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Dear Rachel

**RE: WIGAN CORE STRATEGY EXAMINATION – ADDITIONAL HEARING SESSION**

Thank you for your letter dated 29<sup>th</sup> March 2012 enclosing the Inspector's concerns regarding the soundness of the submitted Core Strategy and the invitation to attend the hearing session on 18<sup>th</sup> April 2012. I can confirm that I will attend along with Stephen Robinson of Wainhomes Developments Ltd.

As you will be aware Wainhomes Developments Ltd. raised a number of concerns on the delivery of housing in our written submissions and oral evidence at the hearing sessions. Our statement dated 17<sup>th</sup> February 2012, written in response to the council's updated housing supply position dated 7<sup>th</sup> February 2012, remains our position on the delivery of housing land within the Core Strategy. This response therefore seeks to comment on the Inspector's conclusions to date and the agenda for the additional hearing session scheduled for 18<sup>th</sup> April 2012.

**Inspector's Conclusions**

Our understanding of the Inspector's conclusions is that there is significant shortfall of housing land and there would be no flexibility in the plan. Therefore land outside the east/west core is needed so that the shortfall can be rectified. That was part of our case at the Examination and we put forward the land within the East Lancashire Road Corridor (ELRC) as a realistic and deliverable source of housing land. The Council has to date resisted the identification of more than 600 dwellings in this broad location. They did however propose a phasing policy for the release of further land in the ELRC if required. The Inspector's conclusions demonstrate that such a phasing policy is no longer required.

**Agenda Item 2 – is it possible to address the shortfall**

Whilst we note that the Inspector considers that the shortfall is significant, to answer point 2, we consider it is necessary to understand what level the shortfall is. Our submission dated 17<sup>th</sup> February set out our shortfall which ranged from 2,808 dwellings to 3,693 dwellings depending on which scenario is used.

From evidence provided to the Examination, there is potentially 2,521 dwellings that could be delivered in the ELRC from the following sites:

- Land east of Stone Cross Lane (600 to 700 dwellings);
- Rothwells Farm (400 dwellings); and,

- Pocket Nook (1,421 dwellings).

In our view the ELRC is the obvious choice to provide additional capacity as the land has been safeguarded for future development in the Wigan UDP.

Should there be need for other sites there will be a need for safeguarded land elsewhere and potentially Green Belt land. As noted above the key question is what the shortfall is in order to answer those questions in greater detail.

### **Agenda Item 3 – Additional Work Required**

Quantifying the shortfall also applies when answering part 3 of the agenda. For example, if the shortfall can be addressed from safeguarded land in the ELRC and Standish, then those sites have been assessed through the Core Strategy process. Whilst they have been discounted, they have nevertheless been the subject of Sustainability Assessment, although WR Estates raised issues on the latter point at the Examination.

We therefore consider that policy SP4 should specifically identify the three sites in the ELRC for release as the Council has done for the sites in the east/west core. We note that the council has been concerned that the release of these sites would harm the overall objective of redeveloping the east/west core. However the written and verbal evidence given to the Inspector was clear that the east/west core and the ELRC are two very different markets and they will build two different products. They are not competing for the same buyer and the evidence from the Northleigh Park Group confirms this.

Each of the sites in the ELRC, with the possible exception of Pocket Nook, are self-contained and well defined and do not require an Allocation DPD for their release. This can be undertaken through the development control process with the site's identification as a broad location in the Core Strategy as justification for release. This is being pursued in Wigan as an application has been submitted for Northleigh Park, which is part safeguarded land.

If the changes are solely related to the inclusion of the other sites in the ELRC and other safeguarded land, for example Standish, this may result in the percentage of development directed to the east/west core being reduced, although it will still remain as a focus for development. Under this scenario, the council will obviously require a period of consultation and this in our view is a way forward to rectify the position in the shortest time possible. This may result in a delay of some 12 months from the close of the Examination, as seen at the recent Central Lancashire Core Strategy. However in that case the changes were minor as they related to an increase to the housing requirement back to the RSS requirement and a strategic extension north of Preston which had been identified in a previous committee draft.

If the shortfall is more significant than this, the core strategy has a more fundamental problem to address. That will require changes which are substantially different to what is in the plan or proposed by ourselves. The letter from the Inspector would indicate that this is indeed the case. In that case the changes would be more fundamental and the council would need to take a few steps back and reassess the capacity of sites in the Borough and the distribution of development. This may also require a review the Green Belt in accordance with the NPPF.

### **Agenda Item 4 – Procedural Implications**

If the shortfall is significant then it is difficult to envisage how such changes can be made within the current examination. Indeed there are a number of fundamental issues outstanding such as the shortfall and the plan period which may require extensive amendments to the plan. The most logical approach would be for the plan to be withdrawn or to be found unsound and for the Inspector to advise on the required changes, including

the extent of the shortfall. This would allow the council to re-appraise options in view of the Inspector's conclusions.

An example of another Council in a similar position is Rochdale. Enclosed in the Cabinet Report dated 29<sup>th</sup> March 2012 which sets out their proposed way forward. In summary the Council is to withdraw its Core Strategy and is to take one step back and prepare a revised Publication Draft. They intend to have a Core Strategy adopted in June 2013. Whilst we consider that this timetable may well be overly optimistic, it nevertheless sets out a way forward. However the issue at Rochdale was the proposed Green Belt release in South Heywood. That is why Wigan may need to go back to the preferred option stage as the changes required seem to be more fundamental. This would mean that Wigan could prepare a local plan which actually allocates sites rather than having a separate Core Strategy and Allocations DPD.

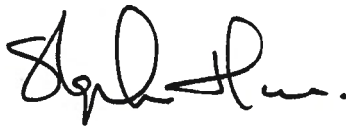
It is apparent that under any scenario the overall percentage of development to be provided in the east/west core will be reduced. However the policy objective to maximise development in the east/west core should not have to change.

### **Conclusions**

This concludes our initial views on the agenda and we look forward to providing detailed input on 18<sup>th</sup> April 2012. Should you require any further information, please do not hesitate to contact me.

Yours sincerely

**EMERY PLANNING PARTNERSHIP LTD**

A handwritten signature in black ink, appearing to read 'Stephen Harris', with a stylized flourish at the end.

Stephen Harris BSc (Hons) MRTPI  
Associate Director