

## EM1A 25 MARTLAND PARK AND HEINZ, WIGAN

### Objections to Draft Deposit

Ref No	a	b	c	d	Name	Agent	Response Ref.
212	O	001	EM	1A	Wainhomes/ Bovis Homes and Marsh Green Tenants Association		WMBC EM1A 25

### Draft Deposit Objections Unconditionally Withdrawn

Ref No	a	b	c	d	Name	Agent	Response Ref.
727	O	7	EM	1A	Suzanne Waymont		

### Supporters of Revised Deposit

Ref No	a	b	c	d	Name	Agent	Response Ref.
747	S	020	EM	1A	Wigan Borough Action Group		

### Main Issue

Whether this policy is appropriate, having regard to the effect of the development of this site on residential amenity, footpaths and nature conservation.

### Inspector's Considerations and Conclusions

7.186 The objection relates to part of Primary Employment Area EM1A25 which lies adjacent to residential development. Objectors argue that its development for employment purposes would be detrimental to residential amenity by reason of visual impact, noise, lighting and pollution. They seek the deletion of this land from the employment allocation and its designation for nature conservation and species protection.

7.187 Policy EV1B provides that development will not be permitted if it would result in unacceptable levels of air pollution or noise in relation to noise-sensitive uses. Policy G1A provides that development will not be permitted where it would be detrimental to amenity by reason of excessive noise, smell, fumes, light spillage, visual intrusion or other nuisance. Policy EV3D requires new development to incorporate good quality hard and soft landscaping to help integrate it into its surroundings. A footpath runs along the eastern and northern boundaries of the site. The LPA has, via the UDP process, proposed a new policy (C1X) to retain and enhance the public rights of way network. This will secure retention of this asset.

7.188 No information is provided to support the view that the site accommodates protected species. If these are identified, policy EV2D would apply. This provides that development will not be permitted if it would have an adverse impact on legally protected species unless the reasons for the development clearly outweigh the protection of the species concerned. For these reasons I conclude that the UDP, read as a whole, provides protection for the amenities identified by the objector.

**Recommendation**

**I recommend:**

**(REC 7.21) that no modification be made to the RDD in response to this objection.**

## EM1A 26 GIDLOW LANE, BEECH HILL

### Objections to Draft Deposit

Ref No	a	b	c	d	Name	Agent	Response Ref.
456	O	008	EM	1A	Salford City Council		WMBC 456

### Main Issue

Whether this policy is appropriate, having regard to the merits of removing land from the adopted green belt.

### Inspector's Considerations and Conclusions

7.189 This Primary Employment Area has a total area of some 8.7ha of which 1.9ha was undeveloped as at January 2004. The Primary Employment Area as shown on the FDD proposals map includes not only an existing factory but also land adjoining this to the north which is shown on the adopted UDP proposals map as lying within the green belt. This green belt land comprises the 1.9ha said to be available in table 1 of the RDD, as updated at January 2004. An objector argues that the modification of the green belt at this point is not justified by exceptional circumstances.

7.190 When the line of the approved green belt at this point is compared with that proposed on the FDD proposals map and the area proposed to be removed from the green belt as shown on the map in Appendix 1 of the RDD, several discrepancies are apparent which make it unclear what the LPA is proposing. The RDD text in Appendix 1 refers exclusively to the deletion of land from the green belt, but comparison of the adopted green belt with the FDD proposals map shows that a small area is proposed to be added to the green belt to the north east of the existing factory building.

7.191 The area to be removed from the green belt as shown on RDD Appendix 1, differs from that shown on the FDD proposals map and, of course, I take that in the RDD to be the subject of the LPA's proposal before this inquiry. That, itself, leaves unresolved the intentions of the LPA in respect of land at the residential development of Greenfields to the north west of the existing factory. Most of this is shown on the proposals map of the adopted UDP as lying within the green belt. The area shown by the map in RDD Appendix 1 as proposed to be removed from the green belt extends up to the eastern edge of this building group but does not extend over the dwellings at Greenfields or their surrounding amenity areas. The boundary of the proposed green belt is shown on the FDD proposals map as excluding this area and it is not referred to at all in the document 'Changes for Revised Deposit' issued in February 2004. As it stands, this area at Greenfields is proposed to be removed from the green belt but no justification for this is presented in the RDD, let alone via the verbal or written evidence of the LPA. I can, therefore, give no weight to this aspect of the LPA's proposal to remove land from the

green belt nor, for the same reasons, can I give weight to the apparent proposal to extend the coverage of the green belt to the north east of the factory building.

7.192 As regards the area shown in RDD Appendix 1 as proposed to be deleted from the green belt, PPG2 advises that the fundamental aim of green belt policy is to prevent urban sprawl by keeping land permanently open. The most important attribute of green belts is their openness. The essential characteristic of green belts is their permanence. Their protection must be maintained as far as can be seen ahead. Once the general extent of a green belt has been approved it should be altered only in exceptional circumstances.

7.193 RPG13 (policy SD5) provides that the need for exceptional substantial changes to any green belt in the region should be investigated by a strategic study. It notes, furthermore, that there is no need to undertake a strategic study of green belts within the Greater Manchester area before 2011. The LPA proposes to push back the green belt boundary by between 70m and 120m over a distance of some 250m. In my view this is a change of a substantial nature. The absence of a strategic study deprives the LPA of essential support for its proposal.

7.194 The LPA argues that the removal of the land from the green belt is justified by the particular needs of the factory immediately to the south. This produces carpets and, therefore, has a specific need for an elongated expansion of the site to accommodate the straight run of the manufacturing machinery. It would not be possible to carry out the necessary extension to the facility within the confines of the existing factory site due to the particular orientation and elongated nature of the machinery. The factory is confined on three sides by housing and the west coast main railway line. The only possibility for expansion lies to the north on to the green belt land.

7.195 The factory is a significant employer of local labour. The LPA considers that the modification of the green belt is justified by the retention of existing employment and the creation of potential to expand this by about 130 jobs. Without the potential for extension there would be a loss of opportunity for further investment at the factory. This would have implications for the local economy. Such considerations, which weigh green belt policy against economic objectives are exactly the sort of matters which should be resolved via the strategic study required by RPG13 (policy SD5).

7.196 In the absence of the strategic study, and having regard to the complete lack of justification by the LPA for changes to the green belt to the west and east of the area shown on RDD Appendix 1, I am unable to conclude that exceptional circumstances exist for the modification of the green belt at this point. PPG2 does, however, advise that inappropriate development in the green belt, such as that advocated by the LPA at this point, can be permitted via the development control system if very special circumstances are demonstrated. Retention of the green belt boundary as currently adopted need not, therefore, constrain the future expansion of the factory. For these reasons I conclude that the green belt boundary in the vicinity of Gidlow Lane should not be modified. Primary Employment Area EM1A26 should be redefined to exclude the land which is within the adopted green belt.

## **Recommendation**

**I recommend:**

**(REC 7.22) that the RDD be modified so that Primary Employment Area EM1A26 excludes the land which is within the adopted green belt.**

**(REC 7.23) that no modification be made to the boundary of the adopted green belt in the vicinity of Gidlow Lane.**

**(REC 7.24) that no other modification be made to the RDD in response to this objection.**

**EM1A 27 BRADLEY LANE, STANDISH**

**Objections to Draft Deposit**

**Draft Deposit Objections Unconditionally Withdrawn**

<b>Ref No</b>	<b>a</b>	<b>b</b>	<b>c</b>	<b>d</b>	<b>Name</b>	<b>Agent</b>	<b>Response Ref.</b>
727	O	008	EM	1A	Greater Manchester Ecology Unit		

## EM1A 29 LAMBERHEAD INDUSTRIAL ESTATE, PEMBERTON

### Objections to Draft Deposit

Ref No	a	B	c	d	Name	Agent	Response Ref.
599	O	001	EM	1A	Andrew Warland	Turley Associates	WMBC 599

### Main Issue

Whether this policy is appropriate, having regard to the merits of extending the Lamberhead Industrial Estate southwards.

### Inspector's Considerations and Conclusions

7.197 An objector argues that land should not be safeguarded for the construction of the A5225 road, part of which area runs to the south of the Lamberhead Industrial Estate. For the reasons I give in the section of this report which relates to policy A1P(1) I have recommended that land should not be safeguarded for this road scheme.

