

Everyman's Guide to the Wainhomes **'outline' planning application 77592**

These notes are based on the application documents available to see via www.wigan.gov.uk and links from 'Planning Applications'. The full application reference is A/12/77592 but 77592 is all that needs to be entered to gain access.

LENDF: Lowton East Neighbourhood Development Forum

LHSRG: Lane Head South Residents' Group

Some pointers to the serious and the funny...

- **The present application has been envisaged since at least the first half of 2011, because discussions began then, in May, about the scope of the Transport Assessment (TA). Indeed, traffic surveys took place on 25th May. At that stage, access was to have been solely from Stone Cross Lane North.**

TA, Appendix A and 6.2.1.

- **'The scheme has evolved through discussions and consultations with residents and officers of Wigan Council.'**

Environmental Statement (ES), 4.3. Quite what this refers to, so far as residents are concerned, is unclear. See also Wainhomes: Statement of Community Involvement (SCI), at 2.2.

- **'Increased peak hour demands on the Strategic Route Network will throttle development and economic aspirations elsewhere in the Borough. This is not acceptable.'**

Rob Owen, Team Leader (Highways DC and Parking), Traffic Group, WMBC to Royal Haskoning (RH), 12th September 2011: TA, Appendix A.

The first, unpublished, version of the Transport Assessment was sent to the Council for comment in November 2011 and was the subject of subsequent discussions.

TA, 1.2.2-1.2.4.

- **In Spring/Summer, 2012, Wainhomes had discussions with Mike Worden, Nick Clarke, Rob Owen and Dave Rawsthorne, representing Wigan MBC.**

Application form.

In July, 2012, the Council published an Initial Transport Assessment (ITA) for the Stirrups Farm area, as part of the wider assessment of various options for providing additional

housing land. Ideas put forward included bus gates on any new link road (i.e. prevention of general use for through traffic) and closure of Nook Lane to all traffic but cyclists – apparently a reference to the Tanners Lane under-bridge.

ITA, Part 1.

However, the requirement for a through road open to all traffic, as part of the scheme, has been set by the Council.

TA, 4.2.1.

On 9th November, 2012, Wainhomes undertook a leaflet drop in the streets off Church Lane and Stone Cross Lane, giving notice of their proposals, inviting attendance at an exhibition and offering the opportunity to comment. LENDF undertook its own leaflet drop shortly after.

SCI, 2.3. There are some doubts about the definition of the area canvassed and whether it was actually fully covered.

- On 20th November, 2012, Wainhomes held the exhibition of their proposals at Golborne Sports & Social Club, in preparation of the way for their outline application for 'approximately 400 homes', illustrated by the masterplan scheme shown in their publicity brochure.

SCI. The SCI does not refer to any changes made as a result of this, the only known formal consultation, so far. In fact, at 7.4-7.5 and 8.1, it either rejects the criticisms made of the illustrative scheme or contends that they have been, or can easily be, mitigated. At 7.3 and 8.1 it is also suggested that respondents were unrepresentative or had approached the matter with closed minds.

Note: letters from LENDF and LHSRG about the exhibition, not reported in the SCI, can be found on www.lendf.co.uk.

- Lowton East Councillors were advised of the exhibition; Golborne & Lowton West Councillors were not.

SCI, 2.5. Step 4 of Wigan MBC's 'Community involvement in the planning application process' (Gillian Bishop, undated) indicates that Councillors in any affected neighbouring area should have been notified, as well.

- The proposal was, and is, presented as phase 1 of a wider scheme to promote construction of up to around 670 open market and affordable dwellings, reflecting Council interest in construction of some 2,300 'greenfield' units in Golborne and Lowton up to 2026.

SCI and Planning Statement (PS), 1.7 and 2.5. The exhibition brochure did not give the 670 figure; however, it is contained in all the main application documents.

- **The application is 'for up to 400 dwellings', translated as 'for residential development' by the Council.**

Application form and Council notices.

- **Planning permission is sought in 'outline', for the principle of the development, with only the details of access to and from Stone Cross Lane North and Church Lane for consideration, at this stage – so leaving the precise details of layout, numbers and appearance of the dwellings for later approval.**

Application form.

