Of the 120 sites assessed within the HDP, 69 sites are within Category A ‘Theoretically Viable’<sup>102</sup> which are characterised in paragraph 7.6 as:

<sup>102</sup> Paragraph 7.6 of the HDP.

*“There are sites that are theoretically viable but, for a variety of reasons, involve challenges and risks that prevent a developer going ahead.”*

- 8.21 The HDP also identifies that there are a further 33 sites in category B which are sites where the value of completed homes exceeds the cost, but there is insufficient value to create a profit. As is discussed earlier within this report, it is evident that both of these bands may struggle to deliver in the current housing market. Bolton suggests that interventions would be required to address these issues. The interventions are considered fully within the Section 5 of this document.

### **Summary**

- 8.22 The individual assessment of sites is included within Appendix 8 and provides a planning judgement on the developability of each site. The assessment has used the GMCA and BMBC evidence base documents and planning history to date.
- 8.23 It is clear from the discussion above and the conclusions within the table that there are several sites which are not likely to be delivered within the timeframe envisaged despite being identified as developable. These conclusions demonstrate that BMBC is currently over-estimating the supply of housing within the borough. This evidence supports the analysis provided within this report with regards to the lack of evidence that the claimed supply will be delivered.

## 9. Conclusion

- 9.1 The emerging GMSF acknowledges that GM faces a housing crisis. In order to address this it identifies a supply of housing land across the city region, including Bolton. However there are fundamental gaps in the evidence base, which mean that the claimed supply is unlikely to be delivered as envisaged.
- 9.2 The evidence in this report demonstrates that the housing supply for Bolton:
- 1) Is over-reliant upon the delivery of significant amounts of housing from urban supply, the majority of which comprise brownfield sites;
  - 2) Claims significant housing delivery (nearly 3,000 homes) in Bolton town centre where there is little evidence to support the viable delivery of this quantum of homes;
  - 3) Has not been subject to viability assessment;
  - 4) Is likely to deliver a high proportion of smaller homes that will perpetuate current imbalances in the housing stock; and
  - 5) Can only be delivered if GM is successful in attracting significant and as yet unidentified sources of “gap” funding.
- 9.3 Whilst Peel strongly supports making the most effective use of land, the claimed supply in Bolton is too narrowly focussed on urban land with little regard to the evidence of needs for a wide range of housing and the implications for future delivery. These conclusions and the issues identified below demonstrate that BMBC is currently over-estimating the supply of housing within the borough, potentially by several thousand dwellings.
- 9.4 This Report has demonstrated that housing delivery in Bolton has been consistently below the required level and that the claimed sources of supply, including the urban land supply, will not deliver the anticipated amount, nor the required size, type and tenure of homes within the plan period. The Proposed Development at Hulton Park will therefore make a significant contribution to the supply in quantitative and qualitative terms which would otherwise not be met.
- 9.5 The significant issues identified include:
- (1) Delivery evidence**
- 9.6 The claimed urban land supply is not supported by an up to date Strategic Housing Land Availability Assessment (SHLAA) contrary to national planning policy (NPPF 67).
- 9.7 In the light of the absence of and deficient evidence base documents, BMBC is unable to demonstrate that the housing land supply is deliverable or developable. The evidence therefore fails to demonstrate that the housing supply will be delivered.

## **(2) Five Year Supply**

- 9.8 BMBC accepts that there is a deficiency in regards to five year housing land supply with the latest position confirmed as 3.6 years. This is acknowledged in the Statement of Common Ground on Housing Issues.

## **(3) Housing Strategy**

- 9.9 The spatial strategy includes a preference for brownfield sites and reliance on delivery of high-density accommodation in areas which have not historically delivered housing<sup>103</sup>. This risks exacerbating existing issues in relation to the availability and affordability of new housing and the lack of diversity within the existing housing stock.
- 9.10 In the context of historic and current delivery, a major step change would be required in delivery, as well as significant government funding. There is insufficient information to demonstrate that the housing land supply is deliverable or developable.

## **(4) Viability Assessment**

- 9.11 Much of the claimed supply is located in areas of marginal viability where suitability and deliverability have not been adequately demonstrated and the GMSF therefore overstates the contribution that urban supply will make to future housing needs.
- 9.12 The viability work undertaken by Turley has demonstrated that significant increases in residential sales values, and/or government funding, would be required to ensure the level of anticipated delivery meets the housing requirement and other policy objectives.

## **(5) Qualitative Needs**

- 9.13 The existing housing stock in Bolton and wider GM demonstrates deficiencies, reflecting a lack of diversity and specifically a distinct absence of larger, higher value housing for families. This reflects the historical legacy of development and the failure to provide adequate numbers of new homes of this type over recent years.
- 9.14 The Housing Delivery Plan (HDP) establishes a need to provide a range of new homes across Bolton. Some 53% of all households, and 59% of those requiring market housing, are estimated to need a home with at least three bedrooms. This creates a sizeable need for houses, which would not be met through the claimed supply of BMBC.
- 9.15 The ageing of the population is also assumed within the HDP to generate a need for bungalows and other specialist older persons' housing products, albeit the deliverability of such products at this scale in Bolton has not been tested. It should be recognised that a failure to meet this specific need would likely discourage older people from moving, consequently growing the need for additional family-sized housing beyond the estimate made in the HDP.

<sup>103</sup> GMSF, page 9

9.16 BMBC's evidence base also calculates a significant need for affordable housing in Bolton, and it confirms that both affordable rent and intermediate housing products can contribute towards meeting this need. The provision of 10% affordable homes as part of the Proposed Development will therefore make an important contribution towards meeting the calculated need.

**(6) Housing Trajectory:**

9.17 Turley has undertaken a review of a selected range of sites which have been included in the claimed supply for Bolton for the period 2018-2037. This comprised an assessment of the availability, achievability and suitability of selected sites based on the information published by the GMCA.

9.18 This review reinforces Peel's fundamental concern that there are numerous sites which are currently identified as developable which are not likely to be delivered within the timeframe envisaged and that BMBC is currently significantly over-estimating the supply of housing within the borough.

## Appendix 1: Focus on Main Town Centres

### (1) Focus on Town Centres

1. It is evident that there is an expectation that a large component of the GMSF supply is expected to be delivered through new residential development in town centres throughout the region. The Main Town Centres of Altrincham, Ashton-under-Lyne, Bolton, Bury, Oldham, Rochdale, Stockport, Wigan are specifically highlighted in paragraph 4.72 of the Revised Draft GMSF.
2. Turley has analysed the list of sites published by the GMCA and identified the development which it is claimed will take place in the Town Centres. This is set out in the table below.

#### Claimed Supply in Main Town Centres

Main Town Centre	Houses	Apartments	Total Homes
Altrincham	69	570	639
Ashton-under-Lyne	22	652	674
Bolton	1,110	1,807	2,917
Bury	230	442	672
Oldham	504	1,983	2,487
Rochdale	13	273	286
Stockport	216	3789	4,005
Wigan	0	376	376
<b>Total</b>	<b>2,164</b>	<b>9,892</b>	<b>12,056</b>

Source: GMCA

3. The data shows that 82% of the development predicted for the town centres is to be provided as apartments.
4. The proposition of such a market has significant benefits for the vibrancy of town centres and may potentially play a role in meeting the needs of a modest segment of the market in terms of providing primarily new apartments and flats. It is, however, noted that the market in the majority of these centres is comparatively untested, and at an embryonic state.
5. The potential to secure the regeneration of historic centres and capitalise on the opportunities to transform certain areas into vibrant and diverse residential and employment locations should be encouraged. However, there is no evidence that has been produced that the sites are developable, or indeed that there is demand for flats in these locations.

6. The realism of the delivery rates proposed and required to achieve the trajectory outlined in the HLSS are subject to a review in this section.

**(a) Town Centre Housing Market Evidence**

7. The Revised Draft GMSF is seeking to realise a new residential market in locations which have not historically been significant areas for residential development. The HLSS includes proposals for the delivery of major high density development and apartment living. This is a significantly different residential offer to that delivered in all but a couple of the town centres to date. Achieving this from a relative standing start is evidently challenging and will require the market and investors to be confident in the demand for town centre living, particularly in the northern towns.
8. A high quality range of homes is central to this. However, the anticipated level of delivery in the town centres is ambitious and there is a degree of uncertainty around their ability to be delivered at the rate and density envisaged. This is principally due to:
  - The density of development proposed which is largely unprecedented outside of the Core Growth Area. In the context of the family housing market the anticipated supply is likely to be providing different residential products to the market and being at a significantly higher density than the main volume housebuilders typically wish to and are able to develop at;
  - The reliance on brownfield sites many of which have an industrial legacy and will be burdened by high clean-up costs to create developable sites;
9. There are inherent risks associated with relying on new residential markets to emerge in town centres to the extent proposed in order to meet its housing requirement. This is a significant burden to place on these locations given the context of them not being established residential locations and being reliant on providing new types of products and building new residential markets from a standing start.
10. The housing typology is likely to consist of one or two bedroom apartments which will only appeal to a narrow demographic. The housing strategy is also reliant on all of the Town Centres delivering all at the same time, many of which are close proximity to one another. There are unlikely to be the sufficient number of predominantly younger buyers to facilitate the delivery of the predicted level of development.
11. Whilst there may be funding available to assist in regeneration, this is not entirely within the GMCA's control. It will rely on a favourable investment market, the appetite of developers and high levels of consumer demand in an otherwise untested sector of the housing market. There are inherent risks and uncertainties and it may be prudent to exercise caution with regards to expectations for these Town Centre locations.

## Appendix 2: Funding initiatives

### (1) Introduction

1. The Revised Draft GMSF acknowledges the importance of securing “major” and as yet unidentified gap funding and Government support to deliver much of the urban supply (see for example paragraphs 1.17; 4.10 and 7.11).
2. However, it is evident that the funding streams and initiatives identified by the GMCA have not been successfully secured and in any case will be insufficient to enable the anticipated level and type of delivery. This section provides further detail on the identified sources of funding and assesses the potential impact on delivery of the land supply.

### (2) Housing Package

3. The GMCA has been in discussion with the MHCLG over several years in relation to the Housing Package. The origin of these discussions stems from the Housing White Paper<sup>104</sup> which made reference to devolution deals and potential additional funding in order to boost the delivery of housing.
4. Paragraph 3.33 of the White Paper states:

*“Housing markets are different right across the country, and we are interested in the scope for bespoke housing deals with authorities in high demand areas, which have a genuine ambition to build. We will look seriously at any request from local authorities for Government powers to be used to support delivery in their local area, and will be prepared to consider all the levers at our disposal to do so, so long as this results in genuinely additional housing being delivered.”*

5. Government intends to provide funding opportunities to authorities which are ambitious enough to deliver significant levels of new housing and are putting in place measures to ensure this happens.
6. The Housing White Paper makes specific reference to a Report prepared by the Institute of Public Policy Research titled Closer to Home: Next steps in planning and devolution<sup>105</sup>. The Report was published in 2016 and investigated the powers which had been devolved to that point specifically looking at the funding opportunities which had been made available and how successful they had been in delivering housing. The conclusion was that new devolution deals on housing are required which will necessitate a two-way process set out as follows:

*“Combined authorities must devise new and ambitious targets for housebuilding, with clear long-term plans on how they will build and regenerate communities in which housing targets can be successfully realised. In return, CAs will ask*

<sup>104</sup> Fixing our Broken Housing Market (February 2016)

<sup>105</sup> Closer to Home: Next steps in planning and devolution (2016), IPPR

*government to respond with new and extended powers – in areas of pooled funding, fiscal flexibility, spatial planning and design.”*

7. The emphasis here is clearly on encouraging plan-making authorities to set housing targets which may exceed the assessed need, so as to significantly boost housing supply and regenerate key areas of the country.
8. In March 2018 the ‘Outline of a Prospective Housing Package for Greater Manchester’ was announced. There are four key funding elements to the package:
  - 1) *Four of the bids made via GMCA for Housing Infrastructure Fund Forward Funding have passed through the initial assessment to enter a ‘co-development’ stage;*
  - 2) *A Land Fund of up to £50 million is to be made available to support the remediation of brownfield land to deliver at least 4,200 homes;*
  - 3) *Up to £8 million of funding to add to GM’s collective capacity to do the work needed to bring forward housing projects; and*
  - 4) *A commitment by Government and Homes England to further joint working to deliver affordable housing and to work together through a proposed Land and Infrastructure Commission.*
9. In addition to these four items, there was a preliminary agreement that a technical adjustment would be made to the management of the existing GM Housing Investment Loan Fund, which will aid the recycling of the Fund and allow additional delivery as a result.
10. In return for these streams of funding the GMCA made a commitment to:
  - 1) *Deliver 227,200 homes between 2015/16 and 2034/35 and ensure the Greater Manchester Spatial Framework reflects this. This is above the level proposed under the Government’s Local Housing Need assessment set out in the draft National Planning Policy Framework;*
  - 2) *Accelerate delivery rates to 12,375 homes per annum to 2026.*
  - 3) *Ensure the Greater Manchester Spatial Framework (GMSF) progresses as planned to reflect delivery of 227,200 homes between 2015/16 and 2034/35. The second draft of the framework should be published in June [2018], with publication of the plan in early 2019, submission in summer 2019 and adoption in late 2020 subject to the examination process.*
  - 4) *Local plans for all constituent members to be updated and adopted as necessary by the end of 2019 to deliver and accommodate 227,200 homes between 2015/16 and 2034/35.*
11. A series of milestones were also established at the time of the announcement to ensure the package was delivered. These include:

- 1) *Detailed business case and delivery plan to be submitted to Government by the end of May 2018*
  - 2) *June 2018 – second draft of the Greater Manchester Spatial Framework to be published setting out commitment to deliver 227,200 homes between 2015/16 and 2034/35*
  - 3) *December 2019 – Local plans for all constituent members to be updated and adopted as necessary to deliver and accommodate 227,200 homes between 2015/16 and 2034/35.*
12. A Report was prepared for the GMCA’s Planning, Housing & Environment Overview & Scrutiny Committee in June 2018, titled Greater Manchester Housing Package, which confirmed that work on the Delivery Plan for the Housing Package was continuing and was scheduled for approval by GMCA for submission to MHCLG at the meeting on 29 June 2018.
  13. To date the Delivery Plan has still not been published. In the meantime, the Revised Draft of the GMSF was delayed until January 2019 and includes a stated housing requirement of 201,000 new homes over a 19-year plan period to 2037, which equates to an annual figure of 10,580dpa. This represents an immediate shortfall of 26,000 homes against the target and a delay of two years on the commitments agreed by the GMCA. The GMCA has therefore failed in three of its commitments, and will miss all of the delivery milestones.
  14. It is understood that no recent discussions have taken place between the GMCA and MHCLG, which have taken matters beyond the outline prospective package. We are not aware that MHCLG have confirmed that the outline of the package will still be made available based on the strategy set out within the Revised Draft GMSF. Elements of this funding may well be withdrawn given that key commitments and milestones have been missed.
  15. A recent letter dated 6 March 2019 from the City Mayor of Salford, Paul Dennett, to Kit Malthouse confirmed that negotiations with the Government on the housing package “appear to have reached an impasse”. Media reports have also confirmed that Simon Ridley of Ministry of Housing, Communities and Local Government (MHCLG) wrote to the GMCA confirming that in light of the reduction in housing numbers in the Revised Draft GMSF, the Housing Package may be reduced<sup>16</sup>.
  16. Notwithstanding the above, the revised Draft GMSF remains reliant on Government funding to deliver its ‘brownfield preference’<sup>106</sup>.
  17. The importance of securing the funding to delivering the strategy outlined in the Revised Draft GMSF, and therefore for Bolton, is clearly paramount. However, Peel is of the view that the funding and the initiatives, even if secured, are unlikely to be sufficient to realise the anticipated level of housing and consequently delivery will fall

<sup>106</sup> Paragraph 1.17 Revised Draft GMSF, GMCA

well short of what is required. The components of the Housing Package and details on the Housing Infrastructure Fund, as well as other initiatives, are considered in turn.

### **(3) Land Fund**

18. As set out in the 'outline' Housing Package there is the potential for the deal to include a Land Fund of up to £50m capital funding. This will take the form of gap funding which will be aimed at unlocking sites for development which are currently considered unviable.
19. The 'June Committee Report'<sup>107</sup> provided more detail on the Land Fund and established that eligible projects will:
  - (a) demonstrate they are targeted at enabling brownfield sites and aligned to other strategic priorities, e.g. the redevelopment of town centre sites, delivering affordable homes, etc.
  - (b) unlock schemes that will not go ahead without public sector intervention
  - (c) demonstrate clear deliverability in the relatively short term
  - (d) achieve good value for money to help ensure the programme as a whole meets or exceeds the target of 4,200 new homes
20. Whilst capital funding to unlock development opportunities in the short term is welcomed, the aim of the Land Fund is to deliver only 4,200 new homes. In the context of an urban land supply of 189,283 homes this represents a very small proportion at just 2.2%, which is less than 6 months' supply.
21. Given the uncertainty over the Housing Package the Land Fund is unlikely to materialise.

### **(4) Public Agency Delivery**

22. An alternative mechanism to capital funding is the provision of services which seek to enable the delivery of new housing. The Housing Package includes £8m capacity funding to aid the delivery of brownfield and urban land opportunities.
23. With this funding it is proposed to establish a 'GM Place Team' which will seek to support the delivery of the urban land supply by turning potential sites into viable, deliverable investable schemes. The team is to be based centrally and provide specialist expertise to bring forward schemes for delivery. It is suggested within the June Committee Report<sup>107</sup> that the team could work on projects funded by the Land Fund, HIF and Town Centre Challenge and that the selected schemes should be match funded or access the Affordable Homes Programme.
24. It is therefore clear that the envisaged role of the Place Team is to assist in administering other funding mechanisms, rather than the delivery of additional

<sup>107</sup> Planning, Housing & Environment Overview & Scrutiny Committee (5 June 2018) - Greater Manchester Housing Package

developer/market-led sites. The contribution which the GM Place Team will make to delivery of supply is principally in shoring up the delivery of other mechanisms.

25. The GMCA meeting on 14 December 2018 included an agenda item on funding packages. The Report<sup>108</sup> included the following paragraph on the GM Place Team:

*“It is intended that a Greater Manchester Place team is set up to provide development support to Local Authorities. An interim GM Place Director is now in post alongside a Development Lead (both funded from existing Planning Delivery Fund budgets for next 6 months). Local Partnerships have similarly been funded to provide project specific support over the last couple of months. The intention was to provide funding for this activity from the GM Housing Deal announced in March 2018. The Deal has stalled and while some funding has been identified from Homes England to continue this work, funding is nearly exhausted and further revenue funding is required to enable continued project support work and support from the GM Place team after the initial 6 month period.”*

26. This is a clear acknowledgment that the Housing Package has ‘stalled’ and that funding for the Place Team is only secured for an initial 6 month period.
27. The Housing Topic Paper<sup>109</sup> refers to the One Public Estate programme which is aimed at achieving the best use of public land and property through breaking down historical barriers. In reality, this is likely to involve the preparation of a database or register which lists all publicly owned assets and assesses their status for future housing opportunities. Whilst publicly owned land in GM may be plentiful there are many barriers to release of the land and ultimately development for housing.
28. The One Public Estate was launched in 2013 and in six years the programme has released land for the delivery of just 3,336 homes across the whole country<sup>110</sup>.
29. Experience of a similar approach in London has been documented in a report titled ‘Building a new deal for London: Final report of the London Housing Commission’<sup>111</sup> published in 2016. This confirmed that the London Land Commission (a body established to identify publicly owned development land) identified that around a quarter of land across the GLA area is owned by public-sector bodies, and that a substantial proportion of this land is already used for homes, in the form of local authority housing estates. However, the Report confirmed that *“the regeneration of housing estates can take many years to achieve, because schemes are often complex and require the consent of residents, who may be opposed to the redevelopment of their homes”*.
30. The London Land Commission work also identified that large tracts of land were currently operational and therefore unavailable for development. Many other sites

<sup>108</sup> GMCA Meeting (December 2018) - Continued City Centre Housing Developments and Use of Property Funds Surpluses

<sup>109</sup> GMSF Topic Paper: Housing (January 2019)

<sup>110</sup> <https://www.theplanner.co.uk/news/money-announced-for-housing-on-public-sector-sites>

<sup>111</sup> Building a new deal for London: Final report of the London Housing Commission (2016), IPPR

that were under-used will need to return to operation as the landowners' organisational needs change.

31. The National Audit Office (NAO) authored a Report in 2015 titled 'Disposal of public land for new homes'<sup>112</sup> and highlighted that public bodies have been slow to dispose of public land, and that disposal has not automatically resulted in increased housing supply. Paragraph 4.1 of the Report states that:

*“Departments do not routinely track what happens to a site after disposal. There has been no recording of development activity or housing starts and completions. The HCA is not able to establish starts or completions as the programme did not require departments to provide this information to the HCA. Therefore we are not able to say how many homes have been built on the land. Evidence of actual homes built would take many years to identify: for larger sites, it may be up to 20 years before all homes are built.”*

32. In light of the experiences within London and the issues highlighted by the NAO it is difficult to quantify the level of delivery from publicly owned land and the impact this may have on the delivery of the urban land supply.

#### **(5) Housing Investment Loan Fund (HILF)**

33. As part of the Greater Manchester Devolution Agreement, GM secured £300 million recyclable loan fund from Government over a ten year period to develop HILF. The fund aims to provide development finance as a loan to accelerate and unlock housing schemes.
34. The Housing Topic Paper confirms that the HILF is now in its fourth year and has committed £421m of funding to support the delivery of 5,500 units across GM, with over 1,000 units completed to date.
35. Whilst loan finance is welcomed, and this may reduce risks for developers sufficiently in challenging market conditions, it is unlikely that loans will be successful in aiding the delivery of affordable homes. The IPPR Report on devolution<sup>105</sup> specifically includes a case study on the GM £300 million HILF Fund and seeks to examine the effectiveness of loan finance. This confirms that at the launch of the fund in 2014 it was the intention that at least 10,000-15,000 homes would be delivered over the ten year period. Given that the fund is now four years old and only 1,000 homes have been delivered to date, it is difficult to envisage that an additional 9,000 homes will be completed in six years. The case study confirms that loans need to be repaid within four years of any work starting.
36. The success of the fund is underwritten by the respective Councils, who guarantee a proportion of the funding. However, if GMCA is unable to demonstrate an agreed repayment schedule to the Treasury, the loans will be administered by Homes

<sup>112</sup> Disposal of public land for new homes (2015), National Audit Office

England. This will ensure that they have the final say on investment and the influence of the GMCA will be reduced.

37. The GMCA meeting on 14 December 2018 included an agenda item which updated the half year position on HILF. The Report<sup>113</sup> included a list of schemes which have been approved for funding by the GMCA up until 30 September 2018. The list has been provided in the table below alongside details on tenure.