7.198 The objector goes on to argue that land to the south of Leopold Street, Pemberton, which is identified in the proposals map for safeguarding for the A5225 road scheme, should be allocated for employment development as an extension to Primary Employment Area EM1A29. He contends that to this area should be added land which is within the adopted green belt to the north of a path which runs from Brook Lane to the northern edge of the railway line.

7.199 PPG2 (paragraph 2.6) advises that detailed green belt boundaries defined in adopted development plans should be altered only exceptionally. I have, in the section of this report which relates to policy EM1, concluded that additional employment land must be identified to meet needs within the plan period. The RDD has, in conformity with the advice of PPG2 (paragraph 2.12 and annex B) identified extensive areas of safeguarded land which, in accordance with that guidance, should be developed before green belt boundaries are altered. There is, therefore, no basis on which I can conclude that exceptional circumstances justify a modification of the green belt boundary in this particular location.

7.200 If my recommendation in relation to policy A1P(1) is accepted, the land to the south of the Lamberhead Industrial Estate, outside the green belt, will become (in accordance with the definition presented on page 52 of the RDD) undeveloped green-field land within the defined urban area. The objector has presented very little information to support his contention that this area should be developed for employment. This is limited to the assertion that it would form a natural extension to the Lamberhead Industrial Estate and is well served by road and rail. It is, nevertheless, green-field land.

7.201 The RDD provides a policy framework for the determination of planning applications seeking the development of land for employment purposes. Policy EM1 provides that an adequate supply of land for employment must be ensured by, among other things, permitting employment uses on land or in buildings not currently in or allocated for employment use, provided that there will be no unacceptable impact. Policy EM1C provides that employment development outside Primary Employment Areas will be permitted provided that stated criteria are satisfied. In accordance with national and regional planning guidance these impose a sequential approach, preferring the use of existing buildings and previously developed land before green-field sites such as that proposed by the objector.

7.202 Because the LPA, in its search for additional employment land, must apply this sequential approach, and because it is not yet possible to anticipate the results of that exercise, there is no basis on which I can conclude that even if green-field land is required for employment development, this is the most suitable area for release. RDD policies EM1 and EM1C do, however, provide an appropriate planning framework by which the objector can, by deploying more convincing arguments than were presented to me at UDP inquiry stage, seek to demonstrate that his proposal is acceptable in policy terms.

### **Recommendation**

**I recommend:**

**(REC 7.25) that no modification be made to the RDD in response to this objection.**

## EM1A 30 PEMBERTON COLLIERY

### Objections to Draft Deposit

Ref No	a	b	c	d	Name	Agent	Response Ref.
009	O	001	EM	1A	Mr Alan Waterhouse		WMBC EM1A 30
016	O	001	EM	1A	Mrs M. Johnson		WMBC EM1A 30
017	O	001	EM	1A	Mr R. Johnson		WMBC EM1A 30
029	O	001	EM	1A	Steven Leng & Jenny Crompton		WMBC EM1A 30
030	O	001	EM	1A	Christopher Welsby		WMBC EM1A 30
031	O	001	EM	1A	Ian Williams		WMBC EM1A 30
034	O	001	EM	1A	Mr A. T. Bradshaw & Mrs J. Bradshaw		WMBC EM1A 30
045	O	001	EM	1A	Mrs Eileen Haigh		WMBC EM1A 30
058	O	001	EM	1A	Colin Marsh		WMBC EM1A 30
066	O	001	EM	1A	Adrian M Taylor		WMBC EM1A 30
067	O	001	EM	1A	Stuart J Peet and Gail Harrington		WMBC EM1A 30
080	O	001	EM	1A	Mrs Patricia Roby		WMBC EM1A 30
081	O	001	EM	1A	John Clinton		WMBC EM1A 30
082	O	001	EM	1A	Elizabeth Cooke		WMBC EM1A 30
083	O	001	EM	1A	Craig Dean		WMBC EM1A 30
084	O	001	EM	1A	Mr F Roby		WMBC EM1A 30
095	O	001	EM	1A	Mrs Wendy Allan		WMBC EM1A 30
120	O	001	EM	1A	Mrs D. Green		WMBC EM1A 30
156	O	001	EM	1A	Jayne Ryance		WMBC EM1A 30
157	O	001	EM	1A	Mr & Mrs Heap		WMBC EM1A 30
181	O	001	EM	1A	Rachel Lewis		WMBC EM1A 30
256	O	001	EM	1A	David Swift		WMBC EM1A 30
340	O	001	EM	1A	M Green and John Green		WMBC EM1A 30
342	O	001	EM	1A	Mr Norman Allan		WMBC EM1A 30
420	O	001	EM	1A	Mr and Mrs Houghton		WMBC EM1A 30
432	O	001	EM	1A	R Yates		WMBC EM1A 30
495	O	001	EM	1A	Mr and Mrs Cooper		WMBC EM1A 30
499	O	001	EM	1A	Gillian Taylor & Alan Connolly		WMBC EM1A 30
522	O	001	EM	1A	Thomas Harte		WMBC EM1A 30
530	O	001	EM	1A	Mrs Brenda Oakley		WMBC EM1A 30
559	O	001	EM	1A	Sandra Adamson		WMBC EM1A 30
598	O	001	EM	1A	KSS Richards	Nathaniel Lichfield and Partners	WMBC EM1A 30
598	O	002	EM	1A	KSS Richards	Nathaniel Lichfield and Partners	WIGAN MBC 598/A
699	O	001	EM	1A	Mr S J Evans		WMBC EM1A 30

### Draft Deposit Objections Unconditionally Withdrawn

Ref No	a	b	c	d	Name	Agent	Response Ref.
598	O	004	EM	1A	KSS Richards	Nathaniel Lichfield and Partners	
598	O	005	EM	1A	KSS Richards	Nathaniel Lichfield and Partners	

### Objections to Revised Deposit

Ref No	a	b	c	d	Name	Agent	Response Ref.
768	O	002	EM	1A	Janette Thomas		WMBC EM1A 14
874	O	004	EM	1A	David Marsh		
598	O	006	EM	1A	KSS Richards	Nathaniel Lichfield and Partners	WIGAN MBC 598/A

### Supporters of Revised Deposit

Ref No	a	b	c	d	Name	Agent	Response Ref.
727	S	026	EM	1A	Greater Manchester Ecology Unit		
747	S	019	EM	1A	Wigan Borough Action Group		

### Note

Objections 598/001, 598/002 and 598/006 proceeded via written representations. Within his subsequently submitted written evidence that objector argues, among other things, that if the safeguarded route for the proposed A5225 road should change, then any residual land should revert to the employment allocation. This matter is not referred to in the objection documents which are listed in the skeleton version of this report which was provided by the LPA. For this reason I have not dealt with that matter and have assumed that it does not relate to a duly-made objection.

### Main Issues

Whether this policy is appropriate, having regard to:

- the extent of the allocation that is likely to be developed within the plan period;
- the scope for housing development on the fringe of the allocation;
- the scope for extending the area of the allocation;
- the effect of development on nature conservation interests;
- the effect of development on residential amenity;
- the merits of a recreational use of the land.

### Inspector's Considerations and Conclusions

*The extent of the allocation that is likely to be developed within the plan period*

7.203 The Primary Employment Area at Pemberton Colliery, as proposed in the RDD, has a total area of some 20.2ha of which 18.7ha was available at both December 2001

and January 2004. An objector argues that the increase in the area of this site from 16.9ha at FDD stage to 20.2ha at RDD stage is contrary to Regional Planning Guidance. An increase of 3.3ha overall (2.6ha available area) is not, however, significant at the regional scale. The reasoned justification of the RDD informs that the full development potential of this site is dependent on construction of the western section of the A5225 to junction 26 of the M6. For the reasons I give in the section of this report which relates to policy A1P(1) I have recommended that land should not be safeguarded for that road scheme.

7.204 Even in the absence of the A5225 this site will gain access via a newly constructed link road to the A49. This affords direct access to junction 25 of the M6, but only for traffic to or from the south. Traffic to or from the north on the M6 will have to either use junction 24 in combination with junction 25 or travel via Wigan town centre and the A577 road to junction 26. This latter option would involve the use of some 4km of single carriageway roads through a densely built-up area. This restriction on accessibility could both reduce the rate at which land is taken up for development and reduce its attractiveness to incoming investors. Such an outcome would be consistent with the view expressed in the RDD that the full development potential of this land is dependent on the A5225 scheme.

7.205 For the reasons I give in relation to the Primary Employment Areas at East and West of Leigh Road and the South Lancashire Industrial Estate, there is likely to be less employment land available than anticipated by the LPA. This could enhance the prospects for the development of the land at Pemberton Colliery and outweigh the access factors to allow the entire 18.7ha to be taken up within the plan period, notwithstanding the absence of the A5225 road.