- **The application site broadly lies between Stone Cross Lane North, Church Lane and the East Lancs Road.**

Application form.

- **It is defined by Stone Cross Lane North, Welford Avenue, Upwood Road, Rutland Avenue, Bromley Avenue, Alderley Avenue, Stretton Avenue, Martland Avenue, the East Lancashire Road and Heath Lane.**

Application plans. However, Phase 1 does not directly affect all the neighbouring streets named.

- **Two public footpaths are directly affected: No. 81, from Church Lane via Rutland Avenue to Stone Cross Lane North and No. 82, from Church Lane via Stirrups Farm to the East Lancashire Road.**

Application plans. The Council originally only acknowledged impact on one right of way; however, publicity materials have since been corrected.

- **The Council has given the site two different descriptions:**

1. **'Open Land East Of Stone Cross Park Stone Cross Lane North Lowton.'**

Mostly without a comma. List of applications for week ending 7th December, circular letter dated 7th December, web pages and notices dated 14th and 20th December.

In fact, there is vacant land east of the office building known as Stone Cross Park; beyond the vacant land lies Stone Cross Lane North and, to the east of it, the western-most part of the application site.

2. **'Open Land East Of Stone Cross Lane North And To The West of Church Lane, Lowton (incorporating Stirrups Farm).'**

Main web pages from early January 2012.

- **The Council originally attributed the site to Golborne & Lowton West Ward.**

List of applications for week ending 7th December and original main web pages.

- **Though Stone Cross Lane North forms the boundary and there are implications for Golborne (such as the possible closure of the Tanners Lane under-bridge for general traffic), it is now recognised that the entire site is within Lowton East Ward.**

Main web pages, from mid-December.

- **Wainhomes are locally based at Birchwood, Warrington, WA3 7PB; their architects (MCK) hail from Fulwood, near Preston; their ecologists (ERAP) from Penwortham, also near Preston; their landscape specialists (tba) from Ashton-under-Lyne; and, their transport consultants (RH) from Manchester – so they all ought to know what they are talking about.**

Application documentation. However, the overall responsibility for presentation, on behalf of Wainhomes, as clients, rests with EPP Planning Consultants from Macclesfield: D&AS 1.1 and Environmental Statement (ES) 1.12.

- **'The site lies immediately adjacent to the Western edge of Wigan town centre.'**

D&AS, 1.3 (page 6).

- **'The site is located in a highly sustainable location with the Wigan interchange within easy walking distance.'**

D&AS, 4.1 (page 32).

- **The area has ample facilities, ranging from a 'Village Center' to a number of schools, public houses and churches, including 'St Catherine of Sienna'.**

D&AS 5.73 (page 51), where not everything is quite as it seems, especially the schools...

In fact, 'St Catherine of Siena' RC church has been closed since the second half of 2011.

St Luke's Primary School is located at Cotswold Avenue, off Lime Grove/Heathmoor Avenue, whereas The Limes is close to the junction of Heathmoor Avenue and Heath Lane.

D&AS, plans on pages 36 and 41, together with plan on page 34 and photograph on page 35.

- **Local amenities include the Golborne Sports & Social Club, whose main access is off Nook Lane.**

D&AS 3.36 (page 24), together with equivalent TA and ES references. The main access is, in fact, off Stone Cross Lane North; there are no made-up paths from the secondary car park off Nook Lane.

- **The site is 'within a ten minute walk of all the existing facilities offered by Lowton and Golborne, a settlement of Wigan...'**

D&AS, 1.2 (page 6), not altogether supported by 3.3.6 (page 24) or Plan 6 (page 26); somewhat contradicted by Transport Assessment (TA) and more strongly so by ES Figure 10.3, which uses a different assessment method.

- **High Street Golborne is within 10-12 minutes of the entire site, which means there is ready access to the 360 bus service and Newton-le-Willows railway station.**

D&AS, 3.36 (page 24) and TA, 5.4.11, contradicted by ES Figure 10.3. A practical walking test suggests that from opposite the proposed Stone Cross Lane North access to High Street can be achieved in a little more than 11 minutes. For the site as a whole, a more representative figure is therefore probably 15 minutes.