**Table 1: Schemes approved to 30 September 2018**

Developer	Scheme	District	Loan (£)	Dwellings	Tenure	Notes
Allied London	Water St	Manchester	23,731,000	307 apartments	Market sale	City centre
	Boundary Park	Oldham	1,450,000	20 houses	Market sale	
Rowlinson Construction and Peel Holdings	Pomona Wharf	Trafford	10,300,000	164 apartments	For rent	City centre
Belgravia Living (Burlington House) Ltd.	Tariff St	Manchester	13,200,000	91 Apartments	Market sale	City centre
	Woodfield Road	Trafford	3,700,000	41 apartments & houses	Market sale	
	Charminster Drive	Manchester	958,000	23 houses	Market sale	
Renaker	Wilburn Basin	Salford	42,500,000	491 apartments	Market sale	City centre
Eric Wright Group	Edinburgh Castle	Manchester	3,577,000	23 apartments	Market sale	City centre
Nook and Key Ltd.	St Stephens Church	Tameside	2,534,000	16 apartments and 14 houses	Market sale	PDL refurbish the former St Stephen's Church
Azar Estates Ltd	The Place	Trafford	6,915,000	24 houses	Market sale	
Waterside Places LLP	Islington Wharf 3	Manchester	10,144,000	101 apartments for sale	Market sale	City centre
Peel Holdings (Media) Ltd	Lightbox	Salford	8,303,000	238 apartments	Market sale	City centre to be provided to a SPV subsidiary
FQ Developments Ltd.	Owen Street	Manchester	70,000,000	846 apartments	Market sale	City centre

<sup>113</sup> GMCA Meeting (December 2018) Item 15: GM Housing Investment Loans Fund – 2018/19 half year report

Splash Developments Ltd.	Star Inn	Oldham	1,228,000	15	Market sale	
Wigget Homes Ltd.	Brook Street, Radcliffe	Bury	1,556,000	22 houses	Market sale	
Blue Dog Property 2 Ltd	Baguley Police Station	Manchester	1,866,000	33 apartments	Market sale	
Select Property Group / GM Property Venture Fund SPV	Circle Square	Manchester	36,000,000	677 apartments	rent	City centre former BBC site
Princess Street Limited Partnership (Urban and Civic)	Princess Street	Manchester	51,000,000	351 apartments	Market sale	City centre
Capital and centric	Crusader works	Manchester	25,450,000	201 apartments	For sale	City centre refurbishment of the former Crusader Works
Former Delph Chapel Ltd.	Delph Chapel	Oldham	987,000	7 apartments	Market sale	refurbish an existing church
Hillcliffe Homes Ltd	Harvey Street	Wigan	664,000	8 houses	Market sale	
Vesta Street Developments Ltd.	Vesta Street	Manchester	20,694,000	169 apartments 3 townhouses	Market sale	City centre
New Little Mill Developments Ltd	New Little Mill	Manchester	10,517,000	68 apartments	Market sale	City centre redevelopment of the Grade II Listed Building
Keepmoat Homes	Charlestown Riverside	Salford	3,320,000	425 houses	Market sale	86 affordable units
The Oaks Gatley Ltd	Stonepail Close	Stockport	4,220,000	24 semi-detached and 2 detached houses	Market sale	
Lampwick Developments Ltd	Lampwick Street	Manchester	24,500,000	213 apartments	Market sale	
Breckside Estates	Clarkesville Farm	Manchester	4,154,000	44 detached and semi-detached houses	Market sale	
Mulbury Homes Ltd	Willows road	Salford	1,741,000	24 semi-detached	Market sale	Previously publicly-owned land S106 – w/ 3 other schemes

						will make a contribution to affordable housing and school provision in the area
Hurstfield Developments Ltd	Hurstfield Road	Salford	1,355,000	6 townhouses and 2 semi-detached houses	Market sale	
Square One Homes (NW) Ltd	Bridgewater Road	Trafford	1,146,000	10 apartments	Market sale	
Rowlinson Developments Ltd. SPV	Stagecoach	Manchester	5,620,000	92 apartments	Market sale	Some of the apartments and houses in the wider scheme will be sold on a shared ownership basis.
Cert JDS Ltd.	40-42 John Dalton Street	Manchester	800,000	4 apartments	Market sale	City centre SME developer
Harwill Homes Ltd	Hilda Street	Wigan	600,000	9 houses	Market sale	Starter homes SME developer
Wiggett Homes Ltd	Hare Hill Mill, Littleborough	Rochdale	2,215,000	30 houses and conversion of a building into 6 apartments	Market sale	S106 contribution to childrens' play and local sports facilities
Maya Property Group Limited	Dale House	Stockport	1,321,000	14 apartments	Market sale	Small developer
J Walker Homes Ltd	Royley, Royton	Oldham	1,543,000	12 houses 8 apartments	Market sale	SME developer
The Northern Powerhouse Residential REIT Ltd	Former Royal Mail Sorting Office	Stockport	5,400,000	117 apartments	Market sale	117 residential apartments for PRS use
Brunswick Living Limited	Brunswick Street	Manchester	2,088,000	16 houses	Market sale	SME developer
Slateacre Partnership Limited	Slateacre Road	Tameside	1,916,000	11 houses	Market sale	SME developer. S106 contribution to be used for improvement of local amenity
HS Property Group	HSPG	GM wide	1,000,000	n/a	Various	Purchase and convert derelict

						and vacant properties for asylum seekers
RP Joint Venture (RPJV)	Various	GM Wide	2,000,000	n/a	Various	Acquire land from GM LA's and build market for sale houses
Paul Cooke Developments (Whitehaven) Ltd ("PCDW")		Bury	792,000	10 apartments	Affordable Rent	Small Greater Manchester based SME developer
Olive Property Construction North LTD	Vernon Street	Tameside	1,366,000	24 apartments	Market sale	Stalled Site Increase urban density
Total			414,371,000	5,054		

*Source: GMCA*

38. It is evident from the research undertaken that the HILF is proving a successful mechanism to aid delivery in GM and it has resulted in a significant number of dwellings being unlocked. However, the above table indicates that of the £414 million that has been committed, over £354 million has been allotted to schemes in the city centres of Manchester and Salford, which historically have failed to deliver any affordable housing.
39. The Table also highlights the viability issue within the region, particularly given that schemes such as Circle Square, which comprises executive apartments and in a prime city centre location, still requires a significant level of forward funding in order to deliver. This demonstrates the issues surrounding the redevelopment of brownfield land which have been discussed extensively within this document and are experienced across the region.
40. The Housing Topic Paper highlights the cash surplus which has been generated is around £2 million, and there are no restrictions to its expenditure. Whilst this surplus is expected rise it will not be sufficient to fill the funding gap to enable the delivery of the 50,000 affordable housing units.
41. It is therefore identified that the HILF has been a successful funding mechanism and it is a strong example of where investment by the GMCA is aiding delivery across the region. However, it also demonstrates the importance of funding to ensure that brownfield schemes are capable of delivery, even in areas with existing demand. Consequently, the current level of investment within GM would not lead to the level of delivery anticipated within the GMSF.
- 9.19 Turley has analysed funding awards granted via the HILF since its inception in 2015 to May 2019. The average loan per dwelling equates to £83,332. Despite the relative success of the Housing Infrastructure Loan Fund, none of the funding has been given to schemes in Bolton.

## **(6) Housing Infrastructure Fund**

42. The importance of the HIF to the delivery of the urban land supply is highlighted in the Revised Draft GMSF. The three bids for Forward Funding which have been shortlisted consist of:
- (a) Manchester Salford Urban Growth Programme: Manchester's Northern and Eastern Gateways;
  - (b) Manchester Salford Urban Growth Programme: City Centre Salford Housing Growth Programme;
  - (c) Bolton and Wigan Key Route Network;
43. Whilst these bids have been shortlisted there is no certainty that they will reach construction stage in the necessary timescales to ensure the delivery of the housing, and cannot realistically be relied upon without significant private investment.
44. In addition to the Forward Fund there is also the Marginal Viability Fund which seeks to provide the missing piece of infrastructure funding to get existing sites unblocked quickly or new sites allocated. A recent Report to the GMCA<sup>114</sup> confirmed that the HIF Marginal Viability Fund projects collectively offer a further £70m of grant and 10,000 new homes. The same Report also highlighted that Forward Fund could provide in excess of £200m and could be unlocked to support more than 25,000 new homes if all are successful.
45. This illustrates that the level of funding that may be required to deliver the claimed supply is significant, given the proportion of the supply that is located on brownfield sites, and in areas of marginal viability.

## **(7) Town Centre Challenge**

46. The GM Mayor's Town Centre Challenge initiative was launched on 17 November 2017. The objective of the initiative is to deliver more high density residential developments with retail and leisure facilities on brownfield land which is supported by transport and digital connectivity<sup>115</sup>. The increased emphasis on place-making is something which Andy Burnham has spoken passionately about, stating the following:

*"Construction can't just be about building more housing and factories; we have to get our head around good placemaking and creating better public realm, especially in our outlying towns,"... "Those towns are not going to be the retail destination that they once were. They will be more residential linked to good transport links. Good public realm can then support better development."*<sup>116</sup>

<sup>114</sup> GMCA Meeting (September 2018) Item 17: Use of Planning Delivery Fund Resources

<sup>115</sup> <https://www.property-matters-law.co.uk/2017/12/andy-burnham-launches-the-greater-manchester-town-centre-challenge-to-revitalise-and-reshape-town-centres-across-the-region.html>

<sup>116</sup> <http://www.infrastructure-intelligence.com/article/jul-2018/placemaking-needs-be-centre-development-says-greater-manchester-mayor>

47. The initiative initially requested that each of the 10 GM local authorities identified a town centre. The following towns were selected and have subsequently been endorsed by the mayor:
- (a) Bolton Metropolitan Borough Council – Farnworth
  - (b) Bury Metropolitan Borough Council – Prestwich
  - (c) Manchester City Council - Unconfirmed
  - (d) Oldham Metropolitan Borough Council – Royton
  - (e) Rochdale Metropolitan Borough Council – Rochdale
  - (f) Salford City Council – Swinton
  - (g) Stockport Metropolitan Borough Council – Stockport West
  - (h) Tameside Metropolitan Borough Council – Stalybridge
  - (i) Trafford Metropolitan Borough Council – Stretford
  - (j) Wigan Metropolitan Borough Council – Leigh
48. The initiative identified mayoral powers which could be used to assist and expedite delivery including Mayoral Development Corporations, the use of Compulsory Purchase Orders (CPOs) and Mayoral grants to kick-start developments<sup>117</sup>. The initiative anticipated the town centre challenge to deliver the following improvements for the identified settlements:
- (a) Innovative solutions for town centre housing which will provide an attractive place to live in easy reach of key amenities;
  - (b) Restructured retail offers;
  - (c) Business spaces;
  - (d) Public sector hubs;
  - (e) Venues for events; and
  - (f) Cultural offers.
49. The Town Centre Challenge is yet to provide mayoral grant funding to schemes or establish a Mayoral Development Corporation, although proposals in Stockport are moving forward. The success of the Town Centre Challenge initiative is considered to be limited as tangible progress is only being realised in those Centres which were already subject to regeneration programmes. Stockport Town Centre for example is currently benefitting from £41.7m of Growth Fund money and £2.6m from the HIF to help support the delivery of a new Interchange and park<sup>118</sup>.
50. A significant deficiency of the initiative is that it has no designated financial budget and as a result delivery is difficult to quantify. This lack of a funding mechanism is a matter which has been raised by Bury MBC who is currently investigating longer term investment approaches to secure the delivery of regeneration in Prestwich<sup>119</sup>.
51. The initiative is however, currently in its infancy and ultimately its success is yet to be determined. It could help to raise the profile of regeneration schemes in Town Centres

<sup>117</sup> <https://www.greatermanchester-ca.gov.uk/news/new-drive-to-regenerate-town-centres-across-greater-manchester/>

<sup>118</sup> <https://www.placenorthwest.co.uk/news/plans-in-for-stockport-interchange/>

<sup>119</sup> <http://leadingbury.com/media/3772/prestwich-village-centre-presentation.pdf>

and help to encourage Local Authorities to consider how masterplanning and development could re-shape these struggling centres. Tameside MBC is currently viewing the initiative as an opportunity to try and attract investment<sup>120</sup>. Although the initiative has been successful in sparking discussion about Stalybridge and helping Tameside create a vision for the centre to realise the regeneration aims development of brownfield sites is required and funding is needed to deliver this<sup>121</sup>.

<sup>120</sup> <https://www.tameside.gov.uk/stalybridgechallenge>

<sup>121</sup> <http://www.stalybridgecorrespondent.co.uk/2018/05/01/plans-progressing-for-town-team-challenge/>

## **Appendix 3: List of Priority 1 Sites**

Unique RTP Reference	RTP_id2	Site Area (ha)	Easting	Northing	Site name	Street Name	Town	Postcode	Ward	Priority
3	7	0.91	374165	409233	St. Osmonds	Blenheim Rd	Bolton	BL2 6EJ	Brightmet	1
4	8	1.23	374332	409851	St. Andrew RC School	Withins Rd	Bolton	BL2 5LD	Brightmet	1
9	16	0.38	366972	408992	53	Regent Rd	Bolton	BL6 4BX	Heaton and Lostock	1
10	19	40.47	363947	410677	Horwich Loco Works	Mansell Way	Horwich	BL6 5NX	Horwich and Blackrod	1
17	31	1.77	369190	409099	Land at Heaton Grange	Heaton Grange Drive	Bolton	BL1 5NE	Heaton and Lostock	1
22	43	5.18	370535	406745	South College	Woodvale Avenue	Bolton	BL3 3HH	Harper Green	1
23	44	2.34	374511	410828	Earls Farm,	Stitch Mi Lane	Bolton	BL2 4HT	Brightmet	1
30	56	1.84	373210	410936	Firwood School	Crompton Way	Bolton	BL2 3BA	Crompton	1
32	63	0.48	374854	410147	Land at	1 Foster Lane	Bolton	BL2 5HE	Brightmet	1
41	137	0.86	373333	405803	HARROWBY MILL	HARROWBY STREET	FARNWORTH	BL4 7BT	Farnworth	1
43	144	0.72	369415	407857	WHARF MILL	KIRKEBROK ROAD	BOLTON	BL3 4JE	Hulton	1
44	148	0.97	365649	409485	LAND OFF	OX HEY LANE	LOSTOCK	BL6 4AP	Horwich and Blackrod	1
48	163	2.28	371025	408112	LAND OFF	DERBY STREET	BOLTON	BL3 6JF	Great Lever	1
65	260	0.49	373254	412098	FORMER BLAIR HOSPITAL	Bolton Road	BOLTON	BL2 3EZ	Bromley Cross	1
124	701	0.41	372299	413374	Darwen Road - 037A	Darwen Road	Bolton	BL7 9JQ	Bromley Cross	1
136	720	1.78	374068	410595	BREIGHTMET HALL IV - 007D		Bolton	BL2 5DD	Bradshaw	1
137	721	1.75	374181	411828	Longsight CP School - 017A		Bolton	BL2 3JL	Bradshaw	1
140	725	0.41	374640	410404	BNU NORTH I - 003	Wasdale Avenue	Bolton	BL2 5JR	Brightmet	1
157	743	0.85	371370	410286	Rushlake Drive - 020		Bolton	BL1 3RB	Halliwell	1
162	749	0.71	371556	405963	Redgate Way - 014A		Bolton	BL4 0JX	Harper Green	1
173	761	0.3	372074	405948	Plodder Lane - 028		Bolton	BL4 0NH	Harper Green	1
184	772	0.44	364114	410839	Brunel Street - H016		Horwich	BL6 5NY	Horwich and Blackrod	1
185	773	0.45	363364	411664	Crown Lane - H029		Horwich	BL6 7TD	Horwich and Blackrod	1
190	780	2.22	364785	410659	Mount Street - H011		Horwich	BL6 6NH	Horwich North East	1
194	784	0.36	361605	411042	Carlton Close - B010	Carlton Close	Blackrod	BL6 5DQ	Horwich and Blackrod	1
197	787	3.93	360939	410921	HILL LANE - B015		Blackrod	BL6 5JG	Horwich and Blackrod	1
199	791	0.38	371011	408429	Rasbottom St - 004A		Bolton	BL3 5AN	Rumworth	1
210	907	0.77	370704	407659	ST PAULS MILL,	BARBARA ST	Bolton	BL3 6SX	Rumworth	1
211	908	0.7	373363	409169	LAND AT TONGE MILL	CLEGG ST	Bolton	BL2 6BL	Tonge with the Haulgh	1
220	920	0.37	374305	409605	Crompton Avenue - S09 - Brightmet		Bolton	BL2 6PQ	Brightmet	1
221	921	0.49	374411	409794	Deepdale Road 2 - S10 - Brightmet		Bolton	BL2 5LP	Brightmet	1
227	927	0.49	374027	409341	Back Bury Road South - S22 - Brightmet		Bolton	BL2 6EA	Brightmet	1
228	928	0.27	374553	409083	Garstang Avenue 2 - S39 - Brightmet		Bolton	BL2 6JT	Brightmet	1

230	930	0.3	375092	408976	Inverbeg Drive2 - S42b - Breightmet	Bolton	BL2 6NA	Breightmet	1
231	931	0.32	375274	408407	Harpford Close - S50 - Breightmet	Bolton	BL2 6TN	Breightmet	1
235	938	0.85	373806	408341	Gorses Road 1 - S60a - Breightmet	Bolton	BL3 1SS	Little Lever and Darcy Lever	1
236	940	0.49	373690	408202	Radcliffe Road 6 - S62 - Breightmet	Bolton	BL3 1RL	Little Lever and Darcy Lever	1
245	954	2.52	372664	405411	Blindsill Road - S13 - Farnworth	Bolton	BL4 9RL	Farnworth	1
246	957	0.27	372896	404955	Masefield Drive 1 - S29 - Farnworth	Bolton	BL4 9TF	Farnworth	1
249	961	0.25	372371	407164	Lowther Street - S28 - Great Lever	Bolton	BL3 2HP	Great Lever	1
251	963	0.38	371816	406963	Rishton Avenue - S30 - Great Lever	Bolton	BL3 2EW	Harper Green	1
252	964	0.31	371673	407662	Finney Street - S34 - Great Lever	Bolton	BL3 6QG	Great Lever	1
258	970	1.06	370172	407304	Nixon Road South - S47 - Great Lever	Bolton	BL3 3PN	Hulton	1
259	971	0.4	371092	406743	The Meade - S58 - Great Lever	Bolton	BL3 3HB	Harper Green	1
261	973	1.01	369060	407944	Dealey Road 1 - S13 - Higher Dean	Bolton	BL3 4QL	Heaton and Lostock	1
271	983	0.43	375704	408026	Suffolk Close - S05 - Kearsley	Little Lever	BL3 1XJ	Little Lever and Darcy Lever	1
272	984	0.36	375903	407061	Nandywell - S100 - Kearsley	Little Lever	BL3 1JS	Little Lever and Darcy Lever	1
274	986	0.79	375299	407480	Lever Gardens - S104 - Kearsley	Little Lever	BL3 1LH	Little Lever and Darcy Lever	1
276	988	0.48	375385	407651	Victory Road - S14 - Kearsley	Little Lever	BL3 1QY	Little Lever and Darcy Lever	1
277	989	0.72	374811	407785	Park Road 2 - S22 - Kearsley	Little Lever	BL3 1DW	Little Lever and Darcy Lever	1
278	990	0.31	375034	407331	Church Street 1 - S26 - Kearsley	Little Lever	BL3 1EF	Little Lever and Darcy Lever	1
288	1002	0.52	375080	404513	Holcombe Close - S74 - Kearsley	Kearsley	BL4 8JX	Kearsley	1
296	1011	0.25	374409	405692	Albert Street - S95 - Kearsley	Bolton	BL4 8AR	Kearsley	1
301	1019	0.25	365232	406310	Collingway Wood 1 - S08a -	Westhoughton	BL5 3TR	Westhoughton South	1
305	1026	0.38	365233	405734	Cricketers Way - S25	Westhoughton	BL5 3TW	Westhoughton South	1
318	1039	0.15	371290	409421	Urban Village 4 Pool St (c50units)	Bolton	BL1 2BA	Halliwell	1
319	1040	0.55	371248	409248	Urban Village 5 St Helena S (c35units)	Bolton	BL1 4AD	Halliwell	1
321	1042	1.4	371496	409412	Central Street (150 units)	Bolton	BL1 2AX	Halliwell	1
323	1044	0.49	371426	409315	Post Office, Deansgate (132 units)	Bolton	BL1 1AD	Halliwell	1
324	1045	0.22	371390	409271	King Street/Deansgate (c50 units)	Bolton	BL1 2JR	Halliwell	1
326	1048	0.48	372058	409062	Breightmet St (c 75 units)	Bolton	BL1 1ET	Great Lever	1
328	1050	0.33	372136	408782	Globe Works (c 75 units)	Bolton	BL2 1DF	Great Lever	1
330	1052	0.36	371264	409054	BIZ Gas St (c 50 units)	Bolton	BL1 4TG	Halliwell	1
331	1053	0.24	371170	409161	BIZ Spa Road (c50 units)	Bolton	BL1 4AG	Halliwell	1
333	1055	0.43	371125	409084	BIZ New Holder St (c 50 units)	Bolton	BL1 4SN	Halliwell	1
334	1056	0.72	371053	409099	BIZ Spa Rd2 (c 75 units)	Bolton	BL1 4SR	Halliwell	1
335	1057	1.56	371830	406370	Royal Bolton Hospital Redgate Way	Bolton	BL4 0HW	Harper Green	1

336	1058	1.11	371841	406233	Royal Bolton Hospital Carr Drive	Bolton	BL4 0NQ	Harper Green	1	
346	1071	0.79	371112	409750	Union Mill	Bolton	BL1 2PT	Halliwell	1	
347	1073	0.61	373342	405031	Manor Garage, Buckley Lane	Bolton	BL4 9PH	Farnworth	1	
359	1090	5.86	371970	409423	Church Wharf	Bolton	BL1 1TU	Crompton	1	
363	1095	3.77	365940	406118	Roscoes Farm	Brook Street	Westhoughton	BL5 3DN	Westhoughton North and Chew Moor	1
378	1114	0.3	369071	406624	Land off St Helens Road	Bolton	BL3 3SR	Hulton	1	
390	1129	0.79	370676	411668	Land at Moss Lea Site A and C	Bolton	BL1 6PL	Astley Bridge	1	

Land Type	Yield	GMSF_2018_site
PDL	41	y
PDL	55	y
Greenfield	11	y
PDL	1600	y
Greenfield	79	y
PDL	194	y
Greenfield	88	y
PDL	66	y
PDL	21	y
PDL	46	y
PDL	32	y
PDL	44	y
PDL	103	y
PDL	20	y
PDL	18	y
PDL	80	y
PDL	79	y
Greenfield	19	y
Greenfield	46	y
Greenfield	32	y
Greenfield	15	y
Greenfield	24	y
Greenfield	24	y
Greenfield	71	y
Greenfield	18	y
Greenfield	147	y
Greenfield	23	y
Greenfield	35	y
PDL	32	y
Greenfield	18	y
Greenfield	22	y
Greenfield	22	y
Greenfield	13	y

PDL	15	y
Greenfield	16	y
Greenfield	38	y
Greenfield	22	y
Greenfield	94	y
Greenfield	14	y
Greenfield	12	y
Greenfield	19	y
Greenfield	15	y
Greenfield	48	y
Greenfield	20	y
Greenfield	45	y
Greenfield	23	y
Greenfield	22	y
PDL	43	y
Greenfield	26	y
Greenfield	39	y
Greenfield	18	y
Greenfield	23	y
Greenfield	15	y
Greenfield	15	y
Greenfield	23	y
Greenfield	50	y
PDL	35	y
PDL	150	y
PDL	132	y
PDL	50	y
PDL	75	y
PDL	75	y
PDL	50	y
PDL	50	y
PDL	50	y
PDL	75	y
PDL	70	y

---

PDL	50	y
Greenfield	50	y
PDL	33	y
PDL	659	y
Greenfield	170	y
Greenfield	15	y
Greenfield	36	y

