

## **Appendix 4**

# **Option B: Land safeguarded for future development at Golborne and Lowton**

## **Our responses to the issues raised during consultations**

**December 2012**



## Introduction

At the public consultation stage of the 'Draft Core Strategy: Options for addressing the shortfall of housing land, and other proposals', we received 1,263 comments on Option B: Land safeguarded for future development at Golborne and Lowton, or to the individual broad site options, from local residents and other individuals and groups. These included comments from 6 landowners and developers. Lists of those that submitted a representation by the deadline date are included in appendix 2 of the main Consultation Report.

The issues raised and our responses are set out in the remainder of this document. The issues raised are in **bold** text, starting with those raised by local residents, other individuals and groups, followed by those raised by landowners and developers. They are presented in summary form given the different language and emphasis used in individual representations.

## **Issues raised by local residents and other individuals and groups**

### **Housing issues:**

#### **Brownfield sites**

- 1. There are many vacant brownfield sites available in the borough. These should be developed before greenfield sites are considered for housing.**

All previously developed sites in the borough that are suitable and developable for housing development have been identified in our Strategic Housing Land Availability Assessment 2012 update as having potential for housing and therefore have been taken into account in meeting future demand. We estimate that such previously developed sites could accommodate in the region of 11,000 homes in the plan period to 2026. This equates to around two-thirds of the overall housing requirement. As such, around one-third of the overall housing requirement will need to be accommodated on greenfield land, including much of the shortfall being consulted upon at this stage.

- 2. Housing should only be constructed on vacant industrial sites where there is little prospect of future employment use.**

A number of former employment sites which we have assessed as having little prospect of continued or future employment use are identified in our Strategic Housing Land Availability Assessment 2012 update as having potential for housing. They therefore contribute towards the overall future housing requirement in the borough of 16,500 homes to 2026. Unfortunately, there is an insufficient supply of such sites in the borough to meet the overall housing requirement to 2026.

#### **Empty homes**

- 3. There are many vacant homes in the borough. These should be occupied before new homes are built. New homes are not needed as there are sufficient vacant homes for sale and to let in the borough, including new builds. Any new homes built are likely to remain vacant.**

The council agrees that empty homes should be brought back into use as soon as possible in order to improve the supply of housing in the borough. Bringing large numbers of empty homes back into use before new homes are built is not feasible. Vacant properties are a feature in any housing market and aid the overall functioning of the market. It would therefore be inappropriate to off-set current vacant homes against the housing requirements.

At July 2012 there were 5,767 empty homes in Wigan Borough. This was 4.2% of the borough's overall housing stock. Of the empty homes 2,211 were long term empty homes, defined as being unoccupied or substantially unfurnished for over 6 months. This was 1.6% of the

borough's overall housing stock. Most of the empty properties have been empty for less than 6 months and the majority will be part of the natural turnover within the overall housing market.

In terms of long term empty homes as a proportion of the overall stock, according to Government data from October 2011 Wigan compares favourably to other areas in Greater Manchester and the North West. In Greater Manchester, only Trafford and Stockport (both higher value housing markets) had a lower proportion of long term empty homes (both 1.1%) whilst for the North West overall the proportion was 1.9%. It is worth noting that in the current depressed housing market the proportion of empty homes in Wigan is the same as at the height of the housing boom in 2007, prior to the credit crunch and subsequent period of economic depression.

In Golborne and Lowton at July 2012, of the 10,560 housing units there were 160 units which were empty for longer than 6 months. This is 1.52% of the housing stock within this township.

Homes can be empty for many reasons and this can effect how long it takes for them to be brought back into use. Properties may be empty in the short term undergoing repairs, awaiting for a new tenant or awaiting a sale. Homes can be empty for longer periods when there are complex circumstances relating to that property, such as when a deceased persons estate is going through probate, disputes on the use of a property following a death, properties in need of significant repair and properties that may have been repossessed. The council does not have control over these issues.

Where empty homes are causing problems or issues in a neighbourhood the council will work proactively with those responsible for the property to bring it back to use. In recent years the number of empty properties in the private sector that have been empty for over 6 months has reduced. The position with empty homes is constantly changing. Whilst bringing empty homes back into use improves housing supply, the rate that this can be done will not provide the borough with a supply of homes to meet its future requirements. It is therefore essential that new homes are continued to be built in line with the projections whilst the council works proactively to bring empty homes back into use.

It is unlikely that new homes built will remain vacant, as if there is not a market for the homes, the developers will not build them.

**4. The Council should require the owners of vacant homes to renovate them and bring them back into use. Alternatively, the Council should purchase them and make them available for rent.**

The council works proactively with those responsible for an empty property to bring it back into use. Unfortunately the council cannot make them do so. The council can only do this where a property is having an effect on neighbouring properties or is causing a significant issue in an area and enforcement action is necessary. Prior to enforcement action the council will work with those responsible for an

empty home in a positive manner for them to bring the home back into use, rather than using enforcement powers.

The council has considered purchasing empty properties to bring them back into use. However due to funding issues this is not always viable, particularly on a large scale. Instead we provide advice to property owners, have developed partnerships with private landlords and are developing a private sector leasing scheme operated by Wigan Housing Solutions. The council has also been successful in obtaining funding from the Homes and Communities Agency to bring 10 empty homes back into use on a repair and rent back basis over a period of five years.

**5. Empty space above shops should be converted into flats.**

The conversion of non-residential buildings into housing, including space above shops, can be an effective way of securing their re-use and improvement and promoting regeneration. An estimate from this source, based on past trend data, has been included within our future housing trajectory and is set out in our Strategic Housing Land Availability Assessment.

**Affordable housing**

**6. The creation of large estates of social housing is not needed or wanted. The East Lancashire Road corridor is not an ideal place for social housing as there are limited supporting and community facilities and public transport provision in the area that people on low incomes will need.**

Large estates of social housing will not be built. We have not stated this in the Core Strategy or in any supporting documentation. The vast majority of new homes would be built by private housing developers and would predominantly be market housing (around 75%). We would require 25% of the new homes to be affordable i.e. social rented or in shared ownership, in line with local planning policy.

**7. The homes are not needed. There is a lack of demand for new housing, particularly executive homes as people cannot get mortgages or afford to buy them. The real need is for affordable housing which the proposals do not address.**

The total housing requirement has been accepted by the inspector against all evidence prevailing, including the Government's own population forecasts and household projections. We will require new developments to include 25% affordable housing provision, in line with local planning policy.

Due to their location and proximity to the A580 East Lancashire Road, executive homes on the sites in Golborne and Lowton are likely to attract professionals working in Manchester, Liverpool and Warrington as well as Wigan Borough. The proposed Leigh Guided Busway and other public transport improvements, which could arise from the developments, will increase sustainable access to these key employment locations.

8. **To tackle the need for affordable housing, the Council should not allow other tenures to be built until the affordable housing requirement is met.**

There is an affordable housing planning policy in place that requires developers of private homes to provide a percentage of these as affordable homes to meet local needs.

The Council is also building new affordable homes for rent itself and is working with housing associations to build more affordable homes. However suitable sites, particularly in Golborne and Lowton, and funding are limited. However, a small site in Golborne is currently being proposed by a housing association for 10 two bedroom apartments for affordable rent. Subject to planning permission, these homes will be built in the next year.

9. **I understand that the plan is for low cost high density housing. This does not reflect the present houses available in the area.**

The plan is not for low cost high density housing. If the sites in Golborne and Lowton are developed, they will be predominantly market housing with an element of low cost, high density housing and a further element of affordable housing.

**Housing should be located elsewhere:**

10. **The new homes should be spread evenly throughout the borough to lessen impact.**

The Core Strategy primarily directs new housing towards the east-west core of the borough, notably the towns of Wigan, Ince, Hindley, Platt Bridge, Leigh, Atherton, Tyldesley, and Ashton-in-Makerfield. The majority of new homes will therefore be spread across these towns. If 2,500 homes are developed in Golborne and Lowton, this will represent around 15% of the overall requirement.

11. **New homes should be built in close proximity to Wigan town centre which has two railway stations, a bus station, a major hospital and other services and amenities.**

Approximately one-fifth of all sites identified in our Strategic Housing Land Availability Assessment as having potential for housing are in Wigan. A number of these are within walking distance of the town centre including Gateway House on Standishgate, the former household waste recycling centre on Frog Lane and adjacent land, and Wigan Pier Quarter.

12. **Only sites in close proximity to major centres of work should be considered.**

Golborne and Lowton are much closer to the major employment centres of Manchester, Liverpool and Warrington than many other parts of the borough. If the Golborne and Lowton sites are developed, there will be genuine potential to transform opportunities to commute to these locations by public transport, including the provision of strategic bus service links into the new guided busway at Leigh. There will also

be a significant opportunity to support the provision of a rail station at Golborne, taking advantage of new service opportunities between Wigan and Manchester and existing regional services on that line. If that isn't possible then enhanced connections to Newton-le-Willows station is a significant alternative opportunity.

- 13. Available land at Plank Lane in Leigh could provide all the housing that is needed in this area. This is a sustainable brownfield location with frequent bus services into Wigan and Leigh.**

The available land at Plank Lane is identified in our Strategic Housing Land Availability Assessment as a potential housing site with capacity for 496 homes and it has outline planning permission. A tender process is underway to determine the principal housebuilder. A detailed planning application will follow in 2013. While it contributes to the supply it falls a long way short of meeting the overall supply needed.

- 14. There are already hundreds of houses not started and these should be taken from the target figures otherwise they would be counted twice, i.e. 600 homes not started at Bickershaw Marina.**

All unimplemented homes with planning permission with a reasonable prospect of delivery over the next 15 years have been included in our housing trajectory and therefore contribute towards our 15 year housing land supply. These are listed in the tables 'Sites with planning permission' and 'Sites with Outline Permission' in Appendix D of the Strategic Housing Land Availability Assessment 2012 Update.

- 15. All the proposed sites in Golborne and Lowton are adjacent to existing estates. Why could the unused land north of Lowton and Golborne not be developed?**

The broad site options are safeguarded for future development under policy GB2 in the Unitary Development Plan. The purpose of such safeguarded land is to provide a reserve of land outside the Green Belt that can be brought forward for development on review of the development plan, in preference to Green Belt land. The land to the north of Golborne and Lowton is in the Green Belt.

- 16. If development is to take place it must be south of the East Lancashire Road. This would reduce travel and infrastructure problems.**

With the exception of Lane Head, all land south of the East Lancashire Road is in the Green Belt where there is a strong presumption against development. In order to justify the release of Green Belt for development it is necessary to demonstrate the existence of exceptional circumstances. Exceptional circumstances have not been demonstrated.

- 17. There are many council owned estates where the properties are spread far apart with wide roads and grass verges and large**



**grassed areas for children to play. Such estates could be simply redesigned to be more space effective.**

Our Strategic Housing Land Availability assessment update does identify some sites which are available for new housing development on both private and local authority housing estates, including unused grassed areas. However it is not financially viable or feasible to redevelop existing housing estates in order to create new layouts which are more space efficient.