- **There is a continuous cycleway on the southern boundary of the site, with segregated crossing facilities**

D&AS 3.36 (page 24), together with equivalent ES and TA references, some of which are even more ambiguous. A misrepresentation. The cycleway is on the southern side of the A580 and crossing facilities are a mixture of uncontrolled and light-controlled.

- **The X34 bus service from Lane Head provides buses direct to Manchester city centre at regular 30-minute intervals throughout the day from Monday to Friday, with just two buses on Saturdays.**

D&AS Table 1 (page 25), together with equivalent TA and ES references. Incorrect. The published September and December 2012 timetables both show that there are just three early morning buses, the last being at 0727, during the main part of the week and no direct buses at all on Saturdays.

- **'Approximately 3 km west of the development, the A580 has a junction with the M60, providing excellent links with the wider region and beyond.'**

TA, 2.2.8.

- **Various baseline and supplementary surveys have been carried out to inform the proposal, including:**

1. **Ecology – report June 2011 (also dated June 2010), surveys on 7th & 13th June 2011.**

2. Noise – report October 2011; survey 14th & 15th September 2011.
3. Newts and other amphibians – report May 2012; survey March 2012.
4. Trees – report May 2012; survey 2nd May 2012.
5. Bats and owls – report June 2012; surveys 25th-26th May and 2nd June 2012.
6. Landscape – Environmental Statement November 2012; survey 21st August 2012.

Individual reports and ES, 11.7.

- **The Design & Access Statement (D&AS) summarises the background studies and indicates how they have been taken into consideration in formulating proposals for the site and wider area. For example, that the 'tree survey was used as a design tool to inform the masterplan layout.'**

D&AS 3.2.3 (page 16). Compare ES 12.30, where a similar claim is made in respect of the landscape appraisal.

- **The scheme drawing (as shown in the publicity leaflet and displayed on 20th November) is dated April 2012 and was originally submitted to the Council in May 2012.**

ES Figures 3.2 and 10.1 (Drawing 12-003-1000, April 2012, drawn by M. King) and D&AS 1.4 (page 6), from which it appears that, in fact, the indicative layout was devised in advance of conclusion of surveys 4, 5 and 6, as listed above. The reproductions show no amendments, so the current scheme would appear to be the first and only version.

Note: on 10th January the Council posted a new version of the masterplan (12-003-1000 A, still dated April 2012). The areas not within the current application red line have been removed and the narrative notes adjusted accordingly. Otherwise, it is the same.

- **The process has secured 'the retention of the great majority of existing trees, groups and hedges within the layout'.**

D&A, 3.2.3 (page 16), somewhat contradicted by 4.1 (page 32), which indicates that up to half the existing trees should be considered for removal. The Council has since made a Tree Preservation Order: see further below.

- **The proposals are also intended to provide 'Increased areas of public green space to compensate for the local areas giving a green heart to the area.'**

D&AS, 4.1 (page 34), though it is not altogether clear what this means.

- Further, the 'predominantly low lying' area of the site next to Stone Cross Lane – 'The western gateway stern edge' – is intended to provide 'an attractive landscape setting to the entrance to the site.'

D&AS, page 38, although it is not quite clear how the low-lying 'western gateway' relates to 'The Western escarpment' (page 39), whatever it may be. It appears that, in practice, substantial parts of the hedge along Stone Cross Lane North are at risk of removal, to accommodate widening at the point of access.

- Another guiding principle is 'to improve existing infrastructure to reduce [existing] congestion, improve safety and contribute to the wider regional strategic network aim.'

D&AS 5.1.8 (page 50), although it is not altogether clear what wider aim is being referred to.

- The April 2012 'illustrative' scheme (as shown in the publicity leaflet and displayed on 20th November) shows a total of around 400 houses, of which just 325 are within the area of the current application for up to 400.

D&AS 5.2 (page 42) and 5.1.5 (page 48). Important facts, which were not made clear in the brochure or at the exhibition, although questions were raised by a number of visitors. 400 represents a 23% increase over the base figure of 325; 75 is nearly 19% of 400.

If the scheme is representative of what is possible, as claimed, where would the other 270 units be located?

Traffic and transport measures put forward include:

1. An additional traffic lane at the Stone Cross Lane North junction with the A580, to provide more capacity for traffic turning right towards Liverpool.