*The scope for housing development on the fringe of the allocation*

7.206 RDD policy EM1A provides that uses other than employment will be permitted within Primary Employment Areas only where they would be small scale and complementary to the primary employment functions of the area or a part of this, or if they are on the fringe of a Primary Employment Area and it can be demonstrated that this development would improve the physical relationship between the employment uses and adjacent uses. It must not, furthermore, result in any greater constraint on the development and use of the remaining employment areas for employment uses.

7.207 An objector refers to existing residential areas which abut this Primary Employment Area. He argues that further housing development within the designated area of the Primary Employment Area would help to mitigate any adverse impact on amenity which might be experienced by their occupiers. He notes that RDD policy EM1A(b) allows the scope for this benefit to be argued in a particular case but, in the interests of certainty, he advocates that specific reference be made within the reasoned justification of the RDD to the appropriateness of such housing development within the Primary Employment Area of Pemberton Colliery. Another objector argues that the site, as a whole, should be developed for housing.

7.208 For the reasons I give in the sections of this report which relate to policies EM1 and R1A I have concluded that, while there is likely to be sufficient land for housing development throughout the plan period, the same cannot be said for employment land. This argument alone indicates that, as a strategic consideration, potential employment land should not be lost to housing.

7.209 At a local, site development, level it will be necessary to protect the amenity of adjacent residents via mitigation measures within the Pemberton Colliery Primary Employment Area by means of landscaping and earth mounding. This, itself, will reduce the potential development area of the site. Any further housing development which is built as a mitigation measure to protect existing housing areas would, itself, require mitigation. I conclude that the approach sought by the objector would unnecessarily reduce a much needed employment land resource. For this reason the RDD should not be modified to secure it.

*The scope for extending the area of the allocation*

7.210 The proposed boundaries of this Primary Employment Area were defined in the FDD and then amended at RDD stage to marginally reduce its area at the western end and substantially increase it at the northern and eastern ends. An objector at both FDD and RDD stages argues that this Primary Employment Area should be extended towards the A49 road in the east, Little Lane in the north and Smithy Brook in the south. He contends that this extended area would allow the proper planning of the site. It would maximise use of previously developed land and, therefore, minimise the need to develop green-field land elsewhere. He considers that it would, by assigning a definite use to these fringe areas, promote certainty for both the users of the plan and the developers of this site.

7.211 An extension southwards to Smithy Brook is, in my view, inappropriate because of the steep slopes in that area and the inevitable adverse impact on the landscape and nature conservation value of the brook corridor. That belt of land has the potential to contribute to the mitigation of the employment development on the allocated land and should not be eroded.

7.212 An eastward extension beyond the limits set out in the RDD would take employment development into an area proposed for a landscaped footpath and cycleway corridor which is intended to separate the proposed employment development from existing housing and serve both. As part of this general area a pocket of land fronting Duke Street has existing housing on three sides. It is separated from the proposed Primary Employment Area by Smithy Brook. Vehicular access to it would be through a residential area with associated harm to amenity and highway safety. The alternative of providing a vehicular access across the brook from the rest of the Primary Employment Area would sever the proposed landscape corridor along it. An extension of the Primary Employment Area northwards towards Little Lane would pose difficulties in relation to vehicular access and would harm residential amenity.

7.213 Because the areas into which the objector proposes to expand the Primary Employment Area already serve, or are intended to serve, an essential mitigation role, leaving them outside its defined boundary will allow more of that latter area to be developed for employment uses. If they were included in the Primary Employment Area it is likely that most of their area would have to be used for landscape planting or mounding in any event. For these reasons I conclude that the boundaries of the Pemberton Colliery Primary Employment Area should not be extended beyond their definition in the RDD.

*The effect of development on nature conservation interests*

7.214 Objectors express concern that development of the land would cause disturbance to wildlife. They advocate that it should be used for nature conservation purposes. The plan should be read as a whole. Appendix 3 notes that an ecological assessment of this site will need to be submitted with any development proposals in order to assess the impact on wildlife. If such interests are identified, policies EV2B and EV2D would provide protection in accordance with current legislation and planning policy guidance.

*The effect of development on residential amenity*

7.215 Objectors argue that the employment development of this land will harm residential amenity by generating noise and disturbance, light pollution and that it will harm their outlook. The plan is to be read as a whole, however. Policy EM1A, itself, provides that employment uses will be permitted within Primary Employment Areas only if there will be no unacceptable environmental, amenity, road safety or other adverse impacts. Policy G1A provides that new development will be permitted only where there would be no harm to the amenity of nearby existing or proposed land uses by virtue of smell, fumes, light spillage, visual intrusion or other nuisance. Policy EV3D requires development to incorporate good quality hard and soft landscaping as an integral part of the proposals to enhance the environment and setting of new buildings and help integrate development into its surroundings.

*The effect of development on the safe and free flow of traffic*

7.216 Objectors argue that the employment development of this site would lead to traffic chaos. RDD policy A1A provides, however, that a Transport Assessment will be required for all proposed development that would, either individually or together with other recently completed development or outstanding planning permissions, give rise to a material increase in the volume or other impact of road traffic. That will establish whether the proposal is acceptable in transport terms and, if not, whether highway works or other measures are required to make it acceptable.

*The merits of a recreational use of the land*

7.217 Objectors argue that the land is needed for recreational use. Related to the development of this Primary Employment Area the LPA has identified over 13ha of land for recreational purposes. This is located to the south near to Smithy Brook. The sale of Council owned land within this Primary Employment Area will fund the creation of a usable green open space designed to cater for all age groups. I conclude that, rather than reducing recreational opportunities, the development of this Primary Employment Area will generate a usable resource.

**Recommendation**

**I recommend:**

**(REC 7.26) that no modification be made to the RDD in response to these objections.**

## EM1A 31 WARRINGTON ROAD INDUSTRIAL ESTATE, WIGAN

### Objections to Draft Deposit

Ref No	a	b	c	d	Name	Agent	Response Ref.
726	O	016	EM	1A	United Utilities Facilities and Property Services		WMBC 726 EM1A 31

### Main Issue

Whether this policy is appropriate, having regard to interests of acknowledged importance

### Inspector's Considerations and Conclusions

7.218 Policy EM1A provides that, within the Primary Employment Areas, development for or changes of use to uses within classes B1, B2 and B8 or other employment uses will be permitted provided that there will be no unacceptable environmental, amenity, highway, road safety or other adverse impact. An objector argues that the land at Warrington Road Industrial Estate should be allocated for B1, B2 and B8 uses without further restriction.

7.219 Even if the proposed A5225 road was constructed immediately to the south of this area the industrial estate would still gain vehicular access to Warrington Road via the same restricted access as at present. Many of the premises on the estate are immediately adjacent to the dwellings that front that highway. It is, therefore, necessary that the reference to safeguarding these interests of acknowledged importance should be retained.

### Recommendation

**I recommend:**

**(REC 7.27) that no modification be made to the RDD in response to this objection.**

## EM1A 32 WARRINGTON ROAD, HAWKLEY

### Objections to Draft Deposit

Ref No	a	B	c	d	Name	Agent	Response Ref.
525	O	001	EM	1A	SCA Packaging	CPM Consulting Ltd	WMBC 525 EM1A 32

### Main Issue

Whether this policy is appropriate, having regard to the need for employment development and the characteristics of this site.

### Inspector's Considerations and Conclusions

7.220 The LPA proposes that this site be subject to policy EM1A which provides that uses other than B1, B2, B8 and other employment uses will be permitted only if they are of a small scale and complementary to the primary employment function of the area or are on the fringe of this. An objector argues that the site should be withdrawn from allocation under this policy so that its future could be considered under the terms of policy EM1B. This would, the objector argues, allow a more flexible approach to the potential future redevelopment of any surplus land that becomes available for other uses.

7.221 Policy EM1B provides that, outside Primary Employment Areas, the development or change of use of land or premises currently or last in employment use to other uses will be permitted only if it can be demonstrated that specified criteria are satisfied. The first of these is that there is no current need or likely future demand for the site or premises for employment uses. Having regard to the contrast between requirement for employment land and the likely future effective supply of this (which I present in the section of this report which relates to policy EM1) I have concluded that the LPA should seek to identify a significant area of additional land for employment purposes. Criterion (a) of policy EM1B could not, therefore, be satisfied by this site.

