

CHAPTER 8 - HOUSING POLICIES

R INTRODUCTION

Objections to Draft Deposit

| Ref No | a | b | c | d | Name | Agent | Response Ref. |
|--------|---|-----|---|---|----------------------|-------|-----------------|
| 572 | O | 015 | R | | Peter Sargeant FRTPI | | WIGAN MBC 572/A |
| 572 | O | 050 | R | | Peter Sargeant FRTPI | | WIGAN MBC 572/A |

Objections to Revised Deposit

| Ref No | a | b | c | d | Name | Agent | Response Ref. |
|--------|---|-----|---|---|----------------------------|-------|-----------------|
| 747 | O | 085 | R | | Wigan Borough Action Group | | WIGAN MBC 747/A |

Main Issues

Whether the introduction to the Housing chapter is appropriate, having regard to:

- the proportion of housing development which is to be on previously developed land;
- the priority to be given to the use of previously developed land within urban areas;
- the identification of sites with planning permission for housing development.

Inspector's Considerations and Conclusions

The proportion of housing development which is to be on previously developed land

8.1 The RDD version of the introduction to the Housing chapter informs that most of the land that is likely to come forward for new housing development will be previously developed. An objector argues that all land developed should be from this source. This would, however, render the plan out of conformity with national and regional policy guidance. As part of this objection the objector advocates that green-field sites which have planning permission for residential development should be reviewed with a view to their removal from the housing land resource. Such sites do, however, have a perfect right to proceed to development. PPG3 (paragraph 40) advises that such a review should take place if application is made to renew such a permission. A review at plan preparation stage is not, therefore, appropriate.

The priority to be given to the use of previously developed land within urban areas

8.2 An objector queries the priority to be given to the development for housing of previously developed land within urban areas. This is, however, identified within PPG3

as a key objective of Government policy. The extent of the urban area in Wigan is clearly defined on page 52 of the RDD. Having regard to this there is no potential for confusion

The identification of sites with planning permission for housing development

8.3 An objector refers to Appendix 4 of the RDD which presents a list of sites with planning permission for housing development at April 2002. He identifies a site at Golbourne which has received planning permission after that date. The core proof on housing presents an updated version of this list as at April 2004. This forms the basis for the assessment of housing land requirement and supply which is presented in the section of this report which relates to policy R1A.

Recommendation

I recommend:

(REC 8.1) that no modification be made to the RDD in this response to these objections.

R1 LAND FOR NEW HOUSE BUILDING

Objections to Draft Deposit

| Ref No | a | b | c | d | Name | Agent | Response Ref. |
|--------|---|-----|---|---|--|---|-----------------|
| 180 | O | 001 | R | 1 | Robert Gill | Borron Shaw and Co. | WIGAN MBC 180/A |
| 220 | O | 003 | R | 1 | Mrs E Ainscough | | WMBC 220 |
| 424 | O | 013 | R | 1 | Government Office for the North | | WMBC 424 GONW |
| 457 | O | 005 | R | 1 | Highways Agency | | WMBC 457 |
| 467 | O | 003 | R | 1 | Wilson Connolly | Barton Wilmore Planning Partnership | WMBC 467 |
| 538 | O | 005 | R | 1 | Mr D R Taylor and Mrs J A Taylor | The Graham Bolton Planning Partnership | WMBC 538/A |
| 572 | O | 051 | R | 1 | Peter Sargeant FRTPi | | WIGAN MBC 572/A |
| 581 | O | 001 | R | 1 | Wrightington, Wigan and Leigh NHS Trust | Michael Courcier and Partners Ltd | WMBC 581/A |
| 582 | O | 006 | R | 1 | Taylor Woodrow Developments Ltd | Michael Courcier and Partners Ltd | WMBC 582/A |
| 583 | O | 010 | R | 1 | Peel Investment (North) Ltd | Halliwell Landau | WMBC 583 WR |
| 698 | O | 002 | R | 1 | The Trustees of Leigh Estate | Matthews and Goodman | WIGAN MBC 698/A |
| 698 | O | 005 | R | 1 | The Trustees of Leigh Estate | Matthews and Goodman | WIGAN MBC 698/A |
| 698 | O | 009 | R | 1 | The Trustees of Leigh Estate | Matthews and Goodman | WIGAN MBC 698/A |
| 704 | O | 001 | R | 1 | Redrow Homes (Lancashire) Ltd | | WMBC 704 R1 |
| 704 | O | 002 | R | 1 | Redrow Homes (Lancashire) Ltd | | WMBC 704 R1 |
| 728 | O | 001 | R | 1 | Lancashire County Council | | WMBC 728 R1 |

Draft Deposit Objections Unconditionally Withdrawn

| Ref No | a | b | c | d | Name | Agent | Response Ref. |
|--------|---|-----|---|---|----------------|----------------|---------------|
| 221 | O | 004 | R | 1 | Westbury Homes | | |
| 417 | O | 001 | R | 1 | Mr J Whitlow | McDyre and Co. | |

Objections to Revised Deposit

| Ref No | a | b | c | d | Name | Agent | Response Ref. |
|--------|---|-----|---|---|--|---|-----------------|
| 096 | O | 016 | R | 1 | Lane Head South Residents Group | | WMBC 096 Lane |
| 253 | O | 015 | R | 1 | MSF Motor Group Limited | | WMBC 253 R/EV |
| 538 | O | 009 | R | 1 | D R Taylor & Ms J A Taylor | The Graham Bolton Planning Partnership | WMBC 538/A |
| 572 | O | 090 | R | 1 | Peter Sargeant FRTPi | | WIGAN MBC 572/A |
| 582 | O | 015 | R | 1 | Taylor Woodrow Developments Limited | Michael Courcier and Partners Ltd | WMBC 582/A |
| 583 | O | 040 | R | 1 | Peel Investments (North) Ltd | Halliwell Landau | WMBC 583 WR |
| 747 | O | 083 | R | 1 | Wigan Borough Action Group | | WIGAN MBC 747/A |

Supporters of Draft Deposit

| Ref No | a | b | c | d | Name | Agent | Response Ref. |
|--------|---|-----|---|---|-------------------------|----------|---------------|
| 005 | S | 001 | R | 1 | B. K. Hodgkinson | | |
| 253 | S | 014 | R | 1 | MSF Motor Group Limited | CgMs Ltd | |

Supporters of Revised Deposit

| Ref No | a | b | c | d | Name | Agent | Response Ref. |
|--------|---|-----|---|---|-------------------------------------|-------|---------------|
| 722 | S | 006 | R | 1 | Bellway Homes (Manchester Division) | | |
| 727 | S | 029 | R | 1 | Greater Manchester Ecology Unit | | |

Note

The following objections are dealt with in the section of this report which relates to policy R1A: 698/002, 698/005, 582/006 and 583/010.

The matters raised by objections 220/003 and 698/009 are dealt with in the section of this report which relates to policy GB1.

The matters raised by objection 538/005 are dealt with in the section of this report which relates to policy GB2.

Objection 581/001 is dealt with in the sections of this report which relate to policies R1A and R1B.

Objection 253/015 is dealt with in the section of this report which relates to policy R1B.

Main Issues

Whether this policy is appropriate, having regard to:

- the components of the housing land requirement;
- the size of the housing land requirement;
- the time period for the policy element relating to the use of previously developed land;
- the definition of sustainable locations;
- the use of the term 'urban area';
- the implications of housing development for the trunk road network;
- the merits of allocating land at Stonecross Lane, Lowton, for housing development;
- the merits of allocating land at Robin Hill Farm, Standish, for housing development;
- the merits of allocating land at Hilltop Farm, Hilltop Fold, Hindley, for housing development.

Inspector's Considerations and Conclusions

The components of the housing land requirement

8.4 RDD policy R1 provides that the LPA will ensure that provision is made in the Borough to accommodate an average of 510 dwellings per year. At least 80% of dwellings provided between 2002 and 2016 will use previously developed land and existing buildings in sustainable locations within the urban area. Objectors argue that the annual average rate of housing provision (410 dwellings per year) should be expressed in this policy separately from the allowance for the replacement of cleared dwellings (100 per year). Policy R1 does combine them into a figure of 510 dwellings per year but explains the composition of this gross figure in the reasoned justification. I conclude that the basis for the housing land requirement is expressed in the RDD with sufficient clarity.

8.5 An objector argues that the annual average rate of provision, which derives from RPG13, should continue beyond the RPG end date of April 2006 up to the end of the UDP period in 2016 until such time as a different rate is adopted following a review of RPG13. The LPA concurs and, in the RDD, incorporates this in the reasoned justification to policy R1.

8.6 An objector considers that this approach is too restrictive, but it is supported by RPG13 (paragraph 5.32). The same objector considers that there is inconsistency between this provision and the reference in the reasoned justification to policy R1B of the potential resort to a review of the plan to release safeguarded land to remedy an under-supply of housing land. There is no inconsistency, however. One measure relates to the overall level of housing requirement. The other to an element of the potential supply.

8.7 An objector argues that the RDD should make clear that planning permission for housing will not be renewed when it expires for sites which are not in sustainable locations and, in the case of green-field sites, if other brown-field sites are available. The LPA concurs and incorporates this measure in the reasoned justification to policy R1A.

The size of the housing land requirement

8.8 An objector argues that the gross housing requirement figure of 510 dwellings per year may be too low. The annual average rate of housing provision (net of clearance) i.e. 410 dwellings is presented in RPG13 (table 5.1). The merits of the 100 dwellings per year allowance for the replacement of cleared dwellings are considered in the section of this report which relates to policy R1A. For the reasons I give there, I conclude that it is soundly based.

