

GB1E - MAJOR EXISTING DEVELOPED SITES IN THE GREEN BELT

Objections to Draft Deposit

Ref No	a	b	c	d	Name	Agent	Response Ref.
218	O	001	GB	1E	Dorberest Homes Ltd	Steven Abbott Associates	WMBC 218/A
403	O	001	GB	1E	David Ellis	De Pol Associates	WMBC 403 GB1E
416	O	001	GB	1E	Orica UK	Cass Associates	WIGAN MBC
424	O	005	GB	1E	Government Office for the North West		WMBC 424 GONW
457	O	001	GB	1E	Kristian Marsh		WMBC 457
583	O	003	GB	1E	Peel Investment North Ltd	Halliwell Landau	WMBC 583 WR
723	O	003	GB	1E	UK Coal Mining Ltd		WMBC 723/A
726	O	006	GB	1E	United Utilities Facilities and Property Services		WMBC 726/A
726	O	007	GB	1E	Andrew Leyssens		WMBC 726/A

Draft Deposit Objections Unconditionally Withdrawn

Ref No	A	b	c	d	Name	Agent	Response Ref.
403	O	002	GB	1E	David Ellis	De Pol Associates	

Objections to Revised Deposit

Ref No	A	b	c	d	Name	Agent	Response Ref.
465	O	007	GB	1E	Bett Homes (North West) Limited	Hepher Dixon	WMBC 465 GB/R
464	O	008	GB	1E	Bispham Hall Brick and Terra Cotta Works	Steven Abbott Associates	WMBC 464

Main Issues

Whether this policy is appropriate, having regard to:

- the merits of identifying the former Leigh CE High School, Leigh, as a major existing developed site in the green belt;
- the merits of identifying the industrial area off Edge Green Road, Golbourne, as a major existing developed site in the green belt;
- the merits of identifying the Bispham Hall Brick and Terracotta Works, Billinge, as a major existing developed site in the green belt;
- the merits of identifying St John Rigby College, Orrell, as a major existing developed site in the green belt;
- the merits of identifying Winstanley College, Winstanley, as a major existing developed site in the green belt;
- the merits of identifying Leyland Mill, Wigan, as a major existing developed site in the green belt;
- the merits of identifying Dicconson Mill, Aspull, as a major existing developed site in the green belt;

- the merits of identifying Astley Works, Gin Pit Village as a major existing developed site in the green belt;
- the merits of identifying Kilhey Court Hotel, Standish, as a major existing developed site in the green belt;
- the merits of identifying land at the Orica UK Ltd site at Shevington, as a major existing developed site in the green belt;
- the merits of identifying the Tyldesley Waste Water Treatment Works as a major existing developed site in the green belt;
- the merits of identifying the Ince-in-Makerfield Waste Water Treatment Works as a major existing developed site in the green belt;
- the merits of identifying Standish Hall Farm as a major existing developed site in the green belt;
- the merits of identifying the Bores Farm Estate, as a major existing developed site in the green belt;
- the merits of identifying Winstanley Hall and its outbuildings as a major existing developed site in the green belt;
- the criteria to be applied to residential development on a major existing developed site in the green belt;
- the need to distinguish between major existing developed sites in the green belt in terms of infill and redevelopment;
- the safe and free flow of traffic.

Inspector's Considerations and Conclusions

The merits of identifying the former Leigh CE High School, Leigh, as a major existing developed site in the green belt

6.90 Proposed RDD policy GB1E provides that limited infilling or redevelopment will be permitted within the boundaries of the Major Existing Developed Sites (MEDS) shown on the proposals map, and listed in the policy, provided that it meets stated criteria. Criterion (a) is to be applied to proposals for both limited infilling and redevelopment. Criterion (b) is to be applied only to the proposals for limited infilling and criterion (c) is to be applied only to proposals for redevelopment.

6.91 Objectors argue that the LPA should provide a justification why, having regard to the advice of PPG2, it is appropriate to identify the site as a MEDS in the green belt, make clear how infilling or redevelopment is consistent with achieving sustainable development and demonstrate that the site is substantial.