7.222 No information has been presented to indicate that the site gives rise to significant environmental problems. It is of sufficient size for any that would potentially arise as a result of redevelopment to be mitigated by detailed layout and design. There are no buildings of architectural or historic interest on the site. No arguments have been presented to support a conclusion that redevelopment of part of the site for non-employment uses is necessary to secure the retention of the remainder for employment. The objector has not demonstrated that there is a need for a particular type of non-employment development that could not be met elsewhere. It is not a small site (less than 0.4ha). There is, therefore, no basis on which I can conclude that the particular circumstances of the site would satisfy the terms of policy EM1B. Having regard, in particular, to the extent to which the requirement for employment land in Wigan is likely to be unsatisfied by the effective supply identified in the RDD, I conclude that this land should remain subject to the provisions of policy EM1A.

**Recommendation**

**I recommend:**

**(REC 7.28) that no modification be made to the RDD in response to this objection.**

## EM1A 35 PARK BROOK, WIGAN ROAD, BRYN

### Objections to Draft Deposit

Ref No	a	b	c	d	Name	Agent	Response Ref.
593	O	002	EM	1A	Hallam Land Management Ltd		WMBC 593
593	O	003	EM	1A	Hallam Land Management Ltd		WMBC 593

### Main Issue

Whether this policy is appropriate, having regard to the merits of a residential or mixed-use development of the site.

### Inspector's Considerations and Conclusions

7.223 An objector argues that the land which comprises this Primary Employment Area should, instead, be developed for housing or a mixed-use scheme. 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 areas to meet housing development needs in the plan period. The objector has not identified a particular need for any of the components of a mixed-use development that could not be equally well satisfied elsewhere.

7.224 Having regard to my consideration of the requirement for employment land and the likely effective supply of it (which I present in the section of this report which relates to policy EM1) I have concluded that there is likely to be insufficient employment land to meet requirement and that additional allocations should be made. Having regard to the pre-eminent accessibility of this site, adjacent to junction 25 of the M6, and its consequent scope to satisfy a wide range of demands, I conclude that it should remain as an element of the employment land resource.

### Recommendation

**I recommend:**

**(REC 7.29) that no modification be made to the RDD in response to these objections**

## EM1A 36 SOUTH LANCASHIRE INDUSTRIAL ESTATE, ASHTON

### Objections to Draft Deposit

Ref No	a	b	c	d	Name	Agent	Response Ref.
727	O	009	EM	1A	Greater Manchester Ecology Unit		WMBC EM1A 36

### Objections to Revised Deposit

Ref No	a	b	c	d	Name	Agent	Response Ref.
023	O	002	EM	1A	Bessie Greenall		WIGAN MBC FOA/A
024	O	013	EM	1A	Mrs M E Fairhurst		WIGAN MBC FOA/A
024	O	017	EM	1A	Mrs M E Fairhurst		WIGAN MBC FOA/A
025	O	003	EM	1A	Philip Fairhurst		WIGAN MBC FOA/A
025	O	007	EM	1A	Philip Fairhurst		WIGAN MBC FOA/A
025	O	008	EM	1A	Philip Fairhurst		WIGAN MBC FOA/A
033	O	006	EM	1A	Miss Winifred Beesley		WIGAN MBC FOA/A
049	O	006	EM	1A	Linda Hickey		WIGAN MBC FOA/A
050	O	006	EM	1A	Robert Hickey		WIGAN MBC FOA/A
053	O	008	EM	1A	Adrian Hurst		WIGAN MBC FOA/A
055	O	006	EM	1A	Mrs M Iredale		WIGAN MBC FOA/A
060	O	007	EM	1A	Anthony Connell		WIGAN MBC FOA/A
060	O	022	EM	1A	Katherine Marsland		WIGAN MBC FOA/A
065	O	005	EM	1A	Colin Greenhalgh		WIGAN MBC FOA/A
086	O	006	EM	1A	Susan Melling		WIGAN MBC FOA/A
087	O	006	EM	1A	B Hughes		WIGAN MBC FOA/A
089	O	006	EM	1A	Ms Margaret Dean		WIGAN MBC FOA/A
090	O	007	EM	1A	Karin & Keith Dagnall		WIGAN MBC FOA/A
091	O	016	EM	1A	W Malcolm Cook		WIGAN MBC FOA/A
097	O	005	EM	1A	Mrs K Lees		WIGAN MBC FOA/A
099	O	004	EM	1A	Mr G E Forster		WIGAN MBC FOA/A
100	O	005	EM	1A	Margaret Brooks		WIGAN MBC FOA/A
100	O	016	EM	1A	Margaret Brooks		WIGAN MBC FOA/A
101	O	015	EM	1A	William Brooks		WIGAN MBC FOA/A
101	O	019	EM	1A	William Brooks		WIGAN MBC FOA/A
114	O	017	EM	1A	Joan Atherton		WIGAN MBC FOA/A
160	O	005	EM	1A	Amelia Ellen Lavin		WIGAN MBC FOA/A
161	O	004	EM	1A	T Brennan		WIGAN MBC FOA/A
161	O	008	EM	1A	T Brennan		WIGAN MBC FOA/A
166	O	006	EM	1A	Mr Jack Delaney		WIGAN MBC FOA/A
172	O	006	EM	1A	Gary Crossley		WIGAN MBC FOA/A
172	O	022	EM	1A	Julie Crossley		WIGAN MBC FOA/A
174	O	005	EM	1A	Miss B McKenna		WIGAN MBC FOA/A
184	O	006	EM	1A	E M Chadwick		WIGAN MBC FOA/A
188	O	007	EM	1A	Josephine Mary Fleming		WIGAN MBC FOA/A
189	O	006	EM	1A	Miss M Topping		WIGAN MBC FOA/A

190	O	005	EM	1A	Sarbari Mukherjee		WIGAN MBC FOA/A
194	O	002	EM	1A	Lillian Corcoran		WIGAN MBC FOA/A
198	O	017	EM	1A	Mrs Kay Pooke		WIGAN MBC FOA/A
198	O	019	EM	1A	Mrs Kay Pooke		WIGAN MBC FOA/A
219	O	008	EM	1A	Mrs M P Anten		WIGAN MBC FOA/A
248	O	006	EM	1A	John E Middleton		WIGAN MBC FOA/A
251	O	015	EM	1A	Val Middleton		WIGAN MBC FOA/A
255	O	004	EM	1A	J McLean		WIGAN MBC FOA/A
255	O	005	EM	1A	J McLean		WMBC R255 EM1A
293	O	005	EM	1A	A Hamilton		WIGAN MBC FOA/A
295	O	005	EM	1A	P D Hamilton		WIGAN MBC FOA/A
297	O	015	EM	1A	Raymond Sharples		WIGAN MBC FOA/A
301	O	004	EM	1A	Mavis Helena Gale		WIGAN MBC FOA/A
303	O	014	EM	1A	Christine A Jones		WIGAN MBC FOA/A
304	O	003	EM	1A	J S Arkwright		WIGAN MBC FOA/A
304	O	013	EM	1A	J S Arkwright		WIGAN MBC FOA/A
306	O	002	EM	1A	Mr P H Starkie		WIGAN MBC FOA/A
308	O	013	EM	1A	M Boardman		WIGAN MBC FOA/A
311	O	012	EM	1A	Bernard Shaw		WIGAN MBC FOA/A
312	O	004	EM	1A	Mary F Shaw		WIGAN MBC FOA/A
313	O	002	EM	1A	Mr B Fielding		WIGAN MBC FOA/A
314	O	005	EM	1A	Mrs M MacDonald		WIGAN MBC FOA/A
317	O	016	EM	1A	J G Ellison		WIGAN MBC FOA/A
318	O	006	EM	1A	Mr G Daniels		WIGAN MBC FOA/A
319	O	005	EM	1A	Mrs M H Hughes		WIGAN MBC FOA/A
322	O	006	EM	1A	Archibald Smith Tate		WIGAN MBC FOA/A
323	O	006	EM	1A	Norman Edward Rusk		WIGAN MBC FOA/A
325	O	006	EM	1A	Mr John Steele		WIGAN MBC FOA/A
326	O	006	EM	1A	Mrs Janet Steele		WIGAN MBC FOA/A
327	O	006	EM	1A	Neina Woodward		WIGAN MBC FOA/A
328	O	002	EM	1A	Mr A Woodward		WIGAN MBC FOA/A
330	O	011	EM	1A	William Glover		WIGAN MBC FOA/A
332	O	011	EM	1A	David Catterall		WIGAN MBC FOA/A
333	O	004	EM	1A	Geoffrey Powell		WIGAN MBC FOA/A
333	O	009	EM	1A	Geoffrey Powell		WIGAN MBC FOA/A
335	O	005	EM	1A	J F Kearsley		WIGAN MBC FOA/A
339	O	004	EM	1A	Kathryn Pennington		WIGAN MBC FOA/A
339	O	009	EM	1A	Kathryn Pennington		WIGAN MBC FOA/A
407	O	007	EM	1A	Adele Wilkes		WIGAN MBC FOA/A
408	O	009	EM	1A	Gary Wilkes		WIGAN MBC FOA/A
435	O	006	EM	1A	Gordon Catterall		WIGAN MBC FOA/A
436	O	006	EM	1A	Mrs E Johnson		WIGAN MBC FOA/A
446	O	006	EM	1A	C Hilton-Carroll		WIGAN MBC FOA/A
450	O	006	EM	1A	Andre Philip Richard Gorner		WIGAN MBC FOA/A
461	O	006	EM	1A	Ethel Glover		WIGAN MBC FOA/A
483	O	002	EM	1A	Mrs J L Mackay		WIGAN MBC FOA/A
493	O	006	EM	1A	William Lovell Verinder		WIGAN MBC FOA/A