D&AS, 3.36 (page 25) and Plan 12 (page 29), together with equivalent ES and TA references.

2. A link road between Stone Cross Lane North (opposite No. 96) and Church Lane (opposite Ranworth Drive) to provide for pedestrians, cyclists, buses and general traffic, which would be self-policing with respect to traffic speeds. The alignment would also 'discourage long distance commuter rat-running.'

D&AS 3.36 (page 24), TA 4.1.4 and TA 4.2.8, together with other equivalent ES and TA references, somewhat contradicted by D&AS 4.1 (page 40) with respect to the attractiveness of the main spine route for rat-running.

3. Closure of the under-bridge at Tanners Lane/Nook Lane to general traffic or the installation of shuttle signals, to improve conditions for cyclists.

D&AS, 3.36 (page 24), together with equivalent ES and TA references.

4. A cycle link to the two primary schools off Church Lane.

As previous.

5. As an alternative to promoting a new bus service through the site, provision of a single voucher to each new household to defray the cost of an annual bus pass for one person or a new bicycle.

D&AS 3.36 (pages 24-25), together with equivalent ES and TA references, which contrive to suggest both would be paid for.

6. New bus shelters and a toucan crossing on Church Lane.

D&AS 3.36 (page 24), together with equivalent ES and TA references. No mention is made of the uncontrolled crossing points on Church Lane (North) and Church Lane (South), let alone those elsewhere at Lane Head.

7. Additional footways on Stone Cross Lane North, together with crossing refuges at the new access point.

D&AS 3.36 (page 24) and Plan 5 (page 25), together with equivalent ES and TA references.

8. Upgrading of the existing public rights of way to urban standards.

D&AS 5.3 (page 46) and 5.1.8 (page 50), together with equivalent ES and TA references.

It is now possible to discern that the public footpath from Church Lane/Rutland Avenue could be enclosed between the rear fences of existing Upwood Road houses and new dwellings.

Is this either good practice (see Crime Impact Statement, 4.1.8) or good design? It is certainly unimaginative. A better solution than currently proposed, or the alternative suggested by GM Police, would be for a green corridor to be established to incorporate the line of the footpath, with houses overlooking it.

- **The Transport Assessment concludes that, subject to modification of the Stone Cross Lane North/A580 junction, the local network would continue to operate satisfactorily, after making allowance for a number of committed developments in the Leigh area (including Bickershaw**

South), and traffic generated by the new houses, using representative factors derived from the TRICS database. In doing so, it relies upon the MOVA and SCOOT programmes already installed to give additional capacity than recognised by the LINSIG, ARCADY and PICADY assessment tools; it also assumes that the bus pass inducement and other measures in the proposed Travel Plan would ease excessive queuing at Golborne Island, on Warrington Road (South).

Speaking as one, the team actually goes a step further and claims that, with the one modification, the existing road network has 'ample spare capacity to absorb this and other anticipated traffic generated by future development' such that the project 'would actually reduce existing driver delay.'

TA, Sections 6-7, together with equivalent ES, Section 10, references; and ES 12.21. The assignment of new traffic is based on an arbitrary 60:40 split between the two accesses and no account has been taken of Ranworth Drive in modelling the new Church Lane junction. The Nook Lane/Stone Cross Lane North junction has not been evaluated at all; nor, apparently, has account been taken of the proposed Tanners Lane closure.

Indeed, the assessment is based on taking individual junctions in isolation, except at Stone Cross Lane/A580 (treated as two). It does not purport to model the whole network and has not even measured predicted performance at the individual junctions, without development, against present observed performance. Nor does it consider whether blockages at Golborne Island could have repercussions that might upset the evaluation of other junctions. Those that could be affected by the cross-country diversionary tactics of frustrated drivers include Stone Cross Lane/A580 itself and all those in the Newton Road corridor, potentially culminating in extra loading of the A580/Church Lane junction.

A more fundamental criticism is that, as all basic data were collected on just one day, 25th May 2011 (or 30th June, in the case of three junctions), it is open to doubt whether the TA shows adequate appreciation of 'normal' traffic levels. Contrary to the impression given by TA 6.2.2 and Appendix B, the work is not informed by a 7-day automatic traffic count.