6.92 This site has the benefit of a recent grant of planning permission for redevelopment for housing, granted by the First Secretary of State after being called-in for his decision. The site is, therefore, confirmed to be suitable for redevelopment and to be capable of this while conforming to the criteria of PPG2 (annex C, paragraph C4). It should, therefore, be regarded as qualifying as a MEDS. The decision letter confirms that the site can be redeveloped, consistent with the achievement of a sustainable pattern of settlement. No guidance is given in PPG2 as to the definition of 'substantial' size. In my

view the built-up road frontage of some 150m, together with the depth of the built-up area (some 150m) gives the building group a dominating presence. It justifies the view of the LPA that it is a substantial site. For these reasons it should be designated as a MEDS.

The merits of identifying the industrial area off Edge Green Road, Golbourne, as a major existing developed site in the green belt

6.93 Objectors argue that the LPA should provide a justification why, having regard to the advice of PPG2, it is appropriate to identify this site as a MEDS, make clear how infilling or redevelopment is consistent with achieving sustainable development and demonstrate that the site is substantial.

6.94 The site is a former colliery in the green belt. It is now occupied by several industrial firms which were established there prior to green belt designation. As a major developed factory site it conforms to the advice of PPG2 (paragraph C1). Limited infilling would help to retain employment at this site in conformity with PPG2 (paragraph C3). The site has a rail link and is, therefore, capable of maintaining continued employment in a sustainable location. It has an area of some 5.55ha. It should, in my view, be regarded as substantial even though that term is not defined in PPG2. For these reasons it should be designated as a MEDS.

6.95 An objector expresses concern about pollution and emissions from the present operation of this site and fears that these would increase if infilling or redevelopment was allowed. Pollution control and monitoring is a function of the Environment Agency. It is not a matter for the UDP. Another objector argues that development within a MEDS may spread beyond its defined boundaries. The provision for limited infilling or redevelopment apply only within the designated areas, however.

The merits of identifying the Bispham Hall Brick and Terracotta Works, Billinge, as a major existing developed site in the green belt

6.96 Objectors argue that the LPA should provide a justification why, having regard to the advice of PPG2, it is appropriate to identify this site as a MEDS, make clear how infilling or redevelopment is consistent with achieving a sustainable pattern of development and demonstrate that the site is substantial.

6.97 The site is a former brickworks containing an extensive area of visually prominent industrial buildings, many of which are now in an advanced state of dilapidation. Complete or partial redevelopment would, by removing these, effect an environmental improvement. It is likely that redevelopment would be carried out by the erection of buildings of considerably lower height than those on the site at present, thereby reducing the current impact on the openness of the green belt. The site is adjacent to the built up area of Billinge and its range of retail and community facilities. Its development need not, therefore, be incompatible with the achievement of a sustainable pattern of settlement.

6.98 In my view, both the size of the site (2.66ha) and the visual prominence of its buildings are such that it should be regarded as a substantial site. For these reasons it should continue to be designated as a MEDS.

6.99 An objector argues that the designated area of this MEDS should be increased to include an area identified in an Established Use Certificate of 5/09/89 as forming part of the industrial site, and also other land which historically formed part of the operational area of the works. The purpose of MEDS designation, as presented in PPG2 (annex C), is to allow for limited infilling where this may help to secure jobs and prosperity without further prejudicing the green belt. It is also intended to allow complete or partial redevelopment where this would result in environmental improvement without adding to the impact on the green belt. Both areas of land are, at present, devoid of buildings or structures. The former is an area of rough land containing low grassed mounds of clay spoil and used, in part, for storage of skips, and the parking of cars and lorries. The latter site is agricultural land in active use. It was a ploughed field on the day of my site inspection.

6.100 It is open to a prospective developer to argue that development on those areas of land, although being inappropriate development in the green belt, is justified by very special circumstances, namely the history of the past development. It is clear, however, that neither of those areas satisfies the criteria for designation as a MEDS. Development on neither of them could be regarded as the filling of a small gap between built development. It would, instead, be development which would add to the impact of the site on the openness of the green belt. For these reasons I conclude that this MEDS should not be extended in the way sought by the objector.

The merits of identifying St John Rigby College, Orrell, as a major existing developed site in the green belt

6.101 Objectors argue that the LPA should provide a justification why, having regard to the advice of PPG2, it is appropriate to identify this site as a MEDS, make clear how infilling or redevelopment is consistent with achieving sustainable development and demonstrate that the site is substantial.