The time period for the policy element relating to the use of previously developed land

8.9 An objector at FDD stage argues that the time period should be between 2002 and 2016, rather than the 1996 to 2016 period referred to in the FDD. The changes at RDD stage have secured this.

The definition of sustainable locations

8.10 An objector argues that the meaning of the term ‘sustainable locations’ should be clarified. This is done in policy R1B. Further objectors argue that there is no justification for the reference to at least 80% of dwellings provided between 2002 and 2016 using previously developed land and existing buildings in sustainable locations within the urban area. One argues that this should be reduced to 50%. This policy wording is, however, in direct conformity with RPG13 (policy UR4).

8.11 A further objector argues that the requirement that 80% of new dwellings be built on previously developed land implies that 20% must be accommodated on green-field sites. Policy R1 uses the term ‘at least 80%’. In doing this it reflects the priorities of RPG13 (policy UR4). I conclude that neither RPG13 nor the RDD envisages that any specific proportion of new dwellings will be completed on green-field sites.

The use of the term ‘urban area’

8.12 An objector contends that the definition of the term ‘urban area’ should be deleted from the UDP because it envisages that such areas are not only outside the green belt but also outside safeguarded land. He notes that this latter category has the potential for possible longer term development. PPG2 (Annex B, paragraph B2) confirms that safeguarded land may be required to serve development needs, but only well beyond the plan period. For this plan period it is, therefore, appropriate to exclude it from the urban area.

8.13 A further objector argues that ‘within the urban area’ is an inappropriate term to use when presenting the requirement for a specific percentage of dwellings to be provided on previously developed land and by the re-use of existing buildings in sustainable locations. It should, in his view, be replaced with ‘within established settlements’. Further objectors argue that what is or is not the urban area should be determined in the context of each individual development proposal. PPS1 (paragraph 8) does, however, emphasise that the plan-led system should be certain and predictable. A definition of the term ‘urban area’ is, therefore, necessary. Furthermore, RPG13 (policy UR4) provides as follows. ‘The redevelopment and re-use of vacant sites and buildings within the urban areas should be a priority. Additional development should be encouraged to make best use of such sites in sustainable locations’. The term ‘urban area’ is, therefore, an appropriate one to use in this case. It is necessary, in the interests of clarity, for this term to be defined in the UDP. I consider that it is appropriate to highlight this definition, as is done in the RDD, via its encapsulation within a ‘box’ because

although this relates primarily to the wording of policy R1 it is of general application throughout the RDD.

8.14 Further objectors argue that the definition of the term ‘urban area’ in the Housing Policies chapter of the UDP gives the impression that it conflicts with other RDD policies which protect urban open land. The plan is to be read as a whole, in conformity with the advice of PPG12 that development plans should be succinct. There is nothing in the wording of the definition of the urban area, or in its position within the UDP, to indicate that it applies in a different way to one part of the plan than it does to another.

The implications of housing development for the trunk road network

8.15 An objector expresses concern that the erection of some 510 dwellings per year could have a detrimental impact on the capacity, safety and efficiency of the trunk road network. This rate of building is, however, a significant reduction on past activity. The sites with planning permission for housing are dispersed across the Borough. It is reasonable to assume that the contribution from windfall sites within the urban area will also be similarly widely dispersed, given the existing pattern of settlement. There is, therefore, no practical reason to anticipate a harmful impact on the trunk road network.

8.16 The plan is to be read as a whole. Policy A1A provides that a Transport Assessment will be required for all proposed development that would either individually or together with other recently completed developments or outstanding planning permissions in the locality give rise to a material increase in the volume or other impact of road traffic. The related reasoned justification confirms that this includes any implications for the trunk road network.

The merits of allocating land at Stonecross Lane, Lowton, for housing development

8.17 An objector argues that safeguarded land at Stonecross Lane, Lowton, should be allocated for housing development. For the reasons I have given in the section of this report which relates to policy R1A, I conclude that there is sufficient land available from sites with planning permission, the residential element of proposed mixed-use allocations and the reasonable expectation of windfall sites coming forward on previously-developed land within the defined urban area to meet housing development needs in the plan period. There is, therefore, having regard to the advice of PPG3 on the sequence of land allocation and development, no justification at this stage for the release of green-field land for housing development, including that at Stonecross Lane, Lowton, for this purpose. I conclude that this land should remain safeguarded under the terms of policy GB2. The objector argues that this site is in a sustainable location. PPG2 (annex B, paragraph B3) advises that this is a necessary aspect of a safeguarded land designation.

The merits of allocating land at Robin Hill Farm, Standish, for housing development

8.18 An objector argues that safeguarded land at Robin Hill Farm, Standish, should be allocated for housing development. For the reasons I give in the section of this report

which relates to policy R1A, I conclude that there is sufficient land available from sites with planning permission, the residential element of proposed mixed-use allocations and the reasonable expectation of windfall sites coming forward on previously developed land within the defined urban area to meet housing development needs in the plan period. There is, therefore, having regard to the advice of PPG3 on the sequence of land allocation and development, no justification at this stage for the release of green-field land for housing development, including that at Robin Hill Farm, Standish, for this purpose. I conclude that this land should remain safeguarded under the terms of policy GB2. The objector argues that this site is in a sustainable location. PPG2 (annex B, paragraph B3) advises that this is a necessary aspect of a safeguarded land designation.

The merits of allocating land at Hilltop Farm, Hilltop Fold, Hindley, for housing

8.19 An objector argues that land at Hilltop Farm, Hilltop Fold, Hindley, should be recorded in the UDP as a housing commitment. The site is an area of green-field land within the urban area of Hindley. It is the residue of an agricultural holding and is currently used for grazing. Part of it has received outline planning permission for residential development. This is noted in the LPA's Housing Core Proof (CD9). The remainder does not have the benefit of planning permission for housing. For the reasons I give in the section of this report which relates to policy R1A, I conclude that there is sufficient land from sites with planning permission, the residential element of mixed-use allocations and the reasonable expectation of windfall sites coming forward on previously developed land within the defined urban area to meet housing development needs in the plan period.

8.20 There is, therefore, having regard to the advice of PPG3 on the sequence of land allocation and development, no justification at this stage for the release of green-field land for housing development and for the allocation of such sites in the plan. The objector argues that, without its allocation for housing, the site may become 'landlocked' and incapable of future development. Given the lack of need for its development I can not attach significant weight to that factor. It is, of course, always open to a prospective developer to argue (having regard to the advice of PPG3, paragraph 32) that the development of a particular green-field site is justified because previously developed sites perform so poorly in relation to stated criteria as to preclude their use for housing before it.

Recommendation

I recommend:

(REC 8.2) that no modification be made to the RDD in response to these objections.

R1A HOUSING PROVISION

Objections to Draft Deposit

| Ref No | a | b | c | d | Name | Agent | Response Ref. |
|--------|---|-----|---|----|---|--|-----------------|
| 220 | O | 004 | R | 1A | Mrs E Ainscough | | WMBC 220 |
| 221 | O | 003 | R | 1A | Westbury Homes Ltd | Rachel Hamilton | WIGAN MBC 221/A |
| 267 | O | 002 | R | 1A | Persimmon Homes | | WMBC 267 |
| 424 | O | 014 | R | 1A | Government Office for the North West | | WMBC 424 GONW |
| 467 | O | 002 | R | 1A | Wilson Connolly | Barton Wilmore Planning Partnership | WMBC 467 |
| 567 | O | 003 | R | 1A | Eddisons | Indigo Planning | WMBC EM1A 12 |
| 572 | O | 052 | R | 1A | Peter Sargeant FRTPI | | WIGAN MBC 572/A |
| 581 | O | 002 | R | 1A | Wrightington, Wigan and Leigh NHS Trust | Michael Courcier and Partners Ltd | WMBC 581/A |
| 581 | O | 006 | R | 1A | Wrightington, Wigan and Leigh NHS Trust | Michael Courcier and Partners Ltd | WMBC 581/A |
| 582 | O | 007 | R | 1A | Taylor Woodrow Developments Ltd | Michael Courcier and Partners Ltd | WMBC 582/A |
| 582 | O | 008 | R | 1A | Taylor Woodrow Developments Ltd | Michael Courcier and Partners Ltd | WMBC 582/A |
| 583 | O | 011 | R | 1A | Peel Investments (North) Ltd | Halliwell Landau | WMBC 583 WR |
| 593 | O | 004 | R | 1A | Hallam Land Management Ltd | | WMBC 593 |
| 593 | O | 007 | R | 1A | Hallam Land Management Ltd | | WMBC 593 |
| 593 | O | 009 | R | 1A | Hallam Land Management Ltd | | WMBC 593 |
| 681 | O | 002 | R | 1A | Burtonwood Brewery Plc | Edmund Kirby | WIGAN MBC 681/A |
| 685 | O | 001 | R | 1A | Wainhomes North West Ltd | Emery Planning Partnership | WMBC 685/B |
| 685 | O | 006 | R | 1A | Wainhomes North West Ltd | Emery Planning Partnership | WIGAN MBC 685/A |
| | | | | | | | WMBC 685/C |
| 698 | O | 003 | R | 1A | The Trustees of Leigh Estate | Matthews and Goodman | WIGAN MBC 698/A |
| 698 | O | 007 | R | 1A | The Trustees of Leigh Estate | Matthews and Goodman | WIGAN MBC 698/A |
| 698 | O | 010 | R | 1A | The Trustees of Leigh Estate | Matthews and Goodman | WIGAN MBC 698/A |
| 722 | O | 003 | R | 1A | Bellway Homes (Manchester Division) | | WMBC 722/A |