---

## **Appendix 4: List of Active Sites**

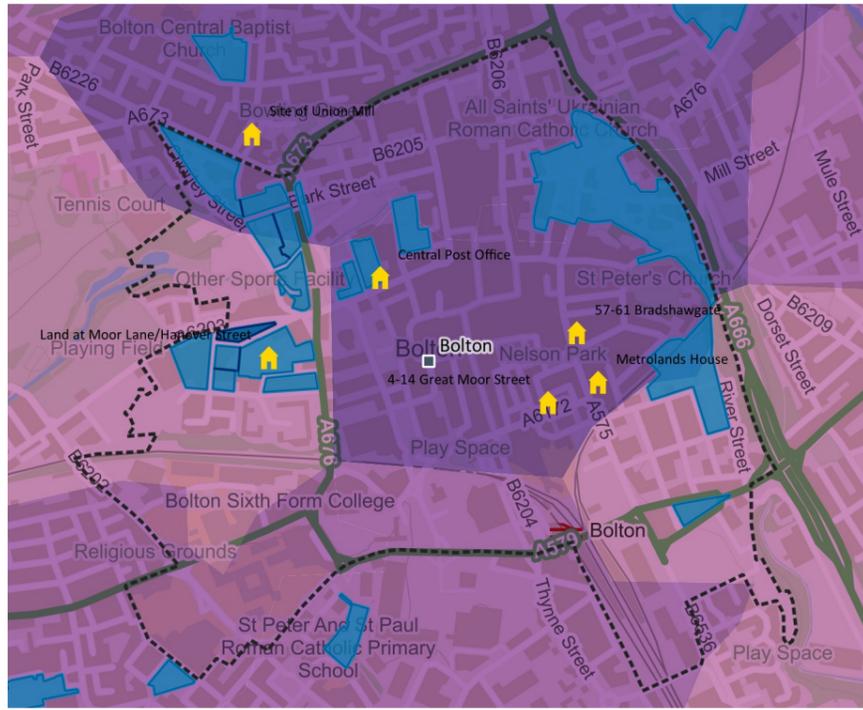
Housebuilder	Site	Address	Post Code	GF/BF	Easting	Northing	Status	Mill?	Site size (ha.)	Density (dph)	1-bed	2-bed	3-bed	4-bed	5-bed	6-bed
Gleeson Homes	MacDonald Park	Blindsill Road, Farnworth	BL4 9RA	GF	372661	405406	Under construction	N	2.5	31		19	50	8		
Jones Homes	Former Bolton Community College	Victoria Road, Horwich	BL6 6ED	BF	364684	410702	Under construction	N	3.98	32	9	10	80	30		
McDermott Homes	Former Longsight Primary School	Hough Fold Way, Bolton	BL32 3JN	BF	374181	411825	Under construction	N	1.77	32		3	28	25		
Wigget Homes	Blackhorse Street	Blackrod, Bolton	BL6 5EW	BF	361267	411120	Under construction	N	0.46	26			12			
Rowland Homes	Land at Hill Lane	Blackrod, Bolton	BL6	GF	360930	410946	Under construction	N	3.81	29			15	57		
Harron Homes	Old Hall Street	Bolton	BL4 8DB	BF (historic use)	374317	405329	Under construction	Y	0.4	160		64				
Cornell Group	Land off Greenland Road	Harper Green		BF	371944	406827	Under construction	N	0.46	33						
HB Village Developments	Land at Worsley Road	Farnworth, Bolton	BL4 9LN	BF	373551	405143	Under construction	N	0.45	53						
	Former Westhoughton Depot	Park Road, Westhoughton	BL3 5DE	BF	365747	405792	Under construction	N	0.51	41						
	Swallowfield Hotel	Chorley New Road, Horwich	BL6 6HN	BF	365139	410162	Under construction	N	0.5	56						
Bellway	Land south of Crompton Way	Bolton		BF	372497	410898	Under construction	N	9.02	34		6	247	56		
	Lorne Street Mills	Lorne Street, Farnworth	BL4 7LW	BF	373216	406735	Under construction	Y	1.5	34		10	34	7		
Bellway	Bowlands Hey	Off Collingwood Way & Old Lane, Westhoughton		GF	364946	406331	Under construction	N	3.5	37			67	17		
Bellway	Former Horwich Loco Works	Chorley New Road, Horwich		BF	363626	410997	Under construction	N	3.19	35			80	32		
	Lostock House Farm	Hall Lane, Lostock	BL6 4BS	BF	365656	409100	Under construction	N	1.15	11				8	5	
	Haslam Mill	Haslam Street, Bolton	BL3 6LB	BF	370935	408106	Under construction	Y	0.44	27			1	7	4	
	Former Congregational Church	Lee Lane, Horwich	BL6 7AG	BF	363737	411788	Under construction	N	Unknown			11				
	Windmill Hotel	112 Chorley Road, Westhoughton	BL5 3PL	BF	365009	407430	Under construction	N	0.18	67	2	6	1	3		
	Merlin Filling Station	254 Bolton Road, Westhoughton	BL5 3EF	BF	366236	406472	Under construction	N	Unknown		3	15	2			
	4-14 Great Moor Street	Bolton	BL1 1NP	BF	371810	409015	Under construction	N	0.11	445	21		2	26		
	Land adjacent Back Lever Street North	Little Lever	BL3 1DA	BF	375253	407688	Under construction	N	Unknown		8	16				
	57-61 Bradshawgate	Bolton	BL1 1DR	BF	371871	409163	Under construction	N	Unknown		16					
	Metrolands House	Bolton	BL1 1QD	BF	371916	409058	Under construction	N	0.143	1517	72	145				
	Land at Watersmeeting Road	Crompton	BL1 8SW	BF	371757	411178	Under construction	N	Unknown							
	Marylawns Rest Home	Bolton	BL2 5HW	BF	374892	410220	Under construction	N	0.47	21				10		
	IGW Garage, 241-245 Belmont	Bolton	BL1 7AF	BF	371419	411828	Under construction	N	Unknown			36				

Land at Moor Lane/Hanover Street	Bolton	BL1 4TG	BF	371218	409110	Under construction	N	0.74	396	156	137	
Central Post Office	Deansgate, Bolton	BL1 1AD	BF	371454	409280	Under construction	N	Unknown				
Site of Union Mill	Bolton	BL1 2PP	BF	371182	409584	Under construction	Y	Unknown		6	121	14

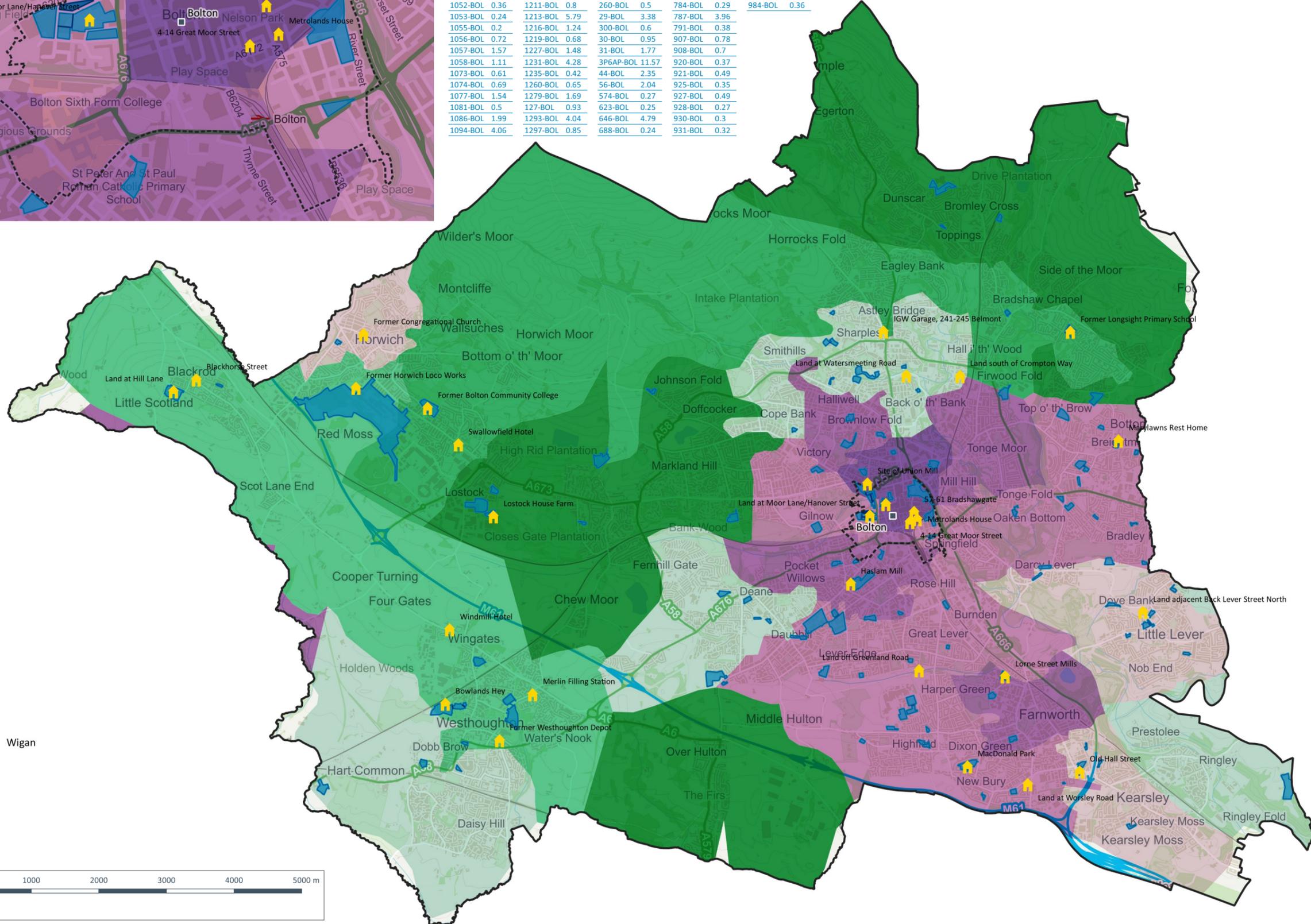
Unkn own Mix	AH 1- bed	AH 2- bed	AH 3- bed	AH 4- bed	AH 5- bed	AH 6- bed	AH - Unknown Mix	AH	AH %	Total Dwellings	Houses	Apartments	Comment	PlanApp:
								0	0%	77	77	0		97199
								17	13%	129	120	9		96670
								0	0%	56	56	0		94271
								0	0%	12	12	0		97995
		17	20					37	34%	109	109	0	Done in two apps - 107 dwellings and 2 dwellings	94656
								0	0%	64	0	64	Apartments - full application data not available	77085
	14		1					15	100%	15	11	4	All affordable	97143
	24							24	100%	24	0	24	All affordable - supported living	97268
		2	19					21	100%	21	21	0	All affordable - intermediate housing	00 940
	4	24						28	100%	28	0	28	Includes 24no. bedroom nursing home	0 1729
								0	0%	309	309	0	<b>98</b> seen as deliverable within the 5 year period. Data not available for which these are. <b>AH provision also unknown.</b>	91081
								0	0%	51	51	0		93831
		8	37					45	35%	129	129	0		97377
								0	0%	112	112	0	First phase of wider scheme, eventually will deliver ~1600 dwellings. Viability assessment means no AH provision in this phase.	0 1373
								0	0%	13	13	0		00 121
								0	0%	12	12	0		94276
								0	0%	11	0	11		76785
								0	0%	12	4	8		90228
								0	0%	20	0	20		76432
								0	0%	49	0	49	Student accommodation - enough for 140 students	92476
								0	0%	24	0	24		83609
								0	0%	16	0	16		94645
								0	0%	217	0	217	Student accommodation - total once completed will be 217 student units. Document states <b>26 under construction.</b>	91861 89938
156									0%	156	0	156	Details of the scheme unknown as the application is 14 years old. Document states this site can deliver <b>30</b> dwellings in the current construction phase.	70243
									0%	10	10	0		75230
									0%	36	0	36	Details of the scheme not readily available as scheme is 13 years old.	72118

			0%	293	0	293		94148
132			0%	132	0	132	Details of the scheme unknown as the application is 12 years old.	77237
			0%	141		141	Details of the scheme unknown as it dates back to to 2007 - time extensions have been accepted but lack in detail.	93145

## Appendix 5: Map of Active Sites



Site ref	Ha	Site ref	Ha	Site ref	Ha	Site ref	Ha	Site ref	Ha	Site ref	Ha
1002-BOL	0.53	1095-BOL	4.1	1326-BOL	1.54	689-BOL	0.26	938-BOL	0.84	986-BOL	0.74
1011-BOL	0.25	1105-BOL	1.15	1348-BOL	0.33	691-BOL	0.3	940-BOL	0.47	988-BOL	0.48
1017-BOL	1.67	1114-BOL	0.3	1349-BOL	1.45	701-BOL	0.25	947-BOL	0.35	989-BOL	0.72
1019-BOL	0.25	1123-BOL	0.68	137-BOL	0.86	717-BOL	2.32	954-BOL	2.53	990-BOL	0.29
1020-BOL	1.19	1129-BOL	0.69	144-BOL	0.72	720-BOL	1.79	957-BOL	0.27	998-BOL	0.38
1026-BOL	0.38	1131-BOL	0.09	148-BOL	0.98	721-BOL	1.76	961-BOL	0.25	HLA-181	0.24
1029-BOL	0.36	1132-BOL	1.03	158-BOL	1.01	725-BOL	0.38	963-BOL	0.38		
1036-BOL	1.26	1148-BOL	1.65	1596-BOL	3.2	734-BOL	0.29	964-BOL	0.31		
1037-BOL	0.4	1161-BOL	0.77	1597-BOL	4.31	743-BOL	0.7	966-BOL	1.06		
1038-BOL	0.37	1163-BOL	0.26	1599a-BOL	0.85	745-BOL	1.27	970-BOL	1.03		
1039-BOL	0.15	1166-BOL	0.41	1609-BOL	0.62	748-BOL	1.03	971-BOL	0.4		
1040-BOL	0.44	1167-BOL	0.45	163-BOL	4.35	749-BOL	0.71	973-BOL	1.01		
1042-BOL	0.63	1192-BOL	0.48	16-BOL	0.38	760-BOL	0.37	975-BOL	0.28		
1045-BOL	0.22	1200-BOL	1.09	172-BOL	1.03	761-BOL	0.3	976-BOL	0.32		
1048-BOL	2.08	1206-BOL	0.44	19-BOL	73.5	773-BOL	0.45	983-BOL	0.43		
1052-BOL	0.36	1211-BOL	0.8	260-BOL	0.5	784-BOL	0.29	984-BOL	0.36		
1053-BOL	0.24	1213-BOL	5.79	29-BOL	3.38	787-BOL	3.96				
1055-BOL	0.2	1216-BOL	1.24	300-BOL	0.6	791-BOL	0.38				
1056-BOL	0.72	1219-BOL	0.68	30-BOL	0.95	907-BOL	0.78				
1057-BOL	1.57	1227-BOL	1.48	31-BOL	1.77	908-BOL	0.7				
1058-BOL	1.11	1231-BOL	4.28	3P6AP-BOL	11.57	920-BOL	0.37				
1073-BOL	0.61	1235-BOL	0.42	44-BOL	2.35	921-BOL	0.49				
1074-BOL	0.69	1260-BOL	0.65	56-BOL	2.04	925-BOL	0.35				
1077-BOL	1.54	1279-BOL	1.69	574-BOL	0.27	927-BOL	0.49				
1081-BOL	0.5	127-BOL	0.93	623-BOL	0.25	928-BOL	0.27				
1086-BOL	1.99	1293-BOL	4.04	646-BOL	4.79	930-BOL	0.3				
1094-BOL	4.06	1297-BOL	0.85	688-BOL	0.24	931-BOL	0.32				



Copyright of Turley  
 This drawing is for illustrative purposes only and should not be used for any construction or estimation purposes. To be scaled for planning application purposes only. No liability or responsibility is accepted arising from reliance upon the information contained within this drawing.  
 Plans reproduced by permission of Ordnance Survey on behalf of The Controller of Her Majesty's Stationery Office. © Crown Copyright and database right (2019). All rights reserved. Ordnance Survey Licence number (100020449)

Town centre boundaries

Bolton Active Sites

Bolton housing land supply 2018

**LR House price Paid 2018**

- less than 80,000
- 80,000 - 100,000
- 100,000 - 120,000
- 120,000 - 140,000
- 140,000 - 160,000
- 160,000 - 180,000
- 180,000 - 200,000
- more than 200,000

CLIENT: Peel

PROJECT: Greater Manchester Review

DRAWING: Priority 1 - Active House Builder Sites

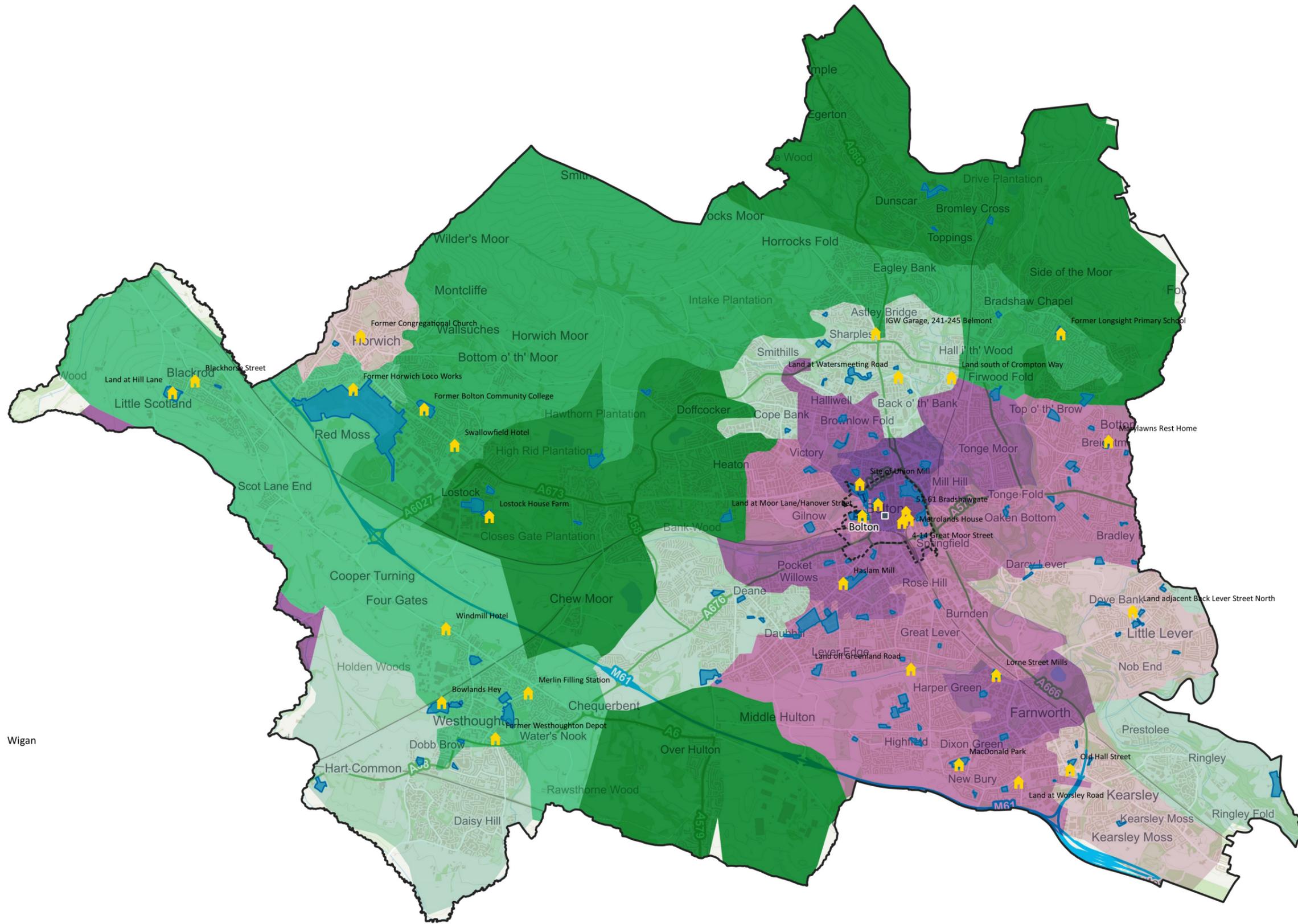
PROJECT NUMBER: PEEM2087

DRAWING NUMBER: GIS\_000      CHECKED BY: MS

REVISION: 1.4      STATUS: Draft

DATE: June 2019      SCALE: 1:60000 @ A3





# Appendix 6: Viability Assessment of the Supply – Technical Appendix

## Introduction

1. This Appendix presents technical supporting information underpinning the chapter of this paper titled 'Viability Assessment of the Supply'. This evidence is provided transparently in accordance with the requirements of both the NPPF<sup>122</sup> and PPGV<sup>123</sup>.
2. Turley has undertaken a viability testing exercise in order to establish the value at which brownfield development can be shown to be viable and deliverable for the majority of national housebuilders. It is determined that development will not be viable for the majority of developers in areas that are not capable of generating sales values above a specified £ psf.
3. The areas of Bolton that cannot support the required level of sales values are not regarded as capable of supporting speculative housing development by standard national or regional housebuilders. Limited delivery can be anticipated through interventions by specialist regeneration developers and the market housing development divisions of a limited number of social housing providers.

## Site Typology

4. The site typology upon which viability is assessed is in line with current delivery in low value brownfield locations in Bolton. Gleeson Homes have recently completed development of one scheme and have commenced construction on a new scheme, with both located in low value brownfield locations.
5. Lorne Court comprises 51no. 2,3 and 4 bed houses, providing 40,046 sq ft of accommodation on a net site area of 3.58 acres (1.45 ha), equating to 11,188 sq ft per net acre and 35 dwellings per net hectare ('dph'). The final sale at Lorne Court completed in December 2018.
6. Macdonald Park is a 77no. unit scheme comprising 2,3 and 4 bed houses, providing 59,557 sq ft of accommodation on a net site area of 4.99 acres (2.02 ha), equating to 11,935 sq ft per net acre and 38 dph. No sales have registered on Land Registry to date.
7. The floor area density within these schemes is lower than standard national housebuilder expectations, who will seek to achieve circa 14,500 sq ft net acre from the majority of their schemes.
8. In contrast to general expectations, it is generally not possible for the few developers that are prepared to build within the low value areas to achieve in excess of 12,000 sq ft per net acre, as it is essential for new build units to fit in with local market value

<sup>122</sup> MHCLG (2019) National Planning Policy Framework ('NPPF') (as amended in February 2019) [CD 11.5]

<sup>123</sup> MHCLG (2019) Planning Practice Guidance for Viability ('PPGV') (as amended in May 2019) [CD 11.6.4]

expectations, with a unit value affordability cap meaning that unit sizes must be maintained at lower than average floor areas, with units offered with good sized gardens helping to increase the attractiveness of the scheme but impacting upon levels of sq ft density.

