

# ACT Neighbourhood Plan Consultation Statement

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## **1. Introduction**

This Consultation Statement accompanies the submission of the ACT Neighbourhood Plan. It summarises the community engagement programme and the Regulation 14 consultation that were undertaken. It shows how the requirements of Regulations 14 and 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) have been satisfied.

## **2. Summary of Community Engagement**

### **2.1 Approach to community engagement**

The approach taken by ACT Neighbourhood Forum was to develop a Forum whereby all 5 villages within Abram Ward (Abram, Platt Bridge, Bamfurlong, Bickershaw and Spring View) would all be represented by key stakeholders within their Village Residents and Tenants Groups. As these have a long-standing legacy across Abram Ward, it was key to bring these groups together.

As part of the Consultation process, that commenced in 2015, the Neighbourhood Forum would host events in each of the Villages' key community hubs, such as Community Centres and Village Clubs.

This was developed to maximise the areas with the greatest footfall and greater opportunity for awareness raising.

### **2.2 What was done?**

Since 2015, the Neighbourhood Forum has undertaken a variety of Community Engagement events. The Forum has consulted with local people across the Neighbourhood Area to inform the development of the vision and objectives and the development of policies.

Evidence from the engagement surveys and projects have been integrated into the development of policies.

These included:

- Survey – 2016
- Survey – 2017
- Placed Consultation – 2018
- Picture This Project – 2018/19

## 2.3 Who was targeted?

The Consultation phases targeted the local community members and Schools, whilst the Picture This Project was designed to target local residents and also local Businesses.

## 2.4 Outcomes/Feedback

### ACT Survey 2016

The 2016 consultation took place over 5 days, utilising 5 venues in key locations across the Neighbourhood Area. In total 149 people took part representing all 5 villages.

Key findings from this consultation were high level and thus not categorised:

- Local activities / areas for teens;
- Supporting the ageing population;
- Development of the canal towpath;
- Clean up all communal areas;
- Safer roads;
- Improved car parking facilities;
- Higher police presence;
- High school;
- Additional primary school;
- Regeneration of dilapidated buildings;
- Protect green spaces;
- Quality housing;
- Community events for all;
- Better local shops.

### ACT Survey 2017

The 2017 consultation took place over 3 days, utilising 3 venues in key locations across the Neighbourhood Area. In total 110 people took part during events held in Bamfurlong, Bickershaw and Platt Bridge.

Key findings from this consultation were categorised.

### *Green spaces*

- Walking, running and cycling with visual signposts and maps;
- Football facilities;
- Wildlife;
- Protect green forestry and flashes;
- Organised walks;
- Canoeing;
- Picnic areas.

### *Allotments for green growing*

- Community allotments;
- Community planters;
- Links with Incredible edible;
- Help with access to allotments to enable local resident to source fresh fruit and vegetables;
- Young and old working together.

### *Types of housing*

- Top end quality apartments;
- Mixed age homes;
- Affordable apartments;
- Bungalows;
- Enable older people to stay in their own area;
- Mixture of housing, e.g. bungalow, family, single.

### *Vision for the ward in the next 15 years*

- Greenheart centre;
- Nature trails;
- Interactive maps for walks;
- No empty shops;
- New shops;
- High school;
- Community growing areas;
- Outdoor facilities, e.g. skate park/BMX/go karting.

### *Green gym*

- Healthy living, keeping fit utilising park areas, focusing on family use within all areas of our ward.

### *New ideas*

- Grants for home improvements;
- Empowering local groups;
- Speed management and improved road surfaces and safety;
- Official sites for quad bikes/scramblers;
- Improved play areas;
- Community hubs in the ward;
- Better use of community buildings.

### **Placed Consultation 2018**

In 2018, the Neighbourhood Forum commissioned Placed, an engagement specialist, to undertake a more in-depth survey with local people. This took place over five days in May 2018, with an exhibition and interactive engagement activities being held in five outdoor locations, one in each village. In total 136 people took part in the survey.

Key findings from the Placed consultation were as follows:

- Concerns around losing green space and traffic congestion;
- The importance of quality, safe, accessible and well-maintained green space;
- Green Gym provision was very popular;
- Providing cycle paths that connect green spaces;
- A lack of awareness of the network of green spaces in the ward;
- Support for community markets and community cafes;
- Importance of retaining community centres and clubs;
- Enhancing safety and maintenance at children's play spaces;
- A lack of awareness of what community facilities are available in other villages.



