

WIGAN CORE STRATEGY EXAMINATION

ADDITIONAL HEARING SESSION

Addressing the shortfall in housing supply – procedural and practical implications

Written Statement on behalf of The Baldwin Family

(Paul Rowley)

(22)

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Agenda Issue

Given the Inspector's concerns in relation to housing supply, is it possible to address the shortfall and what are the practical and procedural implications of seeking to do so?

Questions

Is it possible to address the shortfall?

In principle?

What are the potential options?

- Safeguarded land in the ELRC*
- Safeguarded land elsewhere e.g. Standish*
- Release of Green Belt land*
- Some combination of the above*
- Other options?*

It is considered that, given the conclusion that there is a significant issue with the soundness of the submitted Core Strategy in terms of the implications for the realistic delivery of sufficient housing, there are real difficulties in being able to progress the Core Strategy without needing to go back a stage for further assessment and consultation. It is possible to make a case for pragmatism in order to be able to progress many of the submitted Core Strategy proposals and the policy base, but this approach has elsewhere been demonstrated to lead to a short term, rather than long term, vision and strategy, which is clearly contrary to the intended role and function of the Core Strategy and is essentially counter-productive. It has to be said that the need for additional flexibility in the approach adopted towards housing supply has been clear from the outset and it is unfortunate that this broader philosophy was not accepted by the Council at an earlier stage so that the necessary provision or contingency was clearly part of the proposed strategy. However, this is the position which has now been reached and merely 'tinkering' with the housing supply provisions on the basis of the submitted strategy approach seems unlikely to be either appropriate or capable of meeting the identified requirements.

There are undoubtedly other options which can be taken up to meet the housing supply requirements, most notably in terms of the use of the current safeguarded land, particularly at Standish where development could proceed relatively quickly and contribute to the shorter term housing needs by virtue of the different form of housing and the local housing market involved. Much of the land, including land owned by my clients at Cat i'th Window Farm (part of the Almond Brook site identified in the SHLAA), is already available for allocation and development and it is only the policy designation, which itself recognises that the land is developable, that is holding back its release for an appropriate form of development. The purpose of the safeguarding designation is to provide for the future release of the land without having to review the Green Belt boundary and it must surely be the case that, with an identified shortfall in housing supply in the current plan period, this safeguarded land is

the first 'port of call' for a land release to address the identified requirements. My clients have made it clear that, as local landowners, they are interested in providing for affordable housing locally and in pursuing developments that would minimize any adverse impact on traffic (such as housing aimed at older residents), together potentially with some commercial property that would support the Standish economy whilst minimising the traffic impact, given that such development can be accessed from the M6 without going into Standish itself. Such an approach with a less stringent restraint on development at Standish would not in itself undermine the central philosophy and vision in relation to the priority towards the East West Core, which could still be the principle focus for development; however, it would clearly introduce a different feature and secondary focus for development than is currently indicated in the submitted Core Strategy. The Council has so far resisted any such approach, on what appears to be essentially a local political basis rather than any sound planning arguments, and given the stance to date it does seem that, however logical, the allocation of such current safeguarded land at Standish as part of the final strategy would represent a different approach than previously envisaged.

On this basis, it is unfortunately difficult to see how even this sensible revised approach could be achieved without appropriate re-consultation and additional sustainability appraisal of the implications of the amended strategy; effectively, as the Core Strategy would be unsound as it stands, it would be difficult to justify such a change to the strategy on the grounds primarily of incorporating flexibility in order to address the housing land supply situation. In this context, it would perhaps be preferable to seek to ensure that the additional work and further consultation on the necessary amended strategy now concentrates on the appropriate refined options, including the use of the safeguarded land at Standish, rather than going back to explore all the previously rejected options, so that there are not further difficulties relating to a realistic approach to housing land supply at a later stage.

Additional work required

- *Evidence gathering*
- *Assessment of options*
- *Consultation with local communities and other stakeholders*
- *Sustainability Appraisal*
- *How long would this work take?*
- *Is the Council willing and able to undertake such work?*

It is consequently considered that the approach to the additional work which inevitably will now be required should be directed in some form, rather than leaving the issue open for interpretation and potentially a longer delay than is absolutely necessary. There could certainly be some indication as a conclusion from this Examination stage in terms of 'directing' or 'focussing' the necessary development, so that there is a limitation on any disagreement about what will be required, either in terms of finalising this strategy or at the subsequent Allocations DPD stage. It would also help in the short term, in the light of the provisions of the now applicable National Planning Policy Framework, in relation to whether or not specific local development opportunities should be encouraged or permitted at appropriate times, rather than resisted as a matter of principle.

As previously indicated in earlier submissions, it is important that the Core Strategy should give adequate guidance for the subsequent Allocations DPD so that it is possible readily to

identify the land needed without having to re-visit strategic considerations and this approach must be paramount in the additional work undertaken. It is also important that the additional work is undertaken as quickly as possible so that the process towards an up to date adopted strategy can be completed within the next 12 months.

Procedural Implications

- *Is it legitimate to undertake this work at this stage in the process?*
- *Would it in effect be taking a step back in the process to look at options to accommodate housing growth?*
- *Would the changes necessary result in a substantially different plan to that submitted?*
 - *The relative role of the EW Core within the Borough and the policy position relative to other areas*
 - *How would such changes affect the spatial strategy?*
 - *How would they affect the distribution of housing?*
 - *How would the approach to safeguarded land be affected? How would particular parts of the Borough/individual settlements potentially be affected differently?*
- *Overall, would the nature and extent of changes required and the process involved be beyond the legitimate scope of an examination into a submitted plan?*
- *Should the plan be withdrawn?*
- *What would be the implications of withdrawing the plan?*

As indicated above, it is considered that, regrettably, the necessary additional work does amount to taking a step back in the process and that procedurally it is not possible just to use the pragmatism or flexibility arguments to seek to make the necessary changes to the submitted Core Strategy at this stage. The likely outcome, including with the allocation of the current safeguarded land at Standish, which is the most logical option (perhaps in combination with other changes), is that the changes resulting will lead to a substantially different plan to that submitted with a different spatial strategy and distribution of housing across the Borough. As a consequence, from my experience in Core Strategy and DPD preparation, and in the context of the procedural and legal requirements, the nature and extent of the changes required and the process involved would, in my view, be beyond the legitimate scope of an examination into a submitted plan.

In my considered opinion, the only realistic approach is for the plan now to be withdrawn and for the Council to go back to a consultation stage on the options, drawing on the information and experience from this Examination process and in the knowledge that there is a clear direction evolving; this approach will require what may have previously been considered as unpalatable measures, such as the allocation of the currently safeguarded land at Standish, where the local lobby against such additional development has been strong and reflected in local political decisions, to be incorporated in the amended strategy.

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