494	O	007	EM	1A	Julie L Harrison		WIGAN MBC FOA/A
505	O	006	EM	1A	Mrs C Daington		WIGAN MBC FOA/A
533	O	015	EM	1A	Mrs E A Carter		WIGAN MBC FOA/A
533	O	017	EM	1A	Mrs E A Carter		WIGAN MBC FOA/A
548	O	007	EM	1A	Mrs Sylvia Marion Stitt		WIGAN MBC FOA/A
550	O	007	EM	1A	Belinda Croston		WIGAN MBC FOA/A
573	O	006	EM	1A	Mr A Eaves		WIGAN MBC FOA/A
574	O	006	EM	1A	John Murphy		WIGAN MBC FOA/A
591	O	003	EM	1A	Mr John Makin		WIGAN MBC FOA/A
591	O	007	EM	1A	Mr John Makin		WIGAN MBC FOA/A
727	O	027	EM	1A	Suzanne Waymont M.I.E.E.M		WMBC EM1A 36
747	O	064	EM	1A	Wigan Borough Action Group		WIGAN MBC 747/A
810	O	003	EM	1A	Mr A Sherman		WIGAN MBC FOA/A
810	O	017	EM	1A	Mr A Sherman		WIGAN MBC FOA/A
828	O	004	EM	1A	Dorothy Arkwright		WIGAN MBC FOA/A
828	O	009	EM	1A	Dorothy Arkwright		WIGAN MBC FOA/A
830	O	002	EM	1A	C Murnan		WIGAN MBC FOA/A
830	O	007	EM	1A	C Murnan		WIGAN MBC FOA/A
831	O	011	EM	1A	Les Jones		WIGAN MBC FOA/A
831	O	015	EM	1A	Les Jones		WIGAN MBC FOA/A
833	O	003	EM	1A	S Murphy		WIGAN MBC FOA/A
833	O	007	EM	1A	S Murphy		WIGAN MBC FOA/A
834	O	003	EM	1A	C Murphy		WIGAN MBC FOA/A
834	O	007	EM	1A	C Murphy		WIGAN MBC FOA/A
835	O	003	EM	1A	P Murphy		WIGAN MBC FOA/A
835	O	007	EM	1A	P Murphy		WIGAN MBC FOA/A
836	O	003	EM	1A	Mr C L Pooke		WIGAN MBC FOA/A
836	O	008	EM	1A	Mr C L Pooke		WIGAN MBC FOA/A
837	O	002	EM	1A	Mrs S Whitfield		WIGAN MBC FOA/A
837	O	014	EM	1A	Mrs S Whitfield		WIGAN MBC FOA/A
838	O	004	EM	1A	Rachel Webster		WIGAN MBC FOA/A
838	O	020	EM	1A	Rachel Webster		WIGAN MBC FOA/A
839	O	003	EM	1A	Gary Oakes		WIGAN MBC FOA/A
839	O	008	EM	1A	Gary Oakes		WIGAN MBC FOA/A
840	O	003	EM	1A	Mrs J Sherman		WIGAN MBC FOA/A
840	O	007	EM	1A	Mrs J Sherman		WIGAN MBC FOA/A
887	O	014	EM	1A	Mr Charles Christopherson		WIGAN MBC FOA/A
888	O	012	EM	1A	W A Sefton		WIGAN MBC FOA/A
889	O	001	EM	1A	W Boardman		WIGAN MBC FOA/A
890	O	010	EM	1A	Mrs Edith Sefton		WIGAN MBC FOA/A
891	O	016	EM	1A	Mrs Speed		WIGAN MBC FOA/A
892	O	006	EM	1A	Adrian Hughes		WIGAN MBC FOA/A
893	O	006	EM	1A	Mrs M J Rusk		WIGAN MBC FOA/A
894	O	013	EM	1A	Mr John Wilkieson		WIGAN MBC FOA/A
895	O	009	EM	1A	Mrs T Quinn		WIGAN MBC FOA/A
896	O	005	EM	1A	David Tinsley		WIGAN MBC FOA/A
897	O	005	EM	1A	Janet Marjorie Tate		WIGAN MBC FOA/A

898	O	005	EM	1A	Miss T Topping		WIGAN MBC FOA/A
899	O	014	EM	1A	Betty Prescott		WIGAN MBC FOA/A
900	O	014	EM	1A	Mrs J Lodge		WIGAN MBC FOA/A
901	O	013	EM	1A	Alison Hurst		WIGAN MBC FOA/A
902	O	011	EM	1A	S V Lang		WIGAN MBC FOA/A
903	O	015	EM	1A	J A Harrison		WIGAN MBC FOA/A
904	O	015	EM	1A	Dr A M Mukherjee		WIGAN MBC FOA/A
905	O	007	EM	1A	Mrs H J Hughes		WIGAN MBC FOA/A
906	O	005	EM	1A	Frank Stringfellow		WIGAN MBC FOA/A
907	O	005	EM	1A	Ida Rylance		WIGAN MBC FOA/A
908	O	005	EM	1A	William J Rylance		WIGAN MBC FOA/A
909	O	005	EM	1A	J Butcher		WIGAN MBC FOA/A
910	O	005	EM	1A	Mrs Kathleen F Brown		WIGAN MBC FOA/A
911	O	005	EM	1A	D Ball		WIGAN MBC FOA/A
912	O	005	EM	1A	Mr R Banks		WIGAN MBC FOA/A
913	O	005	EM	1A	J Houghton		WIGAN MBC FOA/A
914	O	005	EM	1A	C Macdonald		WIGAN MBC FOA/A
915	O	003	EM	1A	Jacqueline Sheehan		WIGAN MBC FOA/A
916	O	010	EM	1A	Maureen Smith		WIGAN MBC FOA/A
917	O	007	EM	1A	Mrs P A Tushingam		WIGAN MBC FOA/A
917	O	014	EM	1A	Mrs P A Tushingam		WIGAN MBC FOA/A
918	O	007	EM	1A	Gladys Wilkes		WIGAN MBC FOA/A
919	O	014	EM	1A	P A Waldron		WIGAN MBC FOA/A
920	O	005	EM	1A	Mr R G Bradshaw		WIGAN MBC FOA/A
921	O	013	EM	1A	D Ellison		WIGAN MBC FOA/A
922	O	004	EM	1A	Richard Andrew Corless		WIGAN MBC FOA/A
923	O	012	EM	1A	Jeffrey Cook		WIGAN MBC FOA/A
924	O	005	EM	1A	Maureen Corless		WIGAN MBC FOA/A
925	O	010	EM	1A	I Cotham		WIGAN MBC FOA/A
926	O	006	EM	1A	Margaret Catterall		WIGAN MBC FOA/A
927	O	013	EM	1A	Vincent Corcoran		WIGAN MBC FOA/A
928	O	001	EM	1A	Philip Holt		WIGAN MBC FOA/A
929	O	004	EM	1A	A Horton		WIGAN MBC FOA/A
930	O	002	EM	1A	Mr A J Horton		WIGAN MBC FOA/A
931	O	005	EM	1A	C P Simpson		WIGAN MBC FOA/A
932	O	005	EM	1A	G Brash		WIGAN MBC FOA/A
933	O	005	EM	1A	Bernard H Shorrocks		WIGAN MBC FOA/A
934	O	005	EM	1A	Brenda Ryan		WIGAN MBC FOA/A
935	O	005	EM	1A	Mrs K Marsh		WIGAN MBC FOA/A
936	O	005	EM	1A	Mrs A Cordell		WIGAN MBC FOA/A
937	O	005	EM	1A	F Murtagh		WIGAN MBC FOA/A
938	O	005	EM	1A	Mrs Vivien Rigby		WIGAN MBC FOA/A
939	O	011	EM	1A	Doreen Sharples		WIGAN MBC FOA/A
940	O	005	EM	1A	David Pennington		WIGAN MBC FOA/A
941	O	005	EM	1A	Mrs J Tushingam		WIGAN MBC FOA/A
942	O	013	EM	1A	Mr A Tushingam		WIGAN MBC FOA/A
943	O	002	EM	1A	Marilyn Riding		WIGAN MBC FOA/A