- 18. Planning permission was given to build houses on the old BICC land at West Bridgewater Street, Leigh but no building work has started there.**

As a highly constrained site it may not be viable for it to be developed in the current housing market. In many respects that is the reason for the shortfall that has been identified. Nevertheless the capacity of existing planning permissions for housing has been taken into account in the overall supply of land to meet future needs.

- 19. There is a higher shortage of housing in other proposed areas e.g. Standish that needs to be addressed especially to cope with the growing ageing population.**

Housing needs have been considered on a borough-wide basis whilst the location of land to meet that need is determined according to the availability of suitable land and compliance with our spatial vision and strategy.

The nature of the settlement pattern in the borough with many closely linked settlements means that housing need can usually be satisfied close to where the need arises. There is no duty on the council to satisfy housing need in the locality in which it arises. Standish forms part of a wider housing market area including parts of Wigan within which housing needs will largely be met.

- 20. Golborne and Lowton have poor public transport links with the Regional Centre and much of Wigan Borough. Consequently there is a danger that high levels of residential development would be very car-dependent. The provision of a new railway station is very uncertain and cannot be relied on. In these circumstances, it is important that the total quantum of development taking place in this location is well below the total capacity of the three identified sites, and is phased so that it does not divert demand from more sustainable locations in the east-west core.**

There are opportunities to provide good alternatives to the private car, given the quantum of development that could be proposed and the timescale for implementation of the Core Strategy. There is certainly no justification for restricting development in this area more than other parts of the borough on the grounds of lack of public transport provision. The need to phase new housing development in order to avoid diverting demand from more sustainable brownfield locations is noted and remains a concern for the council. However, the council

needs to demonstrate a deliverable supply of sites in line with national planning policy. This will necessitate some greenfield development in advance of some brownfield sites.

**21. Golborne and Lowton have already been merged inappropriately and the separate identities of the two settlements compromised.**

It is accepted that the previously separate settlements of Golborne and Lowton have now been merged by development. Whether or not this is inappropriate is not relevant to this consultation and provides no evidence for or against the current options for development in the area.

**22. Although brownfield development may be more expensive in some instances, I have not been able to find your evidence suggesting any clear cost-benefit of using greenfield land in your current proposal.**

Our proposals comply with national planning policy on use of brownfield land which specifies that we must “encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.” We have therefore focused development on brownfield land sites as far as we are able. However all development cannot be provided on brownfield land and national planning policy is concerned about deliverability. In the present economic climate this will necessitate some greenfield development in advance of some brownfield sites.

**Other housing issues:**

**23. The proposals are insufficiently detailed and do not say what type of housing will be built and where.**

We have been consulting on the principle of housing in these locations at this stage. The extent, boundaries and other details of development will be determined in a subsequent development plan document.

**24. The development will devalue the area and impact on property values.**

The reduction of property values is not a material consideration when considering planning applications or allocating land for development. However, there is no evidence that housing development in the past has devalued property values across Golborne and Lowton.

**Scale of development issues:**

**25. It represents around a 60% increase in housing in this small area with only minor consideration given to other sites available elsewhere in the borough. The scale of development is excessive.**

There are around 9,300 homes in Golborne and Lowton. An additional 2,500 homes would be an increase of 25%, not 60%. In identifying suitable sites for housing, we have undertaken a thorough and detailed assessment of all land available throughout the borough. The Core Strategy itself includes a key strategic site and five broad locations for large scale housing development and the recent consultation has considered options in Standish, Wigan and Leigh.

- 26. The scale of development will turn Golborne and Lowton into towns and could result in Liverpool and Manchester becoming one conurbation. Small developments on brownfield sites have less of an impact and any new building must be at a scale appropriate to the existing houses adjacent.**

Development at Golborne and Lowton will not result in the merging of Liverpool and Manchester as the vast areas of Green Belt land which separate the two conurbations would remain. The borough's overall housing requirement cannot be met on small brownfield sites alone. We will ensure that new developments are integrated effectively and respect and acknowledge the character and identity of the locality, in line with local planning policy.

- 27. The figure of 600 'aspirational' homes is well documented as the limit of the Council's ambition in literature from late 2010. The idea was sold as making money to prime regeneration. Mass market housing across all three sites represents a qualitative change to the Core Strategy.**

The figure of 600 was only arrived at as part of a proposed modification put forward by the council to the public examination in January 2011. It remains that 600 higher quality, lower density 'aspirational' homes are proposed across the sites in Golborne and Lowton. These will aid regeneration in the borough, particularly in the east-west core. The addition of market housing on the remainder of the sites does not alter this.

- 28. The council expects to conclude all the Golborne and Lowton land should be released, with quibbles about actual availability being overcome by referencing to phasing and change in attitude over time. The original Core Strategy has been altered, both in terms of numbers and the underlying purpose of regeneration. Regeneration is likely to be set back by providing the developers with easy pickings on productive farmland at Lowton.**

The council has, as required by the inspector, set out the available options in an impartial and objective manner.

The Core Strategy has not been altered in terms of numbers or the underlying purpose of regeneration. The housing numbers remain at a net 1,000 new homes per annum. The emphasis remains on regeneration of the east-west core.

Any potential threat to the regeneration of the east-west core would be avoided by a clear and robust phasing policy for the release of housing land contained within the forthcoming Allocations and Development Management Plan. Such a policy would ensure that sites would only be released for development where they would not be likely to prevent or hamper the development of sites within the east-west core which are key to the implementation of our spatial strategy.

- 29. The alternative options and commentary that introduces them, points to an unbalanced approach to land use across the borough with the potential for the heavy over-development of the eastern**

**half of the borough, the parts that are the poorest serviced by public transport.**

Golborne and Lowton are in the south and centre of the borough rather than the east which we would regard as Leigh, Atherton and Tyldesley / Astley. Just over 40% of the supply is in the east of the borough. With the full potential supply in Golborne and Lowton added it is around 53% of the supply. This is reasonable given the proximity of the area to the rest of the Manchester city region. Furthermore, the east of the borough will soon have the benefit of the Leigh Guided Busway, which will vastly improve public transport connections into Manchester / Salford from the east of the borough, with significant potential for services to link into Golborne and Lowton too. The developments will provide further opportunities for improvements.

- 30. Whilst I can't support this option, I do accept a smaller version of the proposal would make sense, though only if the council commits to improving transport infrastructure and develops the new housing stock as sustainable communities with enough schools, shops and facilities for the residents.**

Developers would be required to provide a substantial contribution towards necessary new and improved transport infrastructure and service provision.

- 31. Research says that small communities are more beneficial to improve lifestyle. You want to create a large community like Milton Keynes.**

The overall housing requirement of 16,500 homes over the 15 year period has been accepted by the inspector and is not negotiable. Whilst it would be good if the requirement could be satisfied through the construction of small developments, the requirement is too high and there is insufficient land available to achieve this effectively. This would result in dispersed development which would not be able to contribute to significant infrastructure improvements related to developments.

- 32. I understand that this is part of a government plan to build some 81,000 homes, I feel knowing this particular area this is knee jerk reaction to the problem. I do not dispute that we may in the UK have a housing shortage but any such houses should be built in the correct area and for the correct reason.**

The council has made its own independent assessment of total housing need in the borough for the period of the Core Strategy. The total requirement has been accepted by the independent inspector when considered against all evidence prevailing, including the Government's own population forecasts and household projections. It is only part of a government plan in so far as national planning policy obliges us to meet the full, objectively assessed needs for housing in the area.

## **Traffic and congestion issues:**

### **Additional traffic and congestion**

- 33. Development will result in increased traffic on already heavily congested routes, particularly at peak times, including at junctions with the A580 East Lancashire Road. It can take over 20 minutes to get out of the estate on some days. In addition, the houses proposed at Plank Lane in Leigh and the new Sainsbury's supermarket in Golborne will add to the congestion.**

Our Initial Transport Assessment concludes that the development of these sites will lead to an increase in the peak time car borne trips in the Lowton and Golborne areas, increasing congestion. However, measures such as sustainable transport improvements, off site improvements, the provision of new link roads across the appropriate sites and improved bus services, including the potential of an extension to the Leigh Guided Busway to serve Lowton, will help to mitigate the impact.

- 34. Heavy goods vehicles pass through the area to access the M6 motorway. The signs to use Junction 23 are ignored and are not compulsory. Many heavy goods vehicles use Winwick Lane as a shortcut between the M6 motorway and the A580.**

We will continue to work with the freight industry to ensure heavy goods vehicles use the most appropriate route for their journeys.

- 35. Rothwell Road is used as a drop off and pick up area by parents of children attending Golborne High School. The development of Rothwells Farm would worsen congestion.**

Additional pupils at Golborne High School would likely result in increased traffic at school drop off and pick up times. However, the school is easily accessible by public transport and is within easy walking and cycling distance of the sites, particularly land at Rothwells Farm and land east of Stone Cross Lane. Additional school buses could be provided to meet increased demand.

- 36. Increased congestion will affect people's ability to access employment.**

There are four modern employment areas in Golborne and Lowton and others nearby in Leigh and Ashton. Golborne and Lowton are also much closer to Manchester, Liverpool and Warrington than other parts of the borough and there is a genuine potential to transform opportunities to commute by public transport. Whilst the developments would increase congestion in the area, there are a number of opportunities to provide good alternatives to the car, specifically strategic bus service links into the new guided busway at Leigh, and a significant opportunity to support the provision of a rail station at Golborne, taking advantage of new service opportunities between Wigan and Manchester and existing regional services on that line.

- 37. Increased congestion will prevent access for emergency services.**

The emergency services have been made aware of our proposals and have not made any representations. Access to the site will be designed to the required highways standards.

- 38. The extra traffic that will be generated by the Parkside proposal has not been taken into account. This must be finished before more building is allowed.**

Any additional traffic generated by the Parkside proposal that would impact negatively upon the borough's transport network would require contributions from the developers towards measures to tackle this impact. This could include improved public transport links to Newton-le-Willows, Parkside itself, Warrington and St.Helens.

- 39. In 2007, the housing proposal at Bickershaw Colliery was amended to include Eco-homes with parking for just one car due to identified traffic problems. If the cars from 650 homes were going to be problem, Lowton will not be able to cope with cars from over 3000 new homes.**

The application of eco-homes standards to housing is intended to meet wider environmental objectives relating to such things as energy use and sustainability. It cannot be and was not used in response to specific traffic congestion problems in particular localities.

**Road safety issues:**

- 40. Highway safety will be compromised increasing risk for motorists, cyclists and pedestrians, including children. The roads are currently not safe for cyclists and there are no cycle lanes.**

Any new highway measures to accommodate new development sites will be subject to a road safety audit process to ensure the safety of all road users are considered in depth and all necessary highway standards are met. It would be anticipated that a substantial contribution would be made from the developers towards measures to mitigate congestion, including increasing the safety and variety of routes available for cycling.