Draft Deposit Objections Unconditionally Withdrawn

| Ref No | a | b | c | d | Name | Agent | Response Ref. |
|--------|---|-----|---|----|------------------------------|---------------------|---------------|
| 417 | O | 002 | R | 1A | Mr J Whitlow | McDyre and Co. | |
| 583 | O | 025 | R | 1A | Peel Investments (North) Ltd | Halliwell Landau | |
| 729 | O | 002 | R | 1A | Manchester City Council | | |
| 585 | O | 003 | R | 1A | Wainhomes (North West) Ltd | Sedgwick Associates | WMBC 585/A |

Objections to Revised Deposit

| Ref No | a | b | c | d | Name | Agent | Response Ref. |
|--------|---|-----|---|----|---|--|--------------------------|
| 096 | O | 022 | R | 1A | Lane Head South Residents Group | | WMBC 096 Lane Head South |
| 221 | O | 009 | R | 1A | Westbury Homes Ltd | Broadway Malyan | WIGAN MBC 221/A |
| 538 | O | 008 | R | 1A | D R Taylor & Ms J A Taylor | The Graham Bolton Planning Partnership Ltd | WMBC 538/A |
| 572 | O | 116 | R | 1A | Peter Sargeant FRTPI | | WIGAN MBC 572/A |
| 581 | O | 008 | R | 1A | Wrightington, Wigan and Leigh NHS Trust | Michael Courcier and Partners Ltd | WMBC 581/A |
| 582 | O | 014 | R | 1A | Taylor Woodrow Developments Limited | Michael Courcier and Partners Ltd | WMBC 582/A |
| 583 | O | 041 | R | 1A | Peel Investments (North) Ltd | Halliwell Landau | WMBC 583 WR |
| 722 | O | 007 | R | 1A | Bellway Homes (Manchester Division) | | WMBC 722/A |
| 873 | O | 001 | R | 1A | House Builders Federation | | WMBC 873/884 R1A |
| 884 | O | 001 | R | 1A | Taylor Woodrow Developments | Barton Wilmore Planning Partnership | WMBC 873/884 R1A |

Revised Deposit Objections Unconditionally Withdrawn

| Ref No | a | b | c | d | Name | Agent | Response Ref. |
|--------|---|-----|---|----|--------------|---------------|---------------|
| 417 | O | 004 | R | 1A | Mr J Whitlow | McDyre and Co | |

Note

This policy is subject to DINC11.

The matters raised by objections 681/002, 220/004 and 698/010 are dealt with in the section of this report which relates to policy GB1.

The matters raised by objections 582/008, 467/002, 267/002 and 593/007 are dealt with in the section of this report which relates to policy GB2.

The matters raised by objection 424/014 are dealt with in the section of this report which relates to policy R1.

The matters raised by objection 583/041 are dealt with in the section of this report which relates to policy R1B.

The matters raised by objection 567/003 are dealt with in the section of this report which relates to policy EM1A12.

The matters raised by objection 593/004 are dealt with in the section of this report which relates to policy EM1A35.

Main Issues

Whether this policy is appropriate, having regard to:

- conformity with the advice of PPG3 and its related guidance;
- the size of the housing land requirement;
- the soundness of the assumptions relating to windfall sites;
- the merits of housing development on land at Rectory Lane, Standish;
- the merits of housing development on land at Standish Golf Club and Practice Ground, Standish;
- the merits of housing development on land at Pocket Nook, Lowton;
- the merits of housing development at Stack House Farm, Golbourne;
- the merits of housing development on land to the east of Edgerton Road, Lowton;
- the merits of housing development on the site of the former Billinge Hospital;
- the merits of housing development on land at Primrose Lane, Standish.

Inspector's Considerations and Conclusions

Conformity with the advice of PPG3 and its related guidance

8.21 Policy R1A of the RDD proposes that the Council will provide for the development of an average of 510 dwellings per year from April 2002 on sites with planning permission, on new sites and by the re-use and conversion of existing buildings. An objector argues that the term 'new sites' should be replaced with 'sites brought forward through planning applications'. Since all activity defined as development requires planning permission, the term 'new sites' as used in the policy does not require the amplification sought by the objector.

8.22 At FDD stage the reasoned justification to policy R1A informed that all the sites which are expected to come forward are on previously developed land. An objector argues that some new dwellings will arise from the re-use of existing buildings. The LPA concurs and, at RDD stage, has introduced the qualification that almost all the sites will arise from previously developed land. An objector argues that green-field land should be developed for housing if it performs better against sustainability criteria than previously developed sites. This is already provided for by policy R1B.

8.23 Objectors argue that the RDD identifies insufficient land to accommodate the requirement. RPG13 (table 5.1) provides that the annual average rate of housing provision, net of clearance, in Wigan, shall be 410 dwellings for the period between April 2002 and April 2006. The reasoned justification to policy R1 informs that the LPA will extend this annual average rate of provision to 2016 until such time as any different rate is adopted following a review of RPG.

8.24 PPG3 (paragraph 7) advises that, when RPG is issued in its final form by the Secretary of State, LPAs must have regard to the overall level of housing provision set out in that guidance. They should avoid, wherever possible, reopening consideration of the level of housing provision in their areas which has been considered in full within the

RPG process. The LPA accepts the level of provision set by RPG13 as being appropriate for the Borough. It does not propose to reopen consideration of it via the UDP process.

8.25 Because the RPG housing provision figure is net of clearance it is necessary to add an allowance for the replacement of cleared dwellings. The LPA has postulated an additional allowance of 100 dwellings per year for this, making the overall annual requirement some 510 dwellings. The introduction to the RDD confirms that it covers the period to April 2016. The reasoned justification to policy R1A confirms that the plan period is 14 years. It is clear, therefore, that the plan period is from April 2002 to April 2016.

8.26 The table in the reasoned justification to policy R1A presents an assessment of the housing land supply as at April 2002. More up to date information (as at April 2004) is presented in the Housing Core Proof (CD9). This confirms that, in the period from April 2002 to April 2004 some 1471 dwellings were completed in the Borough. At that latter date, on sites that were under construction, some 517 dwellings were under construction and 700 dwellings had not yet been started. At April 2004 also, the sites which benefited from planning permission but had not yet started construction had a capacity of some 1934 dwellings. The presentation of this information in the Housing Core Proof satisfies the concerns of objectors that the RDD presents such information only at April 2002 (RDD Appendix 4). The table uses the term 'new sites not yet identified (windfalls).' An objector argues that this should be changed to 'previously developed land.' RPG13 (policy UR4) provides that, in Wigan, on average, at least 80% of new dwellings should use previously developed land and existing buildings. Not all windfall sites will, therefore, arise from previously developed land. The LPAs approach is, also, supported by PPG3 (paragraph 32).

8.27 An objector contends that the sites with planning permission should be subject to a review to determine whether they are likely to come forward for development. Since these sites have planning permission, and could be developed at any time at the initiative of those with a controlling interest in them, such a review could not be conclusive. The review to determine whether such sites conform to current policy guidance (as referred to in PPG3, paragraph 40) is to be done, not via development plan preparation, but when the renewal of planning permission is considered.

8.28 The RDD proposes the allocation of mixed-use sites at the former Bickershaw Colliery (policy EM1G) and the Wigan Pier Quarter (policy EM1H). Together these were assessed by the LPA at April 2004 to have a capacity of some 917 dwellings. In addition, as I note in the section of this report which relates to policy C1D, outline planning permission was granted on 24/11/04 for the Leigh Sports Village. That scheme incorporates some 117 dwellings, increasing the capacity of the mixed-use allocations to 1034 units. This element of the supply should be reflected in the table in the reasoned justification to policy R1A. Together all these categories of site have a capacity of some 5656 dwellings. When this is compared with a requirement of 510 dwellings per year it is the equivalent of 11 years building, i.e. from April 2002 to April 2013.

8.29 In addition the LPA has noted that, in the four years between April 2000 (when the current version of PPG3 was issued) and March 2004 an annual average of about 260 dwellings was constructed on previously developed land which had not been identified for this purpose in the adopted UDP. In the 12 year period between April 2004 and April 2016 a continuation of that rate would produce some 3120 windfall dwellings. Furthermore, in the 7 year period between April 1997 and March 2004, planning permission was granted for an annual average of some 76 dwellings arising from conversions and changes of use. In the 12 year period between April 2004 and April 2016 a continuation of that rate would produce some 912 windfall dwellings. The LPA considers that it is reasonable to assume a continuation of both those past rates. Dwellings from these sources, together with those on identified sites to which I have already referred, would provide for the construction of some 9688 dwellings in the 14 year period between April 2002 and April 2016.

8.30 An objector argues that not all of the 76 dwellings per annum for which planning permission was granted will have actually materialised as completed dwellings and that account should be taken of conversions from dwellings to other uses. Any reduction is, however, likely to be marginal and to be rendered spurious by the year to year variation in what is a relatively small absolute total.

8.31 A construction rate of 510 dwellings per year over 14 years would result in the construction of 7140 dwellings. The surplus of some 2548 dwellings provides a comfortable safety margin if the rate of housing development on the two mixed-use sites and Leigh Sports Village is slower than anticipated and/or the LPA's assumptions on future windfalls turns out to be unduly optimistic as a consequence of any shortcomings in the Council's urban capacity study and/or if the levels of replacement for house clearance turn out to be greater than anticipated. Indeed, the completions from the two distinct sources of windfall site could be less than half that assumed by the LPA and the annual average requirement figure would still be met for the whole plan period.