6.102 The site is a sixth form further education college on an established site in the green belt. It is one of the types of establishment identified in PPG2 (paragraph C1). The site has a full range of buildings and facilities. Infilling or redevelopment would enable educational needs to be met on a previously developed site and by capitalising on a substantial investment already made. If this establishment was to close because it could not enjoy the benefits of necessary infill and redevelopment schemes its replacement, with its present range of buildings and playing fields, would require a green-field site. The continued use of this existing site should, therefore, be regarded as contributing to a sustainable pattern of settlement. Having regard to its size (2.69ha) and the prominence of its buildings it must, in my view, be regarded as a substantial site. For these reasons I conclude that it should be designated as a MEDS.

The merits of identifying Winstanley College, Winstanley, as a major existing developed site in the green belt

6.103 Objectors argue that the LPA should provide a justification why, having regard to the advice of PPG2, it is appropriate to identify this site as a MEDS, make clear how infilling or redevelopment is consistent with achieving sustainable development and demonstrate that the site is substantial.

6.104 The site is a sixth form and adult education college on an established site within the green belt. It is one of the types of establishment identified in PPG2 (paragraph C1). The site has a full range of buildings and facilities. Infilling or redevelopment would enable educational needs to be met on a previously developed site and by capitalising on a substantial investment already made. If this establishment was to close because it could not enjoy the benefits of necessary infill and redevelopment schemes its replacement, with its present range of buildings and playing fields, would require a green-field site. The continued use of this existing site should, therefore, be regarded as contributing to a sustainable pattern of settlement. Having regard to its size (3.79ha) and the prominence of its buildings, it must be regarded as a substantial site. For these reasons I conclude that it should be designated as a MEDS.

The merits of identifying Leyland Mill, Wigan, as a major existing developed site in the green belt

6.105 Objectors argue that the LPA should provide a justification why, having regard to the advice of PPG2, it is appropriate to identify this site as a MEDS, make clear how infilling or redevelopment is consistent with achieving sustainable development and demonstrate that the site is substantial.

6.106 The site is a long established area of industrial development in the valley of the river Douglas immediately adjacent to the edge of the built up area of Wigan. As a factory site it is within the range of examples of potential MEDS presented in PPG2 (paragraph C1). It is currently occupied by several small enterprises. Infill and redevelopment will be needed to allow these to adapt to changing economic circumstances and, thereby, maintain employment adjacent to a substantial potential workforce. Its proximity to this and to the services and facilities of the built up area of Wigan, confirm that the site is in a sustainable location. PPG2 does not present advice on how large a site must be to be considered substantial. It is 1.8ha in area. Due to its lengthy frontage to roads along the valley floor it has a significant visual presence. For these reasons I conclude that it should be regarded as a substantial site and one that should be designated as a MEDS.

6.107 An objector at FDD stage argues that this MEDS should be extended at its northern edge. This was done at RDD stage to the extent sought by that objector. I conclude that this satisfies his concerns.

The merits of identifying Dicconson Mill, Aspull, as a major existing developed site in the green belt

6.108 Objectors argue that the LPA should provide a justification why, having regard to the advice of PPG2, it is appropriate to identify this site as a MEDS, make clear how infilling or redevelopment is consistent with achieving sustainable development and demonstrate that the site is substantial.

6.109 The site is a group of former mill buildings at the edge of a small residential settlement which is washed over by the green belt. They are now redundant and seem to be unattractive to employment users. As a former factory the site is within the scope of the activities which PPG2 (paragraph C1) identifies as potentially suitable for designation as a MEDS. At present the buildings have a negative effect on the amenity of the adjacent residential area. Clearance of the buildings would secure environmental improvement without adding to the impact of the site on openness. It would, however, be an expensive operation. For that reason it is unlikely. The LPA identifies the only satisfactory option as a combination of conversion and redevelopment for housing. In order to encourage this it is necessary to provide, via MEDS designation, that such a scheme would not be inappropriate development in the green belt. Such a scheme, by reusing a previously developed site, would contribute to a modest extent to the achievement of a sustainable pattern of settlement. Although the site is only some 0.97ha in area this, combined with the height of the buildings, renders the existing use of the land a substantial development. For these reasons I conclude that the site should be designated as a MEDS.