The Environmental Statement gathers together the many threads of the evaluation contained in the technical studies, including those concerned with water resources, drainage, flood risk, and agricultural land quality. In some areas, such as transportation, it expands on, or qualifies, information found elsewhere; in others, such as landscape appraisal, it is the main source.

In common with the Planning Statement (PS), it comments extensively on the housing policy and land supply issues. It also seeks to take account of cumulative effects, having regard to the Council's ambition to release other areas for housing in Golborne and Lowton. In that context, it contains passing references to air quality and noise.

Lastly, it deals with the economic and social benefits and the need to make appropriate educational provision.

In most topic areas of the appraisal the effects are considered to be negligible, capable of adequate mitigation or beneficial. However, there is recognition of changes to the character of the area, including specific impacts on existing dwellings around the site perimeter.

There are a number of problems with the ES. They include textual difficulties, omissions – most obviously, air quality – and self-serving arguments, some blatant, as in the contention that Standish is not a satisfactory housing location because it is not in Lowton, and the Council wishes to promote housing in Lowton, not Standish (PS, 5.20). Shortcomings in the technical studies also mean there are doubts about the overall soundness of the ES itself, such as in the transportation area.

The ecological appraisal has the inbuilt shortcoming that it is based on two visits within a few days in one season, without any follow-up in 2012. Along with its concomitant amphibian and bat studies, its scope was artificially limited; the Yew Tree Way pond was sampled but Bottle Pond Wood was not. There is also excessive reliance on recorded sightings, or otherwise, of species such as brown hare; little attempt seems to have been made to involve members of the public or ornithologists active in the area. However, displacement of farmland birds, if carried out willy-nilly, on the basis that impacts are 'negligible', has the logical consequence of eventually exterminating all such birds in any given area.

At the same time, it is all too easy to disparage the value of local agricultural land, because of its wetness. The overall resource can only be depreciated, with all the land price, market and food production cost implications that follow.

Similarly, with respect to general environmental impact. Improvements to 'connectivity' may be beneficial for somebody wishing to walk to work over what are presently muddy fields (ES, 13.20); however, the price is loss of the opportunity to walk over muddy fields and enjoy whatever they have to offer, from a wet boot to sighting of a brace of partridges or an unintelligent pheasant, by way of a chance encounter with a friend.

The ES is also subject to profound errors of professional judgement. It sees relatively little significance in the open public views from locations like Rutland Avenue, Alderley Avenue and Church Lane (ES, 11.41-11.42, 11.77-11.78). It is also puzzled why people should use paths that don't seem to go anywhere and require tramping on the grass verge of a busy dual carriageway (ES, 3.9, 11.34-11.36). It further asserts that the widest views of the affected area from the south are restricted to drivers whizzing by without really noticing and users of the footway/cycleway, who are not very many, leading to the conclusion that the significance of the impact is much reduced (ES, 11.43, 11.79). From such misconceptions do bad planning decisions arise.

Where we are and where we might be going...

- Overall the documentation package, including the Planning Statement, is a difficult and unsatisfactory read. Many passages are repeats of other passages (embarrassing errors included); they still have to be read, to find out where the repetition ends and whether there are modifications. There are also serious presentational difficulties, including with the formatting of documents. In the case of the Design**

& Access Statement, they include the page size, use of busy backgrounds and presentational conceits like post-it notes, together with combinations of blue, white and green for text, along with the odd incident of overprinting. Legibility is consequently dire. A blank page (30) has not been reproduced; however, you need to be aware that it is blank to know it does not matter! Further, a good number of the drawings are also so muddy as to be impossible to follow.

At the other end of the scale, some ES diagrams (Appendix 10.1) are so small that it is impossible to magnify them to achieve legibility: they simply become blurred. Consequently, conclusions about the ES transportation assessment have to be provisional. It is not clear whether the AADT – Annual Average Daily Traffic – flows are, or are not, significant; the text itself (10.95) refers to a particular link without naming it, whilst making a dismissive comment.