944	O	005	EM	1A	Edward Ryan		WIGAN MBC FOA/A
945	O	005	EM	1A	Ann Gorner		WIGAN MBC FOA/A
946	O	005	EM	1A	Ben Daniel Gorner		WIGAN MBC FOA/A
947	O	005	EM	1A	Gabrielle Maria Gorner		WIGAN MBC FOA/A
948	O	001	EM	1A	Sheila Jones		WIGAN MBC FOA/A
949	O	006	EM	1A	Gary W Jones		WIGAN MBC FOA/A
950	O	016	EM	1A	Allan Jones		WIGAN MBC FOA/A
951	O	009	EM	1A	Mr Michael W Kelly		WIGAN MBC FOA/A
952	O	011	EM	1A	Mrs V Kelly		WIGAN MBC FOA/A
953	O	014	EM	1A	J A Pendlebury		WIGAN MBC FOA/A
954	O	016	EM	1A	P J Pendlebury		WIGAN MBC FOA/A
955	O	004	EM	1A	S Leonard		WIGAN MBC FOA/A
956	O	014	EM	1A	Harry Millington		WIGAN MBC FOA/A
957	O	004	EM	1A	Patricia A Donnelly		WIGAN MBC FOA/A
958	O	011	EM	1A	Mary E Shorrocks		WIGAN MBC FOA/A
959	O	011	EM	1A	Mrs Heather Williams		WIGAN MBC FOA/A
960	O	011	EM	1A	Mrs P A Grimshaw		WIGAN MBC FOA/A
961	O	004	EM	1A	Mrs Doreen Glover		WIGAN MBC FOA/A
962	O	008	EM	1A	Teresa Garland		WIGAN MBC FOA/A
963	O	003	EM	1A	Karen Gibson		WIGAN MBC FOA/A
963	O	014	EM	1A	Karen Gibson		WIGAN MBC FOA/A
964	O	007	EM	1A	A Pennington		WIGAN MBC FOA/A
965	O	003	EM	1A	F Heaton		WIGAN MBC FOA/A
966	O	007	EM	1A	Eileen Critchley		WIGAN MBC FOA/A
967	O	004	EM	1A	Mrs Eryl Cross		WIGAN MBC FOA/A
968	O	006	EM	1A	Roger K Dandridge		WIGAN MBC FOA/A
969	O	011	EM	1A	R J Brown		WIGAN MBC FOA/A
970	O	004	EM	1A	Norah Bradshaw		WIGAN MBC FOA/A
971	O	014	EM	1A	Mrs K Birkett		WIGAN MBC FOA/A
972	O	010	EM	1A	Debbie Gaynor		WIGAN MBC FOA/A
973	O	006	EM	1A	Margaret Cook		WIGAN MBC FOA/A
974	O	002	EM	1A	Mrs P M Forster		WIGAN MBC FOA/A
975	O	012	EM	1A	Mrs Edna Brown		WIGAN MBC FOA/A
976	O	001	EM	1A	Mrs T Wood		WIGAN MBC FOA/A
977	O	001	EM	1A	Anne Maliczewski		WIGAN MBC FOA/A
978	O	010	EM	1A	Mr J W Fleming		WIGAN MBC FOA/A
979	O	015	EM	1A	Mr Stanley L Brown		WIGAN MBC FOA/A
980	O	004	EM	1A	Jean Haddock		WIGAN MBC FOA/A
981	O	004	EM	1A	A M Catterall		WIGAN MBC FOA/A
982	O	008	EM	1A	Mrs Kinsella		WIGAN MBC FOA/A
983	O	007	EM	1A	Mrs Sheila Majakari		WIGAN MBC FOA/A
984	O	014	EM	1A	D Glover		WIGAN MBC FOA/A
985	O	011	EM	1A	W MacDonald		WIGAN MBC FOA/A
986	O	004	EM	1A	Joan Quick		WIGAN MBC FOA/A
987	O	004	EM	1A	Anthony Quick		WIGAN MBC FOA/A
988	O	005	EM	1A	Miss A L Prescott		WIGAN MBC FOA/A
989	O	005	EM	1A	Mrs B Prescott		WIGAN MBC FOA/A

990	O	005	EM	1A	Barbara Parkinson		WIGAN MBC FOA/A
991	O	005	EM	1A	Marian Ochwat		WIGAN MBC FOA/A
992	O	005	EM	1A	Stefan Ochwat		WIGAN MBC FOA/A
993	O	006	EM	1A	George Swindell		WIGAN MBC FOA/A
994	O	005	EM	1A	Hazel Louise Gorner		WIGAN MBC FOA/A
995	O	005	EM	1A	Andrew Gaynor		WIGAN MBC FOA/A
996	O	004	EM	1A	Patricia M Shannon		WIGAN MBC FOA/A
997	O	005	EM	1A	Dinah Middleton		WIGAN MBC FOA/A
998	O	005	EM	1A	J Fairhurst		WIGAN MBC FOA/A
999	O	004	EM	1A	T Doyle		WIGAN MBC FOA/A
A01	O	005	EM	1A	Anna Louise Calder		WIGAN MBC FOA/A
A02	O	005	EM	1A	Peter Cains Butchers		WIGAN MBC FOA/A
A03	O	005	EM	1A	Linda Croston		WIGAN MBC FOA/A
A04	O	005	EM	1A	Jane Moore		WIGAN MBC FOA/A
A05	O	005	EM	1A	Friends of Ashton		WIGAN MBC A05/A
A06	O	005	EM	1A	Mrs Hilary Davies		WIGAN MBC FOA/A
A07	O	005	EM	1A	Paula Jayne Green		WIGAN MBC FOA/A
A08	O	004	EM	1A	Joseph Garland		WIGAN MBC FOA/A
A09	O	005	EM	1A	Mr James Crook		WIGAN MBC FOA/A
A10	O	005	EM	1A	Mr John Crook		WIGAN MBC FOA/A
A11	O	005	EM	1A	B Carney		WIGAN MBC FOA/A
A12	O	005	EM	1A	Frank Brown		WIGAN MBC FOA/A
A13	O	005	EM	1A	Mr J Bentham		WIGAN MBC FOA/A
A14	O	005	EM	1A	M Withington		WIGAN MBC FOA/A
A15	O	005	EM	1A	Helen Whalley		WIGAN MBC FOA/A
A16	O	005	EM	1A	William James Wilkes		WIGAN MBC FOA/A
A17	O	005	EM	1A	Joanne Young		WIGAN MBC FOA/A
A18	O	005	EM	1A	John G Bradshaw		WIGAN MBC FOA/A
A19	O	005	EM	1A	G Sheedy		WIGAN MBC FOA/A
A20	O	005	EM	1A	Jayne Johnson		WIGAN MBC FOA/A
A21	O	005	EM	1A	Mrs I B Eaves		WIGAN MBC FOA/A
A22	O	005	EM	1A	Greta Kearsley		WIGAN MBC FOA/A
A23	O	005	EM	1A	Margaret Thompson		WIGAN MBC FOA/A
A24	O	005	EM	1A	Richard Prescott		WIGAN MBC FOA/A
A25	O	005	EM	1A	John Melling		WIGAN MBC FOA/A
A26	O	005	EM	1A	Yvonne Harrison		WIGAN MBC FOA/A
A27	O	005	EM	1A	I R Clarence		WIGAN MBC FOA/A
A28	O	005	EM	1A	Mr P Majakari		WIGAN MBC FOA/A
A29	O	005	EM	1A	Brenda Edwards		WIGAN MBC FOA/A
A30	O	005	EM	1A	Alan Edwards		WIGAN MBC FOA/A
A31	O	005	EM	1A	Mrs M McKechnie		WIGAN MBC FOA/A
A32	O	005	EM	1A	Alan Hurst		WIGAN MBC FOA/A
A33	O	005	EM	1A	Thomas Hughes		WIGAN MBC FOA/A
A34	O	005	EM	1A	K Hilton		WIGAN MBC FOA/A
A35	O	006	EM	1A	Albert Atherton		WIGAN MBC FOA/A
A36	O	005	EM	1A	Julia Allen		WIGAN MBC FOA/A
A37	O	012	EM	1A	B Potter		WIGAN MBC FOA/A