9. Average unit sizes at Lorne Court are: 661 sq ft, 768 sq ft, and 1,066 sq ft, for 2, 3, and 4 bed respectively. On the same basis, average sizes at Macdonald Park are 659 sq ft, 771 sq ft, and 1,057 sq ft.
10. As a current model of delivery, the Macdonald Park unit mix has been adopted within the adopted viability modelling, equating to 11,916 sq ft per acre. In line with the site coverage at Macdonald Park, we have assumed a 1ha site delivering 38 units on the basis of an 80% net:gross deduction and adopted the following unit mix:

**Table A7.1: Viability Assessment Typology**

Market Sale Units				
Type	Beds	sq ft	No.	Total sq ft
Terraced/semi-detached	2	651	3	1,953
Terraced/semi-detached	2	671	3	2,013
Terraced/semi-detached	3	759	5	3,795
Semi	3	759	3	2,277
Terraced/semi-detached	3	772	6	4,632
Terraced/semi-detached	3	788	1	788
Detached	3	772	4	3,088
Detached	3	807	3	2,421
Detached	4	1,066	2	2,132
Detached	4	1,048	1	1,048
Detached	4	1,048	1	1,048
<b>Total</b>			<b>32</b>	<b>25,195</b>
Social Rent Units				
Type	Beds	sq ft	No.	Total sq ft
Terraced/semi-detached	2	651	2	1,302
Terraced/semi-detached	3	759	2	1,518
<b>Total</b>			<b>4</b>	<b>2,820</b>
Intermediate Tenure Units				
Type	Beds	sq ft	No.	Total sq ft
Terraced/semi-detached	2	651	1	671
Terraced/semi-detached	3	759	1	759

<b>Total</b>	<b>2</b>	<b>1,430</b>
--------------	----------	--------------

*Source: Turley*

11. Affordable Housing in modelled to meet the Bolton Affordable Housing SPD requirement for 15% affordable units on brownfield sites.
12. Whilst large scale development schemes will require sites in excess of 1 ha, the modelling provides an easy to understand approach, with results following on a pro-rata basis as the site size increases.
13. Apartment development has not been modelled, as it is assessed that apartment sales values will be the same, or lower than housing values and construction costs are higher, generating reduced levels of viability. Therefore, the results generated for housing development are assessed as a proxy for apartment development, albeit exaggerating apartment viability.

### **Development Value**

14. The Turley viability assessment has adopted a sensitivity testing approach to the assessment of the level of sales values required to generate a viable scheme.
15. As a starting point, the current asking values at the Macdonald Park scheme by Gleeson Homes have been modelled.
16. Turley has undertaken research in respect of the current asking prices at the Macdonald Park scheme by Gleeson Homes and has referenced their recently achieved values at the completed Lorne Court scheme.
17. Land Registry data shows no sales having completed to date at Macdonald Park, but Gleeson Homes marketing information confirms asking prices ranging from £176-£185 psf. It is usual to anticipate a reduction from quoted asking prices to reflect purchaser negotiations, but considering the low asking prices, reductions are expected to be minimal.
18. We understand that all units have sold at Lorne Court, and Land Registry data confirms the final sales completed in December 2018, with achieved values equating to £155-169 psf.
19. In order to model the limited current delivery by a regeneration developer, a value equating to £185 psf has been adopted for the market sale units, with social rent values equating to 40% of market value and intermediate units at 70% of market value, in line with market expectations and the Bolton Community Infrastructure Levy Residential Viability Addendum April 2013.
20. At an average market value of £185 psf, the resultant gross development value of the assumed scheme is assessed at £5,054,940, with the breakdown as follows:

**Table A7.2: Appraisal 1 GDV (£185 psf market sale scheme GDV)**

Tenure	No.	Unit sq ft	Total sq ft	£psf	Unit Value (£)	GDV (£)
Market Sale	32	787	25,195	185	145,659	4,661,075
Social Rent	4	705	2,820	74	52,170	208,680
Intermediate	2	715	1,430	130	92,593	185,185
<b>Total/Average</b>	<b>38</b>	<b>775</b>	<b>29,445</b>	<b>172</b>	<b>133,025</b>	<b>5,054,940</b>

21. There are a very limited number of developers that are prepared to tailor their operating model, product specification and house type/scheme design to be capable of delivering new build housing in low value areas. The main national regeneration developers are Gleeson Homes, Lovell Partnerships and Keepmoat Homes. From company account information, these three developers delivered 6,221 homes in their last published trading year.
22. Traditional national house builders such as the largest eight: Barratt David Wilson; Persimmon; Taylor Wimpey; Bellway; Bovis; Crest Nicholson; Redrow; and Galliford Try do not regard delivery in low value locations as viable, or in line with their market profile. Such developers will set a 'drop dead' value, beneath which they will be aware that due to: their operating costs; costs of construction required to meet their required levels of specification; and required profit levels, schemes will not be viable, even at the modest land values sought in low value locations. These eight developers delivered 72,180 homes in their last trading year.
23. The viability sensitivity testing has identified that a sales value equating to £219 psf is required to provide a development that would be regarded as viable by the majority of national housebuilders. Some may not be able to proceed at this level, due to their higher specifications requiring an uplift in construction costs, but it is regarded as a reasonable reflection of general expectations.
24. At an average market value of £219 psf, the resultant gross development value of the assumed scheme is assessed at £5,983,956, with the breakdown as follows:
25. **Table A7.3: Appraisal 2 GDV (£219 psf market sale scheme GDV)**

Tenure	No.	Unit sq ft	Total sq ft	£psf	Unit Value (£)	GDV (£)
Market Sale	32	787	25,195	219	172,428	5,517,705
Social Rent	4	705	2,820	88	61,758	247,032
Intermediate	2	715	1,430	153	109,609	219,219
<b>Total/Average</b>	<b>38</b>	<b>775</b>	<b>29,445</b>	<b>203</b>	<b>157,472</b>	<b>5,983,956</b>

Source: Turley analysis

## Development Costs

26. Abnormal demolition, clearance and remediation costs have been estimated for the brownfield land typologies with reference to the HCA, Guidance on dereliction, demolition and remediation costs, March 2015. The costs have been inflated to Q4 2018 based on instructions within the document.
27. For plan making purposes, RICS BCIS Median Estate Housing costs are generally accepted as representing appropriate data, in line with Planning Practice Guidance: Viability<sup>124</sup>, reflecting national housebuilder costs. However, it must be anticipated that delivery in low value areas will reduce the level of design and specification, thereby reducing costs. Therefore, RICS BCIS lower quartile costs have been adopted, reducing costs by circa £10 psf.
28. RICS BCIS costs do not include an allowance for external works, and a 10% (of Base Construction) allowance has been adopted, falling below the standard allowance of 15%, again reflecting an anticipated reduction in specification due to the low achievable sales values.

**Table A7.4: Base Construction Costs**

Development Type	Base Construction RICS BCIS Lower Quartile (Bolton): (Last 5 Years) Q1 2019		External Works 10% (of Base Construction)	
	£psm	£psf	£psm	£psf
Estate Housing (two storey)	990	91.97	99	9.20

*Source: RICS BCIS; Turley analysis*

29. An allowance of £521 per unit is applied in addition to meet the accessible and adaptable standards in Building Regulations Part M4(2). This is based on the DCLG Housing Standards Review, Final Implementation Impact Assessment, March 2015.

#### **Other Development Costs**

30. Other development costs are summarised in the following table.

**Table A7.5: Other Development Costs**

Other Development Costs	Input
Professional Fees (% Construction Costs)	8.0%

<sup>124</sup> Paragraph: 012 Reference ID: 10-012-20180724

Marketing and Promotion (% Open Market Sale ('OMS') GDV)	1.5%
Sales Agency (% OMS GDV)	1.0%
Sales Legal (£OMS/unit)	£750
Finance (% Debit)	6.0%
Developer's Profit (OMS) (% GDV)	20.00%
Developer's Profit (AH) (% GDV)	6.0%

Source: Turley

### **Planning Obligations**

31. The Infrastructure and Planning Contributions SPD (2016) ('IPCSPD') provides detail on specific policies in the Bolton Core Strategy and provides clarity on what is expected of new developments in terms of the delivery of infrastructure and the operation of planning obligations within Bolton.
32. Planning obligations have been applied in line with the examples provided within the IPCSPD in respect of:
  - a. Open space and children's play space
  - b. Health and well-being
  - c. Education
  - d. Community facilities
  - e. Public art and public realm improvements
  - f. Sustainable Drainage Systems
  - g. Other contributions (off-site access and transport, biodiversity, green infrastructure, flood protection, mitigation against air quality impacts, etc.)

### **Land Acquisition**

33. Where a positive gross residual land value (RLV) is generated, purchaser's costs are then deducted to generate a net RLV. These costs represent Stamp Duty Land Tax (SDLT), land agency fees (1.0%) and legal fees (0.5%).

### **Benchmark Land Value**

34. Establishing the minimum level of financial return at which a reasonable landowner would be willing to release their land for development represents a critical component of a viability assessment. It must represent a premium over the existing use value

(‘EUV’) and a reasonable incentive, in comparison with other options available, for the landowner to sell land for development, whilst allowing a sufficient contribution to comply with policy requirements.

35. Whilst this ‘minimum return’ does not directly feature as a cost in an appraisal conducted on a residual basis, it forms the benchmark land value (‘BLV’) against which the RLV derived from the appraisal is tested in order to determine the viability of the proposed development and scope for planning obligations (including affordable housing).
36. In order to reflect an average brownfield site typology, in setting the BLV for the low value brownfield site assessments, the EUV has been based upon the refurbishment, lease and investment disposal of a single storey industrial / warehouse unit providing 50% coverage on a 1ha (gross) site in the current market.
37. The EUV viability appraisal prepared for generating brownfield BLV is provided within **Annex 1**, showing a residual land value of £385,404.
38. A notional premium of 20% has been added to the EUV as a proxy to represent the minimum incentive level necessary to encourage the landowner to sell for development. The benchmark land value required to release brownfield sites in Bolton is, therefore, assessed at £462,485 (£385,404 + 20% = £462,485).

#### **Site Typology Appraisal Results**

39. Appraisal 1 (£185 psf market sale scheme GDV) is attached at **Annex 2**.
40. Appraisal 2 (£219 psf market sale scheme GDV) is attached at **Annex 3**.
41. The results of the assessment are presented in the chapter of this paper titled ‘Viability Assessment of the Supply’ but can be summarised on the basis that Appraisal 1 (£185 psf market value) generates residual land value of -£231,082 in comparison to a required benchmark land value of £462,485, indicating a viability deficit of -£693,567. Appraisal 2 (£219 psf market value) generates a positive residual land value of £456,375 in comparison to a required benchmark land value of £462,485, which is regarded as a nominal difference.
42. It is determined that a minimum sales value equating to £219 psf is required for brownfield schemes in Bolton to be regarded as viable.

## **Appendix 6: Annex 1**

# Other Brownfield BLV - Ind / Warehouse Refurbishment EUV Methodology

Development Appraisal  
Turley  
04 March 2019

**Other Brownfield BLV - Ind / Warehouse Refurbishment  
EUV Methodology**

**Appraisal Summary for Phase 2 Industrial / Warehouse**

Currency in £

**REVENUE**

**Rental Area Summary**

	Units	ft <sup>2</sup>	Rent Rate ft <sup>2</sup>	Initial MRV/Unit	Net Rent at Sale	Initial MRV
Industrial / Warehouse (Refurbished)	1	51,129	3.50	178,952	178,952	178,952

**Investment Valuation**

<b>Industrial / Warehouse (Refurbished)</b>						
Current Rent	178,952	YP @	8.0000%	12.5000	2,236,894	

**GROSS DEVELOPMENT VALUE 2,236,894**

Purchaser's Costs			(152,109)			
Effective Purchaser's Costs Rate		6.80%		(152,109)		

**NET DEVELOPMENT VALUE 2,084,785**

**NET REALISATION 2,084,785**

**OUTLAY**

**ACQUISITION COSTS**

Residualised Price			385,404			
					385,404	
Stamp Duty		5.00%	19,270			
Agent Fee		1.00%	3,854			
Legal Fee		0.50%	1,927			
					25,051	

**CONSTRUCTION COSTS**

Construction	ft <sup>2</sup>	Build Rate ft <sup>2</sup>	Cost	
Industrial / Warehouse (Refurbished)	53,820	20.00	1,076,400	
				1,076,400

**MARKETING & LETTING**

Letting Agent Fee		10.00%	17,895		
Letting Legal Fee		5.00%	8,948		
					26,843

**DISPOSAL FEES**

Sales Agent Fee		1.00%	20,848		
Sales Legal Fee		0.50%	10,424		
					31,272

**FINANCE**

Timescale	Duration	Commences
Purchase	1	Mar 2019
Construction	6	Apr 2019
Letting	30	Oct 2019
Total Duration	37	

Debit Rate 6.000%, Credit Rate 0.000% (Nominal)		
Land		12,427
Construction		12,716
Letting		242,744
Total Finance Cost		267,887

**TOTAL COSTS 1,812,856**

**PROFIT 271,929**

**Performance Measures**

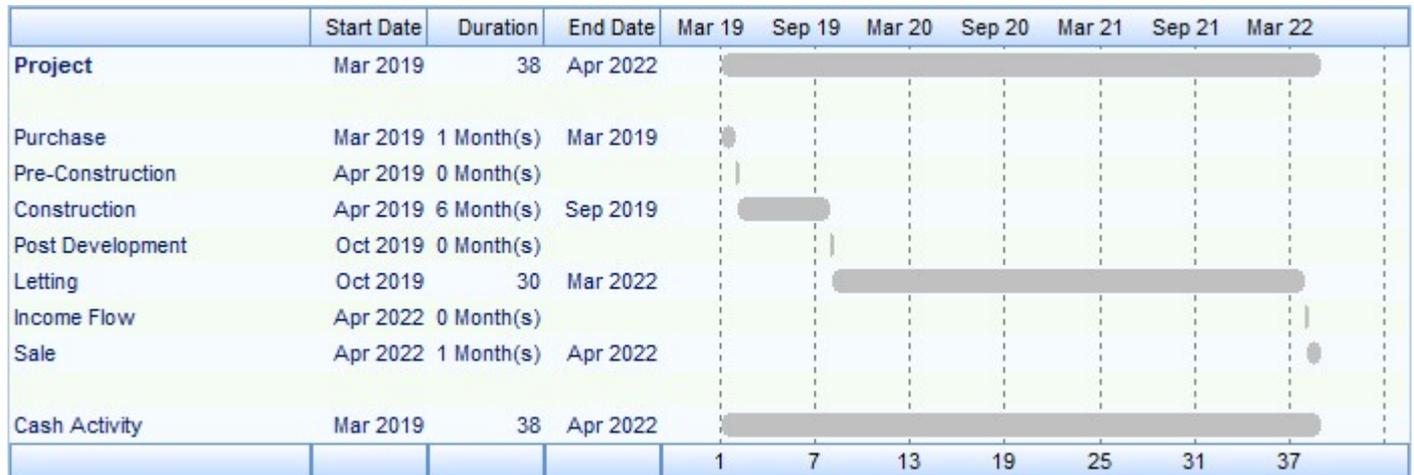
Profit on Cost%	15.00%
Profit on GDV%	12.16%
IRR	11.42%

**Other Brownfield BLV - Ind / Warehouse Refurbishment  
EUV Methodology**

**Other Brownfield BLV - Ind / Warehouse Refurbishment  
EUV Methodology**

Project Timescale	
Project Start Date	Mar 2019
Project End Date	Apr 2022
Project Duration (Inc Exit Period)	38 months

**2. Industrial / Warehouse**



## **Appendix 6:      Annex 2**

# Appraisal 1

**Appraisal 1**

**Appraisal Summary for Phase 1**

Currency in £

**REVENUE**

<b>Sales Valuation</b>	<b>Units</b>	<b>ft²</b>	<b>Sales Rate ft²</b>	<b>Unit Price</b>	<b>Gross Sales</b>
Market Housing	32	25,195	185.00	145,659	4,661,075
Social Rent	4	2,820	74.00	52,170	208,680
Intermediate	<u>2</u>	<u>1,430</u>	130.00	92,950	<u>185,900</u>
<b>Totals</b>	<b>38</b>	<b>29,445</b>			<b>5,055,655</b>

**NET REALISATION** **5,055,655**

**OUTLAY**

**ACQUISITION COSTS**

Residualised Price (Negative land) (231,082)  
(231,082)

**CONSTRUCTION COSTS**

**Construction**

	<b>ft²</b>	<b>Build Rate ft²</b>	<b>Cost</b>	
Market Housing	25,195	91.97	2,317,184	
Social Rent	2,820	91.97	259,355	
Intermediate	<u>1,430</u>	91.97	<u>131,517</u>	
<b>Totals</b>	<b>29,445 ft²</b>		<b>2,708,057</b>	<b>2,708,057</b>

Contingency	5.00%	135,403	
Demolition/Infr./Remediation		447,568	
Open Space		53,504	
Health & Wellbeing		26,600	
Primary School		113,136	
Secondary School		113,987	
Art, Public Realm, sust transport	1.00%	27,081	
			917,278

**Other Construction**

External Works	10.00%	270,806	
Extra over - Bldg regs Part 4(2)	38 un 521.00 /un	19,798	
			290,604

**PROFESSIONAL FEES**

Professional Fees	8.00%	238,309	
			238,309

**DISPOSAL FEES**

Marketing and sales Agent Fee	2.50%	116,527	
			116,527

**FINANCE**

Debit Rate 6.000%, Credit Rate 0.000% (Nominal)			
Construction		58,421	
Total Finance Cost			58,421

**TOTAL COSTS** **4,098,114**

**PROFIT** **957,541**

**Performance Measures**

Profit on Cost%	23.37%
Profit on GDV%	18.94%
Profit on NDV%	18.94%

IRR 95.07%

Profit Erosion (finance rate 6.000) 3 yrs 6 mths

**Appraisal 1**

**Detailed Cash flow Phase 1**

	001:Jun 2019	002:Jul 2019	003:Aug 2019	004:Sep 2019	005:Oct 2019	006:Nov 2019
Monthly B/F	0	(76,145)	(77,681)	(79,217)	(355,331)	(632,818)
<b>Revenue</b>						
Sale - Market Housing	0	0	0	0	0	0
Sale - Social Rent	0	0	0	0	0	0
Sale - Intermediate	0	0	0	0	0	0
<b>Disposal Costs</b>						
Marketing and sales Agent Fee	0	0	0	0	0	0
<b>Unit Information</b>						
<b>Market Housing</b>						
<b>Social Rent</b>						
<b>Intermediate</b>						
<b>Acquisition Costs</b>						
Residualised Price	231,082	0	0	0	0	0
<b>Construction Costs</b>						
Demolition/Infr./Remediation	0	0	0	(74,595)	(74,595)	(74,595)
Con. - Market Housing	0	0	0	(136,305)	(136,305)	(136,305)
Con. - Social Rent	0	0	0	(15,256)	(15,256)	(15,256)
Con. - Intermediate	0	0	0	(7,736)	(7,736)	(7,736)
External Works	0	0	0	(15,930)	(15,930)	(15,930)
Extra over - Bldg regs Part 4(2)	0	0	0	(1,165)	(1,165)	(1,165)
Contingency	0	0	0	(7,965)	(7,965)	(7,965)
Open Space	(53,504)	0	0	0	0	0
Health & Wellbeing	(26,600)	0	0	0	0	0
Primary School	(113,136)	0	0	0	0	0
Secondary School	(113,987)	0	0	0	0	0
Art, Public Realm, sust transport	0	0	0	(1,593)	(1,593)	(1,593)
<b>Professional Fees</b>						
Professional Fees	0	0	0	(14,018)	(14,018)	(14,018)
<b>Net Cash Flow Before Finance</b>	<b>(76,145)</b>	<b>0</b>	<b>0</b>	<b>(274,562)</b>	<b>(274,562)</b>	<b>(274,562)</b>
Debit Rate 6.000%	6.000%	6.000%	6.000%	6.000%	6.000%	6.000%
Credit Rate 0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
Finance Costs (All Sets)	0	(1,536)	(1,536)	(1,551)	(2,924)	(4,297)
<b>Net Cash Flow After Finance</b>	<b>(76,145)</b>	<b>(1,536)</b>	<b>(1,536)</b>	<b>(276,114)</b>	<b>(277,487)</b>	<b>(278,860)</b>
Cumulative Net Cash Flow Monthly	(76,145)	(77,681)	(79,217)	(355,331)	(632,818)	(911,678)

**Appraisal 1**

**Detailed Cash flow Phase 1**

007:Dec 2019 (911,678)	008:Jan 2020 (1,191,954)	009:Feb 2020 (1,473,603)	010:Mar 2020 (1,756,625)	011:Apr 2020 (1,551,272)	012:May 2020 (1,344,853)	013:Jun 2020 (1,137,368)	014:Jul 2020 (532,366)
0	0	0	423,734	423,734	423,734	423,734	423,734
0	0	0	0	0	0	208,680	0
0	0	0	0	0	0	185,900	0
0	0	0	(10,593)	(10,593)	(10,593)	(10,593)	(10,593)
0	0	0	0	0	0	0	0
(74,595)	(74,595)	(74,595)	0	0	0	0	0
(136,305)	(136,305)	(136,305)	(136,305)	(136,305)	(136,305)	(136,305)	(136,305)
(15,256)	(15,256)	(15,256)	(15,256)	(15,256)	(15,256)	(15,256)	(15,256)
(7,736)	(7,736)	(7,736)	(7,736)	(7,736)	(7,736)	(7,736)	(7,736)
(15,930)	(15,930)	(15,930)	(15,930)	(15,930)	(15,930)	(15,930)	(15,930)
(1,165)	(1,165)	(1,165)	(1,165)	(1,165)	(1,165)	(1,165)	(1,165)
(7,965)	(7,965)	(7,965)	(7,965)	(7,965)	(7,965)	(7,965)	(7,965)
0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0
(1,593)	(1,593)	(1,593)	(1,593)	(1,593)	(1,593)	(1,593)	(1,593)
(14,018)	(14,018)	(14,018)	(14,018)	(14,018)	(14,018)	(14,018)	(14,018)
<b>(274,562)</b>	<b>(274,562)</b>	<b>(274,562)</b>	<b>213,173</b>	<b>213,173</b>	<b>213,173</b>	<b>607,753</b>	<b>213,173</b>
6.000%	6.000%	6.000%	6.000%	6.000%	6.000%	6.000%	6.000%
0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
(5,714)	(7,087)	(8,459)	(7,820)	(6,754)	(5,688)	(2,751)	(1,685)
<b>(280,276)</b>	<b>(281,649)</b>	<b>(283,022)</b>	<b>205,353</b>	<b>206,419</b>	<b>207,485</b>	<b>605,002</b>	<b>211,488</b>
(1,191,954)	(1,473,603)	(1,756,625)	(1,551,272)	(1,344,853)	(1,137,368)	(532,366)	(320,878)

**Appraisal 1**

**Detailed Cash flow Phase 1**

015:Aug 2020 (320,878)	016:Sep 2020 (108,324)	017:Oct 2020 104,849	018:Nov 2020 318,022	019:Dec 2020 531,195	020:Jan 2021 744,368
423,734	423,734	423,734	423,734	423,734	423,734
0	0	0	0	0	0
0	0	0	0	0	0
(10,593)	(10,593)	(10,593)	(10,593)	(10,593)	(10,593)
0	0	0	0	0	0
0	0	0	0	0	0
(136,305)	(136,305)	(136,305)	(136,305)	(136,305)	(136,305)
(15,256)	(15,256)	(15,256)	(15,256)	(15,256)	(15,256)
(7,736)	(7,736)	(7,736)	(7,736)	(7,736)	(7,736)
(15,930)	(15,930)	(15,930)	(15,930)	(15,930)	(15,930)
(1,165)	(1,165)	(1,165)	(1,165)	(1,165)	(1,165)
(7,965)	(7,965)	(7,965)	(7,965)	(7,965)	(7,965)
0	0	0	0	0	0
0	0	0	0	0	0
0	0	0	0	0	0
0	0	0	0	0	0
(1,593)	(1,593)	(1,593)	(1,593)	(1,593)	(1,593)
(14,018)	(14,018)	(14,018)	(14,018)	(14,018)	(14,018)
<b>213,173</b>	<b>213,173</b>	<b>213,173</b>	<b>213,173</b>	<b>213,173</b>	<b>213,173</b>
6.000%	6.000%	6.000%	6.000%	6.000%	6.000%
0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
(619)	0	0	0	0	0
<b>212,554</b>	<b>213,173</b>	<b>213,173</b>	<b>213,173</b>	<b>213,173</b>	<b>213,173</b>
(108,324)	104,849	318,022	531,195	744,368	957,541

