

**WIGAN CORE STRATEGY**  
**ADDITIONAL HEARING SESSION**  
**ADDRESSING SHORTFALL IN HOUSING SUPPLY- PROCEDURAL AND**  
**PRACTICAL IMPLICATIONS**  
**RESPONSE BY BARTON WILLMORE**  
**ON BEHALF OF PEEL HOLDINGS (LAND AND PROPERTY) LTD**

**1 Background**

- 1.1 The Inspector has indicated in his letter of 21 March 2012 that he has significant concerns with some of the assumptions made by the Council in seeking to demonstrate an adequate supply of housing land. On this basis, he considers that there is likely to be "*a significant shortfall of housing land*" compared to the Core Strategy requirement of 1000 dwellings per annum. He says that as there would appear to be little if any scope to increase supply in the East-West Core, the shortfall would have to be met through releasing significant amounts of land in other parts of the Borough and/or considering a review of Green Belt land.
- 1.2 The Inspector says he is concerned that the nature and extent of changes to the Core Strategy necessary to rectify the shortfall would result in a plan substantially different to that submitted in terms of the role of the East-West Core, the approach to distribution of housing, the use of safeguarded land, and the implications for particular communities. He says that in overall terms he has significant reservations about embarking on such a process at this stage. He is seeking comments on the matter.

**2 Is it possible to address the Shortfall?**

- 2.1 It is not possible to fully address this question posed by the Inspector as he has not indicated the size of shortfall which he has identified against the Council's latest trajectory, and therefore the amount of additional land which has to be found to remedy it. The publication of the National Planning Policy Framework (NPPF) is also likely to affect the extent of the shortfall which the Inspector has identified.
- 2.2 Peel considers that there is no reason in principle why changes cannot be made to the Submission Core Strategy to significantly increase housing provision. The appropriate test for the acceptability of such changes is whether they would depart significantly from the submitted spatial strategy, and in particular its concentration of development in the East-West Core as set out in Policy SP1. If proposals would have this effect, Peel considers that the Inspector could not recommend them as changes.

- 2.3 Peel has already set out its case that an additional 300 dwelling completions (over and above the Council's latest trajectory) can be obtained from the South of Hindley site if it is converted from a Broad Location to a Strategic Site Allocation. Such a change would be wholly consistent with the submitted spatial strategy. It would also comply with the CLG Plan-Making Manual. Peel estimates that it would take some 3 months to prepare and collate the information necessary to justify a strategic site allocation.
- 2.4 The inclusion of Astley (and the Coldalhurst Lane site) within the East-West Core as now proposed by the Council will add some 260 dwellings to the land supply in the plan period. Little additional work needs to be undertaken to justify this proposal.
- 2.5 The Council has identified the potential of land at South of Atherton for a new Broad Location. Peel has doubts over the deliverability of this potential broad location, especially about access and viability. Peel has also concerns that the development of South of Atherton is likely to displace house-building activity from Northleigh and South of Hindley because of the relatively close proximity of these major regeneration proposals. In the light of these concerns and given the scale of South of Atherton, Peel considers that further substantial evidence will be required to justify it as a new broad location. This evidence is likely to take some 3 to 4 months to gather and assess. There will also need to be very careful phasing of the proposal in the policy to prevent harm to regeneration elsewhere, possibly so that a start is only made after 2021. However if the uncertainties and concerns can be resolved, Peel accepts that a South of Atherton Broad Location would accord with the spatial strategy because of its location within the East-West Core.
- 2.6 The East Lancashire Road Broad Location is capable of producing substantially more housing than the 600 dwellings that the Council has currently identified. In this respect, it is worth emphasising that the Broad Location is a proposal of the Submitted Core Strategy which imposes no policy limitation on the number of dwellings to be accommodated there. Peel considers that an appropriate figure would be 1600 dwellings, of which 600 should be released in the early part of the plan period and the remainder subject to an appropriate phasing policy for the later part of the plan period. Such phasing would ensure that there is no harm to the major regeneration schemes in the East-West Core or the overall objective of Policy SP1 which is to direct development "*primarily*" to the East-west Core. Further work needs to be carried out to assess the cumulative impact of 1600 dwellings on the East Lancashire Road Corridor but this work is feasible within a 3 to 4 month period.
- 2.7 The additional numbers in the East Lancashire Road Corridor is likely to breach the 85% figure contained in Submission Policy CP6 for housing development in the East-West Core.

However this figure should be treated as an indicative guideline only rather than an absolute target which must be achieved. In any case, the figure was always due to be tested through the Examination and can be changed by the Inspector as appropriate. The alteration necessary to accommodate the increased capacity in the East Lancashire Road Corridor would comply with the primary requirement of the spatial strategy, as set out in Policy SP1, which is that development should be directed "*primarily*" towards the East-West Core. For the avoidance of doubt, this requirement can be met by a lower level of housing development in the East-West Core than the 85% figure.

2.8 Peel considers that the release of limited amounts of safeguarded land outside the East-West Core and the East Lancashire Road Broad Location for housing development would not necessarily conflict with the submitted spatial strategy if it is needed to meet the housing requirement. However, if more than limited releases of safeguarded land are necessary, Peel considers that this would fundamentally conflict with the submitted spatial strategy. In such circumstances, Peel considers that other options should be considered and in particular the potential release of land currently in the Green Belt within the East-West Core. Such releases are more likely to support the transformational regeneration of the Borough than large-scale releases of safeguarded land in peripheral locations such as Standish.