- 41. New housing development east of Stone Cross Lane will conflict with heavy goods vehicles from the adjacent industrial estate.**

The vast majority of heavy goods vehicles will enter and exit the industrial estate directly from the A580 East Lancashire Road. This will limit conflict with any new housing development on land east of Stone Cross Lane. Regardless, any new highway measures to accommodate new development sites will be subject to a road safety audit process to ensure the safety of all road users are considered in depth and all necessary highway standards are met.

- 42. With the East Lancashire Road having to take yet more traffic, I can see little sign of any improvement for pedestrians to cross this barrier other than at a very limited number of points; similar issue apply to Newton Road.**

Whilst we recognise that there are existing congestion issues at the junctions along the East Lancashire Road at peak times, our Initial Transport Assessment concludes that although development would increase congestion in the area, measures such as sustainable transport improvements, off site improvements, the provision of new link roads across the appropriate sites and improved bus services will help to mitigate the impact.

**Parking issues:**

- 43. The major roads surrounding the sites are congested by parked vehicles. This will hinder effective access into the sites.**

Any new access points to accommodate new development sites will be subject to a detailed transport assessment to ensure any additional traffic can be accommodated and all necessary highway standards are met.

**Road infrastructure issues:**

**Local access issues**

- 44. The proposed access onto the site option east of Stone Cross Lane is close to a primary school which will place children at increased danger.**

See response to point 43 above.

- 45. There isn't a feasible access to the site east of Stone Cross Lane, unless major road works are carried out to provide access from the East Lancashire Road. Church Lane isn't suitable due to congestion.**

Access to the land east of Stone Cross Lane can be feasibly achieved from both Stone Cross Lane and Church Lane. There will be no new junctions onto the A580 to serve these developments.

- 46. Some of the identified potential access points are not suitable, including Pocket Nook Lane, Carr Lane and Rowan Avenue. Pocket Nook Lane and Carr Lane have insufficient parking places for residents and are used by horse riders and children playing. Rowan avenue is a narrow estate road.**

Any new access points to accommodate new development sites will be subject to a detailed transport assessment to ensure any additional traffic can be accommodated and all necessary highway standards are met.

- 47. Pocket Nook and East of Stone Cross Lane have no ready vehicular access to the A580 East Lancashire Road. New junctions onto the A580 will slow traffic and make congestion even worse.**

There will be no new junctions onto the A580 to serve these developments.

#### **Congestion pinch-points:**

- 48. The narrow roads and lanes in the area are not suitable for the existing level of traffic.**

Our Initial Transport Assessment has identified existing congestion issues at peak times at numerous junctions in the area, notably at junctions with the A580 East Lancashire Road and the A572/A579 (Lane Head) junction.

- 49. The A580 is totally inadequate for local needs.**

The A580 experiences congestion at certain locations at certain times of the day, mainly during the peak hour periods. These periods of congestion are generally no different to those that occur along the A580 within other local authority boundaries. It is important that we maximise the potential for journeys that currently travel along or across the A580 by private car to transfer to public transport, walking or cycling by improving the attractiveness of these modes by utilising developer and public funds where available.

#### **Road surface etc.**

- 50. The road infrastructure cannot cope with existing congestion levels. Road surfaces are deteriorating and need to be improved. This would be made worse by additional traffic.**

The condition of road surfaces in Wigan is consistently amongst the best performing in Greater Manchester. We are committed to providing the most efficient and value for money approach to road maintenance including providing measures to restrict traffic growth.

#### **Traffic mitigation issues:**

- 51. There is no guarantee that the necessary road improvements needed to mitigate the developments would be implemented. Built development prevents road widening and the construction of mini roundabouts so not sure how transport improvements will be implemented. To say measures to tackle congestion could be taken insults the intelligence.**

It would be anticipated that in order for sites to be developed, at the very least the measures necessary to accommodate traffic generated by those sites would be implemented.

- 52. The proposed transport mitigation measures are inadequate; relying mainly on the hope that an increased number of journeys would be carried out by public transport. The reality is, that due to the distances to employment centres and the lack of direct public transport links this is unachievable.**

We are continuously working in partnership with Transport for Greater Manchester and public transport operators to significantly improve the public transport offer within the borough. This is a key component of the Greater Manchester Local Transport Plan and Wigan's emerging Transport Strategy. Site developers will be expected to contribute substantially towards these improvements. The development of the



Leigh-Salford-Manchester busway is a massive opportunity to improve bus services across the east and south of the borough. Golborne provides an opportunity to provide a new rail station, and there are also good opportunities to link into Newton-le-Willows rail station. These provide genuine potential to improve sustainable access into Wigan, Manchester, Liverpool and Warrington.

**Suggestions:**

- 53. An extension of the A579 at Leigh to the M6 at Junction 22 is needed if congestion is to be reduced in Lowton.**

A bypass linking Leigh to the M6 at Junction 22 could potentially reduce congestion in Lowton. However, this is unlikely to be provided in the foreseeable future due to other road scheme priorities. We will continue to work to reduce congestion in the local area.

- 54. More routes for local commuter traffic must be provided across the Manchester Ship Canal which acts as a physical barrier to commuters travelling to employment areas on its south side. Local authorities must be made to cooperate with one another, to avoid parochialism preventing the solution of problems that extend beyond local boundaries to achieve this.**

We are continuously working in partnership with Transport for Greater Manchester and public transport operators to significantly improve the public transport offer within the borough and across Greater Manchester. This is a key component of the Greater Manchester Local Transport Plan and Wigan's emerging Transport Strategy.

We also work closely with other local authorities on transport issues. The CANGo initiative is a good example of partnership working with Warrington and St. Helens to improve cross boundary public transport accessibility to opportunities and services in the Culcheth, Ashton, Newton-le-Willows and Golborne areas. We have previously worked with West Lancashire and Bolton Councils in implementing Quality Bus Corridors and the Leigh-Salford-Manchester Busway is being delivered in partnership with Transport for Greater Manchester, and Salford and Manchester City Councils.

- 55. There is room on the Pocket Nook site, or at the junction with the Atherleigh Way, to build a grade separated junction, perhaps in conjunction with a relief bypass for Lane Head. This would take the pressure of Newton Road/Church Lane a bit and might make the traffic problems new housing in Lowton would create less of a headache.**

A potential link road through the site to link from A572 Newton Road, via Pocket Nook Lane through to A579 Lowton St Mary's Bypass would be funded via site developers. In addition, an internal link road from Stone Cross Lane to Church Lane would be provided as part of the development east of Stone Cross Lane. Providing new road infrastructure will need to be balanced with improvements for sustainable modes of transport.

56. **There is a need for traffic measures that allow a smooth flow of traffic down High Street and Heath Street in Golborne. The ability to cross the A580 at Golborne island at peak times also needs to be considered.**

It would be anticipated that a substantial contribution would be made from the developers towards measures to tackle congestion in the area. This could include measures to tackle these issues.

### **Public transport issues:**

#### **General:**

57. **Public transport provision in the area is unacceptable. There is no railway station and the main Leigh-Wigan bus service takes an hour to get into Wigan. This is not a viable alternative to the car. There is a lack of co-ordinated bus and rail services. Access into major employment areas is very poor.**

We are continuously working in partnership with Transport for Greater Manchester and public transport operators to significantly improve the public transport offer within the borough. This is a key component of the Greater Manchester Local Transport Plan and Wigan's emerging Transport Strategy. The development of the Leigh-Salford-Manchester busway is a significant opportunity to improve bus services across the east and south of the borough. Development in Golborne and Lowton would create opportunities for strategic bus service links into the busway at Leigh, and a significant opportunity to support the provision of a new rail station at Golborne. In addition, there are opportunities to improve connections with Newton-le-Willows rail station.

58. **Wigan was recently reported as having one of the worst public transport systems in the country.**

The report by the Campaign for Better Transport is misleading in the way it portrays Wigan. Wigan is compared to major cities such as Liverpool and Manchester but this is unfair as the borough is a large and diverse district not a major metropolitan city with an integrated transport system and common ticketing. The report finds the borough scores well on many transport matters such as the levels of cycling. The Core Strategy is very much about focussing development around opportunities for public transport such as Leigh-Salford Manchester Guided Busway and the Wigan Transport Hub and will secure the delivery of a number of new complementary road schemes.

#### **Bus specific:**

59. **Whilst there is a regular bus service to Wigan and Leigh there are no bus services to Manchester, Liverpool and Warrington and a limited service to St Helens. A better service to Warrington is needed as it is a key transport exchange and employment centre. Travelling by bus is very expensive.**

There are 3 buses from Lowton and 2 buses from Golborne per hour into Newton-le-Willows rail station, which provides hourly services into

Warrington, three services per hour into Manchester and two services per hour into Liverpool.

We are working in partnership with our neighbouring authorities and public transport operators to improve public transport access to these locations and site developers will be expected to contribute substantially towards these improvements.

Development at Golborne and Lowton will provide genuine opportunities to improve bus services into Newton-le-Willows station and also strategic bus service links into the new guided busway at Leigh, which would provide much improved access into the Regional Centre. It would also provide a significant opportunity to support the provision of a rail station in Golborne, taking advantage of new service opportunities between Wigan and Manchester and existing regional services on that line.

**60. There should be a shuttle bus service which picks up local commuters and enables them to leave their car at home.**

By improving the reliability and frequency of existing and new bus services whilst also providing new connections to new destinations, including the Leigh guided busway, we can provide better public transport for the public as a whole. We are continuously working in partnership with Transport for Greater Manchester and public transport operators to significantly improve the public transport offer within the borough.

**Rail specific:**

**61. The Council has refused a train station in Leigh, and denied us a direct rail link to Manchester and Liverpool or Bolton which would have reduced congestion. Do these homes make this more feasible?**

Recent studies undertaken for Transport for Greater Manchester and Wigan Council by transport consultants have concluded that with all new rail station options assessed, the overall transport benefits are low compared to the high infrastructure and operational costs of providing a new rail station in the Leigh area.

**62. There is no railway station in the area. Promises to deliver a railway station at Golborne have not been honoured. If there is no money for rail, then at least encouraging bus providers to link Lowton directly with more locations outside the borough such as Warrington would help matters.**

We are working in partnership with our neighbouring authorities and public transport operators to improve public transport access to Warrington, St.Helens, Manchester and Liverpool. Site developers will be expected to contribute substantially towards these improvements. A rail station in Golborne is a longer term aspiration for the Council and there is potential for developers to contribute to the funding of this.

- 63. Even if a railway station at Golborne was built, the majority of people would travel to the station by car along the congested routes.**

The promotion of bus services to the any new station together with promotion of existing and new or improved walking and cycle routes to the station would occur, to inform commuters of the sustainable transport modes available.