**Picture This Project 2018-2019**

A six-month long engagement project took place entitled ‘Picture This’ from November 2018 to April 2019.

It was co-designed and produced with a team of nine people who live and/or work within the Neighbourhood Area. The project asked local people to consider the history of shops and small businesses across the ward. Local people engaged in various stages of the project: 130 people responded with stories and memories of shops and small business, on postcards and via Facebook; 65 people attended a final event focussed on community wealth building; 18 business managers/owners in Platt Bridge commented in PBBPR; seven local people took part in Platt Bridge Community Green design workshops and 65 people from across the ward commented on the draft vision for the Community Green redesign.



### 3. Pre-Submission Consultation (Regulation 14)

#### 3.1 How the Consultation Was Undertaken

The Regulation 14 Consultation process commenced on the 7<sup>th</sup> November 2022 and closed 6 weeks later on the 18<sup>th</sup> December 2022.

The Neighbourhood Forum publicised the Consultation phase via its website at [www.abramwardplan.org.uk](http://www.abramwardplan.org.uk) and also via Social Media, utilising both the Neighbourhood Forum facebook page but also other Village community groups pages from across the 5 villages within the Neighbourhood Area.

Feedback was invited in the form of an online survey via the website, where local residents could also print this off and return to a designated point. Residents could also drop in to one of the Community hubs at Platt Bridge Community Zone and meet with Board members of the Neighbourhood Forum and complete the survey via a paper copy.

The Consultation process complied with the Gunning Principles throughout.

#### 3.2 Statutory Consultees

Organisation	Address
Wigan Council	Wigan Town Hall, Library Street, Wigan, WN1 1YN
Local Community Residents groups in Abram Ward	Bamfurlong Residents Group, Abram Tenants and Residents Association, Bickershaw Residents Association, Platt Bridge Community Forum
Housing Providers	Miller Homes

#### 3.3 Issues

The main issues and concerns raised by the persons consulted are set out in the next part of this statement, together with details of how these issues and concerns have been addressed.

## 4. Responses to Representations

Concern Raised By	Policy or Section	Comments	ACT Neighbourhood Forum Response
Miller Homes	RD1	<p>Miller Homes has identified land at Lee Lane Farm, Abram as suitable and deliverable for new housing and would welcome the opportunity to engage with the Community in this regard.</p> <p>We have reviewed the ACT Neighbourhood Plan having particular regard to Objective 3 (Housing and Planning) and Policy RD1: Residential Development and are pleased to make the following observations.</p> <p>The ‘purpose’ having regard to residential development (to enable housing development, to meet local need’) is noted. We would however wish to comment on the ‘Rationale and Evidence’ at 5.3.2.</p> <ul style="list-style-type: none"> <li>• The most recently published WHNA advocates the case for 872 homes per annum. It should be noted that this is however considerably lower than Wigan’s recent housing delivery rate. In the recent past, Wigan has demonstrated a strong rate of housing delivery. On average Wigan Council has delivered 1,385 net completions / annum, over the past three years (as confirmed in the most recent Government Housing Delivery Test measurement). This is a good indicator of strong marketability and demand for housing in the Borough.</li> </ul>	This does not breach basic conditions. The area of land under discussion is within green belt. No further action necessary.