6.110 An objector argues that the boundary of this MEDS should be extended to include adjacent areas where buildings previously stood. In support of his contention, the objector refers to PPG2 (paragraph C9) which advises that, where buildings are demolished rather than being left in a semi-derelict state pending decisions about their redevelopment, it will be necessary to keep suitable records for the purposes of paragraph C5. This latter paragraph relates to the identification of the relevant floor area, to ensure that redevelopment does not occupy a larger area of the site than the existing buildings.

6.111 That guidance is, however, written in the context of paragraphs C3 and C4 which, respectively, refer to limited infilling and redevelopment having no greater impact than the existing development. The buildings referred to by the objector were, the LPA argues, cleared in the 1930s i.e. long before the green belt was approved in this location. It is clear that this is not the sort of situation to which paragraph C9 refers. I conclude that this MEDS should not be extended in the manner sought by the objector.

The merits of identifying Astley Works, Gin Pit Village, as a major existing developed site in the green belt

6.112 Objectors argue that the LPA should provide a justification why, having regard to the advice of PPG2, it is appropriate to identify this site as a MEDS, make clear how infilling or redevelopment is consistent with achieving sustainable development and demonstrate that the site is substantial.

6.113 The site is a redundant engineering works in a semi-derelict condition. As former factory premises it is within the category of uses which PPG2 (paragraph C1) envisages may be suitable for designation as a MEDS. Its redevelopment would entail the use of a substantial area of previously developed land. Given the height of the buildings on the site there is every prospect that this could be achieved while reducing the impact of the site on the openness of the green belt. At some 4.59ha the site must be considered to be substantial. For these reasons I conclude that it should be designated as an MEDS.

6.114 An objector seeks an extension of the proposed MEDS at this site. The proposed additional area is intended to be cleared and landscaped in a recent planning application submitted for this MEDS. It is proposed by the applicant to form part of an area of public open space which would serve the redeveloped area. It is clear, therefore, that a viable development of the Astley Works can proceed without the retention of built development on this extra land. The limitation of the MEDS to the north side of Ley Road is necessary in order to minimise the impact of development on the openness of the green belt. For this reason I conclude that the boundary of the MEDS, as proposed in the RDD, should not be extended.

The merits of identifying Kilhey Court Hotel, Standish, as a major existing developed site in the green belt

6.115 Objectors argue that the LPA should provide a justification why, having regard to the advice of PPG2, it is appropriate to identify this site as a MEDS, make clear how infilling or redevelopment is consistent with achieving sustainable development and demonstrate that the site is substantial.

6.116 The site is an hotel in extensive grounds. Hotels are not referred to in PPG2 (paragraph C1) as among the types of development which may qualify for MEDS designation. Nevertheless that paragraph simply presents examples. The site has the same characteristics (large buildings set in extensive wooded grounds) as some hospitals, research and educational establishments. Infilling and redevelopment would capitalise on a previously developed site rather than express itself as a demand for green-field development. At 3.65ha the site should be regarded as of a substantial size. For these reasons I conclude that it should be designated as a MEDS.

The merits of identifying land at the Orica UK Limited site at Shevington as a major existing developed site in the green belt

6.117 The objector owns an area of some 65ha of land within the adopted green belt to the south of Shevington. The objection relates to an area of some 24ha of this which lies within a defined secure boundary. Within this area there are buildings and structures which have been constructed over the long period that the site has been used for explosive-related activity. The current operations at the site relate to the production of raw materials for the making of explosives. The objector seeks the designation of the defined 24ha area as a MEDS. He notes that PPG2 (annex C, paragraph C1), in setting

out the scope for such a designation, refers to factories and to the sites which accommodate them as being substantial. He recognises that the term ‘substantial’ is not defined in guidance but notes that, in England on average, a minimum threshold of about 5.0ha has been applied in practice. At some 24ha his site must, he contends, be clearly a substantial one.

6.118 He also refers to the major existing developed sites which have been defined in the RDD. These are considerably smaller in size than that to the south of Shevington and, unlike this latter area, a number of them are not adjacent to substantial built up areas. He identifies, within the objection site, two particular areas where buildings and structures are particularly tightly grouped. These would, he argues, be suitable for infilling or redevelopment. The proximity of the urban area of Shevington would allow this to proceed in a sustainable location. Redevelopment would, he contends, be a trigger for a cessation of explosive-related activity on the site which would be a particular benefit to the locality, given the proximity of the built up area.