- 64. The old Cheshire Lines railway should be re-opened, with a station at Lowton St Mary's linking to the Manchester-Liverpool line.**

Recent studies undertaken for Transport for Greater Manchester and Wigan Council by transport consultants have concluded that with all new rail station options assessed, the overall transport benefits are low compared to the high infrastructure and operational costs of providing a new rail station in the Leigh / Lowton area.

- 65. A big gain would be adoption of the Transport for Leigh railway station proposal for Pennington, perhaps with a commuter stop at Pocket Nook Lane. Furthermore the improvement of the old railway lines running north from Pocket Nook Lane into proper cycleways would give Lowton residents the opportunity to access new station facilities without reliance on private motor transport. The housing would occupy the route proposed thus reducing the possibility of a heavy rail station in Leigh.**

See response to point 64 above.

- 66. Electrification of the Liverpool to Manchester line provides the opportunity to establish a railway station to serve the area south of Leigh. This would enable sustainable access into Merseyside, Warrington, Cheshire and beyond as well as Manchester and would take some of the traffic from the roads.**

See response to point 64 above.

- 67. It is not good enough to point to vague plans of a railway at Golborne. In my view, any development is a non-starter without a firm plan to make this a reality. Any planning application must contain a mandatory integrated public transport plan with significant investment.**

A rail station in Golborne is a potential long term aspiration for the Council and there is potential for developers to contribute to the funding of this.

- 68. Culcheth and Glazebury Parish Council are concerned that part of the sustainability justification for this site now is the possibility of a new station at Kenyon Junction in the long term. This is not a valid argument, as the site is not in Wigan but in Culcheth, Warrington, past station proposals have been rejected at a public Inquiry and more recently at an assessment of rail in the Leigh area.**

A new station at Kenyon Junction is not anticipated. It has not been identified as part of any sustainability justification in any of our documents.

**Leigh Guided Busway:**

69. **The Leigh Guided Busway has not materialised. Regardless, many people in the area work in Warrington, Liverpool and Wigan and therefore will not benefit from it. Also, the Busway is not accessible from Golborne or Lowton without a supplementary car or bus journey.**

The Leigh-Salford-Manchester Busway is due to open in early 2015. Development at Golborne and Lowton will provide genuine opportunities to improve public transport access into Manchester, Warrington and Liverpool. These include opportunities for strategic bus service links into the guided busway at Leigh, improved bus services into Newton-le-Willows rail station, and a significant opportunity to support the provision of a rail station at Golborne.

**Environmental issues:**

70. **A scheme that is more sympathetic to the local environment and the needs of the community should be proposed instead.**

We have a duty to provide housing in the borough to meet our housing needs and to do this in the most sustainable way considering environmental and social factors. Policy safeguards in the Core Strategy would ensure development is planned sympathetically to its surrounding environment, through good design, quality landscaping and the protection of amenities. Other policy safeguards would ensure benefits to the community by requiring improvement / provision of appropriate facilities and public transport infrastructure.

**Wildlife:**

71. **There will be a detrimental impact on wildlife, including endangered and protected species and wildlife habitats including protected trees, woodland, hedgerows, wild flowers and ponds. Increased traffic will also increase incidents of 'road kill'.**

It is accepted that there will be an impact upon wildlife. Any site being proposed for development would have to be subject to detailed ecological surveys and the results would have to inform any scheme design and also the planning application decision making process. Any hedgerows on site would need to be assessed to see whether they would be protected under the Hedgerow Regulations 1997.

72. **The collapse of the food chain for birds and animals will detrimentally impact upon Pennington Flash.**

Development of any of the sites will result in the displacement of some species but it would not, at the scale proposed, lead to the collapse of the food chain.

73. **Your own document ‘Wigan’s Biodiversity - Appendix 6: Strategic Sites’ (2010), attest to the environmental damage that would be done under these proposals.**

The information within Appendix 6 of ‘Wigan’s Biodiversity’ gives an overview of the ecological interest of these sites based on the evidence available when the document was produced. It is acknowledged that there is ecological interest on the sites and that there will need to be more detailed assessment in relation to this.

**Protection:**

74. **Development at Rothwell’s Farm, particularly in the north east corner, would cause disturbance to one of Wigan's most important nature conservation sites at Lightshaw Water Treatment Works Lake, which is a grade A Site of Biological Importance and a proposed Site of Special Scientific Interest as an extension to the Abram Flashes SSSI, to which it is ecologically part.**

The site of biological importance at Lightshaw Limebeds is within 60 metres of the north east corner of the site. It is a grade A site. However it is not a proposed Site of Special Scientific Interest. This has been confirmed by Natural England on 25 September. The development would not cause direct impact upon the site of biological importance but any potential for indirect impact or disturbance would need to be assessed and mitigated for within the detailed design process.

75. **There is a small area of protected woodland attached to the land east of Stone Cross Lane.**

There are a number of trees (including veteran oaks) on and bounding the site some of which are protected by Tree Preservation Orders. There are no areas of woodland currently subject to protection. It is identified that retention and enhancement of trees on site would be a key consideration in any proposals for this site.

**Agriculture:**

76. **Loss of agricultural land and working farms in private ownership. World wide food production is subject to drought conditions therefore it is important that we protect our own farmland for crop production to reduce reliance on food imports.**

Farming in the area is fragmented already as a result of past development and the East Lancashire Road. None of the land at these broad site options is classified as grades 1, 2 and 3a ‘best and most versatile’ agricultural land under the national agricultural land classification. It is therefore not protected from irreversible development by national planning policy.

**Pollution**

77. **The developments will increase light, noise and air pollution which will damage the environment, impact on health, and destroy the character of the area.**

Matters relating to noise, light and air pollution can be controlled through the planning process at the detailed planning stage. Residential development is unlikely to create unacceptable levels of noise on site or light. Traffic arising from the development will contribute to increased noise and air pollution levels but its impact will be mitigated as far as practicable and it would not destroy the character of the area.

- 78. It has been reported in recent years that the air quality in Leigh and Lowton is of poor quality, and those suffering from asthma and other respiratory illnesses is increasing. As nitrogen oxide levels are implicated in increases in childhood asthma, it is necessary for a full scale modelling exercise on traffic volumes and their impact on pollution. Building so close to the A580 will be dangerous to the health of babies, children and older people. The area relies on green spaces like this to counteract pollution coming from the A580 East Lancashire Road, and produce oxygen.**

Air quality is not materially different in Leigh and Lowton than elsewhere in the borough. It is widely recognised that there is a link with traffic and air quality. A detailed transport assessment will be required at the planning application stage and a financial contribution would be required for air quality management schemes as deemed appropriate and based on the outcomes of the detailed transport assessment. Mitigation measures will be put in place, incorporating tree cover alongside the East Lancashire Road, landscape bunds and screening. Also, Improvement in bus services and cycling / walking infrastructure will be also be incorporated which would assist in reducing the amount of vehicles on the road.

- 79. New homes will lead to increased litter in the area.**

The potential increase in litter is not a material consideration when considering planning applications or allocating land for development, it is a matter of personal responsibility and enforcing the law.

**Residential amenity:**

- 80. New homes behind my house could block my sunlight and impact on privacy and security.**

There are policy safeguards to protect the amenity of existing residential properties including for overshadowing. There are also policy safeguards to prevent undue levels of overlooking and loss of privacy, such as minimum distances between the main elevations of houses. These are contained in our Residential Design Guide Supplementary Planning Document.

We will require developments to incorporate appropriate mitigation measures, including siting, design and orientation of buildings and the use of effective landscaping, to minimise the impact of development on the amenity of nearby residential areas.

### **Disruption**

- 81. There will be a lot of disruption in the area whilst the new houses are developed.**

Development does cause disruption but this can be minimised through conditions placed on when and how development can take place and/or developers according with the industry's considerate constructors scheme.

- 82. New social housing will attract unsavoury characters that will bring problems to the area. Tenants who do not look after their rented property will create a bad image to a decent area. The development will lead to increased crime and anti-social behaviour in the area.**

Social housing is subject to strict management arrangements and tenancy agreements to ensure that properties are maintained so there is no reason to assume it would be bad for the area. On the contrary it would help meet a local need for people who cannot get a mortgage to purchase their own home. Regardless, development would consist predominantly of market housing and should be designed to reduce the risk of crime and anti-social behaviour in line with national and local planning policy.

### **Recreation issues:**

- 83. Development will result in the loss of recreation land, open space and public rights of way used for a variety of leisure activities including walking, dog walking and fishing. This is contrary to the national agenda of encouraging people to be active.**

Most of the land is in private ownership with limited public access. Existing open space and sports and recreation provision is identified in our options consultation document and, as such, has been discounted from the estimated developable areas. Development would retain and/or provide areas of open space, sport and recreation, including play space and/or contribute to off-site provision as appropriate in line with the requirements of national and local planning policy. Public rights of way have also been identified and would be retained or diverted through statutory procedures if warranted. Opportunities for people to undertake exercise for personal fitness could therefore be increased if improvements to the quality and accessibility of open space are secured should this land be allocated for housing development.

- 84. There is insufficient green space, parks and play space in the area, particularly north of the East Lancashire Road. There will be nowhere for children to play. The Bonk does not provide an appreciable open space function relative to this area.**

Much of the land is in private ownership with limited public access. The Wigan Borough Open Space, Sport and Recreation Assessment (2007) provides details of facilities and provision at that date and identified that these were lacking in parts of Golborne and Lowton.



Development would retain and/or provide areas of open space, sport and recreation including play space, and/or contribute to off-site provision as appropriate in line with the requirements of national and local planning policy. Need for additional facilities will be determined in line with national and local policy and provided for through our Allocations and Development Management Plan and planning permissions.

Principal and township parks in the borough have been identified and classified by Wigan Leisure and Culture Trust in their Parks and Greenspaces Strategy (June 2008) and the Core Strategy reflects those priorities. However, Golborne 'Bonk' does not serve Lowton particularly well and opportunities to improve park provision in Lowton could be explored alongside proposals for development.

- 85. Existing sports grounds should be maintained and more land released to provide additional facilities, which are urgently needed. There has been a steady reduction in playing fields and facilities in the area.**

Existing sports facilities are either the responsibility of Wigan Leisure and Culture Trust, who provide maintenance and improvements in accordance with their management plans, or are provided by private sports clubs. The Wigan Borough Open Space, Sport and Recreation Assessment (2007) provides details of facilities and provision at that date and identified that some investment was required in parts of the Golborne and Lowton area. Need will be assessed further in line with national policy as further details are worked up.

- 86. It is inappropriate to build access points through school playgrounds and fields.**

We agree. Access points will not be taken through school playgrounds and fields unless these have been appropriately relocated.

- 87. Development would put a strain on current leisure facilities; Pennington Country Park for example is well used, however in busy periods is crowded and in my opinion can make for an unpleasant visit.**

Pennington Country Park is a principal park serving the east and south of the borough in particular. The majority of the housing proposed is to meet the demands of the current population through changing household requirements and population increase from natural change. People will use Pennington Country Park from that wider catchment area whether or not development takes place in Golborne and Lowton specifically.