		<ul style="list-style-type: none"><li>• Wigan is a constituent authority member of the Greater Manchester Combined Authority (GMCA) who are progressing the Places for Everyone (Pfe) Spatial Strategy. Having regard to emerging housing needs and requirements, the purpose of Pfe is to allocate the combined local housing need appropriately across the GMCA to where there is a realistic supply of housing land; this could mean that some of the overall housing need could be met in districts such as Wigan which has a strong rate of housing demand and delivery. Indeed, Pfe advocates a housing requirement of 972 homes per annum in Wigan, which is more than the current WHNA requirement, reflecting the District's strong housing delivery rates.</li><li>• In this context, housing need is very much an issue that requires to be addressed and we strongly advocate for plans (at a Regional and Local level) that are positively prepared and effective. The land at Lee Lane Farm, Abram is a suitable and deliverable site for housing that could also support wider Neighbourhood Plan objectives.</li><li>• Having reviewed the Council's most recent Strategic Housing Land Availability Assessments (SHLAA) for 2019/2020 and 2020/2021, the net housing completions in Abram/Platt Bridge were 113 and 117 respectively.</li><li>• There does not now appear to be any specific reference to a Local Housing Need (LHN) figure in the ACT Neighbourhood Plan. The inclusion of a LHN figure would encourage positive</li></ul>	
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		<p>direction to support the wider objectives of the Neighbourhood Plan to be achieved. There is otherwise unlikely to be any notable increase in growth sufficient to attract and sustain new business, enterprise and community facilities as sought by policy BEC1.</p> <ul style="list-style-type: none"> <li>• Notwithstanding that there is no actual LHN figure set out, the Rationale and Evidence at 5.3.2 suggests that the housing need for the Abram Ward is 2+3 bedroom houses / flats / bungalows; and that there is no need for properties of 4 or more bedrooms. Whilst it is noted that this is in accord with the position in the WHNASAP, it does however appear to be at odds with the Objective 3 where it is stated at 4.3.3.1 that an aim for homes in the Abram Ward includes 'larger homes to rent or buy'. It is also noted in the Baseline Evidence Report that the houses of 4 bedrooms only makes up 1% of total housing stock in the Ward. This is very low. We would suggest that the Rationale and Evidence should therefore be modified to make provision for a mix of housing types / sizes and tenures to respond to housing needs during the lifetime of the Neighbourhood Plan - noting that this covers the period 2022 – 2037, over which time housing needs will change. This would be a positive statement that would support wider objectives.</li> </ul>	
Resident 1	RD1	The residential policies in this document are in line with what are group feel are required. We need a mix of tenures to allow all residents to be able to live comfortably and that the properties are built to a high	Thank you for your positive feedback

		quality standard. We fully support that no green belt land should be built on before Brown Field sites are exhausted.	
Resident 2	RD1	Use the land where the Dover Lock Inn is located for housing and hopefully reduce the front car park being used by flytippers	The neighbourhood plan has been written by local residents' groups and is not a council-developed document; its remit is to provide planning regulation for the neighbourhood as a whole. Any specific requests/queries should be taken up directly with the council. No further action required.
Resident 3	RD1	Agree	Thank you for your positive feedback
Resident 4	RD1	Abram village does not need any more lower quality 1 bedroom dwellings. We need to attract new residents and families to bring further heart and enterprise to the community. We also need to support new developments with supporting services such as dentists, nurseries, playgroups, grocers, bakers and much needed improved transport	The neighbourhood plan has been written by local residents' groups and is not a council-developed document; its remit is to provide planning regulation for the neighbourhood as a whole. Any specific requests/queries should be taken up directly with the council. No further action required.
Resident 5	RD1	Prioritising brownfield sites without first turning attention to the extensive number of buildings left derelict for years/decades is not sustainable practise. Brownfield sites are much better used as sites for the promotion of biodiversity, combatting climate change and providing community orchards and wellbeing than for building on. Too often historically decimated green belt sites are then justified as 'brownfield' without acknowledgement that this is actually decimated green space. Investing energy into building new residential homes without first fully insulating and upgrading existing housing stock to make it liveable and aligned to a viable climate cannot in anyway align with supporting the needs of the community and is purely an exercise in prioritising economic profit over the wellbeing of	The neighbourhood plan has been written by local residents' groups and is not a council-developed document; its remit is to provide planning regulation for the neighbourhood as a whole. Any specific requests/queries should be taken up directly with the council. No further action required.