8.32 Because of the high proportion of the housing land requirement that can be satisfied via sites that already have planning permission, the LPA has not provided for housing land allocations within the RDD. This situation is anticipated by the PPG3 companion document 'Planning to Deliver'. On page 8 it notes that there may be situations where the housing requirement is particularly low or where the majority of housing requirements over the plan period are taken up by existing planning permissions, or where little if any green-field development is anticipated and there is a significant reliance on small scale windfalls. These circumstances apply in the Borough.

8.33 In this circumstance the guidance note advises that a criteria-based approach to managing the release of housing sites is appropriate. These criteria may relate, for example, to location or other tests of suitability. They should reflect the sequential approach set out in PPG3. The guidance recognises that such an approach does not offer the certainty sought from the development plan process by infrastructure providers and funders of housing development. It anticipates that the LPA may experience difficulty in managing the pattern and speed of urban growth other than in very broad terms.

8.34 I consider that, because of its particular circumstances, the LPA has no option but to adopt the criteria-based approach. The sites with planning permission can be developed at a time of the developer's choosing. They are not, therefore, susceptible to release on the basis of a ranking order or within time periods defined by the LPA. RDD policy R1B presents the basis for the criteria-based approach to site release. This gives priority to the development of previously developed sites within the defined urban area, but allows the development of green-field sites in defined exceptional circumstances.

8.35 Objectors argue that, in order to allow the LPA to respond to a future shortfall in the number of dwelling completions, possibly as a result of the windfall sites not coming forward at the rate anticipated, or of planning permissions not being implemented by site owners, the RDD should contain allocations of housing land that could be released as necessary. The present rate of housing completions gives no indication that there is a reluctance on the part of developers to bring housing development forward. In the first 2 years of the plan period the completion of some 1471 dwellings was the equivalent of almost 3 years requirement as set out in the RDD. The windfall allowance postulated by the LPA is, furthermore, of sufficient size to absorb some poor performance without risking non-achievement of the requirement targets. In any case an allocation on its own is not an effective part of the housing land resource. To become effective it must be translated into a planning permission. Once granted, such a permission would be just as susceptible to delay as any other within the large stock of such sites identified by the LPA and criticised by objectors.

8.36 PPG3 (paragraph 34) advises that sufficient sites should be shown on the plan's proposals map to accommodate at least the first 5 years of housing development shown in the plan. Site allocations should be reviewed and updated as the plan is reviewed and rolled forward at least every five years. Such an approach promotes certainty by avoiding an undue reliance on a windfall allowance. Objectors argue that it is not possible to make such an identification in the RDD.

8.37 Because of the particular local circumstances of Wigan the housing land resource contains a significant element of sites with planning permission on which units have been completed during the plan period, are under construction or not started, together with some housing capacity on mixed-use land allocations. As I have noted, together these comprise some 5656 dwellings. Of these, some 1471 dwellings were completed in the first 2 years of the plan period between April 2002 and April 2004. If the plan was adopted at about mid-2006 a further 2 years of completions (some 1020 dwellings at the requirement rate) would have been built. This would still leave some 3165 dwellings on sites with planning permission or subject to a plan allocation. At the requirement rate of 510 per year this resource would last for over 6 years. It is, therefore, possible for the plan's proposals map to show sites which accommodate at least the first 5 years of housing development. The plan would not, therefore, on adoption, be unduly reliant on completions assumed to arise from windfall sites. Regular reviews, in conformity with PPG3 advice, would provide the opportunity for additional housing land allocations to be made if this becomes necessary.

8.38 When the allowance of some 4032 dwellings from the various categories of windfall sites is added to the 3165 dwellings remaining at mid-2006 from the planning permission sites and the mixed-use allocations, this would total some 7197 dwellings. This is sufficient for much more than the 10 years potential supply at the likely date of the plan's adoption as advised by the Minister for Housing and Planning on 17/07/03.

8.39 As I note earlier, the 5656 dwelling capacity is, at a rate of 510 dwellings per year, the equivalent of 11 years construction, i.e. from April 2002 to about April 2013. In addition to this the likely capacity of windfall sites is much more than needed to satisfy need in the remaining 3 years of the plan period. For this reason I conclude that there is no justification for the allocation of additional land for house building to meet need up to April 2016. There is, therefore, no need for policy R1B to be modified to present the criteria against which applications for planning permission on allocated sites would be assessed.

The size of the housing land requirement

8.40 Objectors argue that the annual average housing land requirement of 510 dwellings should be increased by an allowance (perhaps 10%) for the non-implementation of planning permissions. As I have already noted the actual rate of past development does not support a view that sites are being held back from the market. The former PPG1 (paragraph 25) advised that, when planning for housing, an allowance should be made for unimplemented planning permissions. That PPG is now replaced by PPS1 which makes no such provision. Even when that advice was current it had to be read together with the approach set out in the later PPG3, RPG13 and 'Planning to Deliver'. This new approach places greater emphasis on managing housing development coming forward in accordance with the annual rates set out in RPG.

8.41 It is clear that, in the particular circumstances of Wigan, the plan, monitor and manage process could be applied to the UDP only at the periodic plan review stages because the necessary lack of plan allocations and the reliance on planning permissions and windfall assumptions does not allow for management of housing land release via the granting or withholding of planning permission for allocated sites. However, management via that more infrequent mechanism is, in my view, preferable to making a standard 10% slippage allowance because, in the prevailing circumstances of Wigan, that could result in a dramatic overprovision of housing land contrary to the provisions of RPG13. To the extent that these allocations were on green-field land they could reduce the impetus for the development of previously developed land and the contribution this could make to urban regeneration.

8.42 Objectors argue that the allowance made by the LPA for the replacement of cleared dwellings should be increased from 100 per year to some 150 or even 200 per year. They note that the Secretary of State, in justifying a reduced rate of new house building in the North West (via RPG13), assumed that the vacancy rate of the existing housing stock would be reduced to 3%, i.e. that the existing stock would be used more

efficiently by being more fully occupied. On this basis they argue that allowance should be made not only for the replacement of occupied dwellings that are cleared but also for many of the unoccupied dwellings, including long term vacant local authority units.

8.43 The higher of these proposed rates of clearance and replacement would require the construction of some 2400 dwellings to replace clearance over the 12 years from April 2004. Account has already been taken of the clearance of an annual average of 100 dwellings over that period, i.e. 1200 in total. The remaining 1200 could be accommodated within the surplus of housing land supply over requirement that I refer to earlier in this section of the report.

8.44 In any case, there is a prospect that housing clearance sites would feed back into the housing land resource as previously developed windfall sites in the designated urban area. An increase in the requirement as a result of extra replacement for dwelling clearance would, to some extent, be balanced by an increase in the housing land resource. This factor need not, therefore, in practice, have the negative effect on the housing land resource which I have assumed for the purpose of this assessment. It does not, in my view, justify the allocation of additional land for housing development.

8.45 Objectors seek the commitment of the LPA to the monitoring of housing requirements and the way these are met. The commitment of the LPA to this is clearly expressed in the final paragraph of the reasoned justification to policy R1A. The reference to the ways in which requirement can be met is sufficient to reassure objectors that the LPAs monitoring will deal with the individual components of the housing land supply. Actual house clearance rates will, of course, have implications for both land requirement and supply. For all these reasons I conclude that the annual average housing land requirement of 510 dwellings should not be increased.

The soundness of the assumptions relating to windfall sites

8.46 PPG3 (paragraph 36) advises that LPAs should make specific allowances for the different sorts of windfall sites in their plans. These allowances should be made on the basis of examining past trends in windfalls coming forward for development and the likely future windfall potential as assessed in a capacity study.

8.47 The LPA has examined the past rates at which windfall sites have come forward. It has carried out an Urban Potential Study in accordance with the advice of the Urban Potential Study Methodology for the North West (published by the North West Regional Assembly). This aspect is regarded by the LPA as consistent with 'Tapping the Potential'. On the basis of this study it is confident that windfall sites will continue to come forward at an adequate rate.

8.48 An objector expresses concern that the RDD does not identify the source of potential windfall sites. PPG3 (paragraph 35) confirms, however, that windfall sites are those which have not been specifically identified as available in the local plan (and hence the UDP) process. Another objector argues that the LPA's Urban Capacity Study should

be treated with caution. It is said to have been undertaken some years prior to the advice issued in 'Tapping the Potential' of 2000. The LPA confirms, however, that the document referred to by the objector was one which summarised information used in the preparation of RPG13. The Urban Capacity Study used in the preparation of the RDD took account of 'Tapping the Potential'.

8.49 The objector believes that there was insufficient involvement of the development industry in the Urban Capacity Study and, therefore, that economic viability and marketability were not sufficiently well examined. He believes that some identified sites are in beneficial uses and may remain in these. He notes that several sites suffer from development constraints. He argues that no proper discounting process was undertaken and that the study did not differentiate between green-field and previously developed sites.

8.50 The LPA agrees that it did not undertake discussions with the house-building industry because of the limited time available to progress the UDP through its various stages. An assessment of economic viability was, however, undertaken. The fact that some sites are currently in employment, commercial, recreation or community uses does not, in its view, prevent them being considered within an Urban Potential Study. This is made clear in both 'Tapping the Potential' and the North West Methodology. Both these guides include such sites within their lists of potential sources to be considered. Some of the sites considered by the Borough Council do suffer from physical, ecological and access constraints. These were taken into account in the discounting process which formed part of the study. That process took account of whether a site was in a sustainable location, planning policy, local character, developability and economic viability. Sites with planning permission (both those with dwellings under construction and those sites not yet started construction) were discounted because they are already identified separately in the statement of existing supply. The densities assumed in the study were derived from the design templates given in the North West Methodology.