#### **Green Belt issues:**

- 88. The Green Belt should be protected from development. The Council has not proved exceptional circumstances for the removal of Green Belt land.**

None of these site options are in the Green Belt. They are safeguarded for future development under policy GB2 in the

Replacement Wigan Unitary Development Plan. The purpose of such safeguarded land is to provide a reserve of land outside the Green Belt that can be brought forward for development on review of the development plan, in preference to Green Belt land. Preparation of the Core Strategy is such a review of the development plan.

**89. If safeguarded land is developed this time, what will protect the Green Belt in the future?**

National planning policy requires that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Should a future situation arise where there was no more safeguarded land available to accommodate new development requirements, this would present the exceptional circumstances to justify altering Green Belt boundaries as part of a review of the Local Plan, to designate land for development and to identify further areas of safeguarded land.

**90. The status of the land east of Stone Cross Lane is questionable as there was no public consultation when the land was removed from the Green Belt.**

This land has not been removed from the Green Belt since it has never been in the Green Belt. Green Belt status first came to the borough with the adoption of the Greater Manchester Green Belt Local Plan in 1984, which was subject to full statutory public consultation. This land was not included in Green Belt in that plan and has not subsequently been designated as Green Belt.

**School provision issues:**

**91. Primary and secondary schools are already at capacity. Additional schools may have to be built to accommodate demand. A lack of school place provision will result in increased traffic as parents drive children to school in over parts of the borough.**

If all of the broad site options were built to the capacity identified, there is potential to yield around 550 primary and 400 secondary pupils. This would require the provision of a new 3-form entry primary school or equivalent. There is sufficient capacity at local secondary schools. These figures have come from education service planners in the council's Children and Young People's Service and will be subject to changes over time. In line with the requirements arising, it would be anticipated that a substantial contribution would be made from developers towards funding such provision. The provision of new schools in the area would reduce the need for children to travel to schools in other parts of the borough.

**92. No details are provided as to where any new schools would be built.**

It is premature to identify sites for schools at this stage. Appropriate sites will be identified in the Allocations and Development Management Development Plan Document or a site masterplan prior to the planning application stage.

93. **The proposal to improve the schools in the area was shelved under the current government so school improvements / expansions are unlikely. Under the current Government, the only new schools that can be built are Free Schools.**

The abolition of the Building Schools for the Future programme is of no relevance to any future school improvements / expansions that may be needed to meet demand from additional development. It is not the case that only free schools can be built under the current Government.

94. **The Building Schools for the Future program proposed the replacement of closing Golborne & Lowton High Schools with a new amalgamated school on the Lowton Civic Hall site. The rationale was that extensive studies had showed that school intake numbers would decline rapidly over the next two decades, so a reduction in school size was justified. If these studies were correct, how come it has now been identified that we need all this extra housing if the number of children are declining? Or is it a case of statistics being manipulated & misused in order to validate a predetermined objective?**

The total housing requirement has been accepted by the inspector against all evidence prevailing, including the Government's own population forecasts and household projections. It is not up for negotiation. The statistics have not been manipulated or misused.

95. **There are no play school places for under-school age children and a lack of nursery schools in the area.**

This is not the case. There are three school nurseries and seven private nurseries situated within the Golborne and Lowton Children's Centre catchment area, and the Council's Childcare Sufficiency Team have confirmed that at present that there are approximately 25% surplus places. Rainbow Day Nursery is a new provider in the area and has very low occupancy at the moment as parents either are choosing more established nurseries in the Golborne area or are unaware of the service.

### **Service provision issues:**

96. **Development will place an increasing burden on existing services which are already over capacity, including doctors, dentists and medical services. There are already congestion and parking issues on Braithwaite Road at the doctor's surgery. Additional homes will make this worse.**

The Technical Report accompanying the options consultation document was prepared to provide an initial assessment of key infrastructure services issues. Key infrastructure stakeholders were consulted as part of this process and their responses were included.

For primary health provision it is expected that current General Practices could expand to accommodate new patients, rather than there being a need for new practices, subject to appropriate premises being available. If premises are not suitable it is anticipated that a

substantial contribution would be made from developers towards funding additional provision. However the new Health and Social Care Act 2012 has now opened up health services to the market and new services will be expected to develop in response to market need.

For secondary health provision the Foundation Trust (Hospitals) has a major investment programme up to 2020 which will provide significant improvements to medical services.

Currently dentists can draw their patients from anywhere and are not restricted by geography therefore dental provision can only be considered at a borough-wide level.

- 97. There is a lack of other key services including youth facilities, banks, libraries, a police station, shops, supermarkets, leisure and other community facilities. There needs to be more investment in local amenities, not more housing. How will any additional service provision be delivered? Who will pay for it and where will they go?**

The Technical Report referred to above sets out the approach to identifying the key infrastructure and services issues that could be critical to development not proceeding without investment, as far as we have been able to consider this at this stage. It also indicates other infrastructure and service issues that will need to be taken into account in the next stage, once it is clear which site options are proposed to be taken forward.

It would not be possible to provide a local plan for the next 15 years, as we are required to do by national planning policy, if this could only be done where there were firm plans and funding commitments in place to meet the additional infrastructure requirements arising from development.

Once the chosen options are confirmed and the Core Strategy adopted, service and infrastructure providers can adjust their spending programmes to meet any requirements arising from the development.

We also intend to charge the Community Infrastructure Levy on all appropriate new development so that part of the value arising from new development is used to contribute to funding infrastructure needs arising from development.

### **Infrastructure issues:**

- 98. There is insufficient electricity, water and sewerage capacity in Golborne and Lowton. The water quality in the area is very poor. The construction of more homes could potentially make the quality worse. Water pressure is also very low.**

The Technical Report referred to above was prepared to provide an initial assessment of the key infrastructure issues. Key infrastructure stakeholders were consulted as part of this process and their responses are included in this document:

- Electricity - spare capacity is available at present.

- Water - there is sufficient infrastructure surrounding the sites that will support development, but there will be a requirement for minimal intervention depending on point of connection.
- Sewerage - at present there is no infrastructure to support development at Rothwell's Farm, there are no real issues with development of East of Stone Cross Lane and there is possibly capacity for foul only flows at Pocket Nook Lane. If any of the sites with issues are proposed for development, schemes for investing in upgrading capacity will be put forward to United Utilities for inclusion in their Asset Management Plan 2015 to 2020 or beyond.

**99. Investment in local infrastructure and facilities must be achieved up front to create the conditions for the construction of new houses to happen in a sustainable manner. Otherwise, the character of the area will be detrimentally affected.**

The Technical Report referred to above sets out the approach to identifying the key infrastructure and services issues that could be critical to development not proceeding without investment, as far as we have been able to consider this at this stage. It also indicates other infrastructure and service issues that will need to be taken into account in the next stage, once it is clear which site options are proposed to be taken forward.

It would not be possible to provide a local plan for the next 15 years, as we are required to do by national planning policy, if this could only be done where there were firm plans and funding commitments in place to meet the additional infrastructure requirements arising from development.

Once the chosen options are confirmed and the Core Strategy adopted, service and infrastructure providers can adjust their spending programmes to meet any requirements arising from the development.

We also intend to charge the Community Infrastructure Levy on all appropriate new development so that part of the value arising from new development is used to contribute to funding infrastructure needs arising from development.

**100. Money generated from the developments by Section 106 agreements or Community Infrastructure Levy must be spent primarily to benefit the people of Golborne and Lowton, not elsewhere in the borough.**

First and foremost, money generated from development will have to contribute to the delivery of infrastructure that is needed, at least in part, as a result of that development. This could be achieved through section 106 agreements, the community infrastructure levy or other means.

**101. New housing will increase flood risk in an area already prone to flooding, particularly at Rothwells Farm.**

All three sites are within flood zone 1 which indicates a minimal risk of flooding from rivers and streams. However, there are some small areas

identified as being at risk from surface water flooding. Development schemes would need to be designed so as not to increase the rates of surface water run-off, so flood risk should not increase as a result.

**102. Pennington Brook has recently been near to bursting its banks.**

Pennington Brook is not in close proximity to any of the three broad site options.

**Developability issues:**

**103. Subsidence associated with past mining will make the sites at Pocket Nook Lane and East of Stone Cross Lane undevelopable or will cause problems of instability. There are numerous tunnels and shafts present. Recent buildings have been rafted on Welford Avenue.**

According to the Coal Authority (ref: CSOP1010) the broad site options at Golborne and Lowton are not within an area of surface coal resource and do not contain coal mining legacy hazards.

**104. I am in receipt of a three year old communication from Orica UK Ltd about the storage of explosives at the Glazebury Depot in Wilton Lane. It is my understanding that we are still on the edge of the blast zone with the Lowton East proposals within the blast zone. What provision is envisaged in the proposals to meet current COMAH regulations?**

We have been in discussion with Orica UK Ltd in relation to the land at Pocket Nook Lane. Approximately one-fifth of the site (the eastern part of the site) is within the outer consultation zone surrounding their facility at Glazebury. Orica UK have confirmed that in this zone, no buildings which are considered vulnerable or of vulnerable construction under their regulations should be situated or built. Such buildings include glass fronted multi storey buildings, hospitals, schools, and other buildings where people congregate. This does not include residential development.

**105. The land at East of Stone Cross Lane has a fault line.**

To the north any fault line would run through existing residential areas of Lowton. It would need to be taken into account in the details of design of the site but would not constrain the site for residential development.

**106. Lancashire Aero Club has put forward a planning application to use a local airstrip for 365 days a year instead of the 28 days currently. This would mean large numbers of low flying aircraft coming in to land and taking off over the proposed areas being considered for housing.**

The site referred to is to the south of Golborne and Lowton. Taking-off and landing manoeuvres need not be over the settlements. However, if they are flying over Golborne and Lowton they would not materially alter the risk. The main landing route into Heathrow is over central

London and the main landing route into Manchester Airport is over Stockport.

- 107. When we purchased our property in Rothwell Road we were assured that no-one could build on this land and we were led to believe that this was actually in our deeds. We are also led to believe that should building be proposed within ten years of the purchasing of our property then compensation could be claimed.**

The land at Rothwells Farm is safeguarded for future development under policy GB2 in the Replacement Wigan Unitary Development Plan. The purpose of such safeguarded land is to provide a reserve of land outside the Green Belt that can be brought forward for development on review of the development plan, in preference to Green Belt land but which is protected from development during the plan period. Preparation of the Core Strategy is such a review of the development plan. It is unlikely that this information is recorded in property deeds but would be disclosed in the local authority search if the appropriate supplementary questions were asked. There is no right to compensation for the development of land adjacent to property in this manner.