6.119 At my site inspection I walked over the whole of the 24ha site and noted that, at the south western end, adjacent to the main site entrance from Gathurst Road, the small group of buildings is entirely of single storey construction. At the northern edge of the site, adjacent to the subsidiary entrance off the continuation of Vicarage Lane, most buildings are of single storey construction but there are several taller structures, the equivalent in height of a two or three storey house. Across the remainder of the site, at widely spaced intervals, are both low, single storey buildings, some in use and some clearly disused for some time, and the remains of those which have been demolished in the past.

6.120 The whole of the site is covered by a dense, mature, self-seeded deciduous woodland. This is reinforced by tall dense tree screens at points along the edge of the site, particularly along Vicarage Lane, where the tree coverage is less dense. This combination of dense and extensive tree cover and the predominantly low height of structures reduces the visual impact of the objector’s site to such an extent that, even when viewed from close quarters, it is scarcely perceived as a developed area. From more distant vantage points, when looking towards the site from the rising land to the south near Gathurst railway station or from the elevated vantage point of the viaduct which carries the M6 motorway over the river Douglas, the structures on the site are entirely hidden. The area appears simply as a dense and extensive woodland.

6.121 PPG2 (paragraph 3.4) advises that the construction of new buildings inside a green belt is inappropriate unless it is for, among other things, the limited infilling or redevelopment of major existing developed sites identified in adopted local plans, which meets the criteria of annex C, paragraphs C3 or C4. I have contrasted the advice of PPG2 annex C with the text of the proposed RDD policy GB1E and note crucial differences.

6.122 Criterion (b) of policy GB1E deals with the ‘infilling’ option. It omits to require that development must have no greater impact on the purposes of including land in the green belt (as set out in PPG2) than the existing development. This matter is referred to in

the reasoned justification but, because it is a criterion against which planning applications will be determined, it should be included within the policy itself. The application of criterion (b) depends on the meaning of the vital term 'infilling'. This is not defined in the proposed policy or the reasoned justification but is defined within PPG2 as the filling of small gaps between built development.

6.123 Criterion (c) deals with the 'redevelopment' option. It fails to provide that this is relevant to such action on sites which are not only redundant but also those in continuing use. It also omits reference to the requirement that such development should have no greater impact than the existing development on the openness of the green belt and the purposes of including land within it. It requires the development to have a positive impact on the character of the green belt, which is not a matter referred to in PPG2. It neglects, however, to require that it should contribute to the achievement of the objectives for the use of land in the green belt.

6.124 The LPA wishes to maintain the essentially open aspect of the green belt at this point. It notes that this derives from a combination of tall, dense, tree coverage and the low height of most structures on the site. It wishes to protect the nature conservation interest of the land, most of which is designated as a Site of Biological Importance. The LPA refers to the 10,000 square metres of floor space currently on the site. Much of this is in the form of low level bunkers dispersed throughout a heavily treed Site of Biological Importance. It fears that it would be virtually impossible to redevelop an equivalent amount of floor space without harm to the green belt. It believes that, if redevelopment becomes necessary, it is better to deal with it as inappropriate development and consider whether this is justified by very special circumstances, rather than deal with it as appropriate development. The former approach would allow the LPA a greater degree of control which would be necessary to deal with the future of what is a vulnerable green-field site. In my view the open aspect of the land and its nature conservation value can be maintained into the future, even if the site was designated as a MEDS, so long as the full advice of PPG2 (annex C) is incorporated into policy GB1E.

6.125 If this is done then, under the infilling option, the requirement that this must have no great impact on the purposes of including land in the green belt than the existing development would, in conjunction with the definition that such development is the filling of small gaps between existing development, give the LPA a sufficient degree of control to ensure that openness was protected. In respect of the redevelopment option, the additional requirement that redevelopment must have no greater impact than the existing development on the openness of the green belt and the purposes of including land within it, would achieve the same purpose. The requirement that redevelopment should contribute to the achievement of the objectives for the use of land in the green belt would enable the LPA to secure, via the development control process, the nature conservation interests of the site, the majority of which is a Site of Biological Importance.

6.126 I conclude that, if RDD policy GB1E was modified in this way, it would be possible to designate the objector's site as a MEDS without risking demonstrable harm to the purposes of including the land in the green belt. My view on this matter is reinforced

by the consideration that the woodland to which I refer is protected by a Tree Preservation Order made in March 2004. The retention of the essential tree cover can, therefore, be assumed for the long term.