8.51 An objector argues that there is some double counting between those sites within the identified land resource with planning permission which have come forward as windfall sites and the LPA's assumptions about the level of future completions on sites which will come forward as windfalls and receive planning permission. He argues that future completions will arise both from past windfall sites which already benefit from planning permission and those where planning permission will be granted during the remainder of the plan period. He contends that those sites which already have planning permission will be counted not only in the commitments but in the allowance for the future, i.e. that they will be counted twice, as a planning permission granted in the past for a certain number of dwellings and as the future construction of those same dwellings. The LPA initially agreed with this argument and proposed DINC11, in part, to remove any double counting. However, at the relevant inquiry hearing session, it expressed doubt as to whether double counting had, in fact, taken place. It drew my attention to the report of the Urban Potential Study 2004 (CD56). As I note earlier this, in the section relating to survey methodology, explicitly confirms that sites with dwellings under construction and sites with the benefit of planning permission for residential use were discounted from the

study prior to the identification of the 'constrained potential' supply because they are already identified separately in the Housing Core Proof (CD9).

8.52 Both PPG3 (paragraph 36) and 'Tapping the Potential' (page 19) confirm that the future contribution of windfall sites is an 'allowance'. That latter source defines a windfall site as previously developed land which has not been specifically identified in the local plan process. The LPA's windfall allowance (as PPG3, paragraph 36 advises), is based on past trends in windfall sites coming forward for development as evidenced by actual completions. It is not based on a list of specific windfall sites that it anticipates will be developed in future. This must, inevitably, be the case because the plan period extends to 2016. It is impossible for an Urban Capacity Study to identify with any certainty all the sites which have the potential to come forward as windfalls during that period. The role of such a study is to indicate the likely future windfall potential. In this case whether or not there is a reasonable prospect that past trends in windfall completions will continue into the foreseeable future.

8.53 The Urban Capacity Study has confirmed that there is scope for past levels of windfall completions to continue into the future. Because the assumption about future windfalls is an 'allowance' rather than an identified list of sites there is, in the very nature of the exercise, no scope for double counting. For these reasons I conclude that the RDD should not be modified in accordance with the element of DINC11 which relates to the windfall allowance.

8.54 The Urban Capacity Study identified the potential for some 4510 dwellings to arise on previously developed land within 5 years and a further 1480 on such sites within 5 to 10 years. This total of some 5990 dwellings is so much in excess of the LPA's assumption that, on the basis of past trends, some 4032 (3120 + 912) dwellings will come forward on windfall sites that, notwithstanding any uncertainty regarding the appropriateness of assumed densities, the rigors of the discounting process and the prospect that particular sites will prove to be developable, there is a reasonable prospect that past trends will continue. The robustness of this conclusion is reinforced by the consideration that the contribution from windfall completions will not, statistically, be required until April 2013. There is, therefore, ample time for constraints to be removed or, indeed, for windfall completions to arise on sites not yet identified within the Urban Capacity Study.

8.55 I have, in any case, noted earlier in this section that levels of completions from the two sources of windfall sites could be reduced to less than half that assumed by the LPA and the annual average requirement figure would still be met for the whole plan period. I conclude, for these reasons, that there is no reasonable basis for modification of the LPA's assumptions in relation to the windfall element of the anticipated housing land resource or, arising from this, for any additional allocation of housing land.

8.56 My conclusion on the overall relationship between housing land requirement and supply is supported by the stringent assessment made by an objector. On the basis of his argument that an allowance should be made for the clearance of 130 dwellings per year,

that there should be a slippage allowance of 10% applied to the sites with planning permission, that no specific assumption should be made about the housing capacity of the two mixed-use allocations or the Leigh Sports Village and that windfall sites will generate only some 77% of the capacity anticipated by the LPA (a significantly reduced figure of the sort advocated by several objectors), he still concludes that, at the end of the plan period, there will be a small surplus (some 167 dwellings) of supply over requirement. He takes issue with the slenderness of that margin.

8.57 PPG3 (paragraph 30) advises that LPAs should seek to identify only sufficient land to meet the housing requirement set by RPG. They should not extend the search further than required to provide sufficient capacity to meet agreed housing requirements. Even if this objector's approach turns out to be accurate it does not, having regard to this advice, justify the allocation of additional housing land.

The merits of housing development on land at Rectory Lane, Standish

8.58 On the basis that land should be allocated for housing development in the period to April 2016 an objector advocates a site at Rectory Lane, Standish. This is proposed to be designated as safeguarded land in the RDD. The objector considers it to be in a sustainable location adjacent to the edge of the built-up area of Standish, with good communications and easy access to community facilities and shops in Standish town centre some 800m to the west. It should, the objector contends, be regarded as an urban extension site.

8.59 This is a green-field site which forms part of the open countryside to the east of Standish. PPG3 (paragraph 32) advises that previously developed sites should be developed before green-field ones. For the reasons I have given I conclude that there is sufficient land available to meet housing development needs in the plan period from sites with planning permission, the residential element of proposed mixed-use allocations and the reasonable expectation of windfall sites coming forward on previously developed land within the defined urban area to meet housing development needs in the plan period. There is, therefore, no justification at this stage for the release of green-field land, including that at Rectory Lane, Standish, for this purpose.

The merits of housing development on land at Standish Golf Club and Practice Ground, Standish

8.60 On the basis that land should be allocated for housing development in the period to April 2016 an objector advocates a site at Standish Golf Club and Practice Ground, Standish. This is proposed to be designated as safeguarded land in the RDD. The objector argues that, having regard to the proximity of the site to the retail, commercial and public services available in Standish, this should be regarded as being in a sustainable location.

8.61 The site is green-field land which forms part of an area of open countryside to the east of Standish. PPG3 (paragraph 32) advises that previously developed sites should be developed before green-field ones. For the reasons I have given I conclude that there is

sufficient land available from sites with planning permission, the residential element of proposed mixed-use allocations and the reasonable expectation of windfall sites coming forward on previously developed land within the defined urban area to meet housing development needs in the plan period. There is, therefore, no justification at this stage for the release of green-field land, including that at the Standish Golf Club and Practice Ground, Standish, for this purpose.

The merits of housing development on land at Pocket Nook, Lowton

8.62 On the basis that land should be allocated for housing development in the period to 2016 an objector advocates a site at Pocket Nook, Lowton. This is proposed to be designated as safeguarded land in the RDD. The objector argues that, having regard to the proximity of the site to the retail, employment and public services available at Lowton, this should be regarded as being in a sustainable location.

8.63 The site is green-field land which forms part of an area of open countryside which extends southwards from Lowton and separates that settlement from the A580 dual carriageway. PPG3 (paragraph 32) advises that previously developed sites should be developed before green-field ones. For the reasons I have given I conclude that there is sufficient land available from sites with planning permission, the residential element of proposed mixed-use allocations and the reasonable expectation of windfall sites coming forward on previously developed land within the defined urban area, to meet housing development needs in the plan period. There is, therefore, no justification for the release of green-field land, including that at Pocket Nook, Lowton, for this purpose.

The merits of housing development at Stack House Farm, Golbourne

8.64 On the basis that land should be allocated for housing development in the period to 2016, an objector advocates a site at Stack House Farm, Golbourne. That area is proposed to be designated as safeguarded land in the RDD. The objector argues that, having regard to the proximity of the site to the retail, employment and public services available in Golbourne, this should be regarded as a sustainable location.

8.65 The site is green-field land in active use for agriculture. It forms part of an area of open countryside which separates the settlements of Golbourne, Abram, Hindley and Leigh. PPG3 (paragraph 32) advises that previously developed sites should be developed before green-field ones. For the reasons I have given I conclude that there is sufficient land available from sites with planning permission, the residential element of proposed mixed-use allocations and the reasonable expectation of windfall sites coming forward on previously developed land within the defined urban area to meet housing development needs in the plan period. There is, therefore, no justification at this stage for the release of green-field land, including that at Stack House Farm, Golbourne, for this purpose.

The merits of housing development on land to the east of Edgerton Road, Lowton

8.66 On the basis that land should be allocated for housing development in the period to 2016 an objector advocates a site to the east of Edgerton Road, Lowton. He argues that, having regard to the proximity of the site to the facilities in the adjacent residential area of Lowton, this should be regarded as a sustainable location.

8.67 The site is green-field land in active use for agriculture. It forms part of an area of open countryside which separates the eastern edge of Golbourne, the western edge of Leigh and the southern edge of Hindley. PPG3 (paragraph 32) advises that previously developed sites should be developed before green-field ones. For the reasons I have given I conclude that there is sufficient land available from sites with planning permission, the residential element of proposed mixed-use allocations and the reasonable expectation of windfall sites coming forward on previously developed land within the defined urban area to meet housing development needs in the plan period. There is, therefore, no justification at this stage for the release of green-field land, including that at Edgerton Road, Lowton, for this purpose.

The merits of housing development on the site of the former Billinge Hospital

8.68 An objector advocates the residential development of the site occupied by the former Billinge Hospital. In the period following the opening of this inquiry the LPA has resolved to grant planning permission for this. This objection has, therefore, been overtaken by events.

The merits of housing development on land at Primrose Lane, Standish

8.69 An objector argues that an area of land at Primrose Lane, Standish, should be allocated for residential development. For the reasons I give in this section of the report I conclude that there is sufficient land available from sites with planning permission, the residential element of proposed mixed-use allocations and the reasonable expectation of windfall sites coming forward on previously developed land within the defined urban area to meet housing development needs in the plan period. There is, therefore, having regard to the advice of PPG3 on the sequence of land allocation and development, no justification at this stage for the release of green-field land for housing development, including that at Primrose Lane, Standish, for this purpose.

