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30th April, 2012

The LDF Programme Officer,
Town Hall, Library Street,
Wigan WN1 1YN

Dear Rachel,

Wigan LDF Core Strategy Examination: 28976

I am responding to your invitation to comment on the implications of the NPPF, following the session on 18th April.

I have four main areas of interest:

- i. the process, including public involvement;
- ii. matters of general principle, common to both housing and employment topics;
- iii. housing in the so-called East Lancashire Road Corridor (ELRC), now more realistically recognised as one location on the edge of Golborne, beyond both Lowton and Golborne, two large tracts on the edge of Lowton, one of which extends all the way from near the Lane Head intersections to the A579 junction, and a location at Astley;
- iv. the Junction 25 employment proposal.

In rereading the NPPF for this purpose, I have kept in mind that the Council places considerable importance on achieving adoption of the Core Strategy (Council CS32, 3.14-3.16 and following paragraphs) and its belief that the CS may be better aligned with national policy now than it was prior to 27th March (Council CS 32, 3.24).

The NPPF and public involvement

I have also noted that another wheel has started to come off. We were led to understand that the North Leigh proposal had been the subject of intensive local engagement. Now, however, as a result of the lodging of the planning application, there is burgeoning evidence of dissent from residents of long standing who say they were previously unaware of what the Council had in mind. I am enclosing a copy of a press item giving prominence to this situation (*Leigh Reporter*, 19th April), which I gather is not the first of its kind.

This, in turn, points a moral about the true meaning of public engagement. For sure, it is not what one reads in local papers and I would not myself be aware of this particular item had my wife not brought a spare copy home from a voluntary organisation in Leigh.

Indeed, the Council should not be assuming that all Wigan residents receive free local papers or that those who receive them necessarily want to read them. (Anybody who has any occasion to make door-to-door visits will be aware of the increasing number of household notices hostile to callers and free newspapers.)

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For my part, I have never received copies of the *Leigh Reporter* and, for some long time, have also been without the *Leigh Journal*. And, whereas I used to regularly buy copies of the *Leigh Reporter* in Leigh, the nearest place where I could buy one now is Martland Mill, in Wigan.

The fact that newspapers may now have web versions and web archives is helpful. However, as with all other web facilities (including Council information on the web) and copies which may still be available in some public libraries, one has to go looking for the information; it does not come automatically.

Engagement actually requires the kinds of activities now being generated by the North Leigh protesters. Indeed, the exchange between Mr Thwaite and Mr Clarke on 18th April demonstrated, for me, that – up to this point – the Council has simply not made proper allowance for the fact that local newspapers are no longer an adequate means of reaching people. Reaching people now requires a much greater effort, to get past more than their impossible letterboxes and their personal security measures.

Many of us have better things to do than keep up with the flood of press releases being issued by Wigan Metropolitan Borough Council, let alone Grant Shapps, all of which may be competing for our attention – if we are switched on. Families face a variety of stresses and strains, whether arising from the misplaced ‘school run’ or trying to make ends meet. And even if individuals are free of such concerns and do not have other private preoccupations, most have developed coping mechanisms for disregarding the posturing of ‘élites’ and the relentless self-advertising of the BBC and other media bodies, as well as the background commercial noise which afflicts most aspects of modern life. Others may actually be wallowing in the inane tide of reality TV and the culture of celebrity.

Therefore, if the Core Strategy really is important, it is going to require a more than perfunctory effort to communicate that fact to the people of the Wigan administrative area, as and when revised proposals are ready. As Greg Clark puts it, achieving sustainable development needs to be ‘a collective enterprise’.

The Ministerial foreword may be somewhat toe-curling in its messianic simplicity. (Mr Clark’s performance on 27th March is perhaps a better measure of the man than his prose.) However, the message that ordinary people and communities should be seen to be involved is clear enough. The experience of the Wigan Examination is itself instructive: virtually all sessions have been dominated by the ‘specialists’ to whom Mr Clark refers – largely middle-aged greying men, pushing the interests of particular developers.