- 108. Much of the land at Pocket Nook is in the ownership of Mr Adamson who is opposed to the development. It is therefore not available for development.**

The council is aware that Mr Adamson has expressed his opposition to the development at Pocket Nook Lane. However, it may be that were the land to be allocated for development and a specific offer to purchase made by housebuilders in the future to Mr Adamson, or whoever is the landowner at that time, that the offer would be accepted. If necessary, the council could use its compulsory purchase powers to enable the development to be delivered..

### **Employment issues:**

- 109. There are practically no jobs available in Lowton. Therefore, the majority of people who occupy the new homes will commute out of the area, adding to congestion and pollution.**

Golborne and Lowton have four modern employment areas: Stone Cross Park, Golborne Enterprise Park, Moss Industrial Estate and area around the Ashton Road / Wigan Road junction including CSL's warehouse and Murphy's plant and utilities. In addition it is a short distance to Leigh Commerce Park eastwards and the South Lancashire Industrial Estate to the northwest and the Haydock industrial estates westwards.

- 110. There is no prospect of new jobs coming to the borough. Over the past 30 years, the town has changed from a place of employment to a commuter town.**

The four employment areas referred to above have all safeguarded jobs and borough new jobs to the borough in the last 10-15 years.

- 111. Congestion could have a detrimental effect on business and commerce within the area as businesses may decide to locate elsewhere if transport routes are too congested.**

Congestion can be a constraint on business but congestion in Golborne and Lowton is no worse than most other parts of the wider sub-region.

**Consultation issues:**

- 112. Only writing notification letters to addresses that share a boundary with a site is inappropriate. All people who live and work in the area and nearby locations will also be affected and should have been notified. Relying on word of mouth is not acceptable; it should have been advertised in Borough Life magazine. Six weeks is not long enough particularly as it was during the summer holidays when many people were on holiday.**

In writing to neighbours of the broad site options, we wrote to nearly 500 addresses in Golborne and Lowton. These addresses would be the ones most directly affected by development on those broad site options. However, in recognition that people in the wider area would also be affected, we put up 9 site notices at key points of access to the Rothwell's Farm, East of Stone Cross Lane and Pocket Nook Lane sites. We sent nearly 4,000 letters and emails out to members of the public, organisations and other stakeholders on our consultation database, including many people in Golborne and Lowton. We also published a press release. This informed an article in the Leigh Journal on 1 August. All of these forms of publicity (apart from those to statutory consultees who do not live locally) gave notice of the drop-in session with planners in Lowton on 22 August.

The summer edition of Borough Life was published on 21 June 2012 and the deadline for inclusion of major features in that edition was the beginning of June 2012. Our consultation period started on 31 July and needed to accord with a timetable set out by the inspector. The copy deadline had therefore passed before we could work up options in sufficient detail for a meaningful item to be included and, indeed, before we could confirm the consultation dates.

The consultation ran for a period of six weeks as this is an established time adopted by councils across the country in carrying out consultation on development plans, in accordance with prevailing legislation. It is accepted by the Government's Planning Inspectorate to be a fair time period for responses to be made. It also accords with the Council's adopted policies for engaging with local communities on planning matters. We have never previously consulted over the main school holidays, unlike many other councils, but this time it was unavoidable as we were working to a tight schedule required of us by the planning inspector. Furthermore very few people would be away for the whole of the six week period.



- 113. There is distrust in the supposed consultation process. The council has deliberately not consulted widely and left people in the dark.**

We aim to consult in an open and fair manner as set out in the response above.

- 114. Given that Lowton is on the border of St Helens and Warrington Boroughs, have these Councils been consulted as part of this consultation process?**

St Helens Council and Warrington Council were both consulted and have not submitted comments.

- 115. I feel the drop-in session was set up to placate people and not actually listen to concerns. Names and addresses were taken but complaints weren't written down. We were not informed of the dates of other drop-in sessions so we could hear their points of view.**

The drop-in sessions were organised precisely for local residents, stakeholders and other interested parties in the vicinity of the proposed site options to view information on the options, and talk to council planning officers about their concerns. For comments to be considered by both the council and the inspector they need to be submitted in writing by the individual concerned. It was therefore not appropriate for officers to write people's comments down. All the drop-in sessions followed a similar format, the maps and information were tailored to suit the locality. People were able ask about other options if they were interested, but most were primarily concerned about their home area. Many of the overall views expressed by members of the public were consistent in each drop-in session, although modified to reflect each particular locality. It was therefore not seen as necessary to invite people to other sessions.

- 116. The Strategic Housing Land Availability Assessment consultation did not extend to everyone on the consultation database. The assessment is also not available on the council's consultation portal. A table in the SHLAA shows an annual average of 424 dwellings which is not consistent with promoting a windfall allowance of 500.**

The Strategic Housing Land Availability Assessment is an assessment of availability of land regardless of whether it is acceptable in local spatial planning terms. It is a technical document not a policy document. While focused public involvement might be appropriate, a general public consultation isn't. as it doesn't seek to set policy. The draft assessment was published for consultation on our website but the views of landowners and developers were sought specifically as they are best placed to advise on the potential deliverability of sites. It will remain available on our website along with the rest of our evidence base. The windfall rate demonstrated of 424 dwellings is per annum from 2006 to 2011. The windfall allowance of 500 dwellings accepted by the Inspector is the total for the period 2011-2026.

**117. Why consult on options for housing land but not consult on housing need?**

Housing need has been established from all evidence prevailing including the Government's own population forecasts and household projections.

**Evidence and policy compliance issues:**

**Local policy:**

**118. The forecasted increase in housing need should be reviewed. The evidence must be flawed.**

The identified housing requirement derives from a variety of evidence sources including the Greater Manchester Forecasting Model and the Government's own population forecasts and household projections. The requirement has been accepted by the Planning Inspector and is not negotiable.

**119. I challenge the Council's initial conclusions in Section 10, in particular in respect to congestion on the solution of public transport. I think these are blanket statements without serious consideration of the practical measures required, and if these conclusions / solutions are to be taken seriously then detailed explanations must be offered and promises to the residents of Wigan Council before approval.**

With regards to public transport in the Golborne / Lowton area, the Busway is a major investment in strategic public transport that has the potential to benefit the Golborne and Lowton area. We are working with Transport for Greater Manchester colleagues to expand this network and subsequent masterplanning of the broad site options, specifically Pocket Nook and East of Stone Cross Lane, can help to deliver these benefits.

Our initial transport assessments have determined that there is potential for a new railway station at Golborne. Alternatively better links can be established to Newton-le-Willows station, through partnership working with Warrington and St Helens Councils, Merseytravel and bus operators to enhance cross boundary bus service provision. The bottom line though is that we cannot guarantee the precise means of achieving public transport benefits and we can't make people use them.

**Different housing figures are used in the Cabinet report (2,640), options document (2,610), key questions (2,600), technical report (2,629), and sustainability appraisal (2,644).**

All figures provided are approximations and this is clearly stated in each document. Across the five documents there is only a range of 44 homes, which is negligible. Detailed masterplanning by developers would almost certainly arrive at a different figure again, either higher or lower. But the precise number of homes will not be known until the last 'block' is being built and there is no more scope for a revision of details

planning application changing house types and consequent layout details.

- 120. The Council should withdraw this plan and look at this issue again when the economy has recovered.**

The council needs to have a development plan in place to inform development, both now in a depressed economy and housing market and when the recovery comes. To start preparing a new plan then will be too late.

- 121. The LDF Transport Assessment is a jargon-based document which fails to address the inadequacy of public transport and represents a de facto acceptance of the private motor car. The proposal discloses no appropriate support.**

The Initial Transport Assessment is an overview of the current available evidence base regarding local transport issues, together with professional judgement on the potential mitigation measures necessary and their likely impact on the transport network.

- 122. I can find no evidence that impacts on the countryside are adequately addressed in the proposal.**

We cannot determine what the representation specifically means by "impacts on the countryside". The Sustainability Appraisal, however, considers a range of impacts that cover urban and non urban environments (identifying them to a greater or lesser degree) and these include environmental issues such as biodiversity, landscapes and soil and minerals.

- 123. The inclusion of further housing land and its location should be a matter for consideration at the local level in line with the localism agenda rather than by a Government Planning Inspector.**

The position that the council has to accord with is the Government's National Planning Policy Framework.

### **Other issues:**

#### **Motives:**

- 124. The people responsible for these plans and proposals do not live in the area.**

The plan has been produced by planning professionals employed by Wigan Council and reporting to Members of the Council. It is evidence based and appraised. Whether an officer lives a particular area or not is irrelevant.

- 125. Profit for national building companies should not be put before the needs and wishes of local people. The council is motivated by generating income from council tax receipts from the new houses.**

If there is not a need for the housing it won't be built, so there will be no profit and no council tax. Council tax is collected to pay part of the cost of the services provided by the council. If a house is occupied the occupants will use council services so will be liable to pay council tax.

**126. It is more a case of the proposals meeting targets rather than identified needs.**

The total housing requirement of 16,500 homes has been accepted by the inspector against all evidence prevailing, including the Government's own population forecasts and household projections. As the Inspector has concluded that the Core Strategy does not provide enough housing land to meet this need, these options have been examined and consulted upon to address this shortfall.

**127. Supermarkets have been opening in Leigh because they know housing is a done deal on these sites.**

No supermarket developer has been party to any such information because it hasn't and, indeed, isn't available. The council's proposals now are subject to further consideration at public examination.

**128. What would happen if the Parkside proposal was resurrected and the proposed house builds also went ahead? There seems to be little evidence of a regional strategy for planning in the area and as a resident of a town adjacent to the border with two other authorities, each with their own agenda, this is a real concern.**

The Parkside proposal and the housing figures for Wigan Borough both accord with the Regional Spatial Strategy, which remains part of the development plan for the North West of England, including Wigan Borough, Warrington and St Helens.

## **Issues raised by landowners, developers and other organisations**

### **Rothwells Farm**

#### **Environment Agency (ref: CSOP6195)**

- 129. We note that this site is identified as a Critical Drainage Area within your Strategic Flood Risk Assessment (SFRA).**

Only the very southern tip of the site does fall within a Critical Drainage Area but is not identified as being at high or intermediate risk of surface water flooding. If a detailed flood risk assessment is required at the planning application stage, the Environment Agency will be consulted.

### **East of Stone Cross Lane, Lowton**

#### **Emery on behalf of Wainhomes (ref: CSOP3228)**

- 130. We support paragraph 5.15 of the consultation document which states that the site can deliver 650 homes by 2026. The suitability, achievability and availability of this site has been set out in our previous submissions. However further environmental and technical surveys and reports have been undertaken to demonstrate that the site can come forward for development. This site is in the control of our client and it can meet the requirement of 600 dwellings that is already in the Draft Core Strategy notwithstanding the shortfall.**

Noted. Land east of Stone Cross Lane forms part of our proposed solution to addressing the identified housing shortfall.