2.9 The Inspector asks whether the changes would result in a substantially different plan to that submitted in relation to a number of matters. We will now consider these matters:-

### **1 The role of the East-West Core within the Borough and the policy position relative to other areas**

For the reasons already given, Peel considers that the additional development necessary to meet the identified shortfall (subject to the Inspector's views on its size) would not damage the objective of the Submission Core Strategy which is to direct development "*primarily*" to the East-West Core. By using the word "*primarily*" it is clear that the submitted spatial strategy does not envisage all development will take place in the East-West Core but only a substantial proportion.

### **3 How would such changes affect the spatial strategy**

The suggested changes to South of Hindley, Astley, and the East of Lancashire Broad Location proposals would be fully consistent with the submitted spatial strategy as set out in Policy SP1. There would need to be some changes to Policy SP4 but these changes would be consistent with the overall thrust of the Submission Core Strategy and are of a type which we believe the Inspector can recommend.

As the South of Atherton proposal is within the East-West Core, it would potentially assist the achievement of the spatial strategy, subject to concerns about deliverability, viability and diversion of development from more strategically important East-West Core locations.

If some very limited releases of safeguarded land are required outside the East-West Core and the East Lancashire Road Broad Location to meet the housing shortfall, these can be accommodated by small changes to the spatial strategy without departing from its overall principles of concentration of development upon the East-West Core. However more major changes could not be accommodated, such as large-scale releases of safeguarded land in and around Standish; and would require the whole plan to be found unsound.

#### **4 How would they affect the distribution of housing?**

The Submission Core Strategy does not contain any detailed policy guidance on housing distribution. The table on page 81 is clearly marked as indicative only. The only policy requirement is the reference in Policy CP6 to focussing around 85% of new housing in the East-West Core of the Borough. We have already expressed our view is that this should be treated as a guideline figure only, and the Inspector can recommend a change to it provided the overall objective of Policy SP1 is maintained that development is directed "*primarily*" towards the East-West Core of the Borough

#### **5 How would the approach to safeguarded land be affected?**

Submission Policies SP1, SP3 and SP4 already envisage the release of safeguarded land within the East-West Core and at the East Lancashire Road Broad Location for housing development. An additional quantum of safeguarded land (for some 1000 dwellings) would need to be made available for development in the East Lancashire Road Broad Location compared to the Council's Pre-Examination Changes but such releases would be consistent with the Submission Core Strategy which specifically refers to the broad location and leaves open the scale of development there.

Any release of safeguarded land outside the East-West Core in places such as Standish would require changes to Policy SP1 (which limits the forms of development there to redevelopment opportunities, existing allocations for development and suitable infill or other small sites) and Policy CP7 (which refers to safeguarded land within the East-West Core only as being suitable for review and allocation for

development). However, Peel considers there is no reason in principle why the Inspector cannot recommend minor changes that do not alter the overall principles of the submitted spatial strategy that housing development should be focussed on the East-West Core.

## **6 How would particular parts of the Borough/individual settlements potentially be affected?**

The changes proposed by Peel and/or the Council would lead to significantly higher levels of housing development taking place in Atherton and Golborne/Lowton than envisaged by the table on Page 81. However this table is not policy and is clearly marked as being for indicative purposes only. A different distribution was always possible through the Allocations DPD, taking account of Submitted Policies SP1, SP4 and CP8 and accompanying text.

Any significant increase in the housing provision for Standish would raise fundamentally different issues as it would not accord with the principles underlying the spatial strategy set out in Submitted Policy SP1.

- 2.10 In conclusion there is significant scope to increase housing provision within the principles set out in the submitted spatial strategy and legally there is no reason why the Inspector could not recommend such changes. However if the Inspector is persuaded that housing provision must be increased to a level that would require a fundamental re-appraisal of the submitted spatial strategy, Peel considers that the changes cannot and should not be made. In such circumstances, the Core Strategy should be withdrawn and the Council should review the alternatives, including the release of green belt land in the East-West Core, to identify the most sustainable option(s).

## **3 Additional Work Required**

- 3.1 Peel accepts that further work needs to be carried out on the options available to increase housing provision.
- 3.2 The first stage should be evidence gathering to provide a robust and credible base for decision-making about the alternatives, especially for South of Atherton. This will include considering matters such as deliverability and viability. The alternatives will also have to be formally assessed, including sustainability appraisal. This work has not yet been carried out.

- 3.3 The second stage is for the Council to make decisions about its preferred strategy to meet the housing shortfall. Any new or amended proposals forming part of this strategy will probably need to be subject to further sustainability appraisal.
- 3.4 The third stage is for the Council to consult the public and stakeholders on its proposals.
- 3.5 The final stage is for the Inspector to reopen the Examination.
- 3.6 Peel considers that a realistic timescale for this programme of work would be 6 months. This is within the timescale generally considered by the Inspectorate to be acceptable for an adjournment of an examination to allow additional work to be carried out.

#### **4 Procedural Implications**

- 4.1 Peel accepts that there will be delay in the achievement of an adopted Core Strategy if the Examination is adjourned for up to 6 months to allow for further work to be carried out on the options to increase housing provision. However this delay would be much less than if the Core Strategy has to be withdrawn and the Council has to start again. In such circumstances, there is unlikely to be an adopted Core Strategy for at least 2 years, especially as the Council would then have to comply with the duty to cooperate on strategic matters with other Greater Manchester Authorities. The NPPF indicates that housing provision is a strategic matter in a conurbation such as Greater Manchester.
- 4.2 The main implication of withdrawing the Core Strategy would be to produce a hiatus in planning policy in Wigan where there would not be a five year supply of deliverable housing sites. In such circumstances, it is likely that the major decisions on housing development in the Borough would be taken on appeal rather than as part of the development plan system. The danger is that the greenfield sites on the periphery of the Borough would be allowed which would undermine the regeneration of the East-West Core.