## **Appendix 6:      Annex 3**

## Appraisal 2

**Appraisal 2**

**Appraisal Summary for Phase 1**

Currency in £

**REVENUE**

<b>Sales Valuation</b>	<b>Units</b>	<b>ft<sup>2</sup></b>	<b>Sales Rate ft<sup>2</sup></b>	<b>Unit Price</b>	<b>Gross Sales</b>
Market Housing	32	25,195	219.00	172,428	5,517,705
Social Rent	4	2,820	87.60	61,758	247,032
Intermediate	<u>2</u>	<u>1,430</u>	153.30	109,610	<u>219,219</u>
<b>Totals</b>	<b>38</b>	<b>29,445</b>			<b>5,983,956</b>

**NET REALISATION**

**5,983,956**

**OUTLAY**

**ACQUISITION COSTS**

Residualised Price			456,375		456,375
Stamp Duty		2.69%	12,276		
Agent Fee		1.00%	4,564		
Legal Fee		0.50%	2,282		
					19,122

**CONSTRUCTION COSTS**

<b>Construction</b>	<b>ft<sup>2</sup></b>	<b>Build Rate ft<sup>2</sup></b>	<b>Cost</b>	
Market Housing	25,195	91.97	2,317,184	
Social Rent	2,820	91.97	259,355	
Intermediate	<u>1,430</u>	91.97	<u>131,517</u>	
<b>Totals</b>	<b>29,445 ft<sup>2</sup></b>		<b>2,708,057</b>	
Contingency		5.00%	135,403	
Demolition/Infr./Remediation			447,568	
Open Space			53,504	
Health & Wellbeing			26,600	
Primary School			113,136	
Secondary School			113,987	
Art, Public Realm, sust transport		1.00%	27,081	
				3,625,335

**Other Construction**

External Works		10.00%	270,806	
Extra over -Bldg regs Part 4(2)	38 un	521.00 /un	19,798	
				290,604

**PROFESSIONAL FEES**

Professional Fees		8.00%	238,309	
				238,309

**DISPOSAL FEES**

Marketing and sales Agent Fee		2.50%	137,943	
				137,943

**FINANCE**

Debit Rate 6.000%, Credit Rate 0.000% (Nominal)				
Land			31,593	
Construction			51,912	
Total Finance Cost				83,506

**TOTAL COSTS**

**4,851,193**

**PROFIT**

**1,132,763**

**Performance Measures**

Profit on Cost%	23.35%
Profit on GDV%	18.93%
Profit on NDV%	18.93%
IRR	62.69%

**Appraisal 2**

Profit Erosion (finance rate 6.000)

3 yrs 6 mths

**Appraisal 2**

**Detailed Cash flow Phase 1**

	001:Jun 2019	002:Jul 2019	003:Aug 2019	004:Sep 2019	005:Oct 2019	006:Nov 2019
Monthly B/F	0	(782,724)	(786,638)	(790,551)	(1,069,066)	(1,348,954)
<b>Revenue</b>						
Sale - Market Housing	0	0	0	0	0	0
Sale - Social Rent	0	0	0	0	0	0
Sale - Intermediate	0	0	0	0	0	0
<b>Disposal Costs</b>						
Marketing and sales Agent Fee	0	0	0	0	0	0
<b>Unit Information</b>						
<b>Market Housing</b>						
<b>Social Rent</b>						
<b>Intermediate</b>						
<b>Acquisition Costs</b>						
Residualised Price	(456,375)	0	0	0	0	0
Stamp Duty	(12,276)	0	0	0	0	0
Agent Fee	(4,564)	0	0	0	0	0
Legal Fee	(2,282)	0	0	0	0	0
<b>Construction Costs</b>						
Demolition/Infr./Remediation	0	0	0	(74,595)	(74,595)	(74,595)
Con. - Market Housing	0	0	0	(136,305)	(136,305)	(136,305)
Con. - Social Rent	0	0	0	(15,256)	(15,256)	(15,256)
Con. - Intermediate	0	0	0	(7,736)	(7,736)	(7,736)
External Works	0	0	0	(15,930)	(15,930)	(15,930)
Extra over -Bldg regs Part 4(2)	0	0	0	(1,165)	(1,165)	(1,165)
Contingency	0	0	0	(7,965)	(7,965)	(7,965)
Open Space	(53,504)	0	0	0	0	0
Health & Wellbeing	(26,600)	0	0	0	0	0
Primary School	(113,136)	0	0	0	0	0
Secondary School	(113,987)	0	0	0	0	0
Art, Public Realm, sust transport	0	0	0	(1,593)	(1,593)	(1,593)
<b>Professional Fees</b>						
Professional Fees	0	0	0	(14,018)	(14,018)	(14,018)
<b>Net Cash Flow Before Finance</b>	<b>(782,724)</b>	<b>0</b>	<b>0</b>	<b>(274,562)</b>	<b>(274,562)</b>	<b>(274,562)</b>
Debit Rate 6.000%	6.000%	6.000%	6.000%	6.000%	6.000%	6.000%
Credit Rate 0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
Finance Costs (All Sets)	0	(3,914)	(3,914)	(3,953)	(5,326)	(6,698)
<b>Net Cash Flow After Finance</b>	<b>(782,724)</b>	<b>(3,914)</b>	<b>(3,914)</b>	<b>(278,515)</b>	<b>(279,888)</b>	<b>(281,261)</b>
Cumulative Net Cash Flow Monthly	(782,724)	(786,638)	(790,551)	(1,069,066)	(1,348,954)	(1,630,215)

**Appraisal 2**

**Detailed Cash flow Phase 1**

007:Dec 2019 (1,630,215)	008:Jan 2020 (1,912,929)	009:Feb 2020 (2,197,015)	010:Mar 2020 (2,482,474)	011:Apr 2020 (2,203,277)	012:May 2020 (1,922,635)	013:Jun 2020 (1,640,546)	014:Jul 2020 (888,557)
0	0	0	501,610	501,610	501,610	501,610	501,610
0	0	0	0	0	0	247,032	0
0	0	0	0	0	0	219,219	0
0	0	0	(12,540)	(12,540)	(12,540)	(12,540)	(12,540)
0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0
(74,595)	(74,595)	(74,595)	0	0	0	0	0
(136,305)	(136,305)	(136,305)	(136,305)	(136,305)	(136,305)	(136,305)	(136,305)
(15,256)	(15,256)	(15,256)	(15,256)	(15,256)	(15,256)	(15,256)	(15,256)
(7,736)	(7,736)	(7,736)	(7,736)	(7,736)	(7,736)	(7,736)	(7,736)
(15,930)	(15,930)	(15,930)	(15,930)	(15,930)	(15,930)	(15,930)	(15,930)
(1,165)	(1,165)	(1,165)	(1,165)	(1,165)	(1,165)	(1,165)	(1,165)
(7,965)	(7,965)	(7,965)	(7,965)	(7,965)	(7,965)	(7,965)	(7,965)
0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0
(1,593)	(1,593)	(1,593)	(1,593)	(1,593)	(1,593)	(1,593)	(1,593)
(14,018)	(14,018)	(14,018)	(14,018)	(14,018)	(14,018)	(14,018)	(14,018)
<b>(274,562)</b>	<b>(274,562)</b>	<b>(274,562)</b>	<b>289,102</b>	<b>289,102</b>	<b>289,102</b>	<b>755,353</b>	<b>289,102</b>
6.000%	6.000%	6.000%	6.000%	6.000%	6.000%	6.000%	6.000%
0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
(8,151)	(9,524)	(10,897)	(9,904)	(8,459)	(7,013)	(3,363)	(1,918)
<b>(282,714)</b>	<b>(284,086)</b>	<b>(285,459)</b>	<b>279,197</b>	<b>280,643</b>	<b>282,088</b>	<b>751,989</b>	<b>287,184</b>
(1,912,929)	(2,197,015)	(2,482,474)	(2,203,277)	(1,922,635)	(1,640,546)	(888,557)	(601,374)

**Appraisal 2**

**Detailed Cash flow Phase 1**

015:Aug 2020 (601,374)	016:Sep 2020 (312,745)	017:Oct 2020 (23,643)	018:Nov 2020 265,458	019:Dec 2020 554,560	020:Jan 2021 843,661
501,610	501,610	501,610	501,610	501,610	501,610
0	0	0	0	0	0
0	0	0	0	0	0
(12,540)	(12,540)	(12,540)	(12,540)	(12,540)	(12,540)
0	0	0	0	0	0
0	0	0	0	0	0
0	0	0	0	0	0
0	0	0	0	0	0
0	0	0	0	0	0
(136,305)	(136,305)	(136,305)	(136,305)	(136,305)	(136,305)
(15,256)	(15,256)	(15,256)	(15,256)	(15,256)	(15,256)
(7,736)	(7,736)	(7,736)	(7,736)	(7,736)	(7,736)
(15,930)	(15,930)	(15,930)	(15,930)	(15,930)	(15,930)
(1,165)	(1,165)	(1,165)	(1,165)	(1,165)	(1,165)
(7,965)	(7,965)	(7,965)	(7,965)	(7,965)	(7,965)
0	0	0	0	0	0
0	0	0	0	0	0
0	0	0	0	0	0
0	0	0	0	0	0
(1,593)	(1,593)	(1,593)	(1,593)	(1,593)	(1,593)
(14,018)	(14,018)	(14,018)	(14,018)	(14,018)	(14,018)
<b>289,102</b>	<b>289,102</b>	<b>289,102</b>	<b>289,102</b>	<b>289,102</b>	<b>289,102</b>
6.000%	6.000%	6.000%	6.000%	6.000%	6.000%
0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
(472)	0	0	0	0	0
<b>288,629</b>	<b>289,102</b>	<b>289,102</b>	<b>289,102</b>	<b>289,102</b>	<b>289,102</b>
(312,745)	(23,643)	265,458	554,560	843,661	1,132,763

## Appendix 7: Map of Live Sites



## **Appendix 8: Detailed Site Assessment**

Site Reference	Site Name	Site Address	Settlement	Post Code	Town Centre	Bolton Priority Category	Site Size (ha)	Net Site Area (SHLAA)	No. Dwellings proposed	Density Houses	Density Apartments	total house additions - 2018-2023	total apartment additions - 2018-2023	total house additions - 2023-2028	total apartment additions - 2023-2028	total house additions - 2028-2033	total apartment additions - 2028-2033	total house additions - 2033-2037	total apartment additions - 2033-2037	Planning Position	Brownfield/Greenfield	Ownership Status	Owner/Developer	Constraints Identified in the GMSF SHLAA	HM Land registry by ward GMSF	Housing Delivery Plan (HDP)	Turley Comments	Turley Conclusion	Turley Anticipated Delivery in years 6-15	Amount of affordable housing potential*	
1039-BOL	Urban Village	Urban Village 4 Pool Street	Halliwel	BL1 2BA	Bolton Town Centre Boundary	1	0.15	0.07	50	0	337.18	0	0	0	50	0	0	0	0	0	N/A	Greenfield	Mixed Ownership	Bolton Council		Less than 100,000	n/a	Long thin strip of land within Flood Zone 2. Contains outreach centre scrubland open space adjacent to a retaining wall/ high road	Site removed as it is unsuitable for residential development.	0	0
1055-BOL	Biz New Holder St	biz New Holder St	Halliwel	BL1 4SN	Bolton Town Centre Boundary	1	0.2	0.19	50	0	246.23	0	0	0	0	0	50	0	0	0	N/A	Brownfield	Not in public ownership			Less than 100,000	n/a	Historic Mill Building in a state of disrepair. Overgrown Yard. Contamination likely. Surrounded by industrial buildings.	Site in low value area, affordable housing not considered to be viable.	50	0
1045-BOL	King Street/Deansgate	King Street/Deansgate	Halliwel	BL1 2JR	Bolton Town Centre Boundary	1	0.22	0.11	50	0	226.73	0	0	0	50	0	0	0	0	0	N/A	Brownfield	Mixed Ownership	Bolton Council		less than 100,000	n/a	Former Post Office Building opposite has planning permission for apartments. Telephone kiosks opposite and St Helena building and bridge are listed. Currently in use as a car park and a sub station. Within AQMA.	Site in low value area, affordable housing not considered to be viable.	50	0
1053-BOL	Biz Spa Road	Biz Spa Road	Halliwel	BL1 4AG	Bolton Town Centre Boundary	1	0.24	0.12	50	0	205.55	0	0	0	0	0	50	0	0	0	N/A	Brownfield	Mixed Ownership	Bolton Council		less than 100,000	No Permission. Costs of development exceeds market value. Interventions proposed: D1, D2, D3, D4, D5, D6, P1, P2. Estimated cost of interventions £250,000.	Contains a derelict mill building and Bolton Lads and Girls club. TPO's to the east of the site. Land to the west of the site has a planning permission approved for 32 self contained apartments on 21/04/2015 this has now expired (53483/15)	Site in low value area, affordable housing not considered to be viable. HDP identifies that the cost of development exceeds market values. Without further evidence it is not 'realistic' to assume the interventions will be implemented.	0	0
1163-BOL	Land and premises at Jct of New Holder St/Garside St	Land and premises at Jct of New Holder St/Garside St	Halliwel	BL1 4SN	Bolton Town Centre Boundary		0.26		50	0	195.72	0	0	0	0	0	50	0	0	0	N/A	Brownfield	Not in public ownership			less than 100,000	n/a	Currently in use as Elite Storage. Land adjacent (to the east) had planning permission granted for erection of 293 apartments (94/48/15) which is a re-design of the implemented planning approval 74966/06. Decision issued 24/12/2015 and expired 24/12/2018.	Site in low value area, affordable housing not considered to be viable.	50	0
1582-BOL	Queen Street South	Queen Street South	Halliwel		Bolton Town Centre Boundary		0.26		58	0	226.59	0	0	0	58	0	0	0	0	0	N/A	Brownfield	Public ownership	Bolton Council	New additions 2016/17	Less than 100,000	n/a	Historic Building - likely to require conversion - currently in use as the Job Centre. Small parade of shops and some car parking included within the Bolton Town Centre Masterplan as 'mixed use' with educational shops to be provided at ground floor.	Site in low value area, affordable housing not considered to be viable.	58	0
822-BOL	The Withins Pub, Minthorpe Road	Minthorpe Road 1 - S11 - Breightmet	Breightmet	BL2 6PW			0.3		33	0	109.4	0	0	0	0	33	0	0	0	0	N/A	Brownfield	Not in public ownership	EI Group		£100,000 - £150,000	n/a	Currently in use as 'The Withins' pub. The pub had closed down and was for sale but re-opened in 2016 by EI Group. High density anticipated and not in keeping with the surrounding area (the estate opposite is approximately 32 dph which would reduce the dwelling yield to 10 dwellings).	Site removed due to recent re-opening and use by EI Group.	0	0
1143-BOL	Derby Mill	Derby Mill, Thomas Street	Rumworth	BL3 6JW			0.34		42	0	124.69	0	0	0	0	0	42	0	0	0	N/A	Brownfield	Not in public ownership		Existing employment uses need to relocate	less than 100,000	n/a	Currently in employment use with multiple leases including a scrap yard and tyre shop. Likely to be heavily contaminated. 5 companies active.	Site in low value area, affordable housing not considered to be viable.	42	0
1052-BOL	Biz Gas Street	Biz Gas Street	Halliwel	BL1 4TG	Bolton Town Centre Boundary	1	0.36	0.18	50	0	138.88	0	0	0	0	0	50	0	0	0	N/A	Brownfield	Mixed Ownership	Bolton Council		less than 100,000	No Permission. Costs of development exceeds market value. Interventions proposed: D1, D2, D3, D4, D5, D6, P1, P2. Estimated cost of interventions £250,000.	Multiple ownership and uses including a pub and a carwash. Remediation likely to be required. Opposite the Bolton bus station redevelopment. Outside the Town Centre Masterplan area.	Site in low value area, affordable housing not considered to be viable. HDP identifies that the cost of development exceeds market values. Without further evidence it is not 'realistic' to assume the interventions will be implemented.	0	0
1038-BOL	Urban Village	Urban Village 3 Chorley St	Halliwel	BL1 2BB	Bolton Town Centre Boundary	2	0.37	0.18	50	0	136.52	0	0	0	0	0	50	0	0	0	N/A	Brownfield	Not in public ownership			Less than 100,000	n/a	Within Flood Zone 2. Adjacent to other industrial uses - predominantly legacy industrial and storage uses. Town centre Masterplan does not identify residential development for this site. Retaining walls to the south. Existing buildings in situ.	Site in low value area, affordable housing not considered to be viable.	50	0
1040-BOL	Urban Village	Urban Village 5 St Helena S	Halliwel	BL1 4AD	Bolton Town Centre Boundary	1	0.44	0.12	35	78.76	0	0	0	35	0	0	0	0	0	0	N/A	Brownfield	Mixed Ownership	Bolton Council		less than 100,000	n/a	Predominantly located within Flood Zone 2 & Flood Zone 3. Grade 2 listed bridge and Grade 2 listed St Paul's building within close proximity. Currently laid out as a carpark. Significant tree coverage. Town centre Masterplan identifies this site for residential development and parkland. Predominantly used as a carpark. Southern part of the site has planning permission (assumed extant as pre-commencement conditions are discharged) for a 6 storey building with student accommodation for 48 students.	Site in low value area, affordable housing not considered to be viable.	35	0
1581-BOL	Cheade Square	Cheade Square	Halliwel		Bolton Town Centre Boundary		0.47		57	0	121.03	0	0	0	57	0	0	0	0	0	N/A	Brownfield	Mixed Ownership	Bolton Council	New additions 2016/17	Less than 100,000	n/a	Grade 2 listed civic centre adjacent to the site. Former petrol station currently derelict and unused. Identified in the Bolton Town Centre Masterplan for 50 'high end' dwellings.	Reduced by 7 dwellings to reflect the Town Centre Masterplan. Site in low value area, affordable housing not considered to be viable.	50	0
1081-BOL	Travis Perkins	Travis Perkins, Bark Street/ Chorley Street	Bolton	BL1 2BB	Bolton Town Centre Boundary	2	0.5	0.44	31	62.6	0	0	0	0	0	31	0	0	0	0	N/A	Brownfield	Not in public ownership		Existing employment uses need to relocate	less than 100,000	n/a	Within Flood Zone 2 and partially within Flood Zone 3. Former industrial building and yard in use as a builder's merchant - likely to require remediation. Adjacent to other industrial uses and storage uses. Site opposite has planning permission for residential use for the erection of 103 no. 1&2 bedroom apartments and 16 3&4 bed town houses - this has been implemented and started. The first floor has been granted Planning Permission to change from offices to a Place of Worship 03699/18. The first floor has been granted permission for B1/B2/B8 uses but was vacant between 2015 and 2018. Town centre Masterplan does not identify residential development for this site.	Site removed due to multiple active uses and PLC tenant.	0	0
1042-BOL	Central Street	Central Street	Halliwel		Bolton Town Centre Boundary	1	0.63	0.63	130	157.71	47.31	100	30	0	0	0	0	0	0	0	N/A	Brownfield	Mixed Ownership	Bolton Council	Contaminated land and existing uses including car parking. PA by end of 2018, start Spring 2019, complete by end 2020/early 2021	Less than 100,000	n/a	Northern parcel is in Flood Zone 2. Grade 2 listed building to the east. Currently in use as a carpark. Bolton Town Centre Framework identifies two residential development blocks on this site.	Site in low value area, affordable housing not considered to be viable.	130	0
1610-BOL	Pool Street/Bark Street	Pool Street/Bark Street	Halliwel		Bolton Town Centre Boundary	2	0.66		100	113.09	37.7	75	25	0	0	0	0	0	0	0	N/A	Brownfield	Not in public ownership		PSP bringing site to the market. PA Spring 2019, start late summer 2019	Less than 100,000	n/a	Within Flood Zone 2. Listed St Helena Mill building to the south. Primarily in use as carpark land and old mill buildings.	Site in low value area, affordable housing not considered to be viable.	100	0
1337-BOL	Land at Hall Lane	Land at Hall Lane, Whitley St/Loxham St	Farnworth	BL3 2PZ		3	0.67		46	28.17	40.04	0	0	19	27	0	0	0	0	0	N/A	Brownfield	Not in public ownership		Recent expiry	less than 100,000	Outline permission, not deliverable. Cost of development exceeds market value even with no land value. D1, D2, D3, D4, D5, D6, D7, P1, P2. Estimated costs of interventions: £230,000.	In use by Benchmark Builder's Merchants. Outline Planning permission granted (88255/12) for demolition of buildings followed by residential development of 19 dwellings and 27 apartments - approved 3/4/2014 and expired 3/4/2017. Off site affordable housing contribution of: £84,044.80.	Site in low value area, affordable housing not considered to be viable. HDP identifies that the cost of development exceeds the cost of development even with no land value. Without further evidence it is not 'realistic' to assume the interventions will be implemented.	0	0
1056-BOL	BIZ Spa Road	BIZ Spa Road	Halliwel	BL1 4SR	Bolton Town Centre Boundary	1	0.72		75	103.6	0	0	0	0	75	0	0	0	0	0	N/A	Brownfield	Not in public ownership			Less than 100,000	n/a	Currently an industrial area. Partly in use as United Utilities, part in use as a dental surgery, part in use as a granite warehouse. Historic mill building. Several regeneration sites surrounding the site.	Site in low value area, affordable housing not considered to be viable.	75	0

