

Consultation & Research Team,
2nd Floor, Town Hall,
Victoria Square,
Bolton,
BL1 1RU

ldfconsultation@bolton.gov.uk

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Dear Sir/ Madam

Bolton Local Plan – Direction of Travel Consultation (Regulation 18 Consultation Part 2)

1. Thank you for consulting with the Home Builders Federation (HBF) on the Bolton Local Plan – Direction of Travel Consultation.
2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multinational PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new “for sale” market housing built in England and Wales as well as a large proportion of newly built affordable housing.
3. The HBF would like to submit the following comments in relation to selected questions contained in the consultation document, plus additional comments to pick up on other key themes and areas. The HBF is keen to ensure that Bolton produces a sound Local Plan which provides appropriate policies for the area.

Changes to National Planning Policy and Plan-Making System

4. It is worth highlighting that in December 2025 the Government published a consultation on a new National Planning Policy Framework (NPPF). This followed a Written Ministerial Statement made on 27 November 2025 which outlined the Government's intention to move forward with a new plan-making system (reference: UIN HCWS1104). The move to a new plan-making system includes a series of transitional arrangements.
5. It is understood that currently, the Council is intending to use these transitional arrangements and submit its Local Plan for examination under the current plan-making regime. On this basis, Paragraphs 4 and 8 in Annex A of the draft NPPF outline that the Local Plan will then be examined

under the current NPPF (December 2024). However, it is also notable that in relation to decision making, Annex A also states that from the date the new NPPF is published, Local Plan policies that are “...any way inconsistent with national decision-making policies in this Framework should be given very limited weight, except where they have been examined and adopted against this Framework”.

6. Consequently, in preparing the next iteration of this Local Plan, the Council may need to have regard to national policies for decision making, given that any inconsistency may effectively render policies in the Local plan that are not consistent with the new NPPF redundant as soon as the Local Plan is adopted.

Ambitions and Objectives

Consultation Question 1 – Do the Ambition Statement and six Objectives reflect the long-term aims for the Borough?

7. The HBF broadly supports the overall approach to the Ambition Statement and Objectives, however to ensure that the objective for Homes and Neighbourhoods is sufficiently robust, it is considered that when it mentions sustainable locations, that it adds ‘where need is best met’. This makes it clear that need will not only be met in terms of house types and sizes but also geographically.
8. The HBF also notes that the objective highlights that priority will be given to the development of brownfield land. This should be appropriately caveated to make clear that to meet the needs of the Borough over the plan period, a mix of brownfield and greenfield land will be required.
9. More generally, it is noted that the Homes and Neighbourhoods Objective commits the Council to deliver at least 13,379 homes. Whilst the consultation document is not clear on the plan period start and end date, Page 7 of the consultation document elaborates on this and outlines that this would be over a 15 year period. This would equate to around 892 dwellings per annum. The overall figure itself is derived from the Greater Manchester ‘Places for Everyone’ (Pfe) development plan document.
10. The HBF has a number of observations in relation to this. Whilst the Pfe document does indeed commit the Council to this quantum of housing, the Pfe was adopted in March 2024 (prior to the December 2024 National Planning Policy Framework (NPPF)). As such, the quantum of housing set does not correspond to the latest (stock-based) Standard Method. For the Council’s Local Plan to be found sound, it should be meeting (as a minimum) its Local Housing Need using this latest Standard Method (as set out in paragraph 62 of the NPPF). This means the Council should be planning to deliver at least 1,236 dwellings per annum over the plan period. The Council will

also need to make sure that when setting out its plan period, that this is at least 15 years from adoption (as required by paragraph 22 of the NPPF). The Council's current timetable envisages that the Local Plan would be adopted by 2027 and the consultation document mentions an end date for the plan of 2042. Whilst this would mean upon adoption, the plan period would be 15 years, it does not allow for any slippage in timescales during the preparation of the plan. If this were to occur, then the 15 year minimum plan period upon adoption may not be achieved. As such, the Council should be looking beyond 2042 to be certain that paragraph 22 of the NPPF can be adhered to.

11. The Council should also explain alongside the Objectives, how it is seeking to balance jobs and new homes so that sustainable patterns of development are achieved.

Spatial Options

Consultation Question 2 – Do you think Anchor-led growth is a realistic and appropriate option for Bolton? What are the challenges and opportunities of delivering this approach?

12. Irrespective of which spatial option is chosen, the HBF considers it is important that it is able to facilitate meeting the housing needs of the Borough wherever it arises over the plan period. This should be done through a strategy that can provide an appropriate mix of brownfield and greenfield land in different sizes and in suitable and sustainable locations. In particular, the HBF would seek that the NPPF requirement for at least 10% of the housing requirement to be on sites no larger than one hectare should be included in the Local Plan (and these should be allocated). These sites are vital for small and medium housebuilders and can be built out relatively quickly (see paragraph 73 of the NPPF).
13. The HBF also acknowledges that the Council considers for their favoured spatial option that some Green Belt release will be required. We support this and consider this is a pragmatic and sensible approach which will greatly assist the Council in meeting its housing need over the plan period. As such, the Council will need to undertake a comprehensive review of its Green Belt.

Local Areas of Change

Consultation Question 3 - What is needed to make sure development in these locations is of high quality and sustainable?