The merits of designating the Tyldesley Waste Water Treatment Works as a major existing developed site in the green belt

6.127 An objector argues that the Tyldesley Waste Water Treatment Works should be designated as a MEDS. Although PPG2 (paragraph C1) advises that MEDS may be identified from among water and sewage treatment works, it qualifies this by requiring that they be substantial. To be identified as a MEDS they should be sites where limited infilling (the filling of small gaps between built development) may help to secure jobs and prosperity without further prejudicing the green belt. Alternatively, they may be sites where complete or partial redevelopment may offer the opportunity of environmental improvement without adding to their impact on the openness of the green belt and the purposes of including land within it.

6.128 The site at Tyldesley Waste Water Treatment Works, while covering an extensive open area, contains only a very few structures. As a built-up area it cannot, in my view, be regarded as substantial. No evidence is presented by the objector that limited infilling between them would have any tangible benefit for job creation or that redevelopment would result in any improvement to the environment. Given the present limited visual impact of the site, there is every prospect that redevelopment would reduce the openness of the green belt. For these reasons I conclude that this site should not be designated as a MEDS.

The merits of designating the Ince-in-Makerfield Waste Water Treatment Works as a major existing developed site in the green belt

6.129 An objector argues that the Ince-in-Makerfield Waste Water Treatment Works should be designated as a MEDS. The advice of PPG2, to which I refer in the preceding subsection, applies to this site also. The site at Ince-in-Makerfield Waste Water Treatment Works, while covering an extensive open area, contains only a very few structures. As a built-up area it cannot, in my view, be regarded as substantial. No evidence is presented by the objector that limited infilling between them would have any tangible effect on job creation, or that redevelopment would result in any improvement to the environment. Given the present limited visual impact of the site, there is every prospect that redevelopment would reduce the openness of the green belt. For these reasons I conclude that this site should not be designated as a MEDS.

The merits of designating Standish Hall Farm as a major existing developed site in the green belt

6.130 An objector argues that Standish Hall Farm should be designated as a MEDS. Agricultural buildings are not identified by PPG2 (paragraph C1) as the type of development from among which MEDS may be identified. That paragraph, in any case,

requires that such areas should be ‘major developed sites’ and ‘substantial sites’. Standish Hall Farm contains a building group which is not distinctively larger than others throughout the wider rural area. Groups of farm buildings like that at Standish Hall Farm are to be found in green belt locations throughout the nation. If they were all to be regarded as potential candidates for MEDS this would completely undermine the achievement of a sustainable pattern of settlement.

6.131 The objector wishes to reuse certain of the buildings at the farm for leisure/recreation uses. PPG2 (paragraph 3.8) advises that the reuse of buildings within the green belt is not inappropriate development providing certain criteria are satisfied. These are reflected in RDD policy GB1A. The objector’s scheme can be considered against the provisions of the RDD without the need for any further designation. For these reasons I conclude that Standish Hall Farm should not be designated as a MEDS.

The merits of designating the Bores Farm Estate as a major existing developed site in the green belt

6.132 An objector argues that the Bores Farm Estate should be designated as a MEDS. Agricultural buildings are not identified by PPG2 (paragraph C1) as the type of development from among which MEDS may be identified. This paragraph, in any case, requires that such areas should be ‘major developed sites’ and ‘substantial sites’. Bores Farm Estate contains a building group which is not materially larger than others throughout the wider rural area. It is smaller than any MEDS identified in the RDD. If all such groups were to be regarded as potential candidates for MEDS this would completely undermine the achievement of a sustainable pattern of settlement. There are few buildings on the site and those that are present are not substantial in height or bulk. The present visual impact of the site derives, in large measure, from the activities which are carried on outside the buildings. Therefore, even if these were redeveloped that would not, in itself, effect a tangible environmental improvement as PPG2 requires. For these reasons I conclude that Bores Farm Estate should not be designated as a MEDS.

The merits of designating Winstanley Hall and its outbuildings as a major existing developed site in the green belt

6.133 An objector argues that the grade II and II* building group at Winstanley Hall should be designated as a MEDS because this would help secure the future of this via a residential re-use/regeneration scheme. Policy GB1E should, it is argued, provide for new build/enabling development there to help bridge the gap between the costs of building repair/refurbishment and the value of any finished scheme.