Site Reference	Site Name	Site Address	Settlement	Post Code	Town Centre	Bolton Priority Category	Site Size (ha)	Net Site Area (SHLAA)	No. Dwellings proposed	Density Houses	Density Apartments	total house additions - 2018-2023	total apartment additions - 2018-2023	total house additions - 2023-2028	total apartment additions - 2023-2028	total house additions - 2028-2033	total apartment additions - 2028-2033	total house additions - 2033-2037	total apartment additions - 2033-2037	Planning Position	Brownfield/Greenfield	Ownership Status	Owner/Developer	Constraints identified in the GMSF SHLAA	HM Land registry by ward GMSF	Housing Delivery Plan (HDP)	Turley Comments	Turley Conclusion	Turley Anticipated Delivery in years 6-15	Amount of affordable housing potential.*
144-BOL	Stanley Wharf Business Centre/ Stanley Mill Wharf Mill	Wharf Mill, Kirkbrook Road	Hulton	BL3 4JE			0.72	0.65	32	44.28	0	0	0	0	32	0	0	0	0	N/A	Brownfield	Not in public ownership		Existing employment uses need to relocate	less than 100,000	n/a	Following active businesses: Direct supply limited (Units 1-9) N A Frozen Foods (Unit 2A) Bodyworx Gym (Unit 12) Bolton Halal Meat & poultry Limited (Unit 11) 2 leases were signed in 2015 Likely to require remediation Surrounded by residential development.	Site in low value area, affordable housing not considered to be viable.	32	0
1338-BOL	Hallwell Mills	Hallwell Mills, Raglan Street/ Bertha Street	Crompton	BL1 8AH			0.85		38	44.63	0	0	38	0	0	0	0	0	0	N/A	Brownfield	Not in public ownership		Existing employment uses need to relocate. Recent expiry	£100,000 - £150,000	Outline permission, deliverable Cost of development exceeds market value Interventions proposed: D1, D2, D3, D4, D5, D6, P1, P2 Estimated cost of intervention cost: £190,000	Outline Planning Permission (ref: 92717/14) was granted for redevelopment of the site for residential use - expires 25/11/2019 - No RM has been submitted to date. Currently in employment use with multiple leases: 6 were signed in 2015/2016 for at least 5 years. Permission granted for change of use from car park to carwash 01168/17 Permission Granted for change of use from joiners workshop to Gym 94874/15 Significant fire on the site in 2016 - remediation would be required	Cost of development exceeds market value, requires market interventions. Without further evidence it is not 'realistic' to assume the interventions will be implemented.	0	0
127-BOL	Land to the rear of Hallwell Mills	Land to the rear of Hallwell Mills, Raglan Street,	Crompton	BL1 6NP		2	0.93	0.84	42	0	45.01	0	0	42	0	0	0	0	0	N/A	Brownfield	Not in public ownership			£100,000 - £150,000	n/a	Land identified as Woodland Habitat on the GMSF map with a score of 16. Topographical constraints. Heavily wooded site.	Site removed - considered unsuitable for ecological reasons.	0	0
158-BOL	Land off Wigan Road	Land off Wigan Road	Westhoughton South	BL5 2AS		2	1.01	0.9	54	53.69	0	0	0	54	0	0	0	0	0	N/A	Brownfield	Not in public ownership	Firwood timber and builders merchants		Medium £150,000 - £300,000	n/a	River running through the site Part of the site is covered by TPOs In use as Firwood timber and builders merchants which has been in business for over 40 years	No Comment	54	16
966-BOL	Roxalina Street	Roxalina Street - s39	Great Lever	BL3 6UP		2	1.06	0.95	47	44.43	0	0	47	0	0	0	0	0	0	N/A	Greenfield	Public ownership	Bolton Council		Less than 100,000	No permission Cost of development exceeds market value Interventions proposed: D1, D2, D3, D4, D5, D6, P1, P2 Estimated cost of interventions: £240,000	Currently comprises open space between two residential areas. Contains significant amounts of trees.	Cost of development exceeds market value. Without further evidence it is not 'realistic' to assume the interventions will be implemented.	0	14
1580-BOL	Bolton Bus Station Redevelopment	Bolton Bus Station Redevelopment	Hallwell		Bolton Town Centre Boundary		1.06		63	0	59.67	0	0	63	0	0	0	0	0	N/A	Brownfield	Mixed Ownership	Bolton Council	New additions 2016/17	Less than 100,000	n/a	Town Centre Masterplan identifies a gridded structure with active ground floor uses and residential development above. Grade 2 listed civic centre is visible from the former bus station Bus station has been demolished	Site in low value area, affordable housing not considered to be viable.	63	0
1105-BOL	Land North of Radcliffe Road	Land North of Radcliffe Road, rear of 747	Breighmet	BL2 6TS		2	1.15	1.03	51	44.52	0	0	51	0	0	0	0	0	0	N/A	Greenfield	Public ownership	Bolton Council		Less than 100,000	No permission Viable development where the market value exceeds the cost plus developer's profit Interventions proposed: D1, D2, D3, D4, D5, D6, P1, P2 Estimated cost of interventions: £260,000	Open space adjacent to woodland Contains PROW	No Comment	51	15
747-BOL	Redgate Way	Redgate Way - 014C	Harper Green	BL4 0NG		3	1.19	1.98	99	83.05	0	0	99	0	0	0	0	0	0	N/A	Brownfield	Public ownership	Royal Bolton Hospital		£100,000 - £150,000	No permission Viable development where the market value exceeds the cost plus developer's profit Theoretically viable but, for a variety of reasons, involve challenges Interventions proposed: D1, D2, D3, D4, D5, D6, P1, P2 Estimated cost of interventions: £350,000	Comprises three NHS carparks at the entrance to the Hospital com TPOs to the east of the site	Site in use and no evidence provided to demonstrate these sites are surplus to requirement.	0	0
1036-BOL	Urban Village	Urban Village, 1 Chorley St N	Hallwell	BL1 4AN		Bolton Town Centre Boundary	3	1.26	75	59.7	0	0	0	75	0	0	0	0	0	N/A	Brownfield	Mixed Ownership	Bolton Council	Existing employment uses need to relocate	Less than 100,000	n/a	In existing mixed use including: houses, shops, Autocare Car Garages, Serious Law LLP offices, The Sensory Centre and several well used small industrial units Opposite a Grade 2 listed buildings (97 and 99 Chorley Street) Eastern side of the site is within Flood Zone 2 Adjacent to but outside the town centre framework boundary Several leases signed in 2017/2018 and some do not expire until 2027/2028	Removed due to active site status and existing lease position	0	0
1048-BOL	Breighmet Street	Breighmet Street	Great Lever	BL1 1ET		Bolton Town Centre Boundary	1	2.08	235	24.01	88.82	0	0	50	185	0	0	0	0	N/A	Brownfield	Public ownership	Bolton Council	Existing car park use - Site extended in 2016/17	Less than 100,000	n/a	In use as a carpark to the north and vacant brownfield land to the south. Identified within the town centre masterplan as Trinity Quarter Residential (3)	Site in low value area, affordable housing not considered to be viable.	0	0
1555-BOL	Sunset Business Park	Sunset Business Park, Manchester Road	Kearsley	BL4 8RH			2.22		90	40.55	0	0	0	0	90	0	0	0	0	N/A	Brownfield	Not in public ownership			£100,000 - £150,000	n/a	8 active businesses within the business park Overhead lines	No comment	90	27
1332-BOL	Radcliffe Road Caravan Storage Site	Radcliffe Road Caravan Storage Site, Radcliffe Road	Breighmet	BL3 1AN			2	2.41	108	44.73	0	0	108	0	0	0	0	0	0	N/A	Brownfield	Not in public ownership			£100,000 - £150,000	n/a	In use as a caravan storage yard Adjacent to the GB contains ponds and drains and substantial tree cover close to an existing pig farm	No Comment	108	32
1579-BOL	Trinity Quarter Core	Trinity Quarter Core Shiffhall St/Carton St/Salop St	Great Lever			Bolton Town Centre Boundary	2.72		253	46.64	46.27	0	0	127	126	0	0	0	0	N/A	Brownfield	Not in public ownership		New additions 2016/17	Less than 100,000	n/a	Identified within the town centre masterplan as Trinity Quarter Residential (3) for mixed use development with several retained buildings. Collection of Mill Buildings of varying quality and condition Many of those of higher quality are expected to be retained The proposed new buildings are proposed on the car park spaces	Site in low value area, affordable housing not considered to be viable.	272	0
1559-BOL	Hoover Candy	Hoover Candy Site, Breighmet Fold Lane	Breighmet	BL2 6PS			4.6		180	39.1	0	0	0	0	180	0	0	0	0	N/A	Brownfield	Not in public ownership			£100,000 - £150,000	n/a	Would require re-location of existing use. Use is in use by Hoover Candy Group. Adjacent to existing industrial uses and residential uses. First industrial unit on the industrial estate.	Site removed due to multiple active uses and PLC tenant.	0	0
<b>Total:</b>									<b>2324</b>	<b>175</b>	<b>55</b>	<b>628</b>	<b>658</b>	<b>516</b>	<b>292</b>	<b>0</b>	<b>0</b>											<b>1360</b>	<b>104</b>	

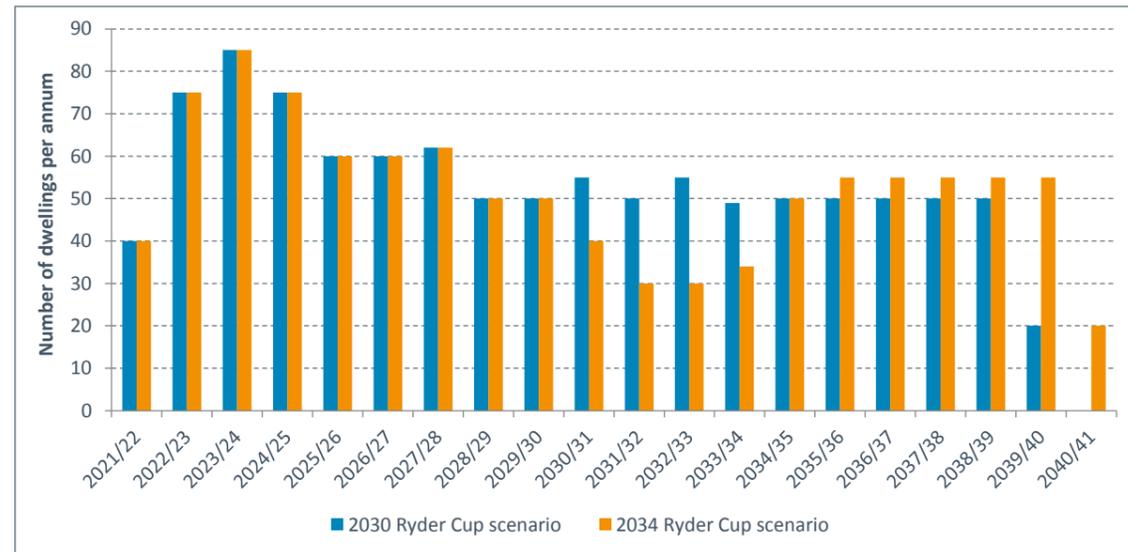
**Turley Office**  
1 New York Street  
Manchester  
M1 4HD

T 0161 233 7676

## **Appendix 6: Illustrative phasing and delivery trajectory for the residential development**

**Hulton Park: Illustrative residential development delivery trajectory**  
03 September 2019

		Estimated Yield	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	TOTAL
2030 Ryder Cup scenario	Phase 1 (Dearden's Farm)	192	20	30	30	30	30	30	22														192
	Phase 2 (Park End Farm)	85	20	25	25	15																	85
	Phase 3 (Western Fields north)	389		20	30	30	30	30	40	50	50	40	30	30	9								389
	Phase 4 (Western Fields south)	370										15	20	25	40	50	50	50	50	50	50	20	370
	TOTAL	1,036	40	75	85	75	60	60	62	50	50	55	50	55	49	50	50	50	50	50	50	20	1,036
	CUMULATIVE TOTAL	-	40	115	200	275	335	395	457	507	557	612	662	717	766	816	866	916	966	1,016	1,036		-
2034 Ryder Cup scenario	Phase 1 (Dearden's Farm)	192	20	30	30	30	30	30	22														192
	Phase 2 (Park End Farm)	85	20	25	25	15																	85
	Phase 3 (Western Fields north)	389		20	30	30	30	30	40	50	50	40	30	30	9								389
	Phase 4 (Western Fields south)	370												25	50	55	55	55	55	55	55	20	370
	TOTAL	1,036	40	75	85	75	60	60	62	50	50	40	30	30	34	50	55	55	55	55	55	20	1,036
	CUMULATIVE TOTAL	-	40	115	200	275	335	395	457	507	557	597	627	657	691	741	796	851	906	961	1,016	1,036	-



## **Appendix 7: Off-site paths condition survey and potential upgrades**



## Hulton Park

Off-site paths condition survey  
and potential upgrades



February 2018



Canada House  
3 Chepstow Street  
Manchester  
M1 5FW

T: 0161 228 7721  
E: [mail@randallthorp.co.uk](mailto:mail@randallthorp.co.uk)  
[www.randallthorp.co.uk](http://www.randallthorp.co.uk)

Project/ doc reference	-
Document date	27.02.2018
Author	BH / GH
Checker	LC
QM Status	Checked
Product Status	Confidential client issue

## Contents

Introduction

PRoW - WES 136

PRoW - ATH 28

PRoW - WES 127

Spa Road

Subway link

Applicable locations of indicative sketches

## Introduction

Following consultation on the proposals for The Hulton Park development and the Hulton Trail proposals within, Wigan Metropolitan Borough Council (WMBC) and Bolton Council have suggested that various PRoWs to the south of the proposed development site and existing links to Hag Fold Train Station and the subway link from Greendale Road, are improved.

Atherton 28, WES 136 and WES 127 together with the land north of the subway link from Greendale are requested as being enhanced to bridleway status. Spa Road has also been identified as a 'ROWIP' route identified as potential bridleway'.

Randall Thorp have visited the site to assess the current condition of these paths and highways.

A photographic survey has been carried out to provide a record of the corridors within which the paths sit, and to propose how paths might be improved, together with an assessment of whether bridleway status is practicable.

Sustrans Design Manual Chapter 5 – Traffic free routes: Conceptual Design December 2014 and The British Horse Society provide best practice guidance as follows;

- Segregated routes in urban fringe areas

Minimum 3.0m width for horses with 1.0m clear verge on either side.

Minimum 3.0m width for shared use cyclists and pedestrians with 0.5m clear verge on either side.

Minimum 2.0m width for pedestrians only with 0.5m clear verge on either side.

- Shared routes in urban fringe areas

Minimum 5.5m width for shared pedestrian, cyclist and equestrian use with 1.0m clear verge on either side.

Underpasses should allow a minimum of 3.4m. While the society seeks the desirable height for underpasses, in exceptional circumstances a lower height may be tolerated. The absolute minimum would be two metres. When a lower height is locally agreed as acceptable, riders would be expected to dismount. A mounting block should be provided at either end.

not to scale



## PRoW - WES 136 (approx 250m)

This existing PROW does change in width and boundary treatment along its length, however there is consistently a clear space of 5m between boundaries which would allow for a 3.0m wide path with 1.0 m verges on either side. There is no discernible surface to the path but drainage appears to be satisfactory and conditions under foot are reasonable with no standing water present. The path terminates at the eastern end at the north / south permissive route section of the Hulton Trail which is not proposed to be for equestrian use.

There are no existing or proposed bridleway connections at either end of the existing footpath. The creation of a bridleway between these points may therefore be considered of little benefit for users.

### Potential footpath improvement

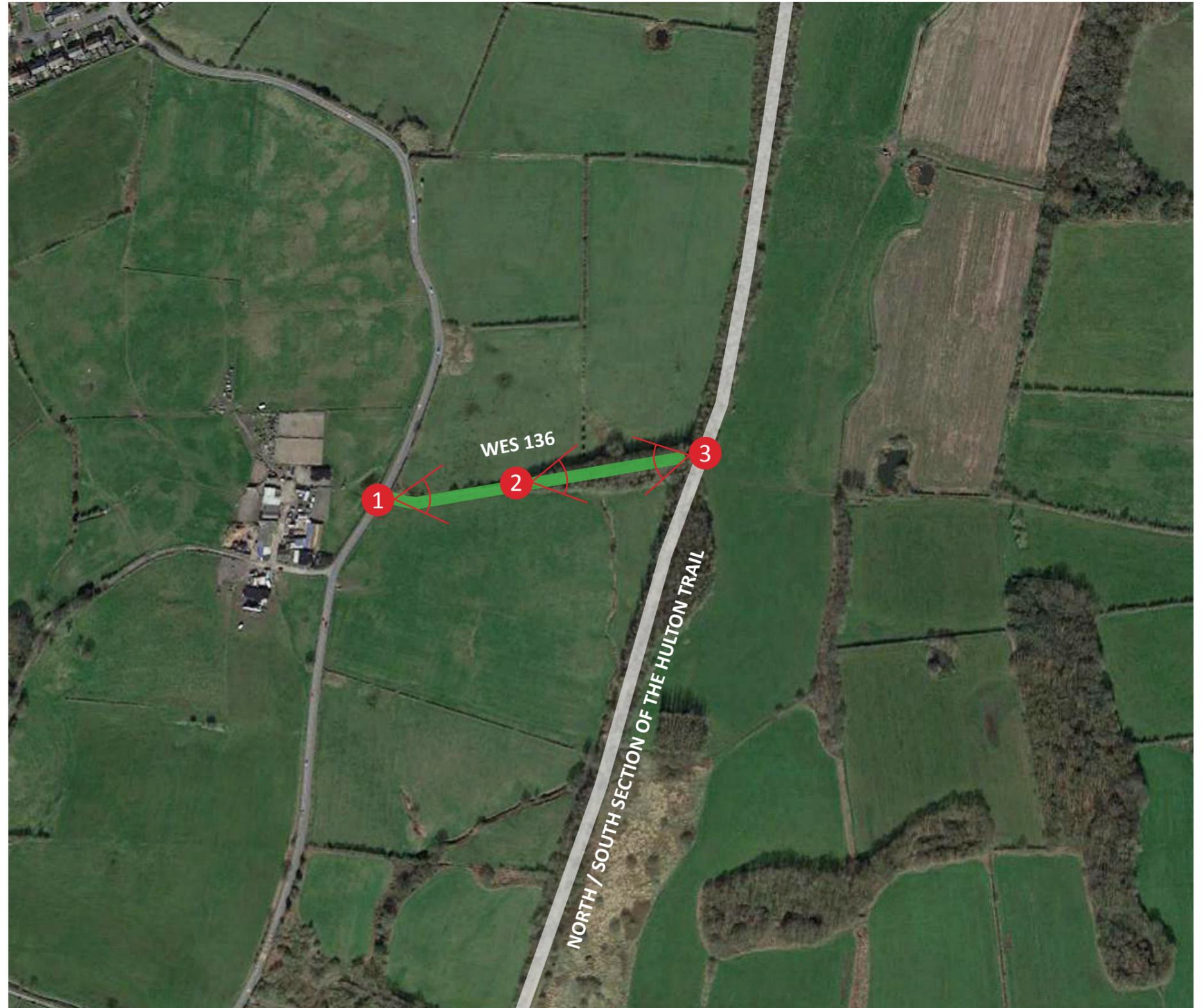
Signage

### Improvements to permit bridleway / equestrian use

Signage

Provision of a 3.0m wide rolled stone path with drainage.

Mounting block



not to scale



## PRoW - ATH 28 (approx. 880m)

The condition and settings of this footpath vary greatly along its length ranging from field boundary to urban fringe, public open space and an enclosed woodland setting.

The eastern end starts as a wide surfaced 3.0m wide path within a corridor of approx 6m width, ideal for bridleway use. The route soon narrows considerably bounded by rear property boundaries to the south and woodland to the north to become a narrow unsurfaced path approximately 1m wide including a short bridge crossing. The path emerges on to an area of open grass for a section where the route could easily be widened before again becoming restricted on both sides by property boundaries, landform and vegetation.

The presence of an existing wet ditch adjacent to the path along sections indicates that this is part of a wider drainage network. Areas of standing water suggest that the network is compromised and that work may have to be carried out in order to restore and maintain the system.

### Potential footpath improvement

Vegetation clearance required throughout to create an unobstructed corridor 3m wide.

Construction of a 2m wide rolled stone path with timber edging and drainage in areas where existing surface is poor (approx 1/3 of length). Maintain and restore existing drainage system.

Create new connection between ATH 28 and Spa Road at the location shown.

### Improvements to permit bridleway / equestrian use

Significant tree felling and vegetation clearance to the north of the path to allow a 7.5m wide corridor. In some sections cutting into the existing slope would be necessary to achieve this width, and ground retained as necessary. A 5.5m wide rolled stone path with timber edging and drainage would have to be built to create a satisfactory surface. The existing ditch would need to be filled in order to achieve the necessary width, and a new culverted drain installed. Maintain and restore existing drainage system.

The existing bridge would need to be removed and replaced with a wider, horse friendly structure.



not to scale





4



5



6

## PRoW - WES 127 (approx. 150m)

This footpath predominantly runs through woodland and is restricted on both sites by vegetation. There is no path surface and drainage is very poor with muddy under-foot conditions and a number of areas of standing water present.

### Potential footpath improvement

Some vegetation clearance where possible to create a wider unobstructed corridor 3m wide.

Construction of a 2m wide rolled stone path with timber edging and drainage.

### Improvements to permit bridleway / equestrian use

Significant tree felling and vegetation clearance on both sides of the path to allow a 7.5m wide corridor. In some sections cutting into the existing slope would be necessary to achieve this width, and ground retained as necessary. A 5.5m wide rolled stone path with timber edging and drainage would have to be built to create a satisfactory surface.



not to scale

1



2



3



## Spa Road (approx. 1,080m)

Spa Road has been earmarked by Wigan Council as a 'ROWIP route identified as potential bridleway'. It is unclear whether these aspirations refer to simply designating the existing route to bridleway or to provide an improved segregated route specifically for bridleway use.

The site inspection revealed the following; Spa Road is a public highway flanked on both sides by footways of varying widths. There is not sufficient space to create a segregated bridleway route following the road. A green space exists at the most northerly point of Spa Road and this offers an opportunity to create a new link from Spa Road to ATH 28 and subsequently the Hulton Trail.

The public highway is available for use by horses - albeit, asphalt is not a preferred surface. The British Horse Society indicates a preference for a tar spray and chip treatment to existing sealed surfaces to provide additional grip. The footways adjacent to the highway are wide enough in some areas to be designated as bridleway, however there are numerous instances where the path narrows to an unsuitable width. Residents also use the footways for keeping bins on collection day and car parking outside their properties where in-curtilage parking is not available. These activities result in the useful width of the footway being reduced considerably.

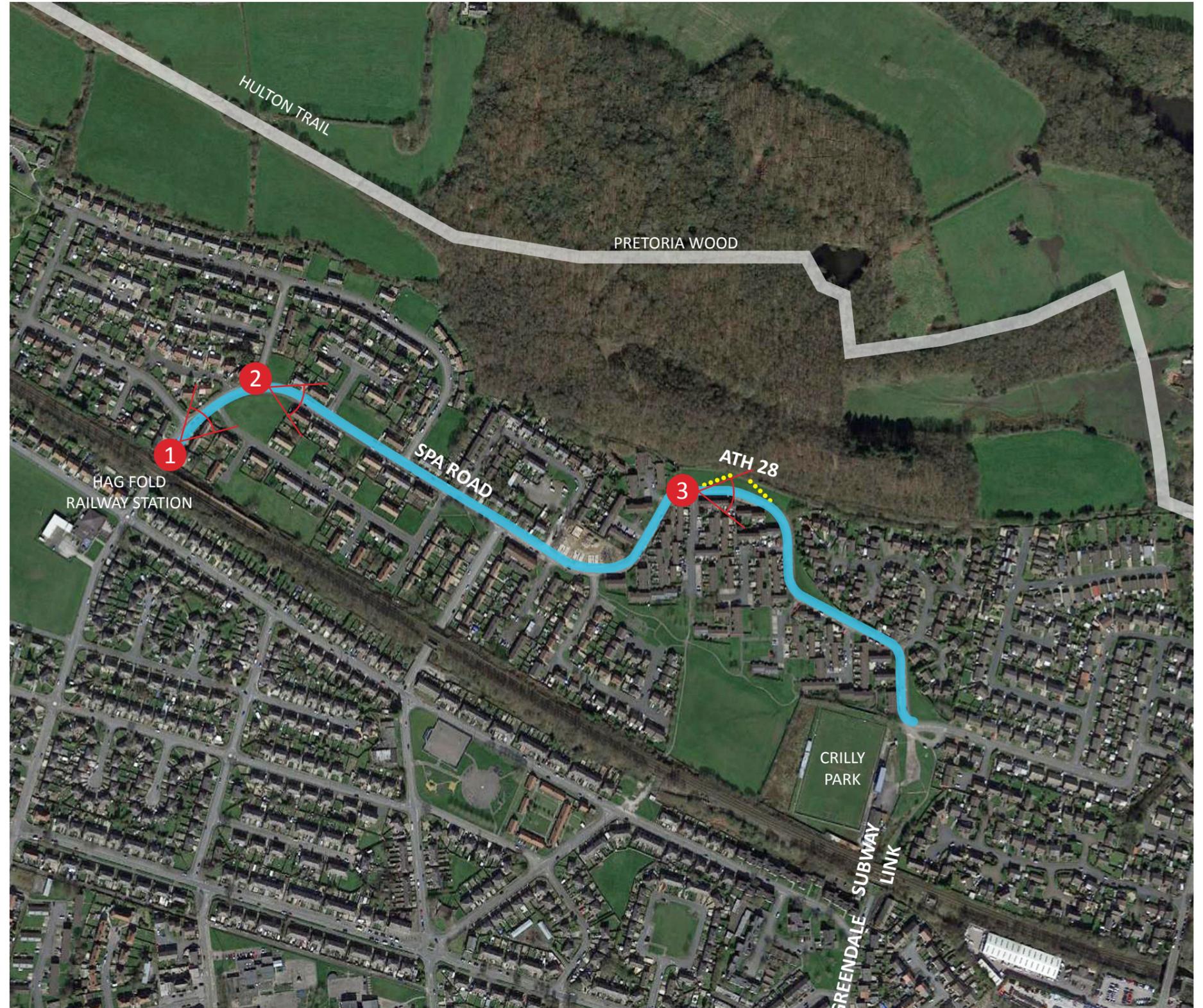
Due to the restrictions described above, it is not possible to physically improve Spa Road or its footways to achieve the parameters required for bridleway use.