14. Whilst the HBF does not comment on specific sites, there is clearly a need for any Local Areas of Change chosen to successfully tie into the spatial option that has been chosen and to meet the needs of the Borough over the plan period. For instance, it is noted that the option put forward would see a notable number of homes allocated in Central Bolton. Whilst there is clearly a degree

of logic to this, the Council will need to be mindful that overly concentrating development in such areas will have implications for the types, size and tenure of homes provided (including affordable homes) and not necessarily provide the appropriate mix of homes needed to meet the housing needs across the Borough.

15. The Local Areas of Change chosen will also need to be informed by robust evidence to ensure that the delivery of homes in these areas is viable when all policy requirements and expected planning obligations are taken into account.

Policy Areas under Consideration

Consultation Question 4a – We want to know your thoughts on Affordable Housing.

16. The HBF considers that first and foremost that the Council will need a detailed Strategic Housing Market Assessment (SHMA) to ascertain the quantum and type of affordable housing need within the Borough. Whilst the current plan requirements are noted, these will need to be updated with more recent data.
17. In addition to this, it is clear that the NPPF allows derivation of affordable housing requirements to also take into account viability and deliverability of sites (paragraph 35). It is therefore a combination of an assessment of need and viability that will need to be considered when setting an appropriate affordable housing requirement.
18. For Green Belt release sites, the affordable housing requirement also needs to be informed by paragraphs 67 and 68 of the NPPF. Any uplift put forward on Green Belt release sites will also need to be thoroughly tested in terms of viability to ensure these sites remain deliverable.
19. The evidence base will also need to inform the tenure split for affordable housing. The HBF recommends that when setting out the affordable housing policy, that a degree of flexibility is allowed for when examining affordable housing tenure, as there may be site specific circumstances such as viability or requirements from Registered Providers which can have a bearing on the type of affordable homes that can be offered on a site.

Consultation Question 4c - We want to know your thoughts on development density.

20. The NPPF is clear in Section 11 that planning policies should promote an effective use of land in meeting the need for homes, while also safeguarding and improving the environment and ensuring safe and healthy living conditions (paragraph 124).

21. Notwithstanding the requirements set out in the PfE, the Council will need to ensure that any density requirements which it chooses to set are realistic when taking into account on site requirements such as open space, biodiversity net gain, active travel measures, parking, refuse storage, tree planting and sustainable drainage. Paragraph 129 of the NPPF also outlines the need to consider the following points:
- The identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
 - Local market conditions and viability;
 - The availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
 - The desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
 - The importance of securing well-designed, attractive and healthy places.
22. Consequently, the HBF considers that it is imperative that any density requirements included in the Local Plan are based upon sound evidence and allow a degree of flexibility for site specific circumstances.

Consultation Question 4d - We want to know your thoughts on open space standards.

23. The HBF considers that the inclusion of open space within development sites is important in creating attractive and healthy places to live. In line with our comments above, the Council will need to examine open space standards more widely in terms of their impact on site densities and how the standards interact with other planning policy requirements in the Local Plan.
24. There may be some instances where it may be more appropriate to provide a mix of on-site and off-site open space to meet certain open space typologies. This approach should also be considered in any future open space policy.

Consultation Question 4e - We want to know your thoughts on transport and parking standards.

25. The HBF considers that setting rigid maximum parking standards for developments depending on their locations should be avoided. Whilst the move to more sustainable travel should be encouraged, the HBF is sceptical that setting maximum parking standards will achieve this, as it is beyond the remit of the planning system to seek to control vehicle ownership as this is clearly a personal choice.

26. Indeed, all the policy may achieve is to disperse car parking to neighbouring areas or increase instances of on street parking, which will not achieve what the policy is intended to do and may cause highways issues elsewhere.
27. Instead, the policy response should look to make alternative modes of transport more attractive in order to promote the modal shift that is desired. In relation to Electric Vehicle (EV) charging specifically, this requirement is covered through Part S of the Building Regulations and so does not need to form part of the Local Plan.

Consultation Question 4f - What do you think are the main factors that would help ensure new development is supported by the right infrastructure at the right time?

28. The HBF considers that it is imperative that the Council undertakes an Infrastructure Delivery Plan (IDP) at the earliest opportunity, so as to ascertain where infrastructure improvements are needed to support development proposed through the Local Plan and how development sites will assist in the delivery of this infrastructure.
29. There is clearly a delicate balance to be made between the IDP and the viability and deliverability of development sites, and therefore the IDP will need to be informed by a Whole Plan Viability Assessment and vice versa. In this regard, the Council will need to carefully consider the phasing of planning obligations so as to ensure the delivery of infrastructure takes place when it is needed and also ensuring delivery of the new homes that the Borough needs can come forward.
30. The HBF would strongly encourage the Council to engage with the housebuilding industry in relation to this matter so as to seek to agree an approach to infrastructure provision that can be incorporated into the Local Plan.

Future Engagement

31. HBF trusts that the Council will find these comments useful as it continues to progress its Local Plan. We would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
32. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours faithfully,

Chris Martin

Chris Martin BSc(Econ) MSc MA MRTPI
Regional Planning Manager (North West, North East and Yorkshire)
Home Builders Federation
Email: chris.martin@hbf.co.uk
Phone: 07972774229