Recommendation

I recommend:

(REC 8.3) that the RDD be modified by the incorporation within the table which follows policy R1A of the housing capacity of the mixed-use sites at Wigan Pier Quarter and Bickershaw Colliery, together with the housing capacity of the Leigh Sports Village, a total of 1034 dwellings.

(REC 8.4) that no other modification be made to the RDD in response to these objections.

R1B NEW HOUSING SITES

Objections to Draft Deposit

| Ref No | a | b | c | d | Name | Agent | Response Ref. |
|--------|---|-----|---|----|--|--|-----------------|
| 096 | O | 007 | R | 1B | Lane Head South Residents Group | | WMBC 096 Lane |
| 220 | O | 005 | R | 1B | Mrs E Ainscough | | WMBC 220 |
| 221 | O | 002 | R | 1B | Westbury Homes and Morris Homes Ltd | Rachel Hamilton | WIGAN MBC 221/A |
| 253 | O | 013 | R | 1B | MSF Motor Group Limited | CgMs Ltd | WMBC 253 R/EV |
| 265 | O | 001 | R | 1B | Des Ewing | | WMBC 265 R1B |
| 267 | O | 003 | R | 1B | Persimmons Homes | Dunlop Heywood Lorenz | WMBC 267 |
| 405 | O | 001 | R | 1B | David Cusani | | WIGAN MBC 405/A |
| 464 | O | 004 | R | 1B | Bispham Hall Brick and Terra Cotta Works | Steven Abbott Associates | WMBC 464 |
| 465 | O | 004 | R | 1B | Bett Homes (North West) Ltd | Hepher Dixon | WMBC 465 GB/R |
| 466 | O | 004 | R | 1B | Jeffreys Miller Limited | Steven Abbott Associates | WMBC 466 |
| 467 | O | 001 | R | 1B | Wilson Connolly | Barton Willmore Planning Partnership | WMBC 467 |
| 538 | O | 004 | R | 1B | Mr D R Taylor and Mrs J A Taylor | The Graham Bolton Planning Partnership | WMBC 538/A |
| 539 | O | 001 | R | 1B | Mr J Abbey – Brook Head Farm | Acorn Rural Property Services | WMBC 539/A |
| 569 | O | 002 | R | 1B | Persimmon Homes | | WMBC 569 R1B |
| 569 | O | 003 | R | 1B | Persimmon Homes | | WMBC 569 R1B |
| 572 | O | 053 | R | 1B | Peter Sargeant FRTPI | | WIGAN MBC 572/A |
| 581 | O | 003 | R | 1B | Wrightington, Wigan and Leigh NHS Trust | Michael Courcier and Partners Ltd | WMBC 581/A |
| 582 | O | 009 | R | 1B | Taylor Woodrow Developments Ltd | Michael Courcier and Partners Ltd | WMBC 582/A |
| 583 | O | 012 | R | 1B | Peel Investments (North) Ltd | Halliwell Landau | WMBC 583 WR |
| 585 | O | 002 | R | 1B | Wainhomes (North West) Ltd | Sedgwick Associates | WMBC 585/A |
| 590 | O | 002 | R | 1B | Wildlife and Social Preservation | | WMBC 590 WASP |
| 593 | O | 006 | R | 1B | Hallam Land Management Ltd | | WMBC 593 |
| 681 | O | 003 | R | 1B | Burtonwood Brewery Plc | Edmund Kirby | WIGAN MBC 681/A |
| 682 | O | 005 | R | 1B | English Nature | | WMBC 682/A |
| 685 | O | 002 | R | 1B | Wainhomes North West Ltd | Denise Emery | WIGAN MBC 685/A |
| | | | | | | | WMBC 685/C |
| 685 | O | 007 | R | 1B | Wainhomes North West Ltd | Denise Emery | WIGAN MBC 685/A |
| | | | | | | | WMBC 685/C |
| 722 | O | 002 | R | 1B | Bellway Homes (Manchester Division) | | WMBC 722/A |

Draft Deposit Objections Unconditionally Withdrawn

| Ref No | a | b | c | d | Name | Agent | Response Ref. |
|--------|---|-----|---|----|---------------------------------|---------------|---------------|
| 424 | O | 015 | R | 1B | Government Office for the North | | |
| 417 | O | 003 | R | 1B | Mr J Whitlow | McDyre and Co | |

Objections to Revised Deposit

| Ref No | a | b | c | d | Name | Agent | Response Ref. |
|--------|---|-----|---|----|---|-----------------------------------|-----------------|
| 096 | O | 019 | R | 1B | Lane Head South Residents Group | | WMBC 096 Lane |
| 221 | O | 008 | R | 1B | Westbury Homes Ltd | Broadway Malyan | WIGAN MBC 221/A |
| 572 | O | 091 | R | 1B | Peter Sargeant FRTPI | | WIGAN MBC 572/A |
| 581 | O | 009 | R | 1B | Wrightington, Wigan and Leigh NHS Trust | Michael Courcier and Partners Ltd | WMBC 581/A |
| 582 | O | 013 | R | 1B | Taylor Woodrow Developments Limited | Michael Courcier and Partners Ltd | WMBC 582/ |
| 682 | O | 026 | R | 1B | English Nature | | WMBC 682/A |
| 685 | O | 009 | R | 1B | Wainhomes (NW) Ltd | Emery Planning Partnership Ltd | WIGAN MBC 685/A |
| | | | | | | | WMBC 685/C |
| 685 | O | 010 | R | 1B | Wainhomes (NW) Ltd | Emery Planning Partnership Ltd | WIGAN MBC 685/A |
| | | | | | | | WMBC 685/C |
| 747 | O | 082 | R | 1B | Wigan Borough Action Group | | WIGAN MBC 747/A |
| 747 | O | 084 | R | 1B | Wigan Borough Action Group | | WIGAN MBC 747/A |
| 747 | O | 100 | R | 1B | Wigan Borough Action Group | | WIGAN MBC 747/A |

Revised Deposit Objections Unconditionally Withdrawn

| Ref No | a | b | c | d | Name | Agent | Response Ref. |
|--------|---|-----|---|----|--------------|---------------|---------------|
| 417 | O | 005 | R | 1B | Mr J Whitlow | McDyre and Co | |

Supporters of Draft Deposit

| Ref No | a | b | c | d | Name | Agent | Response Ref. |
|--------|---|-----|---|----|---|----------------------|---------------|
| 418 | S | 005 | R | 1B | GMPTE | | |
| 698 | S | 004 | R | 1B | The Trustees of Leigh Estate | Matthews and Goodman | |
| 698 | S | 011 | R | 1B | The Trustees of Leigh Estate | Matthews and Goodman | |
| 725 | S | 003 | R | 1B | United Utilities Facilities and Property Services | | |

Supporters of Revised Deposit

| Ref No | a | b | c | d | Name | Agent | Response Ref. |
|--------|---|-----|---|----|----------------------------|--|---------------|
| 538 | S | 010 | R | 1B | D R Taylor & Ms J A Taylor | The Graham Bolton Planning Partnership | |

| | | | | | | | |
|-----|---|-----|---|----|-------------------------------------|--|------------|
| 722 | S | 008 | R | 1B | Bellway Homes (Manchester Division) | | WMBC 722/A |
|-----|---|-----|---|----|-------------------------------------|--|------------|

Note

The matters raised by objections 681/003, 220/005 and 539/001 are dealt with in the section of this report which relates to policy GB1.

The matters raised by objection 593/006 are dealt with in the section of this report which relates to policy GB2.

Main Issues

Whether this policy is appropriate, having regard to:

- the title of the policy;
- the framework of the Government’s Planning Policy Guidance;
- the scope to deal with uncertainty;
- the role of wider regeneration benefits;
- the comprehension of terms used;
- the scope of planning control;
- the relationship of policy R1B to policy GB1E;
- the role of previously developed land in supporting nature conservation interests;
- the merits of allocating land at Camberwell Crescent, Wigan, for residential development;
- the merits of allocating land at Walmesley Farm, Higher Fold, Leigh for residential development;
- the merits of allocating a site at Higher Green Lane, Astley, for residential development.

Inspector’s Considerations and Conclusions

The title of the policy

8.70 RDD policy R1B is entitled ‘New Housing Sites’. An objector argues that it should be renamed ‘Sites for New Housing’. In my view no gain in comprehension would arise from this change. The same objector argues that the term ‘within the defined urban area’ is inappropriate. For the reasons I give in the section of this report which relates to policy R1, I conclude that this is the correct term to use.

The framework of the Government’s Planning Policy Guidance

8.71 An objector proposes his own definition of previously developed land. I see no reason to qualify that given in PPG3 (annex C). Another objector argues that every site to be developed for housing should be included in the UDP. Such an approach would conflict with the advice of PPG3 (paragraphs 35 and 36) that LPAs should make a

specific allowance for windfall sites. These are, by definition, not identified on a site-specific basis at plan preparation stage.

The scope to deal with uncertainty

8.72 RDD policy R1B presents the criteria to be applied to the determination of planning applications for residential development on previously developed land within the defined urban area. It also presents the exceptional circumstances in which such development may be allowed on green-field sites. Objectors note that the final paragraph of the reasoned justification in relation to RDD policy R1B informs that when the LPA considers that there is likely to be a significant variation from the average annual rate of housing provision over the plan period it will take action to manage the supply of land coming forward. This will involve using policy R1B to phase or restrict the supply of new sites granted planning permission if there is an oversupply, or could involve a review of the plan to release safeguarded land if there is an undersupply of housing sites. They doubt that, in the particular circumstances of Wigan, such a mechanism could be made to work effectively. They query what is meant by ‘significant variation’.