- The diligent reader also has to contend with examples of rank carelessness. They may be diverting; however, they also sap mental energy. RH confuse the A572 and A573, some of the time, when they are not confusing the B5207 with the A573 or terminating it prematurely; some of the time, Stone Cross Lane North also becomes Yew Tree Way. So the identifications of the M6 and M60, at one end of the East Lancs, and the A580 (sometime A50) and A6, at the other, are just part of a wider pattern.**
- Anybody who has ever had trouble with local names, like Winton/Wilton and Five Acres/Four Acre, or who has recently confused Bromley/Broseley, should be wary of casting the first stone. Still, EPP contrive to refer to both 'Goldborne' and 'Golbourne' on the same page, though elsewhere they get the right two syllables together. Nor is it 'Stirrips Farm' that appears on the 'Ordnance Survey'. They are also wedded to 'Wellford Avenue'. So it is a relief that 'Marsland Avenue' only takes a solitary bow. The Chief Constable, for his part, has actually copyrighted 'Upward Road', in two variants. Hence, like the Council in its ITA, RH seem to be unsure as to whether it is Tanners Lane or Nook Lane that goes under the bridge they propose to close, except to cyclists. They were at 'Brickshaw/Brickershaw' whilst Traffic Sense (!) were counting at 'Stag Lane', 'Goldbourn Road', the 'A52' and 'Kenyon Road'...**
- Worst of all is the turgid quality of the language. In places it is little better than Pidgin English. RH, who repeatedly refer to the 'Manual for Street', are prime offenders. (The real article is pictured within the D&AS.) However, they are not the only ones. MCK alone have given us 'incurtige' (a bastard contraction of 'within the curtilage?') and other horrors such as 'an uncluttered frontages' and 'Blocks set**

along a street radii' and, just to make it clear that is not an accident, 'a contrasting radii'.

They say frontage parking would be 'minimise' along their boulevard (incidentally, apparently relying on good design to prevail over human nature or presuming on the Council to put down yellow lines where they say it would be 'restricted'). There is no pride in their stride (schoolboy mnemonic, to be written out as corrective); otherwise, Wainhomes would not tolerate 'there primary use'.

However, this group of professionals are sometimes in the wrong year and definitely do not know their principals from their principles, either. So can they be trusted to be midwives to 'Building Britain's Heritage'?

- **Meantime, the Council has taken formal steps to protect the trees on and around the site, by making a Tree Preservation Order (No. 12 of 2012), effective from 20th December.**

Information from Gill Dickinson (LHSRG). It should be noted that the grant of planning permission prevails over a Tree Preservation Order, in the event of any conflict. An outline planning permission therefore constitutes a threat to any and every protected tree.

- **Fresh publicity was carried out during the week beginning 14th January and is likely to be followed, in due course, by at least one further round, when the Council has asked for, and received, such further information as it needs, on matters such as air quality and impact on wildlife.**

Oral communication Dave Rawsthorne to Peter Sargeant (LHSRG)

- **Objections and other representations may be lodged at any time up until shortly before the relevant meeting. Current indications are that a decision is two or more months away.**

Oral communications Dave Rawsthorne to Ed Thwaite (LENDF). Future meeting dates now include 16th April, 28th May, 25th June and 23rd July.

The Council's attention has been drawn to the fact that, as indicated, some documents pose extreme difficulties of legibility, despite zooming. Requests have been made to get copies deposited locally, at Golborne Library. If you, too, have difficulties, please let the Council know, otherwise they will tend to assume that their arrangements are fully satisfactory.

The Case Officer is Dave Rawsthorne, whose direct line is 01942 489127. However, if you wish to pursue the issue of local deposit and related matters, The Corporate Director 'Places' is Gillian Bishop; The Director 'Economy' is Stephen Normington; and, The Head of Planning and Transport is Mike Worden. They are the people who can make things happen.

Peter Sargeant

- with thanks to Keith Robb and all the Ireces -

12.2.2013 V3

Amendments: credits, on page 12 (V2, 15.1.2013); reference to traffic surveys on 25th May inserted, with added citation, on page 1; rights of way position updated, on page 3; reference to misleading nature of TA 6.2.2 reworked, on page 9; presentation clarified and further name errors by Traffic Sense added, on page 11; references to publicity and anticipated time-scale updated and simplified, on page 12; and, job title corrected from 'Executive' to 'Corporate' Director, also on page 12 (V3).