6.134 The objector does not argue that the designation of the building group as a MEDS would help to secure jobs and, therefore, justify limited infilling in conformity with the advice of PPG2 (paragraph C3). Complete or partial redevelopment (as provided for by PPG2, paragraph C4) would be inconsistent with the objectives of including the group in a list of buildings of architectural or historic interest. The site is not, therefore, one which PPG2 (annex C) identifies as suitable for MEDS designation.

6.135 There is no reason to conclude that the new development that the objector identifies as potentially necessary to bridge a funding gap could take place, as infilling, within the listed building group consistent with the objective of preserving its setting. If it took place elsewhere in its vicinity this would occupy a larger area of the site than the existing buildings contrary to the advice of PPG2 (Annex C, paragraph C4d). It would almost inevitably impact on the openness of the green belt. For these reasons I conclude that Winstanley Hall should not be designated as a MEDS.

6.136 The reasoned justification to RDD policy EV4B informs that it may be necessary to relax the strict interpretation of other policies of the plan, for example green belt policy, in order to ensure the survival of particularly important buildings. The acceptable balance between objectives relating to listed buildings and green belts can be reached only in the context of a particular development proposal when specific costs and benefits can be identified. The reasoned justification text of policy EV4B does not justify a decision to compromise green belt objectives in advance of this at development plan stage.

The criteria to be applied to residential development on a major existing developed site in the green belt

6.137 Objectors seek the reinstatement of the first sentence of the final paragraph of the reasoned justification to policy GB1E. This was presented in the FDD but was deleted at RDD stage. It confirmed that the redevelopment of MEDS for residential purposes, even though they were not within the defined urban area, would be considered against the provisions of policy R1B. The LPA opposes the reinstatement of that wording because it notes that the criteria of policy R1B relate to previously developed sites within the defined urban area, and the MEDS are not within such areas.

6.138 PPG2 (paragraph C4) advises that the complete or partial redevelopment of MEDS may offer the opportunity for environmental improvement without adding to the impact on the openness of the green belt and the purposes of including land within it. Such sites are often remote from built-up areas and cannot, therefore, be expected to be readily accessible to jobs, shops and services by modes of transport other than the car. There may be no opportunities to build on existing communities. The redevelopment of such sites may not, therefore, be able to conform to the criteria of policy R1B. Nevertheless, PPG2 (paragraph C4) supports this because it can bring environmental gains which, that PPG presumably accepts, outweigh these sustainability costs.

6.139 The consideration of residential redevelopment schemes in MEDS, against the criteria of policy R1B, would introduce the possibility that such schemes could be refused planning permission if they failed to satisfy all its criteria, contrary to the advice of PPG2. For this reason I conclude that the deleted sentence should not be reinstated.

The need to distinguish between MEDS in terms of infill and redevelopment

6.140 An objector argues that it is necessary for the UDP to distinguish between those MEDS which are suitable for infill and those which are suitable for redevelopment. Development under either option is constrained by the advice of PPG2 (paragraphs C3 and C4) to the extent that it would have no greater impact on the green belt than the existing development. For the reasons I give elsewhere, I recommend that these should be incorporated within the text of policy GB1E. If this is done, each sort of development would achieve the same beneficial outcome. There is, therefore, no need to distinguish between the two forms of development on a site by site basis in the UDP.

The safe and free flow of traffic

6.141 An objector argues that policy GB1E should be modified to include reference to the need for development permitted under its terms to protect the safe and efficient operation of the trunk road network. In conformity with the advice of PPG12 that development plans should be succinct, the introduction to the UDP advises that the plan should be read as a whole. Policy A1N provides that the LPA will safeguard the strategic road network. Policy A1A, furthermore, requires that a Transport Assessment will be required for all proposed development or change of use that would 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. There is nothing in these policies to indicate that they will not apply to development within a MEDS.