8.73 Given the range of issues to be taken into consideration I do not believe it is possible to postulate a degree of departure from the annual average rate of housing completions which can be considered as a threshold for remedial action. It must be a matter of judgment whether such a departure threatens the key objectives of securing that everyone has the opportunity of a decent home and promoting a sustainable pattern of settlement.

8.74 In respect of an oversupply, RPG13 (policies UR4 and UR8) seeks to secure the priority of previously developed land in urban areas. The best practice guide ‘Planning to Deliver’ advises that, if more windfall sites arise than anticipated the best course is, if these meet the criteria for development, to permit them even if this leads to more housing being built than initially planned for. The repercussions of this should then be dealt with through the monitoring and review process. Any green-field allocated sites should be assigned to a later phase of the plan.

8.75 In the particular case of Wigan the high proportion of the requirement that can be met by sites with planning permission has led the LPA to limit its housing allocations to the housing elements of mixed-use sites on previously developed land and not to allocate any green-field sites for housing. Restraining the housing development of these, in circumstances where there are too many windfall sites coming forward, would require a balance to be struck between the need to limit housing completions in Wigan in the interests of maintaining the overall distribution of completions on a regional basis in support of the overall RPG13 strategy, and risking the loss of the desirable non-housing elements of the mixed-use allocations which might well depend on the housing element for cross-funding.

8.76 As ‘Planning to Deliver’ advises, this is a hard choice to be made via the monitoring and review process. That document also recognises that, in the particular

circumstances of Wigan, the necessary ‘criteria-based’ approach to managing housing land release may have shortcomings. In particular it might present the LPA with difficulties in managing the speed of urban growth. In my view this is an inescapable aspect of the circumstances in which Wigan finds itself, i.e. a housing requirement that is low by historic standards and a supply which contains a high proportion of planning permission sites.

8.77 Supporting text to RDD policy R1B refers to the use of that policy to phase or restrict the supply of new sites granted planning permission if there is an over supply. The policy, as drafted, does not provide the basis for such action. Objectors speculate that the LPA may intend to achieve this via supplementary planning guidance, but no reference is made to this. The new sites which are referred to in the reasoned justification are likely, in accordance with the terms of that policy, to be primarily previously developed land within the urban area which come forward as windfall sites. RPG13 is silent on the matter of the restriction of planning permission on such sites. If it had intended the development of such land to be restricted it would surely have said so. In fact, the wording of RPG13 (policy UR7) is explicit that it is the land identified in development plans (i.e. the allocated sites and not any windfall sites that arise) which is to be monitored and managed. RPG13 (policy UR8) confirms that it is the land which is allocated for housing that should be subject to a phasing mechanism.

8.78 As I have already noted, the document ‘Planning to Deliver’ (a companion guide to PPG3) advises that if more windfall sites arise than estimated, these should be permitted even if this would lead to more housing being built than initially planned for. The repercussions of this should be dealt with in the monitoring and review process. It is instructive to note that the advice of that document refers only to the possibility that green-field allocations might be moved back to a later phase. There is no reference to deferring the implementation of allocations of previously developed land for housing. Read together with RPG13 it is clear that the scope to impose a moratorium on planning permissions extends only to green-field sites.

8.79 The absence within RPG13 and ‘Planning to Deliver’ of a reference to a restriction on the development of windfall previously developed land is to be expected because, even when PPG3 (paragraph 33) advice is given that LPAs should manage the release of sites over the plan period to control the pattern and speed of urban growth, it is clear from the section heading that this is in relation to the release of land allocated in development plans. There is no indication that the release of previously developed land in sustainable locations which arises as windfalls should be so controlled.

8.80 Because the potential for restricting the grant of planning permission in the case of oversupply is limited to applications for the development of green-field land, and because there are no green-field housing land allocations proposed within the RDD, there is no effective mechanism for controlling oversupply of housing in Wigan. This is due to the particular local circumstances of the Borough and must be reflected in the RDD. The final paragraph of the reasoned justification to policy R1B should, therefore, be modified

to remove the reference to the use of that policy to control the oversupply of housing land.

8.81 In respect of a future undersupply of housing land a remedy could not be found within a housing land resource composed mainly of sites with planning permission and assumptions about future windfall capacity on previously developed land within the defined urban area. The former would come forward for development at the discretion of developers, not the LPA. The latter are, by definition, unidentified and not subject to the LPA's influence.

8.82 Such an undersupply situation could be remedied only by the grant of planning permission, on an exceptional basis, for the development of green-field land. This is recognised by the final element of RDD policy R1B, which presents the circumstances in which residential development may be allowed on green-field sites. This element of the policy presents three criteria.

8.83 The first criterion is in conformity with the advice of PPG3 (paragraph 32) that the exception to the principle that previously developed sites should be developed before green-field ones will be where the former perform so poorly in relation to the criteria in paragraph 31 that this precludes their use for housing before a particular green-field site.

8.84 The second criterion requires that the green-field site is within the urban area as defined on the UDP proposals map. The RDD (page 52) clarifies that the urban area is those parts of the Borough which are not designated as green belt or safeguarded land. In relation to this latter category, PPG2 (annex B, paragraph B6) advises that development plans should provide that planning permission for permanent development of safeguarded land should be granted only following a review of the UDP which proposes the development of particular areas of this. This second criterion of the latter part of policy R1B, by limiting the release of green-field land to that which is within the urban area, is therefore in conformity with the approach of the RDD to the identification of safeguarded land.

8.85 An objector contends that criterion (ii) should be extended to the effect that, where suitable housing sites are not available within the urban area, resort should be had to those that would form a sustainable urban extension. Due to the way that the urban area is defined in the RDD such extensions would be either in the green belt or on safeguarded land, with the development of the latter to take precedence over the former. For the reasons I give in this section of my report I recommend that the RDD be modified to make provision, in specified circumstances, for a review of the plan to identify housing allocations from within safeguarded land. If this recommendation is accepted there is no need for extension of criterion (ii).

8.86 A further objector seeks a modification to criterion (ii) to anticipate the situation where safeguarded land might be located within the urban area. The approach taken by the RDD (page 52) confirms that the urban area and safeguarded land are mutually exclusive terms.

8.87 The third criterion requires that the green-field site should not be in current use, nor last used, for agriculture or forestry. This particular restriction is not supported by PPG3 guidance. The protection of agricultural land is secured via RDD policy GB3. The protection of woodlands is secured by policy EV2E. I therefore conclude that RDD policy R1B, in criteria (i) and (ii), makes appropriate provision to deal with an undersupply of housing land (if such a situation arises) via the release of green-field land. Criterion (iii) is superfluous and should be deleted.

8.88 An objector seeks to insert measures into policy R1B to control the accumulation of releases of green-field land into larger sites. Individual planning permissions would, however, have to satisfy the criteria set out in that policy. These will prevent demonstrable harm to interests of acknowledged importance. Because individual decisions on planning applications will be taken in the context of RDD policy R1A, which sets out the annual average dwelling requirement, any releases of green-field land will be no more than are needed to meet the immediate shortfall that is identified having regard to poor performance of previously developed sites.

8.89 In the circumstances that the grant of planning permission for housing development on green-field land within the urban area is not sufficient to meet need, and the development of safeguarded land has to be considered, the reasoned justification informs (in accordance with the advice of PPG2) that this would trigger a review of the UDP. Such an approach would, in my view, be preferable to making allocations of green-field land for housing development in the present RDD because, having regard to my considerations in relation to policy R1A, there is no indication that such releases of land will be required, let alone how much land should be designated. This latter factor would, of course, be crucial if green-field land allocations were to be made. It is clear, moreover, that there is no justification at this stage for a review of safeguarded land to identify additional housing sites. In the interests of certainty, however, the UDP should present the criteria which would be used in a future review to identify housing development sites from within safeguarded land.

8.90 Several objectors argue that not only should green-field sites be identified for development within the plan period but also for development beyond it. Such an approach would be contrary to the advice of PPG3 (paragraph 30) that LPAs should not extend the search for housing land further than required to provide sufficient capacity to meet the agreed housing requirement.

The role of wider regeneration benefits

8.91 At FDD stage an objector argues that within criterion (e) the reference to loss of amenity should be qualified by the proviso that this be unacceptable. The LPA concurs and, at RDD stage, inserts this reference. Criterion (e) of RDD policy R1B, therefore, secures that residential development on previously developed sites within the defined urban area must not result in unacceptable loss of amenity for nearby residents. Preferably it should result in environmental gains via the removal of dereliction, the

improvement of an eyesore, the regeneration of a neglected or untidy site or the regeneration of the wider area. An objector seeks the removal of the reference to the regeneration of the wider area because the policy does not clarify what development would occur within that extended zone. The policy wording does not, however, imply that any development above that being considered would arise in that wider area. The removal of a negative impact on amenity by the development of a particular site can, in itself, have a beneficial effect on the amenity of its surroundings.

8.92 The same objector seeks the deletion of the qualification that loss of amenity must be unacceptable. PPS1 (paragraph 19) advises that significant adverse impacts on the environment should be avoided. The RDD wording of policy R1B(e) reflects this qualification that harm must be significant if it is to be regarded as a material consideration..

The comprehension of terms used

8.93 An objector seeks the deletion of the word ‘only’ in the initial wording of the policy because it implies that all the stated criteria should be satisfied by a scheme. Each criterion relates to an interest of acknowledged importance. All of them should, therefore, be satisfied by a development scheme. Section 38(6) of the P&CPA 2004 provides the scope for a developer to argue, in a particular case, that material considerations indicate that a specific criterion should be afforded little weight.