### Potential footpath improvement

Signage from both Hag Fold Station and Greendale Road would significantly help users orientate themselves and access the footpath network more easily.

Painting symbols on the road surface would also make other users aware that there is an equestrian route present.

Create a new connection between ATH 28 and Spa road at the location shown.



not to scale

1



2



3



## Subway link (approx. 140m)

The subway link at Greendale Road offers an opportunity to improve the existing journey from housing further south to Hulton Park.

There is currently a 1.2m wide macadam path linking Greendale Road through to Hillside Avenue via a wide green corridor (and beneath the railway) in front of the recreation ground. The underpass has a height clearance of approximately 3.0m.

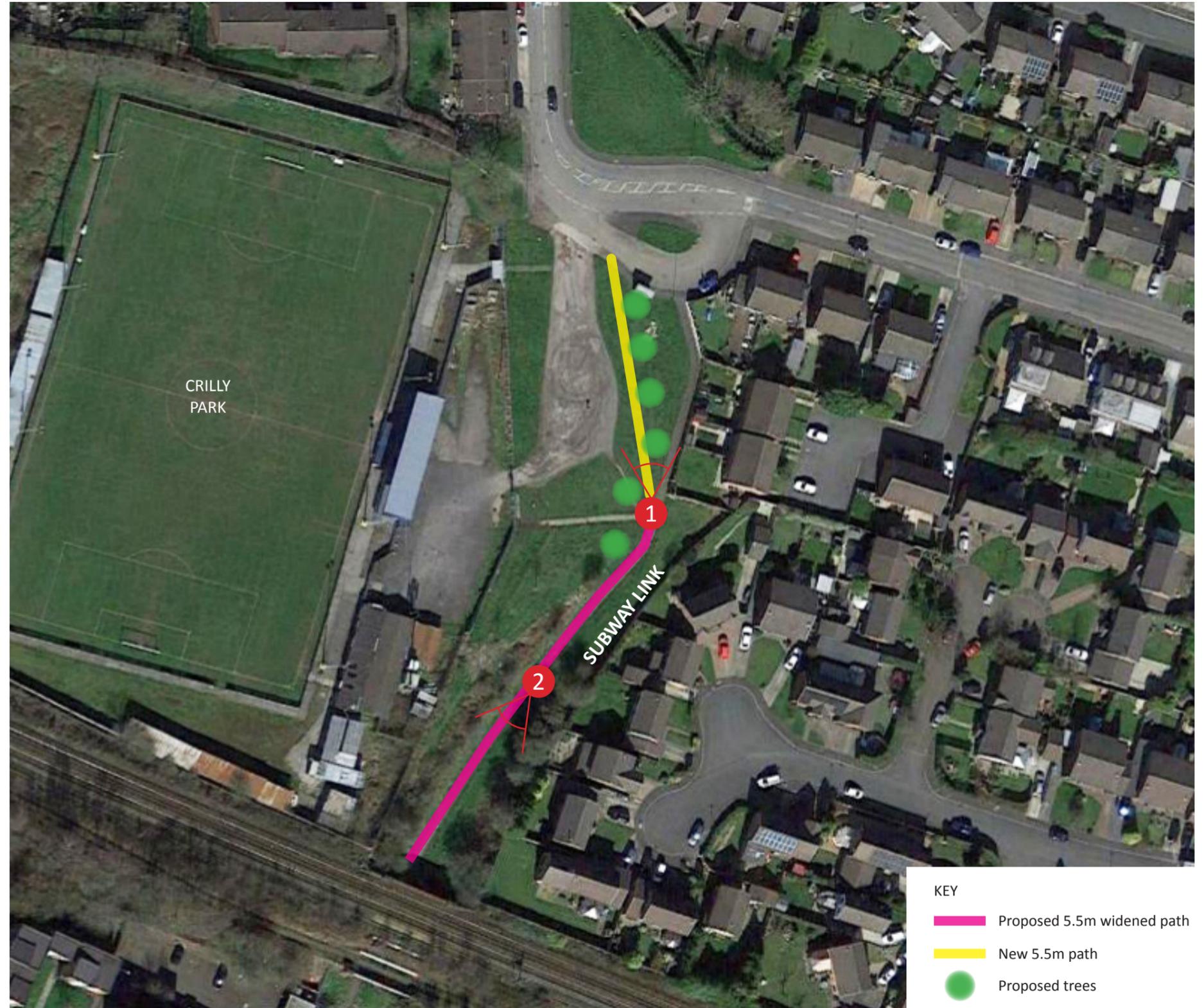
### Improvements to permit bridleway / equestrian use

A combination of widening the existing path to 5.5m where possible and the construction of a new 5.5m wide path will allow combined cycle, pedestrian and equestrian use in line with British Horse Society recommendations. Ideally the surface should be treated with a tar spray and chip to provide grip for horses.

Standard tree planting will create a more pleasant environment for the users and new signage would help to orientate and inform the user of the footpath links to the north.

The underpass has a clearance of approximately 3m which is less than the British Horse Society desirable height of 3.4m. When a lower height is locally agreed as acceptable, riders would be expected to dismount. A mounting block should be provided at either end.

Removal of barriers at Greendale Road.



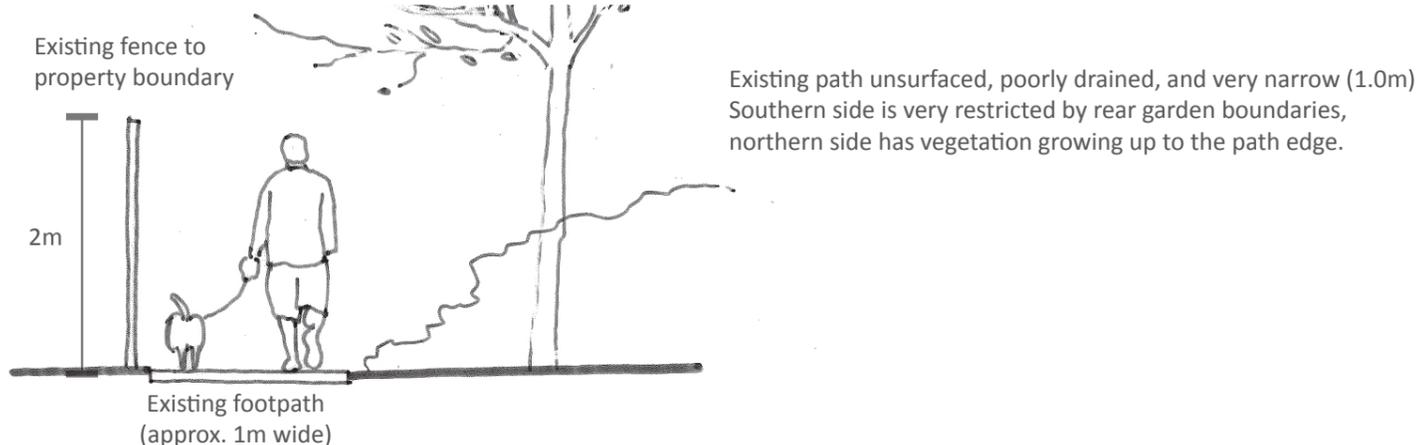
not to scale



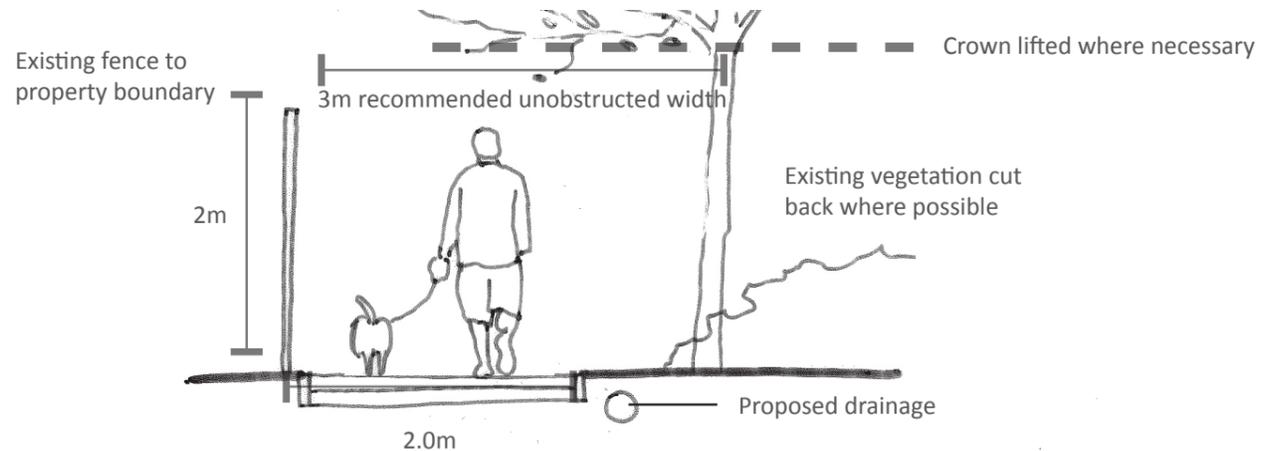
Applicable locations of indicative cross sections



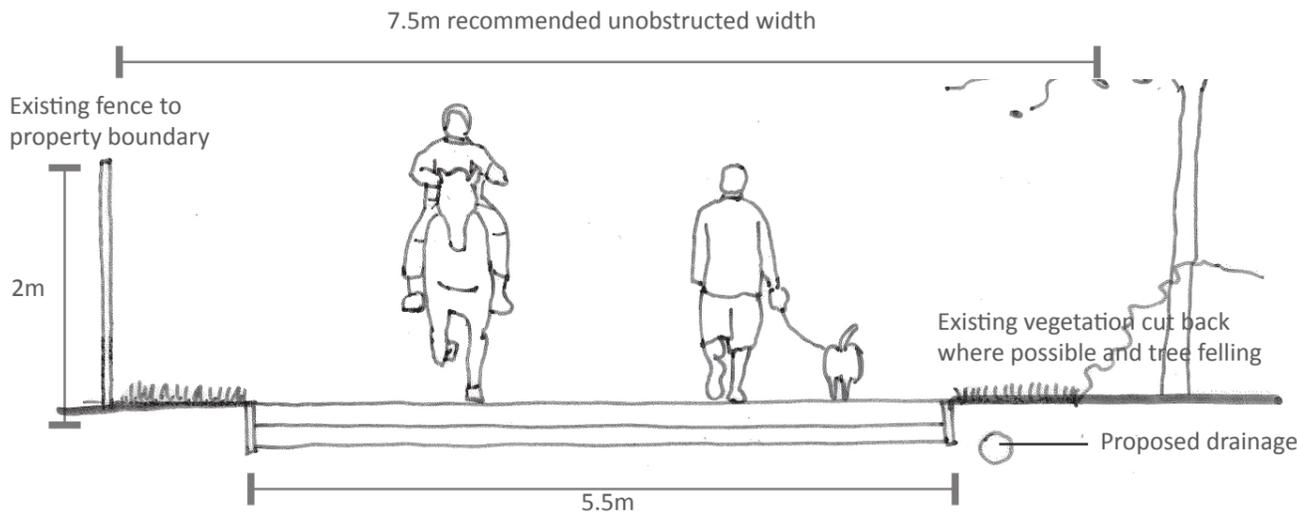
S1



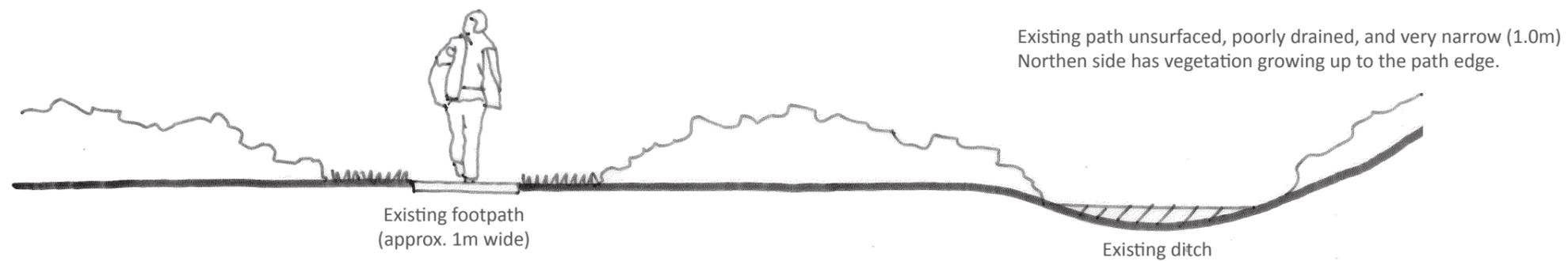
ATH 28 section 1 Indicative cross section of existing footpath



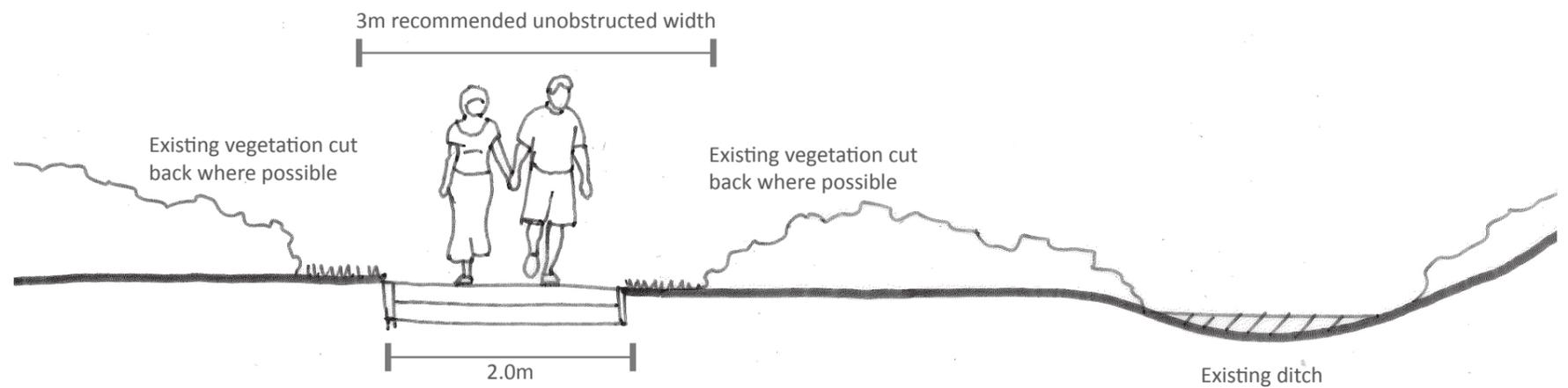
ATH 28 section 1 Option 1 - Potential upgrade to 2.0m wide footpath



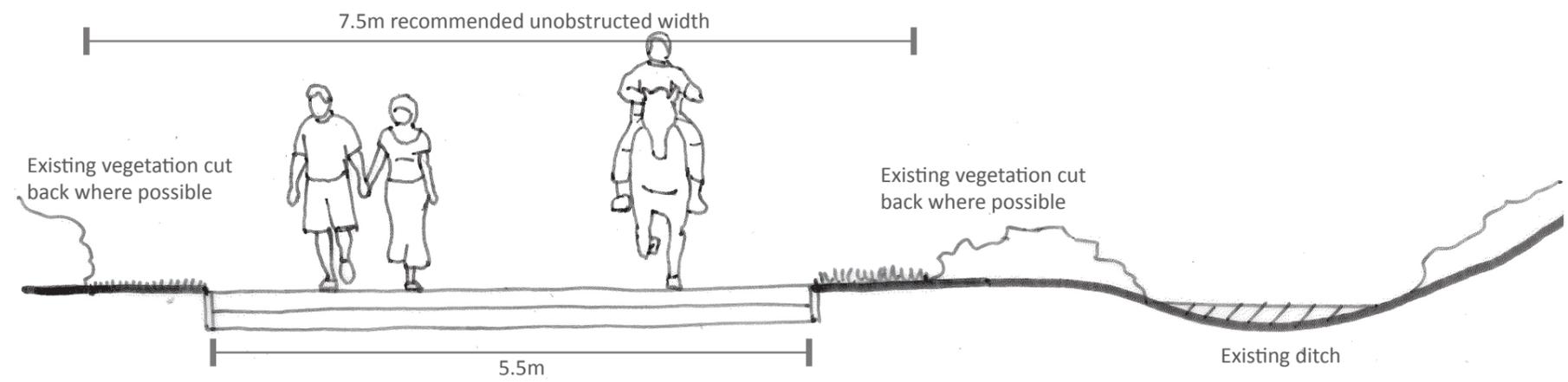
ATH 28 section 1 Option 2 - Potential upgrade to 5.5m wide bridleway with 1m verges on both sides



ATH 28 section 2 Indicative cross section of existing footpath

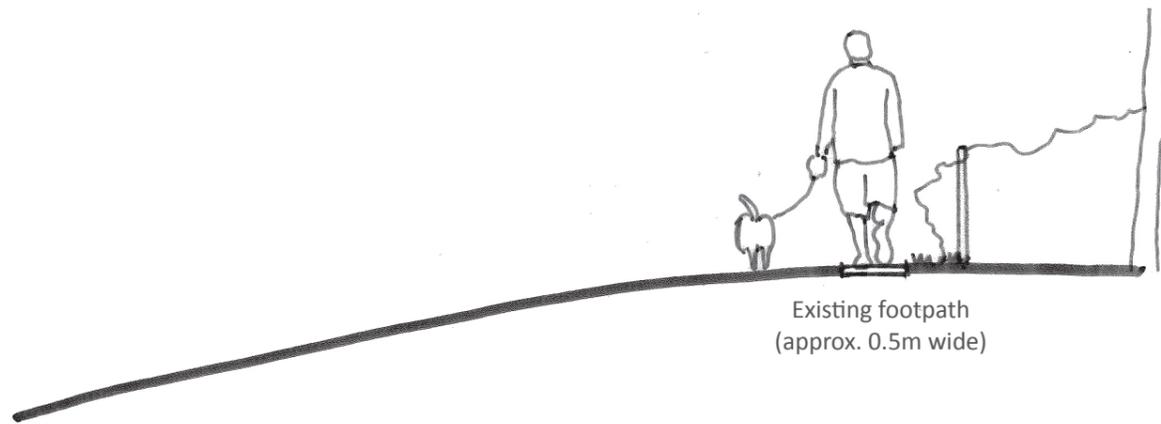


ATH 28 section 2 Option 1 - Potential upgrade to 2.0m wide footpath



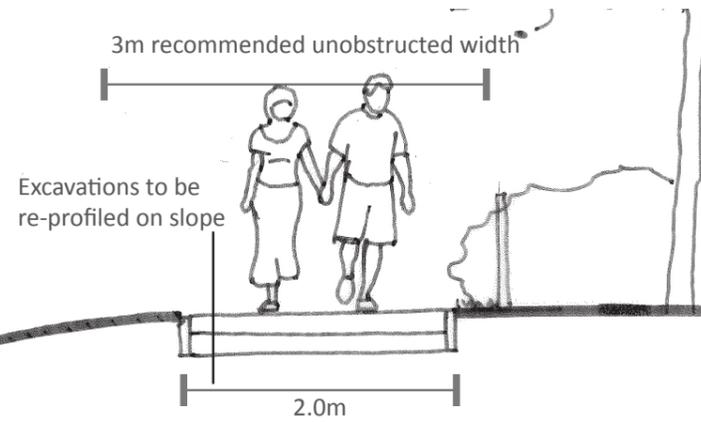
ATH 28 section 2 Option 2 - Potential upgrade to 5.5m wide bridleway with 1m verges on both sides

Existing path unsurfaced and very narrow (0.5m)  
Northern side has vegetation growing up to the path edge.