#### **Environment Agency (ref: CSOP6196)**

- 131. We note that areas in the south-west and south-east corners of this area are at risk from fluvial flooding. In line with the National Planning Policy Framework (NPPF) the Sequential test should be carried out for this site. If this site passes the Sequential and Exception test a Sequential approach should be adopted for this site whereby houses are located outside the areas at risk from fluvial flooding.**

The sequential approach has already been applied to potential allocations and development proposals. Through the application of our Strategic Flood Risk Assessment site capacity has been reduced to exclude flood zone 3 areas and areas at intermediate to high risk of surface water flooding. Such areas have been removed from the developable area and will function as open space and / or for the purposes of green infrastructure. A detailed flood risk assessment will be required.

### **Pocket Nook Lane, Lowton**

## **Persimmon (ref: CSOP3330)**

- 132. The housing land supply should be split into broadly developable areas. There are several distinct individual sites at Pocket Nook, each with differing levels of deliverability. The company's land interest is suitable for housing delivery in the short-term. By failing to acknowledge this the constraints described are inaccurate, misleading and inhibitive to development.**

We consider that splitting sites into components parts to reflect ownership or otherwise is unnecessary, given that the varying deliverability across sites is reflected in the estimated phasing. Large sites, such as Pocket Nook, are likely to be developed over several years; and we assume that the least constrained parts of such sites are developed in the early phases. We are aware of the extent and location of site constraints. We disagree that the constraints are inaccurate, misleading and inhibitive to development.

- 133. The company's land is affected by significantly less constraints than the remainder of the policy designation and is the most favourable location in terms of relating to the existing settlement boundary.**

Noted. We have not identified any constraints on the land in Persimmon's ownership, with the exception of a small area at risk of flooding alongside Carr Brook.

- 134. The company's land accords with the requirement that a site 'should be available now' and 'controlled by a housing developer who has expressed an intention to develop'. Persimmon Homes is proactively seeking to deliver new homes at the Pocket Nook Lane site.**

The land at Pocket Nook Lane is safeguarded for future development. It will therefore only become available for development if it is allocated for housing development in the Allocations Development Plan Document. We are aware that the land is controlled by a housing developer who has expressed an intention to develop. The 2012 update of the Strategic Housing Land Availability Assessment acknowledges that there is a reasonable prospect of the development commencing before 2017.

- 135. In terms of achievability, the company's land accords with the requirement that a site 'be available with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable'. Furthermore, the fact Persimmon Homes is seeking to deliver the site meets the criteria that consideration should be given to the 'capacity of the developer to complete and sell the housing over a certain period'.**

The Strategic Housing Land Availability Assessment acknowledges that there is a reasonable prospect of the development commencing before 2017.

- 136. Prioritising the delivery of the company's land will act as a confidence builder, encouraging interest and demonstrating commitment for the allocation; it will support the development of a community hub and community assets which will take time to deliver, as well as supporting the 'improvements in infrastructure serving the area, notably for traffic, sewerage and education'; it will facilitate access and redevelopment of the allocation through access to the north; and it is ideally positioned to accommodate a mix of housing types that will provide an appropriate transition between the existing higher density homes to the north, and the lower density homes proposed at the south of the site. The company would gladly undertake a Masterplan for the entire Safeguarded Land policy designation.**

It is premature at this stage to determine the appropriate phasing of the site. Should the site be identified as a broad location in the Core Strategy, its phasing will be determined in the Allocations Development Plan Document.

**JASP Planning on behalf of the A F Bideoake Will Trust (ref: CSOP3505)**

- 137. In terms of the site at Pocket Nook Lane, the site is considered to be in a highly sustainable location with good access to shops and key services, such as schools etc. There is significant scope for improvements to highways infrastructure and scope for connection into existing bus routes. There is ample room within the site to provide for the community infrastructure, such as a new primary school, and provide the requisite numbers of executive and aspirational housing as well as housing to meet local needs. There are no significant constraints to the development of the site, either in whole or in part.**

Noted. We agree. Land at Pocket Nook Lane forms part of our proposed solution to addressing the identified shortfall of housing land.

**Landgate Property Consultants Ltd (ref: CSOP5212) and Mrs Patricia Bold (ref: CSOP5104)**

- 138. We would also support Option B Pocket Nook as having potential for employment use. Whilst not a Strategic Site it could provide employment land with reasonably convenient access to the East Lancashire Road (A580) and M6 (J22).**

Noted. With the exception of land at Junction 25 of the M6, which our evidence base demonstrates is the most appropriate location in the borough for an employment site of exceptional quality, the Core Strategy focuses new employment development primarily towards the east-west core of the borough.

**Environment Agency (ref: CSOP6197)**

- 139. Carr Brook runs through the site and there is an area within Flood Zone 2 and 3 within the central area of the site. In line with the**

**NPPF the Sequential test should be carried out for this site. If this site passes the Sequential and Exception test a Sequential approach should be adopted for this site whereby houses are located outside the areas at risk from fluvial flooding. We note that this site is identified as a Critical Drainage Area within your SFRA**

The sequential approach has already been applied to potential allocations and development proposals. Through the application of our Strategic Flood Risk Assessment site capacity has been reduced to exclude flood zone 3 areas and areas at intermediate to high risk of surface water flooding. Such areas have been removed from the developable area and will function as open space and / or for the purposes of green infrastructure. A detailed flood risk assessment will be required.

The north section of the site falls within a Critical Drainage Area but is not identified as being at high or intermediate risk of surface water flooding. This will be considered as part of the detailed flood risk assessment in line with Wigan's Strategic Flood Risk Assessment and the National Planning Policy Framework.

## **Golborne and Lowton**

### **Merseytravel (ref: CSOP3046)**

- 140. The strategic direction set should be a balanced and sustainable development approach, integrating land use and transport, regeneration and economic development, social inclusion and helping to tackle climate change. As a result Option B may be appropriate to consider further.**

Noted.

- 138. The Core Strategy and Local Development Framework documents should be fully interlinked with the relevant LTP3 and provide for the integration of land use and transport planning, for example: locating development in accessible locations, using Accession software to assist; development based around the need for access by all forms of transport; management of parking in new development; and an expectation that developers should contribute to cost of public transport access in areas that are not well served by existing public transport services.**

Comments from Merseytravel noted. The Core Strategy and Local Development Framework documents are fully integrated with the Greater Manchester LTP3 and emerging Wigan Transport Strategy to secure the integration of land use and transport planning. We intend to charge the Community Infrastructure Levy on all appropriate new development so that part of the value arising from new development is used to contribute to funding infrastructure needs arising from that development.



- 139. Housing and employment development sites should be focussed around rail stations and along existing rail or bus corridors as the first priority. Spatial development should be guided coherently towards sustainable development taking into account the impacts of climate change and air pollution.**

Comments from Merseytravel noted. Where spatial development is located in areas that are not well served by existing public transport services, developers will be expected to contribute to cost of improved public transport access in those areas as indicated in our Initial Transport Assessment.

- 140. Finally the Core Strategy and relevant policy proposals might need to be reviewed and updated in the light of 2011 Census data being released through to late 2013, in order to ensure that it is as up to date as possible.**

The draft Core Strategy proposals have been based on the most up to date evidence at the time. Initial results recently published for the 2011 Census suggest that these are reasonably consistent with the household forecasts on which our housing needs are based.

#### **Mosaic on behalf of Persimmon (ref: CSOP3137)**

- 141. Our clients agree with the Council's overall verdict that Golborne and Lowton make a sustainable strategic option for housing development. It is a location in which delivery will be achieved as the sites are attractive to the market. Site-specific issues are of a scale and nature that can readily be addressed as part of development proposals. Viability in this location is such that necessary infrastructure can be funded, together with affordable housing. It is also one of the limited number of locations in which higher value, lower density homes are realistically deliverable.**

Support for Option B and issues on deliverability and viability are noted.

- 142. However, the Options report is fundamentally flawed in suggesting that these sites alone could meet the shortfall when combined with sites identified in the 2012 SHLAA update. A revised SHLAA has not yet been produced which accords with best practise, and so there is no credible evidence for the Council's position. Furthermore, development in this location will need to be phased so that delivery rates are realistic, creating a need for the early allocation of land in Standish to achieve a adequate 5-year supply.**

A revised 2012 update of the Strategic Housing Land Availability Assessment has been produced. This demonstrates that the site options in Golborne and Lowton combined with other identified sites in the assessment can meet the shortfall. The 2012 assessment applies a realistic delivery rate of 30 dwellings per annum per housebuilder on the site, as suggested by Persimmon and other housebuilders.

## **Transport for Greater Manchester (ref: CSOP3158)**

- 143. Having reviewed the options TfGM would support Wigan Council's initial conclusion that Option B: Land safeguarded for future development at Golborne and Lowton, has the potential to deliver the most sustainable housing development and enable a significant contribution to the necessary infrastructure improvements which will need to be concentrated in one location rather than dispersed across the borough.**

Support for Option B is noted.

- 144. The Initial Transport Assessment correctly highlights concerns over peak time congestion and increased car borne commuting and a number of sustainable transport interventions will be required to offer alternative travel options. The more refined approach to housing density could also help to ensure that public transport services are economically viable. It will also be necessary to reduce the need to travel by improving access to employment opportunities and services locally in the Golborne and Lowton areas.**

Noted.

## **Emery on behalf of Wainhomes (ref: CSOP3223)**

- 145. To meet the Inspector's shortfall, all of the site options are required and there is still a remaining shortfall of 790 dwellings. The council's position in paragraphs 10.3 and 10.4 is that the 2012 SHLAA can provide the additional capacity to bridge the gap. The 2012 SHLAA was the subject of consultation in June 2012 and our submission questioned some of the assumptions and assessments in that document. We consider that the actual deliverable supply is well below the 5,695 dwellings identified. Indeed the Inspector concluded that there is a 2.9 years supply. This equates to a deliverable supply of 3,480 dwellings.**

A revised 2012 update of the Strategic Housing Land Availability Assessment has been produced. This demonstrates that the site options in Golborne and Lowton combined with other identified sites in the assessment can meet the shortfall. The 2012 assessment was revised as a result of the key stakeholder consultation and the actual deliverable supply has been reduced to 4,512 dwellings.

- 146. The National Planning Policy Framework advises that a deliverable site should be available now, be suitable now, and be realistically achievable and viable. A recent appeal decision (ref: APP/H1033/A/11/2159038) confirmed that sites without planning permission should not be considered to be deliverable. On that basis the Core Strategy must identify sites to address the shortfall and frontload strategic sites. It is not clear from the consultation document whether this will actually be the case.**

There are a number of sites within our five year supply that do not have planning permission. However, we consider them all to be available and suitable, with a reasonable prospect of delivery within five years in line with the National Planning Policy Framework and the 2007 SHLAA Practice Guidance. This is set out in the 2012 update of our Strategic Housing Land Availability Assessment. Our five year supply includes homes at Northleigh, and the following broad locations - South of Hindley, East of Atherton and Garrett Hall, and also at Rothwells Farm, Stone Cross Lane and Pocket Nook Lane. We believe there to be a reasonable prospect of development commencing on these broad locations before April 2017.