Recommendation

I recommend:

(REC 6.12) that the RDD be modified by the rewording of policy GB1E as follows. 'Limited infilling or redevelopment will be permitted within the boundaries of the major existing developed sites shown on the proposals map and listed below provided that it meets the following criteria:

- (a) that it does not exceed the height of the existing buildings; and**
- (b) in the case of infilling, which is to be allowed only at sites in continuing use, that it has no greater impact on the purposes of including land in the green belt (as set out in PPG2) than the existing development and does not lead to a major increase in the developed proportion of the site;**
- (c) in the case of redevelopment, which is to be allowed both at sites which are redundant and in continuing use, that it would not occupy a larger area of the site than the existing buildings (unless this would achieve a reduction in height which the Council considers would benefit visual amenity) and would have no greater impact than the existing development on the openness of the green belt and the purposes of including land within it. Such redevelopment should contribute to the achievement of the objectives for the use of land in green belts.**

1. **Former Leigh CE High School, Leigh**
2. **Industrial area off Edge Green Road, Golbourne**
3. **Bispham Hall Brick and Terracotta Works, Billinge**
4. **St John Rigby College, Orrell**
5. **Winstanley College, Winstanley**
6. **Leyland Mill, Wigan**
7. **Dicconson Mill, Aspull**
8. **Astley Works, Gin Pit Village**
9. **Kilhey Court Hotel, Standish**
10. **The Orica UK Ltd site at Shevington'**

(REC 6.13) that the RDD be modified by the rewording of the first paragraph of the reasoned justification of policy GB1E to omit the second sentence and replace it with the words 'Infilling is, in conformity with the advice of PPG2 (annex C), defined as the filling of small gaps within built development'.

(REC 6.14) that the RDD be modified by the addition to Appendix 2 of the details of the Orica UK Ltd site at Shevington.

(REC 6.15) that no other modification be made to the RDD in response to these objections.

GB1E 2 – INDUSTRIAL AREA OFF EDGE GREEN ROAD, GOLBORNE.

Objections to Revised Deposit

Ref No	a	b	c	d	Name	Agent	Response Ref.
105	O	005	GB	1E	Barbara McLachlan		WMBC GB1E 2
396	O	001	GB	1E	Mrs J Allison – The Community Forum		WMBC GB1E 2

Note

Objections 105/005 and 396/001 are dealt with in the section of this report which relates to policy GB1E.

GB1E 3 BISPHAM HALL BRICK AND TERRACOTTA WORKS, BILLINGE.

Objections to Draft Deposit

Ref No	a	b	c	d	Name	Agent	Response Ref.
464	O	005	GB	1E	Bispham Hall Brick and Terra Cotta Works	Steven Abbott Associates	WMBC 464
464	O	007	GB	1E	Bispham Hall Brick and Terra Cotta Works	Steven Abbott Associates	WMBC 464

Supporters to Draft Deposit

Ref No	a	b	c	d	Name	Agent	Response Ref.
464	S	006	GB	1E	Bispham Hall Brick and Terra Cotta Works	Steven Abbott Associates	

Note

Objections 464/005 and 464/007 are dealt with in the section of this report which relates to policy GB1E.

GB1E 6 LEYLAND MILL, WIGAN

Objections to Draft Deposit

Ref No	a	b	c	d	Name	Agent	Response Ref.
466	O	005	GB	1E	Jeffreys Miller Limited	Steven Abbott Associates	WMBC 466

Supporters of Draft Deposit

Ref No	a	b	c	d	Name	Agent	Response Ref.
466	S	006	GB	1E	Jeffreys Miller Limited	Steven Abbott Associates	

Note

Objection 466/005 is dealt with in the section of this report which relates to policy GB1E.

GB1E 7 DICCONSON MILL, ASPULL

Objections to Draft Deposit

Ref No	a	b	c	d	Name	Agent	Response Ref.
537	O	001	GB	1E	John and Robert Haes	Hulton Bailey and Co.	WMBC 537 GB1E

Note

Objection 537/001 is dealt with in the section of this report which relates to policy GB1E.

GB1E 8 ASTLEY WORKS, GIN PIT VILLAGE

Objections to Draft Deposit

Ref No	a	b	c	d	Name	Agent	Response Ref.
465	O	005	GB	1E	Bett Homes	Hepher Dixon	WMBC 465 GB/R

Supporters of Draft Deposit

Ref No	a	b	c	d	Name	Agent	Response Ref.
465	S	006	GB	1E	Bett Homes	Hepher Dixon	

Note

Objection 465/005 is dealt with in the section of this report which relates to policy GB1E.