8.94 Policy R1B(c) refers to the ability of a proposal to build on existing communities. Objectors query the meaning of this phrase and seek explanation why new development should be expected to provide sufficient demand to sustain existing local services and facilities. In the context of a strategy of sustainable development I consider the meaning of this text to be clear, i.e. that development should be located in places where it can take advantage of, and support, existing investment in public and commercial facilities.

8.95 Objectors query what is meant by loss of ‘amenity’. This is a standard term referring to a pleasant or useful feature. In the context of policy R1B it clearly refers to the impact of development upon a neighbourhood. The framework of national and regional planning guidance supports the objectives of R1B(c). For this reason, they cannot be considered to be unduly onerous.

The scope of planning control

8.96 An objector expresses concern that landowners may be tempted to let their land fall into disuse in order to support their later proposals for development. Such action does not constitute development, however, and since it relates to land management practices is beyond the scope of the UDP.

The relationship of policy R1B to policy GB1E

8.97 Objectors seek a reference, in the reasoned justification to policy R1B, to the special considerations that will be applied to major existing developed sites in the greenbelt. They want it to make clear that the provisions of R1B will apply to such sites. For the reasons I give in the section of this report which relates to policy GB1E I conclude that no such reference should be made.

The role of previously developed land in supporting nature conservation interests

8.98 An objector argues that previously developed land has a role to play in supporting nature conservation interests. He seeks a reference to this in policy R1B. The plan is to be read as a whole, however, in conformity with the advice of PPG12 that it should be succinct. Nature conservation interests are protected by policies EV2, EV2A, EV2B, EV2C, and EV2D. Development will not be permitted if it fails to satisfy their terms. For this reason there is no need for the cross-references that the objector seeks.

The merits of allocating land at Camberwell Crescent, Wigan, for residential development

8.99 An objector argues that land at Camberwell Crescent, Wigan, should be allocated for housing as it is in the adopted UDP. He notes that it received a grant of planning permission for this in 1984, but that this has now lapsed. The objector contends that this is previously developed land but, at my site inspection, I noted that it consists of rough grassland with a tree belt along the main road frontage. Even if it was previously developed, the remains of any structure or activity have blended into the landscape in the process of time to the extent that it can reasonably be considered to be part of the natural surroundings. Having regard to the advice of PPG3 (annex C) I conclude that it is green-field land.

8.100 For the reasons I give in the section of this report which relates to policy R1A, I conclude that there is sufficient land available from sites with planning permission, the residential element of proposed mixed-use allocations and the reasonable expectation of windfall sites coming forward on previously developed land within the defined urban area to meet housing development needs in the plan period. There is, therefore, having regard to the advice of PPG3 on the sequence of land allocation and development, no justification at this stage for the release of green-field land for housing development, including that at Camberwell Crescent, notwithstanding its sustainable location within the urban area.

The merits of allocating land at Walmesley Farm, Higher Fold, Leigh, for residential development

8.101 An objector argues that an area of land at Walmesley Farm, Higher Fold, Leigh, which is situated within the defined urban area, should be allocated for residential development. For the reasons I give in the section of this report which relates to policy

R1A, I conclude that there is sufficient land available from sites with planning permission, the residential element of proposed mixed-use allocations and the reasonable expectation of windfall sites coming forward on previously developed land within the defined urban area to meet housing development needs in the plan period. There is, therefore, having regard to the advice of PPG3 on the sequence of land allocation and development, no justification at this stage for the release of green-field land for housing development, including that at Walmesley Farm, for this purpose. It is, in any case, always open to a prospective developer to argue, in a particular case, that a green-field site satisfies the terms of policy R1B.

The merits of allocating a site at Higher Green Lane, Astley, for residential development

8.102 An objector argues that land at Higher Green Lane, Astley, which lies within the defined urban area, should be allocated for residential development. For the reasons I give in the section of this report which relates to policy R1A, I conclude that there is sufficient land available from sites with planning permission, the residential element of proposed mixed-use allocations and the reasonable expectation of windfall sites coming forward on previously developed land within the defined urban area to meet housing development needs in the plan period. PPG3 (paragraph 30) advises that LPAs should not extend the search for housing land further than required to provide sufficient capacity to meet the agreed housing requirement. There is, therefore, no justification for allocating additional land for housing development, including that at Higher Green Lane, Astley. It is, in any case, always open to a prospective developer to argue that, in a particular case, a potential development site within the defined urban area satisfies the terms of policy R1B.

Recommendation

I recommend:

(REC 8.5) that the RDD be modified by the deletion of criterion (iii) from the final element of policy R1B.

(REC 8.6) that the RDD be modified by the deletion of the final paragraph of the reasoned justification to policy R1B and its replacement as follows. ‘The average annual rate of housing completions will be one of the key indicators which will be continuously monitored, as referred to in Chapter 4. When the Council considers that, on the basis of the annual average rate of housing land requirement (i.e. 510 dwellings) there will be an undersupply of housing land, it will apply the provisions of policy R1B to remedy the situation. If all sources of land, apart from safeguarded land, are insufficient to satisfy the requirement, the LPA will initiate a review of the plan to identify housing allocations from within areas which are subject to that designation’.

(REC 8.7) that the RDD be modified to present the criteria which would be used in a review of the UDP to identify housing development sites from within safeguarded land.

(REC 8.8) that no other modification be made to the RDD in response to these objections.

R1D THE DESIGN OF NEW RESIDENTIAL DEVELOPMENT AND HOUSE EXTENSIONS

Objections to Draft Deposit

| Ref No | a | b | c | d | Name | Agent | Response Ref. |
|--------|---|-----|---|----|----------------------|-----------------|-----------------|
| 221 | O | 001 | R | 1D | Westbury Homes Ltd | Broadway Malyan | WMBC 221 R1D |
| 572 | O | 016 | R | 1D | Peter Sargeant FRTPI | | WIGAN MBC 572/A |
| 572 | O | 054 | R | 1D | Peter Sargeant FRTPI | | WIGAN MBC 572/A |

Draft Deposit Objections Unconditionally Withdrawn

| Ref No | a | b | c | d | Name | Agent | Response Ref. |
|--------|---|----|---|----|--------------------------------------|-------|---------------|
| 424 | O | 16 | R | 1D | Government Office for the North West | | |

Objections to Revised Deposit

| Ref No | a | b | c | d | Name | Agent | Response Ref. |
|--------|---|-----|---|----|----------------------------|-----------------|-----------------|
| 221 | O | 010 | R | 1D | Westbury Homes Ltd | Broadway Malyan | WMBC 221 R1D |
| 572 | O | 092 | R | 1D | Peter Sargeant FRTPI | | WIGAN MBC 572/A |
| 747 | O | 081 | R | 1D | Wigan Borough Action Group | | WIGAN MBC 747/A |

Supporters to Draft Deposit

| Ref No | a | b | c | d | Name | Agent | Response Ref. |
|--------|---|-----|---|----|-------|-------|---------------|
| 418 | S | 006 | R | 1D | GMPTE | | |

Main Issues

Whether this policy is appropriate, having regard to:

- the provision made for monitoring the plan;
- the expression of dwelling interface standards;
- car parking standards;
- the provisions for the density of development.

Inspector's Considerations and Conclusions

The provision made for monitoring the plan

8.103 RDD policy R1D provides that proposals for new residential development and house extensions will be required to create attractive living environments and deliver sustainable development through a number of stated actions. They must have regard to specified criteria. An objector argues that the plan makes insufficient provision for monitoring the objectives of policy R1D. The matters to which the policy requires the decision maker to have regard are, in the main, those which require a subjective judgement. Such factors are not susceptible to the monitoring of precisely defined measures. The only factor that could be consistently monitored, that relating to the

density of residential development, is already specified in the chapter of the RDD which relates to monitoring the plan.

The expression of dwelling interface standards

8.104 Policy R1D(f) seeks to secure adequate levels of amenity and privacy for occupiers of new and existing neighbouring dwellings by applying interface standards. These are expressed in metric terms that reflect earlier imperial measures. An objector argues that it is not appropriate to perpetuate the use of non-metric measures in policy documents. The important matter is the appropriate distance for the operation of the policy. No evidence has been presented to indicate that the distances quoted in the policy are inappropriate. The measures are expressed in metric terms. I conclude that there is no basis for modifying this aspect of the policy.

Car parking standards

8.105 At FDD stage the reasoned justification for policy R1D presented car parking standards for residential development. These were deleted at RDD stage and objectors seek their reinstatement. These standards are referred to in RDD policy A1S and are presented in Appendix 9. Their reinstatement in the reasoned justification to policy R1D would effect a duplication of text. A cross-reference between these elements is not necessary, given the advice of the introduction to the RDD that the plan should be read as a whole.

The provisions for the density of development

8.106 An objector argues that the provisions in policy R1D(e), which relate to the density of residential development, should incorporate a measure of flexibility to enable developers to cater for a range of house types and provide choice to potential purchasers. The particular measures presented in policy R1D(e) closely reflect the advice of PPG3 (paragraph 58). The introduction to the plan confirms that it is to be read as a whole. Policy EV3A provides that all proposals for development will be required through their design to promote, among other things, the character and identity of places, responding to and reinforcing locally distinctive patterns of development. This provides the flexibility sought by the objector because it ensures the scope for a prospective developer to argue, in a particular case, that the need to respect the local character of an area outweighs the need to achieve a particular density.

Recommendation

I recommend:

(REC 8.9) that no modification be made to the RDD in response to these objections.