A38	O	012	EM	1A	Mrs K W Parker		WIGAN MBC FOA/A
A39	O	009	EM	1A	Barbara Hodkinson		WIGAN MBC FOA/A
A40	O	006	EM	1A	F W Appleton		WIGAN MBC FOA/A
A41	O	003	EM	1A	Alastair Stitt		WIGAN MBC FOA/A
A42	O	007	EM	1A	Ian Campbell		WIGAN MBC FOA/A
A43	O	005	EM	1A	Allen James Johnson		WIGAN MBC FOA/A
A44	O	001	EM	1A	Mr A Simpson		WIGAN MBC FOA/A
A45	O	013	EM	1A	Mr Robert Richard Hughes		WIGAN MBC FOA/A
A46	O	006	EM	1A	Paul A Tushingham		WIGAN MBC A05/A
A47	O	014	EM	1A	Mrs I Prescott		WIGAN MBC FOA/A
A48	O	012	EM	1A	Mrs Carol Spencer		WIGAN MBC FOA/A
A49	O	001	EM	1A	E J Clarence		WIGAN MBC FOA/A
A50	O	014	EM	1A	Michael David Iredale		WIGAN MBC FOA/A
A51	O	005	EM	1A	Warren Pennington		WIGAN MBC FOA/A
A52	O	010	EM	1A	Beryl Helsby		WIGAN MBC FOA/A
A53	O	012	EM	1A	Geoffrey MacDonald		WIGAN MBC FOA/A
A54	O	014	EM	1A	Andrea Hilton		WIGAN MBC FOA/A
A55	O	014	EM	1A	W Carney		WIGAN MBC FOA/A
A56	O	007	EM	1A	M Owen		WIGAN MBC FOA/A
A57	O	004	EM	1A	Matthew Tushingham		WIGAN MBC FOA/A
A58	O	005	EM	1A	W D Gibson		WIGAN MBC FOA/A
A59	O	005	EM	1A	Pauline Campbell		WIGAN MBC FOA/A
A60	O	004	EM	1A	R Huyton		WIGAN MBC FOA/A
A61	O	005	EM	1A	Alan Dean		WIGAN MBC FOA/A
A62	O	005	EM	1A	D Cunliffe		WIGAN MBC FOA/A
A63	O	005	EM	1A	Paula Cunliffe		WIGAN MBC FOA/A
A64	O	005	EM	1A	Angela Catterall		WIGAN MBC FOA/A
A65	O	005	EM	1A	George Croston		WIGAN MBC FOA/A
A66	O	005	EM	1A	Cyril Catterall		WIGAN MBC FOA/A
A67	O	005	EM	1A	Steven Sheehan		WIGAN MBC FOA/A
A68	O	005	EM	1A	Bernard Mattison		WIGAN MBC FOA/A
A69	O	005	EM	1A	A I Bullough		WIGAN MBC FOA/A
A70	O	005	EM	1A	Mrs Dawn Wilson		WIGAN MBC FOA/A
A71	O	005	EM	1A	Mrs K Maddocks		WIGAN MBC FOA/A
A72	O	005	EM	1A	R F Bullough		WIGAN MBC FOA/A
A73	O	005	EM	1A	Cissie Garston		WIGAN MBC FOA/A
A74	O	005	EM	1A	George McCathie		WIGAN MBC FOA/A
A75	O	005	EM	1A	Susan Holt		WIGAN MBC FOA/A
A76	O	005	EM	1A	David Thompson		WIGAN MBC FOA/A
A77	O	005	EM	1A	Natalie Gibson		WIGAN MBC FOA/A
A78	O	005	EM	1A	Mr S J Winstanley		WIGAN MBC FOA/A
A79	O	005	EM	1A	Mr P Redmond		WIGAN MBC FOA/A
A80	O	005	EM	1A	Mrs M Leyland		WIGAN MBC FOA/A
A81	O	005	EM	1A	Mrs H M Francis		WIGAN MBC FOA/A
A82	O	005	EM	1A	Mrs J Smith		WIGAN MBC FOA/A
A83	O	005	EM	1A	J Marsh		WIGAN MBC FOA/A
A84	O	005	EM	1A	Derek Woods		WIGAN MBC FOA/A

A85	O	005	EM	1A	Mrs Sheila Dandridge		WIGAN MBC FOA/A
A86	O	005	EM	1A	Mrs M Johnson		WIGAN MBC FOA/A
A87	O	005	EM	1A	Freda Woods		WIGAN MBC FOA/A
A88	O	005	EM	1A	Daniel Gibson		WIGAN MBC FOA/A
A89	O	006	EM	1A	Roy Calder		WIGAN MBC FOA/A
A90	O	005	EM	1A	Mrs M Crossley		WIGAN MBC FOA/A
A91	O	005	EM	1A	Valerie Middleton		WIGAN MBC FOA/A
A92	O	005	EM	1A	Mrs H Harris		WIGAN MBC FOA/A
A93	O	005	EM	1A	M W Doyle		WIGAN MBC FOA/A
A94	O	007	EM	1A	Mr L Prescott		WIGAN MBC FOA/A
A95	O	005	EM	1A	W A Payne		WIGAN MBC FOA/A
A96	O	005	EM	1A	P J Huyton		WIGAN MBC FOA/A
A97	O	005	EM	1A	D A Payne		WIGAN MBC FOA/A
A98	O	005	EM	1A	Mrs Hilda Payne		WIGAN MBC FOA/A
B01	O	004	EM	1A	J McDougall		WIGAN MBC FOA/A
B02	O	004	EM	1A	W J McDougall		WIGAN MBC FOA/A
B03	O	004	EM	1A	D J Holden		WIGAN MBC FOA/A
B04	O	002	EM	1A	George Conway		WIGAN MBC FOA/A
B05	O	005	EM	1A	E Brash		WIGAN MBC FOA/A
B11	O	002	EM	1A	Ann Boyes		WIGAN MBC FOA/A
B12	O	002	EM	1A	Miss W Barton		WIGAN MBC FOA/A
B13	O	002	EM	1A	Gwen Allen		WIGAN MBC FOA/A
B14	O	002	EM	1A	Dorothy Delaney		WIGAN MBC FOA/A
B15	O	002	EM	1A	Mrs L Hobson		WIGAN MBC FOA/A
B19	O	002	EM	1A	Joyce Pemberton		WIGAN MBC FOA/A
B30	O	002	EM	1A	Mr Kinsella		WIGAN MBC FOA/A
B31	O	002	EM	1A	William E Coyle		WIGAN MBC FOA/A
B32	O	005	EM	1A	Kathleen Jones		WIGAN MBC FOA/A
B33	O	002	EM	1A	Chris Waring		WMBC EM1A 36

### Supporters of Revised Deposit

Ref No	a	b	c	d	Name	Agent	Response Ref.
747	S	018	EM	1A	Wigan Borough Action Group		
333	S	019	EM	1A	Geoffrey Powell		

### Main Issues

Whether this policy is appropriate, having regard to:

- the prospect that the proposal will be implemented during the plan period;
- the type of employment uses to be permitted on the site;
- the need to secure the interests of protected species;
- the potential for off-site flooding.

## **Inspector's Considerations and Conclusions**

*The prospect that the proposal will be implemented during the plan period*

7.225 The proposed Primary Employment Area at the South Lancashire Industrial Estate, Ashton-in-Makerfield, has a total area of some 91.0ha. Of this some 49.3ha is already developed. The remaining 41.7ha (as at January 2004) consists of about 9.0ha of vacant land within the existing industrial estate and about 32.7ha of green-field land to the south of it which is proposed in the RDD for its expansion.