- 147. It has been accepted at the Examination that the corridor is a different market to the east-west core so a range of sites can be delivering early in the plan period. Paragraph 47 of the National Planning Policy Framework requires local planning authorities to “boost” housing supply. Our client’s deliverable site can assist. Wainhomes are building across the North West and in Golborne and Lowton. We see no reason to hold back this site. With the identified shortfall the only choice is that East of Stone Cross Lane is specifically identified for delivery in the first 5 years. Clearly Rothwell’s Farm and a proportion of Pocket Nook will also be required.**

Noted. The Strategic Housing Land Availability Assessment includes 120 homes on land east of Stone Cross Lane within the five year supply. Homes at Rothwells Farm and Pocket Nook are also included in the five year supply.

- 148. A second important point on the SHLAA is the number of dwellings expected to be delivered in a very confined area. We have drawn a 3 mile radius around North Leigh and calculated the percentage of SHLAA sites in that area. Within years 0-5 41% of SHLAA capacity is within 3 miles of North Leigh. Within years 5-10 it is 38%. This reaffirms our position the Council is heavily reliant on a concentrated area with an identical market which will stifle delivery. The gross completions of 278 dwellings for the year 2011/12 demonstrate this. In turn it justifies the need for a greater number of sites outside the east-west core to come forward as soon as possible.**

This issue was discussed in detail at the examination and following instruction from the Inspector we have reduced delivery over the 15 year plan period by 1,000 homes across Northleigh, South of Hindley, South of Atherton and East of Atherton. The SHLAA sites within a 3 mile radius of Northleigh are not all within the same housing market, but spread across the distinct Leigh, Wigan and Manchester housing markets.

- 149. We therefore support Option B, although other sources will be required to meet the shortfall. Two such sites would be those submitted to the SHLAA by our client, these being: Thames**

**Avenue, Pennington (Wig 144); and Smiths Lane, Hindley Green (Wig 146).**

Support for Option B noted. However, both Thames Avenue, Pennington and Smiths Lane, Hindley Green are less than 3 miles from Northleigh. Both of these sites are identified in our Strategic Housing Land Availability Assessment as having housing potential but are not within our 5 year supply.

**Barton Willmore on behalf of Peel Investments Ltd. (ref: CSOP3268)**

- 150. Option B has considerable potential to increase supply over and above the level proposed by the Council at the Examination (600 dwellings in the plan period). However, as a location it does not have good public transport links at present with the Regional Centre or much of the rest of Wigan Borough, and consequently there is a danger that high levels of residential development would be very car-dependent. The provision of a new railway station is very uncertain and cannot be relied on. In these circumstances, it is important that the total quantum of development taking place in this location is well below the total capacity of the three identified sites, and is phased so that it does not divert demand from more sustainable locations in the East-West Core.**

Whilst development at Golborne and Lowton would result in a substantial increase in congestion there are a number of opportunities to provide good alternatives to the private car. It is much closer to Manchester, Liverpool and Warrington and there is genuine potential to transform opportunities to commute by public transport. Specifically there would be opportunities for strategic bus service links into the new guided Busway at Leigh, new and improved bus services to Newton-le-Willows rail station, and a significant opportunity to support the provision of a rail station at Golborne. This is a longer term aspiration for the Council.

The release of such relatively unconstrained greenfield sites need not impact upon the other developments in the east-west core provided that they are released through a clear and robust phasing policy for the release of housing land contained within the forthcoming Allocations and Development Management Plan. Such a policy would ensure that greenfield sites would only be released for development where they would not be likely to prevent or hamper the development of key brownfield sites within the east-west core.

**Persimmon (ref: CSOP3330)**

- 151. The submitted version of the Core Strategy states an intention to focus 'around 85% of new housing in the east-west core of the borough'. However, it also identifies the 'East Lancashire Road corridor' as a broad location for new development, consisting of four site options. Specifically it will provide primarily for lower**

**density, higher value housing that would be unlikely to be developed in a significant quantity in the east-west core'. This is a positive step towards meeting the National Planning Policy Framework's objective 'to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities'. Certainly, housing delivery will be achieved in Golborne and Lowton and the Pocket Nook Lane as the sites are attractive development opportunities, which will support further infrastructure and affordable housing.**

Noted. However it is now proposed to include Astley in the east-west core of the borough with the effect that safeguarded land at Coldalhurst Lane, Astley, formerly one of the four site options in the 'East Lancashire Road corridor', could be developed for housing. Also Option B puts forward the development of all 3 of the remaining site options with around 600 of their capacity used for lower density, higher value homes but with the remainder for general market housing.

- 152. It is only good planning to prioritise Safeguarded Land. It may be required to serve the development needs of the borough beyond the plan period for which they are allocated. Such land therefore helps to strengthen the permanence of Green Belts. Consequently, this Core Strategy is the opportune moment to progress already identified Safeguarded Land as opposed to harming the permanence of the Green Belt.**

Noted.

**JASP Planning on behalf of the A F Brideoake Will Trust  
(ref: CSOP3505)**

- 153. Development within the East Lancashire Road Corridor is the most deliverable and sustainable option for meeting the shortfall in housing land. The three main sites are all within sustainable locations with few infrastructure issues. It is accepted that there will be issues in respect of highways and the capacity of individual junctions, however this remains a matter that can be resolved through a subsequent Development Plan Document or individual applications. There are no insurmountable issues with any of the three broad locations that could not be readily addressed.**

Noted. We agree that development at Golborne and Lowton is the most appropriate option and it forms part of our proposed solution to addressing the identified shortfall of housing land.

- 154. There is also scope to identify additional land within the existing urban area for development. For example, land that forms part of the two High Schools was previously identified for development in the SHLAA. These were previously part of the Building Schools for the Future programme, but since the withdrawal of funding the sites have been removed. However, it may well remain the case**

**that a viable and deliverable solution may emerge which will allow for the release of one or both of these sites. These issues could be fully explored in a subsequent DPD.**

There are currently no plans to close either Lowton High School or Golborne High School. If either site becomes available in the future and is deemed suitable for housing development, the site will be added to a future update of the Strategic Housing Land Availability Assessment.

- 155. The Strategic Housing Land Availability Assessment is however a key component of the consideration of the housing land supply. It is therefore imperative that the council produces a thorough and robust document following the recent consultation. Whilst a number of concerns were expressed regarding that document, it is apparent that there are sufficient sites to meet the current shortfall within the East Lancashire Road corridor.**

The 2012 update of the Strategic Housing Land Availability Assessment has been produced. This demonstrates that the site options in Golborne and Lowton combined with other identified sites in the assessment can meet the shortfall.

- 156. The East Lancashire Road corridor complements the council's proposals within the east-west core and will ensure a balanced approach to the delivery of aspirational and executive housing that is unlikely to be able to be delivered elsewhere. There should be comprehensive planning of all three sites, which could yield significant investment and improvements to existing infrastructure. These sites could be delivered early in the plan process.**

We agree that the sites in Golborne and Lowton will complement the council's proposals within the east-west core and will ensure a balanced approach to the delivery of aspirational and executive housing. The Strategic Housing Land Availability Assessment assumes commencement of all three sites before April 2017.

- 157. However, the sites should be considered collectively and individually. For example, although the site at Pocket Nook Lane is largely within the control of two developers, the policy approach adopted should not discount the possibility of phasing or disaggregation of individual sites as the best approach to securing the overall strategy.**

The sites will be considered collectively and individually. Should the sites be identified as a broad location in the Core Strategy, the appropriate phasing of the sites will be determined in the Allocations Development Plan Document. The phasing or disaggregation of individual sites will be considered.

#### **Indigo on behalf of Seddon Homes (ref: CSOP3295)**

- 158. We note that Option B alone will not address the full housing shortfall identified by the Inspector and required to be planned for**

**in the Core Strategy. The Council suggests it will only be able to deliver in the order of 1,700 dwellings.**

The site options in Golborne and Lowton combined with other identified sites in the 2012 update of the Strategic Housing Land Availability Assessment can meet the shortfall.

**Arup on behalf of North Leigh Park Group Limited (ref: CSOP5213)**

- 159. NLPGL consider it more appropriate according to the strategy set out in the Core Strategy (policy SP1) to include in the Core Strategy land in the Green Belt within the east-west core and the East Lancashire Road Broad Location provided that it does not prejudice the deliverability of the North Leigh site (by being either located further away in the western parts of those two corridors or delivered in the later years of the plan). Only, if necessary to meet a shortfall in delivery, should safeguarded land outside of those two corridors be released under the monitoring policy.**

The release of such relatively unconstrained greenfield sites need not impact upon the other developments in the east-west core provided that they are released through a clear and robust phasing policy for the release of housing land contained within the forthcoming Allocations and Development Management Plan. Such a policy would ensure that greenfield sites would only be released for development where they would not be likely to prevent or hamper the development of key brownfield sites within the east-west core such as North Leigh which are key to the implementation of our spatial strategy.

**Nathaniel Lichfield & Partners on behalf of Taylor Wimpey (ref: CSOP5322)**

- 160. A strategic location focussed on Golborne, accessible to the East Lancashire Road, is the most appropriate option for growth outside of the east-west core and the only option capable of delivering the aspirational housing, with good links to the regional centres, required to address the identified imbalance in the housing market.**

Noted. We agree that development at Golborne and Lowton is the most appropriate option for growth, and it forms part of our proposed solution for addressing the identified housing land shortfall.

- 161. Option B is the most sustainable option for addressing the shortfall in housing.**

Noted. We agree. Option B forms part of our proposed solution for addressing the identified housing land shortfall.

- 162. The shortfall in housing land should be met in part by releasing safeguarded land at Rothwell's Farm. It has been demonstrated that land at Rothwell's Farm is suitable and deliverable for housing development - 100 dwellings in years 0-5, with remaining being delivered in years 5-10. The 2012 SHLAA Update supports**

**this position. It is also the most sustainable and appropriate safeguarded site for housing development in this location and priority should be given to the release of this site for development.**

Land at Rothwells Farm, Golborne forms part of our proposed solution for addressing the identified housing land shortfall.

- 163. Safeguarded land east of Stone Cross Lane, Lowton is required to be released in order to meet in part the shortfall in housing land identified.**

Land east of Stone Cross Lane, Lowton forms part of our proposed solution for addressing the identified housing land shortfall.

- 164. Safeguarded land at Pocket Nook Lane, Lowton should be released in order to meet in part the shortfall in housing land identified, noting concerns over the prospects of this site delivering housing in the short term, due to fragmented ownership and other constraints.**

Land at Pocket Nook Lane, Lowton forms part of our proposed solution for addressing the identified housing land shortfall.