The Junction 25 session, it is true, welcomed a wider spread of talents, including several women. However, their purpose was to challenge the failure of the Council’s specialists to carry the local community with it. The discussion did not exhibit elements of a collective enterprise in favour of sustainable development; instead, it revealed the vehement, if polite, rejection of the Council’s methods and its Trojan Horse.

PPS12 is no more. However, at paragraph 150, the NPPF tells us that ‘Local Plans are the key to delivering sustainable development that reflects the vision and aspirations of [whole] local communities.’ 152 emphasises that economic objectives should not be pursued at the expense of the social and environmental

dimensions; significant adverse impacts should be avoided, mitigated or compensated for. 154 says that 'Local Plans should be aspirational but realistic.' And 155 advises that 'Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.'

Elsewhere, at 16, it is assumed that neighbourhood planning will follow seamlessly from the Local Plan process, implying a strong level of local commitment arising from proper involvement in the evolution of the Local Plan; 17 tells us that planning should be 'genuinely plan-led, empowering local people to shape their surroundings'. Paragraph 69 elaborates with respect to the development of a shared vision for the residential environment and local facilities, stressing the involvement of 'all sections of the community' in decisions. Paragraphs 188-189 embody similar expectations with respect to the application process.

The NPPF itself avoids defining what it means by neighbourhoods (and neighbourhood forums); quite properly so, as it is running in advance of the Localism Act provisions and must, in any event, be of general application. Therefore, whilst administrative units such as Wards and Civil Parishes will have some relevance, local perceptions may be more important. Indeed, the continuous revision of constituency, local authority and ward boundaries (along with abandonment of historic counties) has now become so substantially antipathetic to maintenance of local community identity that local perceptions are the appropriate starting point.

In the case of Wigan, during the course of Core Strategy development, there has been a largely unexplained retreat from so-called Townships, loosely based on pre-1974 local government units. These were, in truth, hothouse creations which had a life of less than ten years and, arguably, were as destructive of independent local organisations – perhaps deliberately – as they were constructive in fostering genuine new ones. (Reputedly, there were some which flowered artificially, as a means of promoting top-down political control.)

Depending on the location, the Township Forums have been survived by pre-existing organisations, which used to send representatives to them, such as the Lane Head South Residents' Group, at Lowton. They may also have been succeeded by new organisations. So, in Lowton East Ward – half of what used to be the Township of Golborne & Lowton – the gap left by the Council's abandonment of the Township Forum has been filled by the voluntary Lowton East Neighbourhood Development Forum (LENDF).

Its particular genesis can be traced to the implosion of the Township Forum and a local campaign against removal of Lowton Civic Hall, in favour of a BSF school complex (since vetoed by Government). However, it should not be necessary to enquire into the constitutional status of local organisations. Rather, because of the nature of the NPPF advice, it is more appropriate to regard them as one useful means, where they exist, of reaching local communities. Other opportunities should also be taken.

Safeguarded land may, in principle, all be available for development. However, the underlying Green Belt boundary was, of course, established in the early 1980s, approximately thirty years ago. In bringing sustainable development, as now defined, to the forefront, the NPPF begs the question whether it is necessarily appropriate to let all the residual 'beautiful common good land' go.

In the case of Lowton, housing has already got out of balance with employment and, indeed, has supplanted business premises – such as the landmark Anderton House, which supported the regional NCB operation, and the prominent toffee factory on Church Lane. Even now, the Council's present housing land supply involves nibbling at the edges of the established Moss Industrial Estate and Lowton Business Park.

The only significant recent additional employment area is Stone Cross Park, the original template for Council promises of one thing (high-tech) which turn out to be something else (warehousing). Now, however, the promises are turning over much faster – at Winstanley, from logistics to offices; at Golborne and Lowton, from unspecified numbers of low density houses to several hundred and, now, to around three thousand.