Existing footpath  
(approx. 0.5m wide)

ATH 28 section 3 Indicative cross section of existing footpath

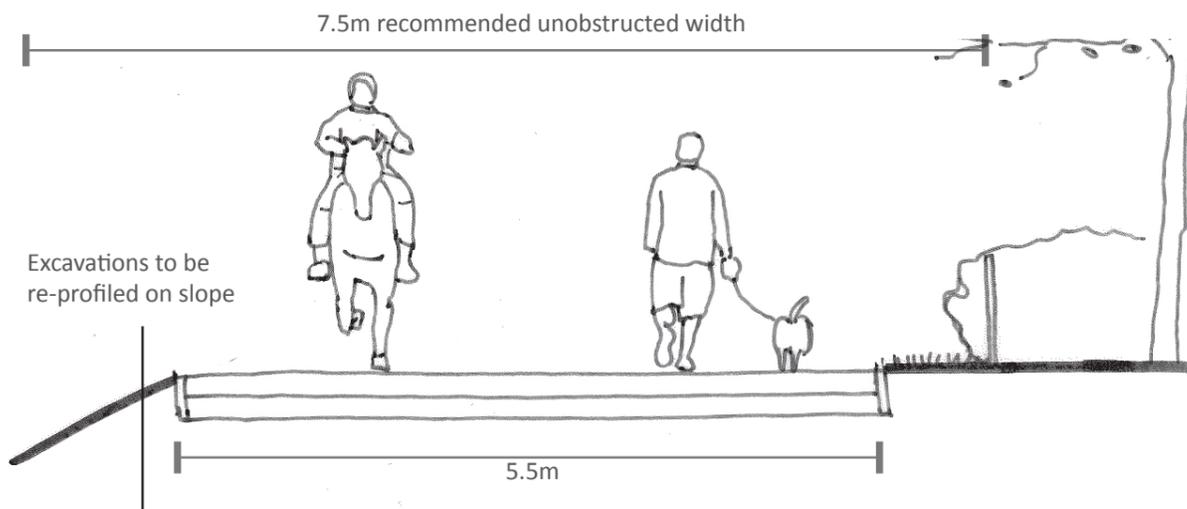


3m recommended unobstructed width

Excavations to be  
re-profiled on slope

2.0m

ATH 28 section 3 Option 1 - Potential upgrade to 2.0m wide footpath

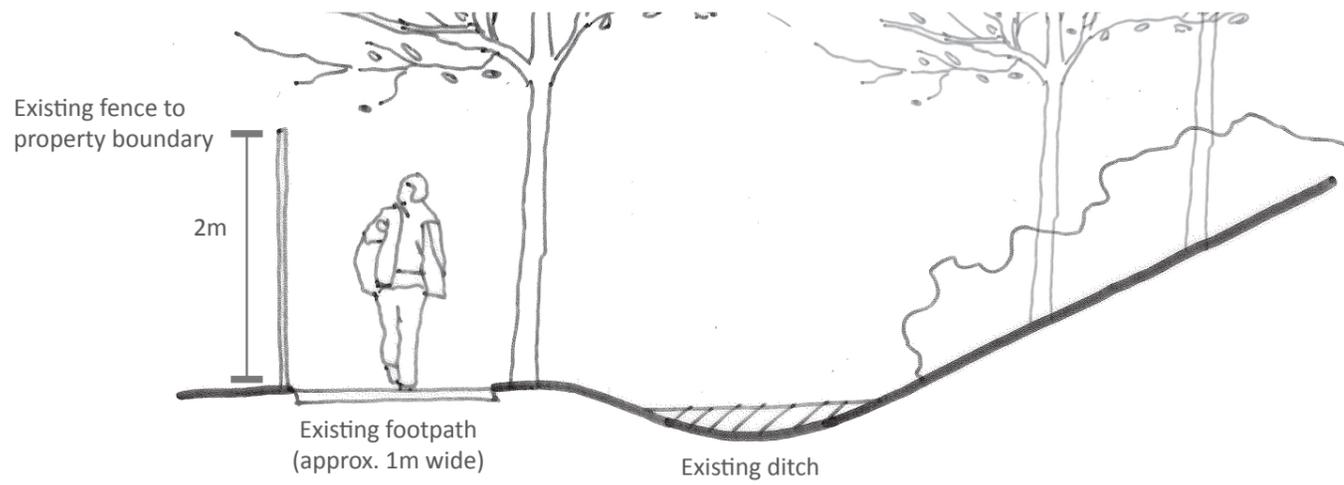


7.5m recommended unobstructed width

Excavations to be  
re-profiled on slope

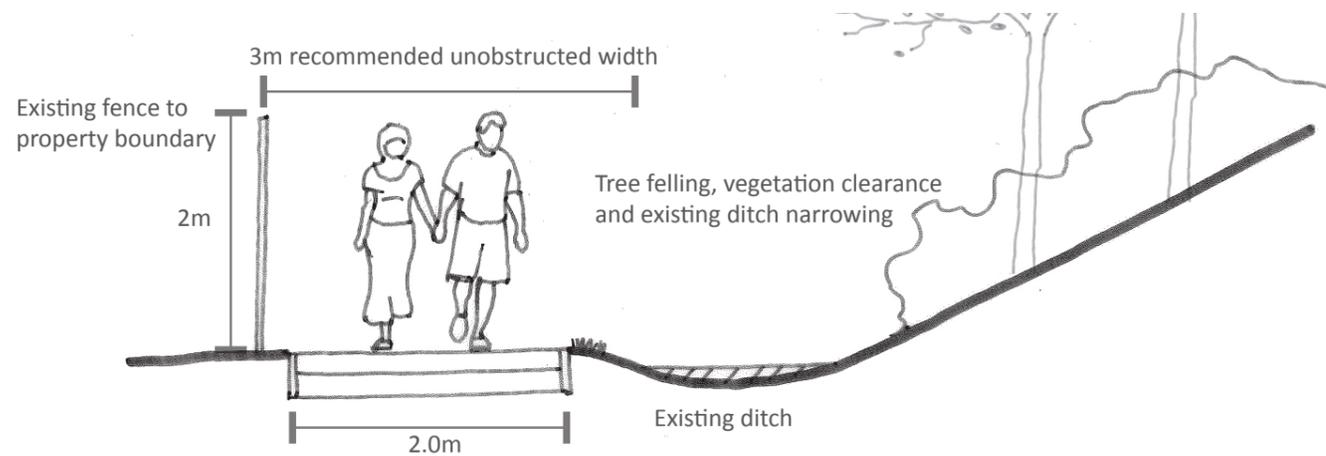
5.5m

ATH 28 section 3 Option 2 - Potential upgrade to 5.5m wide bridleway with 1m verges on both sides

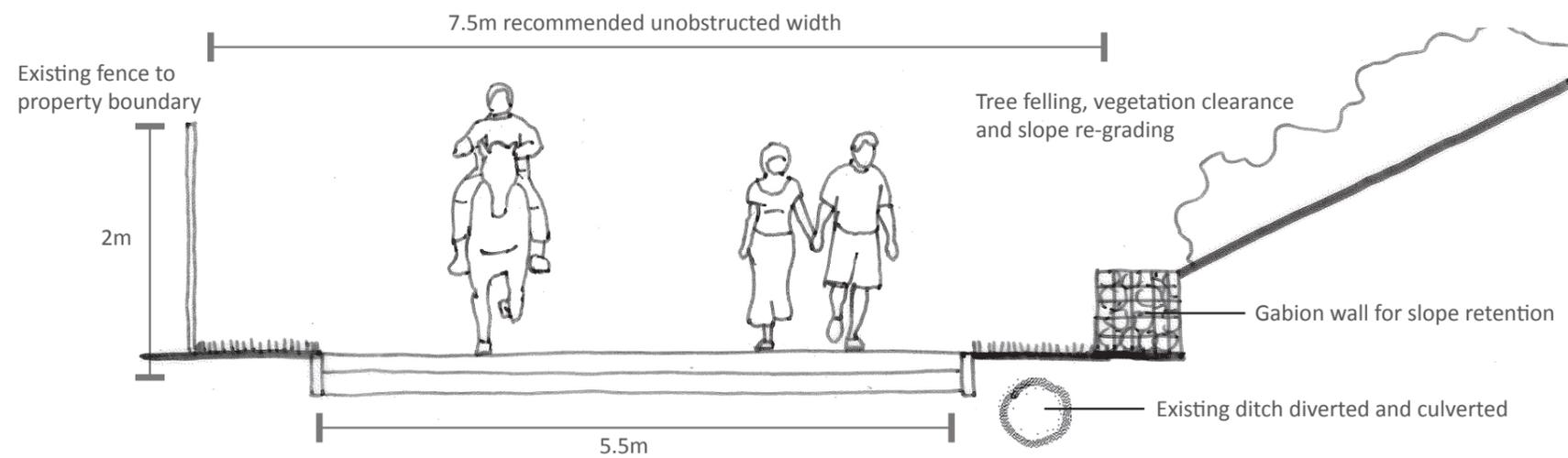


Existing path unsurfaced, poorly drained, and very narrow (1.0m)  
Southern side is very restricted by rear garden boundaries, northern side has vegetation including large trees growing up to the path. The northern side is also bounded by an existing drainage ditch beyond which the landform rises sharply.

ATH 28 section 4 Indicative cross section of existing footpath

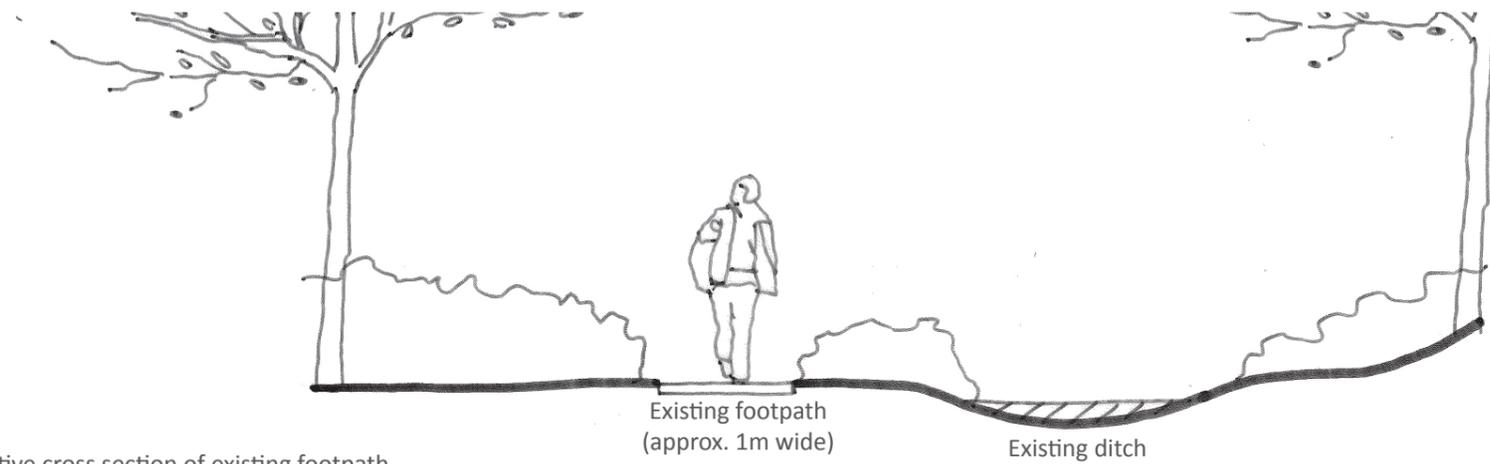


ATH 28 section 4 Option 1 - Potential upgrade to 2.0m wide footpath



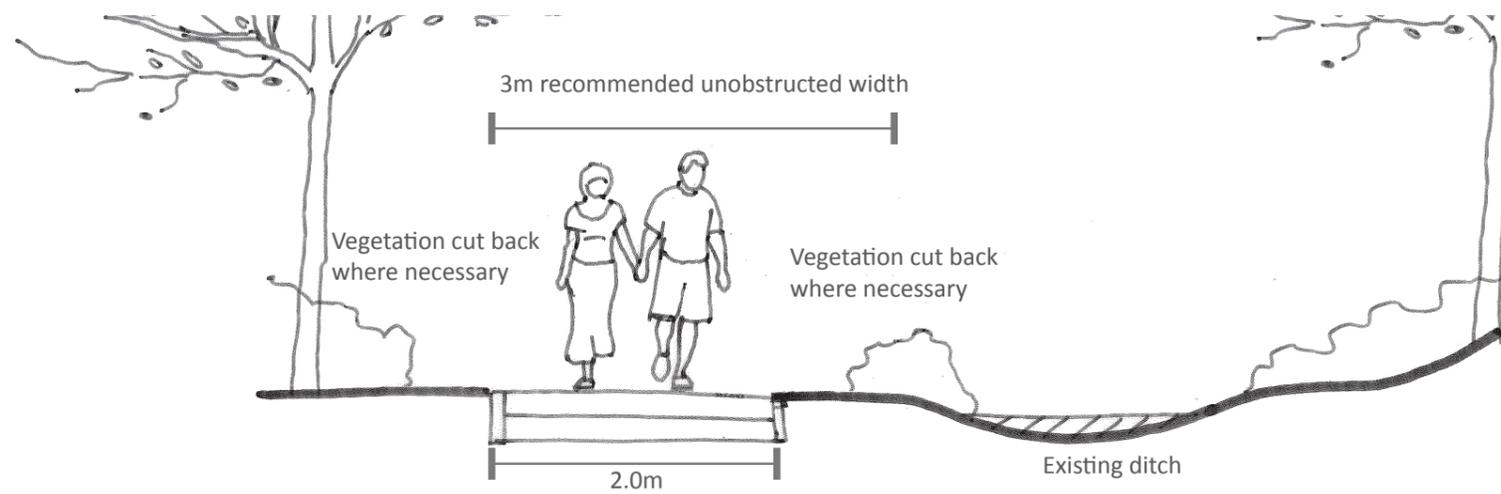
ATH 28 section 4 Option 2 - Potential upgrade to 5.5m wide bridleway with 1m verges on both sides

S5

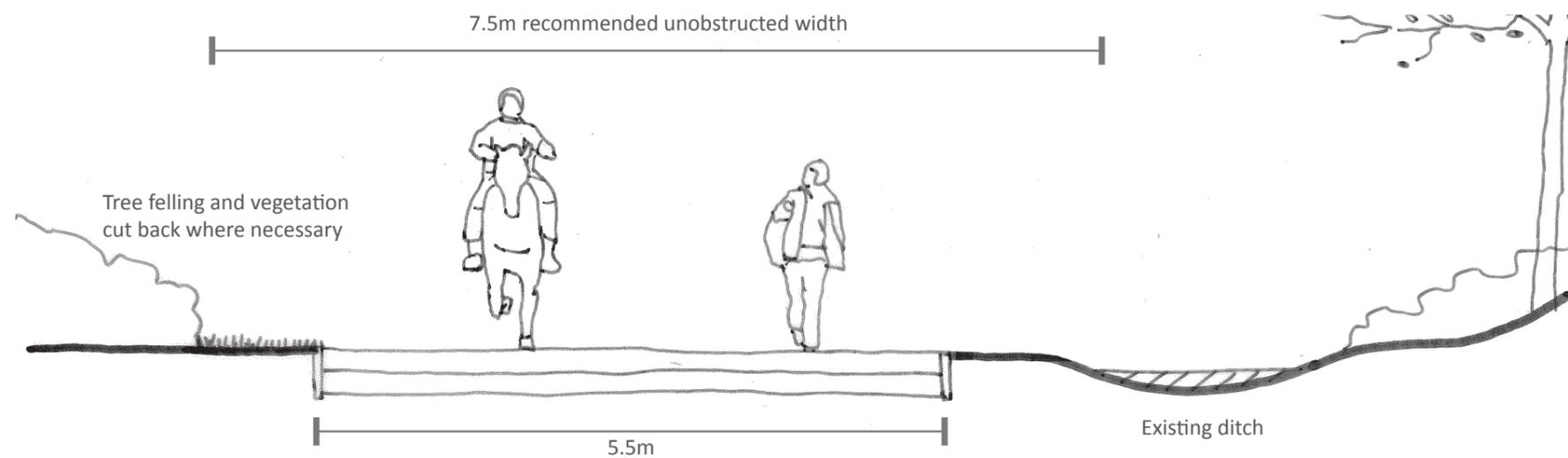


Existing path unsurfaced, poorly drained, and very narrow (1.0m)  
Both north and south of the path are bounded by vegetation.  
The northern side is also bounded by an existing drainage ditch beyond which the landform rises sharply.

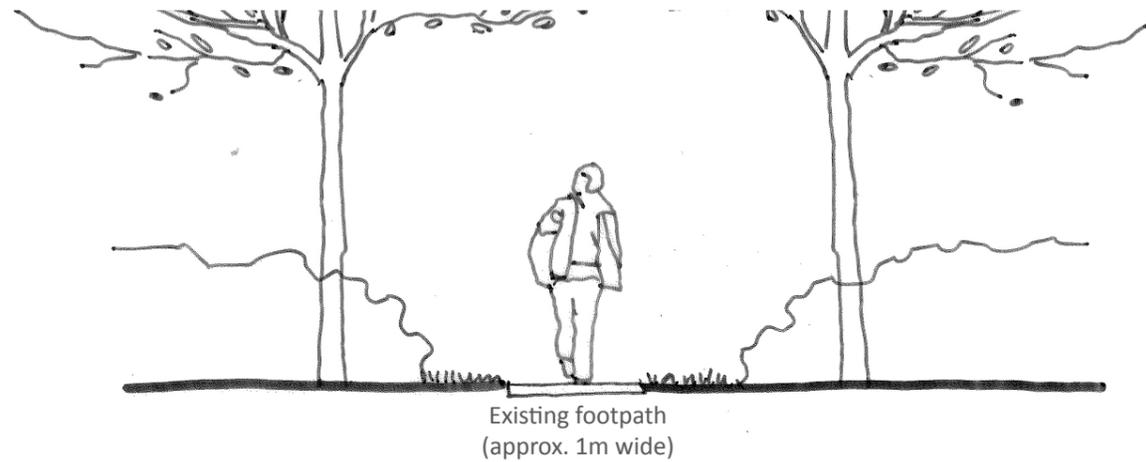
ATH 28 section 5 Indicative cross section of existing footpath



ATH 28 section 5 Option 1 - Potential upgrade to 2.0m wide footpath

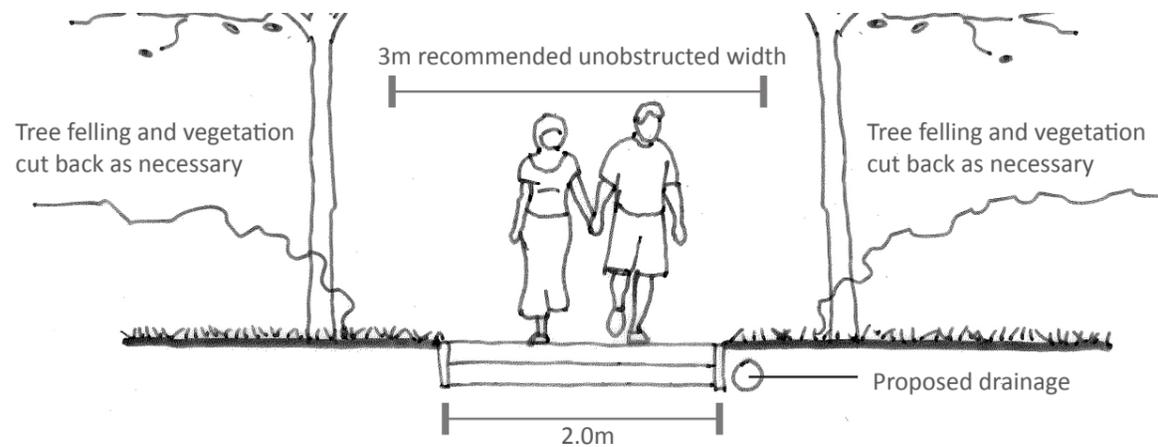


ATH 28 section 5 Option 2 - Potential upgrade to 5.5m wide bridleway with 1m verges on both sides

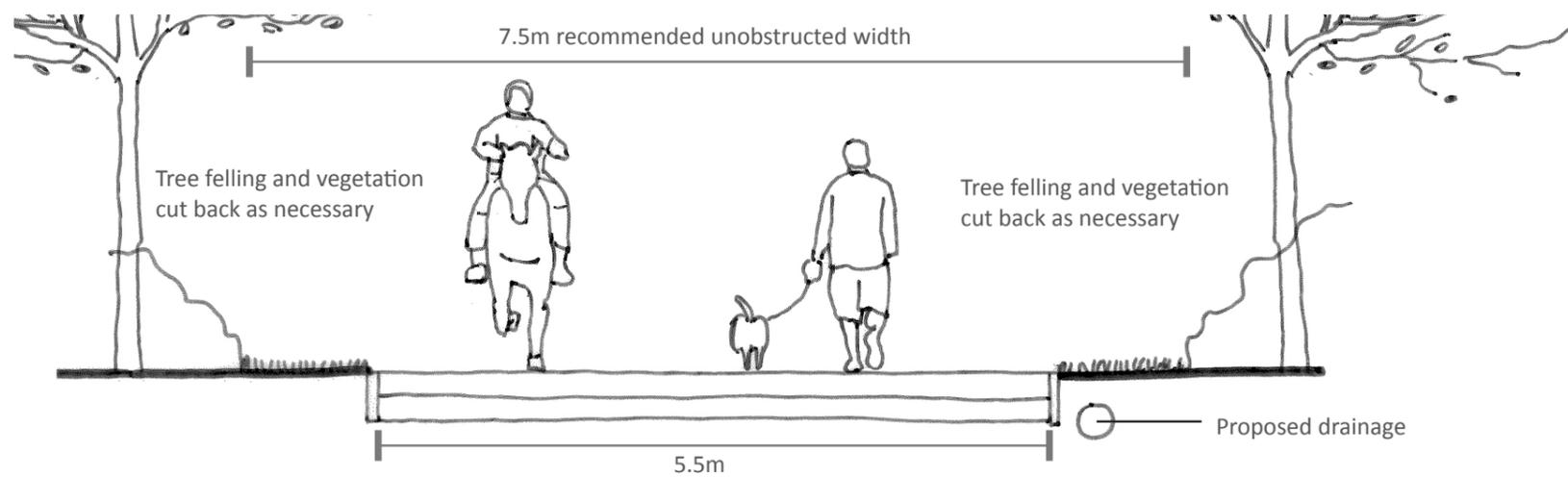


Existing path unsurfaced, poorly drained, and very narrow (1.0m)  
 Southern side is very close to the slope in sections. Both sides have mature trees and vegetation growing very close to the path.

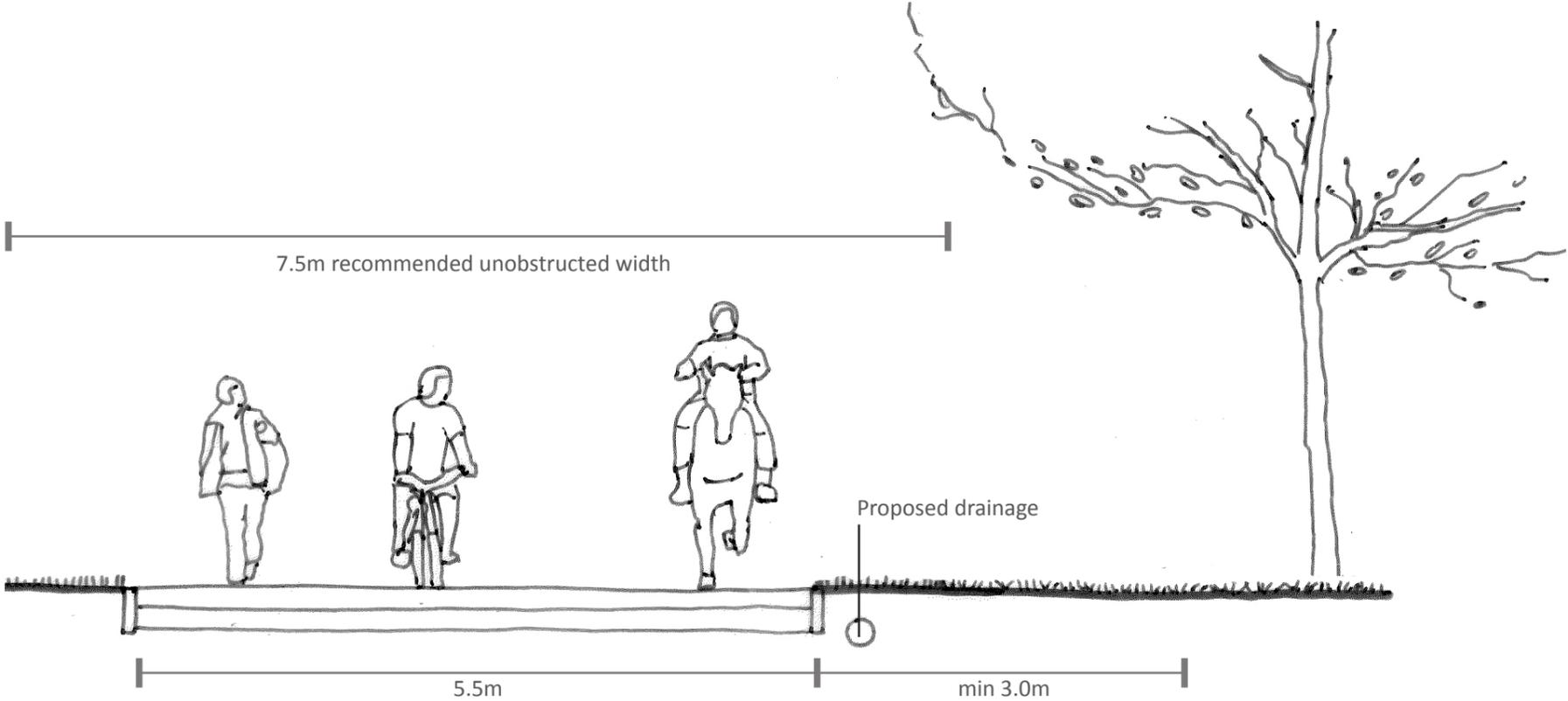
WES 127 section 6 Indicative cross section of existing footpath



WES 127 section 6 Option 1 - Potential upgrade to 2.0m wide footpath



WES 127 section 6 Option 2 - Potential upgrade to 5.5m wide bridleway with 1m verges on both sides



Subway link section 7 Illustrative cross section to show proposed improvements to existing path and proposed bridleway



**Turley Office**  
1 New York Street  
Manchester M1 4HD

T 0161 233 7676