7.226 PPG12 (paragraph 6.24) emphasises the importance of ensuring that the provisions of development plans are realistic and likely to be implemented during the period of the plan. Objectors argue that only a limited amount of development will be possible during the plan period because of the road traffic conditions in Ashton-in-Makerfield town centre and the limited prospects for an effective solution during the plan period.

7.227 The reasoned justification of the RDD, itself, expresses the view that the full potential of the South Lancashire Industrial Estate extension and the ability to substantially remodel and modernise the existing estate is dependent on progress with the Ashton Northern Bypass and/or other off-site highway works. For the reasons I give in the section of this report which relates to policy A1P(4), the Ashton-in-Makerfield Northern Bypass, I have concluded not only that this proposal would not relieve industrial and through traffic from Ashton-in-Makerfield town centre but also that there is no realistic prospect that this highway scheme will commence construction during the plan period. I have recommended that the RDD be modified to remove reference to the safeguarding of land for this purpose.

7.228 In the section of this report that relates to policy A1P(4) I note that the proposed extension to the South Lancashire Industrial Estate would increase its area very substantially. It would certainly increase the level of traffic generated, the extent of this depending on the nature of the new activities to be located there. I express the view that, given the extent of the problems of congestion, noise, pollution, severance and danger caused by the existing through traffic in Ashton town centre, it is reasonable to conclude that employment development at the South Lancashire Industrial Estate must be severely restricted in terms of type and/or amount until a solution is found. I note that this has not happened up to the time of the inquiry into the RDD. It is clear that the Ashton Northern Bypass is not, on its own, the answer.

7.229 The LPA, at the inquiry, referred to the intention of a developer to submit, in the spring of 2005, a planning application for the development of part of the extension to the South Lancashire Industrial Estate. The LPA witness expressed the view that 'indications are that the Transport Assessment submitted as part of this application will show that 18.2ha of the proposed extension can be developed without the presence of the Ashton Northern Bypass, but subject to other off-site highway works'. The LPA contends that,

when that 18.2ha within the proposed extension to the industrial estate is added to the 9.0ha of vacant land within the existing part of that area, some 27.2ha of employment land could come forward for development within the plan period.

7.230 The Transport Assessment referred to by the LPA was not submitted in evidence at the inquiry. No indication was presented as to what these ‘other off-site highway works’ might be and whether they are capable of being implemented and of being effective. Certainly no such other off-site highway works are presented in the RDD, nor were they referred to in any of the LPA’s evidence to the inquiry. The only technical evidence presented to the RDD inquiry was that of an objector. The only other off-site highway works examined at the inquiry were those to upgrade junction 25 of the M6 to an all-ways junction. No evidence was presented to support a conclusion that this is likely to be achieved during the plan period.

7.231 It may well be that further technical arguments to be presented in future Transport Assessments related to planning applications, when read together with future off-site highway schemes that are yet to be devised, could permit a significant development of land at the South Lancashire Industrial Estate. I must, however, reach my conclusion on the evidence actually presented to me via the RDD inquiry process. Nothing presented in that way leads me to any conclusion other than that, for the foreseeable future, development at the South Lancashire Industrial Estate must be limited, in the public interest, to that which can be implemented without significantly increasing the traffic flow through Ashton town centre.

*The type of employment uses to be permitted on the site*

7.232 An objector argues that the RDD does not clearly state the type of employment uses which will be permitted on this site. Policy EM1A provides that Class B1, B2 and B8 uses, or other employment uses, will be permitted provided that there will be no unacceptable environmental, amenity, highway, road safety or other adverse impact. As indicated in the introduction to the RDD the UDP is to be read as a whole. The particular policies to be applied to a decision on a planning application will depend on the nature of the proposal and the particular part of this large site it relates to.

*The need to secure the interests of protected species*

7.233 An objector, at FDD stage, notes that this site contains a number of ponds. He argues that they should be surveyed for Great Crested Newts. The LPA has responded to this. Appendix 3 of the RDD identifies known environmental and nature conservation issues affecting Primary Employment Areas. In respect of allocation EM1A36 it notes that there are a number of ponds within the undeveloped part of the allocation which will need to be surveyed for Great Crested Newts prior to the commencement of development.

7.234 Objectors argue that such surveys should be undertaken in respect of other species. The purpose of Appendix 3 is to present information on known environmental and nature conservation issues. In this case the information derives from that provided by

the Greater Manchester Ecology Unit which specifically identified the habitat of parts of site EM1A36 as being potentially suited to Great Crested Newts. Such a judgement has not yet been made in respect of any other statutorily protected species. If such species were identified their continued protection would be taken into account in the planning application decision process under the terms of RDD policy EV2D.

7.235 A further objector argues, that instead of the survey of Great Crested Newts being carried out prior to development commencing it should be carried out prior to the submission of a planning application. The LPA agrees. I concur, having regard to the limited time period available to an LPA when it is determining a planning application. The LPA notes, however, that it is necessary to further qualify this requirement by reference to the appropriate time of year for such a survey. I conclude that this is necessary, given the difficulty of detecting the presence of this species at particular times of year.

#### *The potential for off-site flooding*

7.236 An objector argues that development of the site may cause off-site flooding downstream from Millingford Brook, particularly in the area of Lincoln Drive. The LPA concurs with this assessment. It is, therefore, necessary for the UDP to make reference to the need for surface water attenuation measures to be incorporated into schemes of new development.

### **Recommendation**

#### **I recommend:**

**(REC 7.30) that the RDD be modified by the insertion of text within table 1 in relation to Primary Employment Area 36 to confirm that development of the 39.2ha of available land referred to (actually 41.7ha as at January 2004) must be limited to schemes which, due to their inherent nature or their integration with achievable off-site works, will not significantly increase the traffic flows through Ashton-in-Makerfield town centre.**

**(REC 7.31) that the RDD be modified by the deletion of the text relating to policy EM1A36 in Appendix 3 and its replacement as follows. ‘There are a number of ponds within the undeveloped part of the allocation which will need to be surveyed for Great Crested Newts at an appropriate time of year, prior to any planning application being submitted. New development on the part of the site where surface water discharges ultimately into Millingford Brook will be required to provide surface water attenuation to minimise the potential risk of flooding downstream’.**

**(REC 7.32) that no other modification be made to the RDD in response to these objections.**

## EM1A 37 KIRKLESS INDUSTRIAL ESTATE, TOP LOCK

### Objections to Revised Deposit

Ref No	a	b	c	d	Name	Agent	Response Ref.
885	O	001	EM	1A	J and A Walker	De Pol Associates	WMBC 885 EM1A

### Main Issue

Whether this policy is appropriate, having regard to the characteristics of this site.

### Inspector's Considerations and Conclusions

7.237 Policy EM1A provides that, within Primary Employment Areas, development for or changes of use to uses within classes B1, B2 and B8 or other employment uses will be permitted provided that there will be no unacceptable environmental, amenity, highways, road safety or other adverse impact. Other uses will be permitted only when specified criteria are satisfied. An objector argues that the Kirkless Industrial Estate does not satisfy the criteria for designation as a Primary Employment Area.

7.238 The reasoned justification to policy EM1A informs that Primary Employment Areas include not only modern business parks but also older industrial areas such as Kirkless Industrial Estate. It recognises that they do not all share the same attributes and characteristics but argues that they do all have particular advantages for continuing employment use. Among other things these are said to include good accessibility for workers and potential workers by a choice of means of transport, including on foot and wherever possible by public transport, together with good accessibility for goods.

7.239 The site gains access via a single track canal bridge. Both vehicles and pedestrians share the same restricted road surface. It, therefore, has particularly poor access, not only for HGVs but also for workers, whether they arrive and depart by car, cycle or on foot. No reference is made to public transport access being available. The site is, effectively, at the end of a cul-de-sac some 0.85km distant from the nearest part of the strategic route network. Traffic to and from this, including HGVs, must pass through a predominantly residential area with consequent adverse impacts on residential amenity and road safety. For these reasons I conclude that the site does not conform to the attributes of a Primary Employment Area as set out in the RDD itself. It should not, therefore, be subject to this designation, notwithstanding its value in accommodating low amenity employment uses. The LPA expresses concern that if this site is not designated as a Primary Employment Area it could be the subject of a proposal for housing development which would give rise to similar access problems. RDD policy EM1B provides the framework for the determination of such a proposal, however.

## **Recommendation**

### **I recommend**

**(REC 7.33) that the RDD be modified by the deletion of the land at Kirkless Industrial Estate from designation as a Primary Employment Area.**

**(REC 7.34) that no other modification be made to the RDD in response to this objection.**