Paragraph 14 of the NPPF defines the presumption in favour of sustainable development. It also makes clear that there are some overriding restrictions, such as those embodied in Green Belt policy, and that in addition development may legitimately be restricted where 'any adverse impacts' arising 'would significantly and demonstrably outweigh the benefits' when assessed against the NPPF as a whole. As already indicated, 17 embodies the principle that planning should empower local people. Other principles include clarity over the business and housing needs of particular areas in formulating strategies, along with a general stress on using 'brownfield' land, balanced patterns of development (mixed uses, best use of transport facilities) and meeting local needs. The multiple rôles fulfilled by open land are recognised. Established concepts of good amenity, sensitivity to local character and conservation are all listed; in particular, the need to reduce the need to travel is repeated, at 29-41. Elsewhere, at 112, the 'economic and other benefits of the best and most versatile agricultural land' are stressed; as is the need to prove the case for removing any significant areas of land from agricultural use. (See also paragraph 28.)

The Council's original emphasis on limited quantities of managerial housing for out-commuting by car along the A580 was questionable enough, in itself; the new prospect of volume housing for out-commuting makes it very difficult to see how such development can be reconciled with either the general principles, or the particular provisions for housing, in the NPPF.

The NPPF and housing provision

The main passages of direct relevance to housing in the NPPF are to be found at paragraphs 47-55 – although paragraphs 54-55 are of limited relevance to Wigan, as they are concerned with rural areas – and 159. In turn, they need to be read with the general advice about Local Plans at 150-158 – including those elements about public involvement mentioned above – and about viability and deliverability at 173-177.

Paragraph 47 requires the identification of key sites necessary to the delivery of

objectively assessed needs over the plan period. There should be sufficient land to provide for five years of building at any one time, with a buffer of 5% in hand for flexibility. However, where there is a 'record of persistent under delivery [sic]' the buffer should be 20%.

The meaning of this latter requirement is already the subject of dispute. Does it, for example, provide an element of choice, allowing one to write off any historic shortfall? However, given that 1,000 is 20% of 5,000, the point may be academic, in the case of Wigan's shortfall relative to RSS.

Paragraph 48 also indicates that elements of the supply for years 6-10 and 11-15 should be identified, whether as specific sites or broad locations. Rates of delivery over time should also be set out, together with a strategy for achieving maintenance of a five-year supply. Local assumptions regarding density must also be articulated. Now, with respect to density, there are elements of doubt regarding the Council's approach. In the case of the so-called ELRC, the argument for taking all the residual land for volume housing is plainly at odds with the original case for modest amounts of upmarket housing, at a relatively low density, to balance up the supply. It potentially also compromises the market attractiveness of particular sites for upmarket development. However, from their several pitches, it seems that the developers always had general market housing in mind.

Paragraph 48 provides that supply figures may include an allowance for windfalls (excluding building on gardens), if there is compelling evidence for doing so. The unrelated paragraph 22 also countenances the alternative use of employment land which is no longer viable, in response to market signals; this provides some encouragement to Wigan in their anticipation of unidentifiable industrial land becoming available for housing. Similar support can be derived from a parallel reference at 161.

Paragraph 159 indicates how development plans should evaluate housing needs, including those of different groups in the community, and the available supply. However, all these policy provisions do, of course, have to be read in the context of the NPPF document overall, as indicated in paragraph 14.

We have already seen that sustainable development includes reducing the need to travel. In particular, paragraphs 30 and 34 refer to use of appropriate patterns of development, to reduce emissions and congestion; paragraphs 37-38 refer to getting the balance of land uses right and, for larger scale residential developments, promoting a mix of uses. Employment opportunities, primary schools and shops should all be close at hand. Paragraph 159 also has to be read with paragraphs 69-70, on 'Promoting healthy communities', where the social objectives of the mixed use approach and neighbourhood planning are set out.

In sum, therefore, the NPPF does not condone the allocation of large monocultural areas for residential development, such as those the Council is now promoting at Golborne and Lowton. Rather, it expects that allocations should be adjusted to make appropriate provision for jobs and social infrastructure. And there is uncertainty whether the Council has sufficiently developed its ideas, or adjusted its numbers, to account for such requirements. Indeed, much of the information previously supplied to the Examination is of questionable validity in this regard, with misrepresentations of bus timings and the like.

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The NPPF and employment provision

In addition to the general advocacy of sustainable development, the NPPF contains a number of passages of relevance to business, such as at paragraphs 18-22 and 160-161.