		<p>residents. Refusal of developers to build a viable number of affordable properties (so that their profit margins remain intact above the needs of the community) being resolved by smaller properties being built will detrimentally impact larger families looking for housing in an already devastated market, being crammed together in smaller spaces having both obvious and empirically proven impacts on wellbeing, increasing instances of domestic violence, sexual abuse and poor mental health. Any green belt development at this stage of the climate and ecological crisis is explicitly inappropriate. Encouragement of measures to reduce environmental impact is a weak standard; the council should demonstrate sufficient care for the community and ensure all development projects are mandatorily aligned with a liveable planet</p>	
Wigan Council	RD1 (criteria 1)	<p>Policy RD1 refers to “village urban areas”, which is a different terminology again and needs to be consistent with the choice taken in response to the council’s comments on the Policies Map, suggested ‘villages’.</p> <p>The words “and/or” should be added at the end of clause 1a to make clear that greenfield infill sites accord with clause 1.</p>	<p>There must be consistency between terminology used on maps and in policies. The term ‘urban areas’ is now used for policies and maps.</p> <p>If there are sub-criteria listed, they are all required unless an “or” has been placed which sets out that criterion as an alternative. We think the policies are clear as drafted.</p>
Wigan Council	RD1 (criteria 2)	<p>Are the house types listed in this criterion only supported in the locations set out in criterion 1? If so, there is scope to merge criteria 1 and 2 to improve clarity.</p>	<p>The Plan does not make housing site allocations, so clause 1 makes clear where housing development would be supported. Clause 2 sets preferences for certain kinds of housing and would apply anywhere, including sites allocated in the Local Plan. This encourages types of accommodation where there is particular local need. Merging the clauses would create</p>

			confusion. Interpretation amended to make application of the policy clear.
Wigan Council	RD1 (criteria 3)	This policy criterion will be difficult to implement. Criterion 2 already encourages and supports new housing to smaller homes, and further policy restriction is likely to impede viability further.	Comment on viability noted. In response to this and the next comment criteria 3 and 4 have been deleted. The following paragraph has been added to the interpretation:  “Viability considerations will not justify poor or unsustainable design which fails to meet the requirements of the design policy. Where developers seek reduction of the proportion of affordable housing provision on viability grounds, a housing mix based on predominantly smaller properties would help to create affordability for first time buyers”.
Wigan Council	RD1 (criteria 4)	Whilst the principle of this is supported, the criterion is not deemed necessary as the plan should be read as a whole and acceptable design quality is covered in Policy DES1. This could effectively be covered in the supporting text / interpretation rather than in the policy.	See above
Resident 6	GS1	Fully supported. It is now a necessity to enhance our Green spaces and the protection of natural habitat and that the recreation facilities are maintained.	Thank you for your positive feedback
Resident 7	GS1	Increase the canal car park but removing all fly tipped material. Cut all hedging to 3 feet and hopefully reduce fly tipping.	The neighbourhood plan has been written by local residents’ groups and is not a council-developed document; its remit is to provide planning regulation for the neighbourhood as a whole. Any specific requests/queries should be taken up directly with the council. No further action required.
Resident 8	GS1	Agree	Thank you for your positive feedback

Resident 9	GS1	Agree	Thank you for your positive feedback
Resident 10	GS1	<p>These are generally positive aspirations but remain vague on what 'small-scale development to enhance the community use of the space' includes and this could be exploited in unquantifiable terms to suggest that some development which is adverse to restoring biodiversity and achieving a liveable planet is justified for some incompatible alternative rationale, commonly economic profit. Again, development that 'must not encroach onto' or 'have any detrimental impact on' already devastated green spaces is a weak development regulations from the council who could be providing a much firmer stance that all development must be aligned actively with the promotion of biodiversity and the improving of green spaces by allowing the benefits of these green spaces to extend into currently over-urbanised communities where active travel and public transport across the borough are still maintained by council policies as the most inaccessible methods of transport.</p>	<p>The neighbourhood plan has been written by local residents' groups and is not a council-developed document. Its remit is to provide planning regulation for the neighbourhood as a whole; any specific requests/queries should be taken up directly with the council. No further action required.</p>
Wigan Council	GS1	<p>The first mention of Platt Bridge Community Green is to designate it as a Local Green Space in this policy. There is an audit trail for the other three proposed LGSs as they are noted as Natural and Semi Natural Greenspace under section 5.6.2.2 and in Figure 10. Platt Bridge Community Green is not easily seen on Figure 10 or on the Policies Map. The justification for Platt Bridge Community Green as LGS and its location need to be clearer.</p> <p>Three of the four sites are within the Green Belt; and Maypole Wood is also an SBI, so the need for extra protection must be justified and should be listed under "other designations" in the Local Green Space</p>	<p>Justification for Platt Bridge Community Green added to rationale, together with more explicit justification for the other LGS. Rationale reviewed for consistency with the polciies, for example by removing reference to key green spaces.</p> <p>Policy split in two. LGS policy refers to to:</p> <p>LGS1: Maypole Wood</p> <p>LGS2: Platt Bridge Community Green;</p>