The commitment to economic growth is something to which significant weight is to be given. Measures should include setting criteria or identifying strategic sites to enable investment to match the local strategy. Support should be given to existing business sectors; equally, provision should be made for new and emerging sectors. Any long-term protection of existing employment land should be avoided if there is no realistic prospect of development; a point made in both paragraphs 22 and 161, as indicated above.

The NPPF thus gives general support to identification of key sites and new kinds of economic activity, from which the Council can derive some general comfort in promoting development at Junction 25 and in arguing that it needs to let go of some older employment areas. However, against this stand numerous other strands of policy to do with Green Belt and the value of the countryside, whether for its own sake, for agriculture, recreation or conservation of wildlife.

The NPPF, in its final version, has been strengthened in relation to the countryside, as indicated at paragraph 17, and also seeks to make clear that Green Belt policy continues on essentially the same basis as heretofore, at 87. However, whilst the direction of policy is, in effect, very little different from before, the very fact that it has been challenged by the process and brought back, refreshed, does have significance. The rescue of the phrase about the intrinsic value of the countryside, for example, shows that nurturing and protecting 'ordinary' fringe areas is not to be regarded as a perfunctory duty. Indeed, it is buttressed by the emphasis on local circumstances and local character. Very special circumstances really does mean very special circumstances.

Conclusions

Indeed, it is instructive that, both in the 'ELRC' and at Winstanley a number of similar issues arise. Rothwell's Farm is not in the Green Belt; it still has the potential to contribute to urban sprawl. The broad locations at Lowton, if substantially developed, will erode the identities of Golborne and Lowton still further, compromise Pennington and even blur the identity of Leigh, as viewed from the A580. At Junction 25, the intrusion of an employment development of uncertain size and uncertain character, if permitted, is going to have similar effects. If, previously, there was doubt about the need to apply Green Belt principles, rather than going through the motions of doing so, the NPPF should have dispelled it. In all locations, there should be a precautionary approach to the loss of open 'greenfield' land, especially productive agricultural land.

Yours sincerely,

P.S. The poetically apt expression 'beautiful common good land' used above is not in the NPPF; it appears to have been coined by Anne Thomas, of FoE's Inverness & Ross Branch (*Planning* 9th March).

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Friends mourn Ian Howarth -
page nine

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NORTH LEIGH PLANS FACE OPPOSITION

RESIDENTS living near the site of the planned North Leigh development have vowed to continue fighting the proposals.

Campaign group Save Our Borough, which is campaigning to prevent around 1,800 houses and industrial units being built across an extensive site of former brownfield land between Westleigh and Hindley Green.

Campaigners say the development, which is currently being considered by Wigan Council, will devastate the local environment and leave the local infrastructure unable to cope with the increased population and traffic.

Save Our Borough are currently hold-

BY ANDREW NOWELL

ing a series of public meetings, including one at the Bethel Community Centre in Hindley Green which was attended by more than 150 people, and are encouraging as many residents as possible to fill in letters of objection to the development.

The group's vice-chairperson Maxine Armstrong, said: "Our meetings have all been a huge success. We are encouraging people to send their objections in, and have been helping elderly residents who do not support the proposals but can't necessarily get to the meetings to write and post letters.

"It's such a big project, and the worst thing is that many residents don't seem to have been aware of it until the planning letter arrived.

"Support for our campaign is definitely growing. A lot of people have been quite complacent because there have been projects like the A5225 which didn't happen because the government with-

drew the funding, but now they've all got letters and realised it's much more realistic than they thought."

The group has several objections to the project, including the impact it will have on wildlife and the local environment. The campaigners also dispute the findings of North Leigh and the council, who say the area needs developing as it is dangerous to the public due to its past use for mining.

There are also concerns over the lack of services in the area to serve people living in the new houses, and whether the road network will be able to cope with the traffic demands of more housing.

Save Our Borough has also promised to support independent candidates who include objections to the North Leigh project in their manifestos in the upcoming council elections.

Maxine said: "I've been walking with my family and my dog on that land for more than 20 years and I've never heard of any incidents.

● Continued on page 20

25-YEAR-OLD ASTLEY MAN KILLED IN ROAD ACCIDENT SEE PAGE 19

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