		<p>Assessment. Two of the four sites (Victoria Fields at 23 hectares, and Kingsdown Flash at 19 hectares) are large and could be considered to be expansive tracts of land, and therefore contrary to required criteria set out in NPPF paragraph 102 (c). There is <a href="#">Caselaw</a> concluding that sites of 19 hectares and above do constitute expansive tracts of land. On this basis, the two larger proposed LGSs could breach the basic conditions.</p>	<p>Victoria Fields and Kingsdown Flash (Polly's Pond) now drafted into policy REC1 (now GS3).</p> <p>LGS map amended to identify LGS and other protected spaces.</p> <p>All maps moved to be with the corresponding policy.</p>
Resident 11	GS2	<p>Fully supported. There is a definite need to promote walking and cycling. The Green corridor is necessary to consolidate the much needed connectivity between the villages</p>	<p>Thank you for your positive feedback</p>
Resident 12	GS2	<p>Agree</p>	<p>Thank you for your positive feedback</p>
Resident 13	GS2	<p>Agree</p>	<p>Thank you for your positive feedback</p>
Miller Homes	GS2	<p>The concept of the Proposed Green Corridor is noted although there are concerns having regard to its location and delivery. For example;</p> <ul style="list-style-type: none"> <li>As identified in Figure 11, the boundaries appear to be quite arbitrary and do not appear to follow any obvious / logical landmarks, features or designations.</li> <li>It incorporates land that is in private ownership; any proposals to manage/improve and/or change the function of the land within private ownership will need to be agreed with the relevant landowner having regard to existing use(s) and any future aspirations.</li> </ul> <p>In this instance, Miller is promoting land with the landowner at Lee Lane Farm at Crankwood Road, Abram. We would welcome the opportunity to work with Abram Ward Communities Together having regard to the aspirations for the land and how any ambitions</p>	<p>This does not breach basic conditions. The area of land under discussion is within green belt. No further action necessary.</p>

		<p>can be achieved and supported. As it stands, the proposed green corridor includes land in private ownership.</p> <p>Finally, it is noted that the draft NP now suggests in Figure 3 that there are Heritage Assets / Buildings of Local Interest at Crankwood Road / Lee Lane Farm. This was not previously the case when an earlier iteration of the NP was published in late 2021. Furthermore there is no new evidence or rationale to support the identification of this as a Heritage Asset within the NP. We are not aware of any historical significance that would merit its identification as a Building of Local Interest in this regard.</p>	
Resident 14	GS2	<p>These are generally positive aspirations but remain vague on what 'small-scale development to enhance the community use of the space' includes and this could be exploited in unquantifiable terms to suggest that some development which is adverse to restoring biodiversity and achieving a liveable planet is justified for some incompatible alternative rationale, commonly economic profit. Again, development that 'must not encroach onto' or 'have any detrimental impact on' already devastated green spaces is a weak development regulations from the council who could be providing a much firmer stance that all development must be aligned actively with the promotion of biodiversity and the improving of green spaces by allowing the benefits of these green spaces to extend into currently over-urbanised communities where active travel and public transport across the borough are still maintained by council policies as the most inaccessible methods of transport.</p>	<p>The neighbourhood plan has been written by local residents' groups and is not a council-developed document; its remit is to provide planning regulation for the neighbourhood as a whole. Any specific requests/queries should be taken up directly with the council. No further action required.</p>

Wigan Council	GS2 – Proposed Green Corridor	<p>There is an inconsistency between the policy and the Policies Map. Policy GS2 refers to a Proposed Green Corridor but the map shows a Proposed Wildlife Corridor. Clarification is needed on what is intended, as noted above.</p> <p>Replacement Figure 11 is provided as Appendix B.</p> <p>“Development must not disrupt, compromise or encroach” is too stringent. The purpose of a corridor is that access along it should be maintained, whether that is for wildlife or recreation. Development could accommodate that, notwithstanding that it is also almost entirely Green Belt and in part proposed Local Green Space too, which would restrict development.</p>	<p>Consistent terminology now used (see previous comment).</p> <p>Map replaced.</p> <p>The wording is consistent with national policy.</p>
Wigan Council	GS2	<p>Criterion 2 references the ‘strategic green space network’. Does this apply to just the ‘Proposed Green Corridor’ to which the policy relates, or to a wider area?</p>	<p>Reference to ‘strategic green space network’ deleted. Wording amended to:</p> <p><b>1. Development must not disrupt or compromise the identified area for the proposed green corridor (Figure 11) or have any detrimental impact on its amenity, safety or accessibility.</b></p>
Resident 15	REC1 (now GS3)	<p>We support the terms of Policy REC1. Furthermore, new parks and recreational space would be delivered in conjunction with new housing development.</p> <p>By way of example, we understand that the Maypole Crescent Recreational Park, to which Policy REC1 applies and now seeks to protect, was delivered as part of the housing development within which it is situated.</p> <p>It should therefore be recognised that new development can also bring benefits including new recreational spaces.</p>	<p>Thank you for your positive feedback</p>

Resident 16	REC1 (now GS3)	As described in the document we must not allow any parks, recreation areas and fishing ponds to be lost to the community. We must enhance these recreation areas to enable more activities to take place and promote the wellbeing of our residents.	Thank you for your positive feedback
Resident 17	REC1 (now GS3)	Agree	Thank you for your positive feedback
Resident 18	REC1 (now GS3)	Agree	Thank you for your positive feedback
Resident 19	REC1 (now GS3)	Fantastic to finally experience a commitment to enhance spaces of wellbeing and with rich biodiversity in this consultation. It would be great to see more of this crucial commitment throughout all aspects. Given the much weaker stances expressed in other areas of the consultation, I would hope that 'enhance' here is used in a way that supports an increase in biodiversity as well as providing a much needed improvement of accessible facilities for all ages and abilities in many of the parks around the area. Destroying existing greenspace within recreational areas to provide more facilities is not enhancing the space.	Thank you for your positive feedback
Wigan Council	REC1 (now GS3)	<p>For clarity, this policy should be renumbered as Policy GS3 as it is within the Green Spaces chapter.</p> <p>The policy should include an additional criterion which relates to green gyms, as whilst their provision is identified as a key objective throughout the plan, including on the Policies Map, they are not referred to in a policy. They need to form part of a policy to be on the Policies Map.</p> <p>Replacement Figure 9 is provided as Appendix C</p>	<p>Policy renumbered to GS3, as suggested.</p> <p>The green gyms are projects, so planning policy not required.</p> <p>Map replaced.</p>
Wigan Council	REC1 (now GS3) (criteria 1)	Need to ensure that all of the recreational spaces listed in 5.6.5.1 are included on the Policies Map. For ease and clarity, the Recreational Spaces, Amenity Greenspace, Parks and Gardens and Provision for Young	<p>Suggested use of 'recreation spaces' could be confusing, especially in relation to ponds.</p> <p>Map updated to include all facilities.</p>

		<p>People layers on the Policies Map could be merged into one Recreational Spaces layer which signposts to this policy. Criterion 1 could then be amended to replace “...parks, recreation spaces, play areas and fishing ponds” with “...recreation spaces (as shown on the Policies Map)”.</p> <p>Replacement Figure 12 is provided as Appendix D.</p> <p>Criterion 1 is too stringent and does not allow for the loss of spaces where there is low demand, or an appropriate replacement is provided on a nearby accessible site. We suggest that the policy is amended to say that such provision should be maintained unless it is demonstrated as not needed (unless you have evidenced proof that it all is) or that it is replaced by a modern equivalent or better facility nearby that is similarly accessible. Sometimes that is a better outcome for local communities and the policy as written would be contrary to such an outcome</p>	<p>The forum would not want to encourage or support loss of green infrastructure, even if new facilities were being provided. Criterion 1 amended:</p> <ol style="list-style-type: none"> <li><b>1. Development should not harm the area’s parks, recreation spaces, play areas and fishing ponds, including any significant adverse impact on their community use, amenity, safety or accessibility.</b></li> </ol>
Miller Homes	TM1	<p>The land at Lee Lane Farm / Crankwood benefits from excellent access to public transport. The whole of the site is within 400m walking distance of existing bus stops along Warrington Road (A573) which is clearly a high frequency bus corridor providing connections to elsewhere within Abram and Wigan, seven days a week. The site is clearly well connected by sustainable, recreational / non-vehicular modes and would represent a sustainable location for development.</p>	<p>This does not breach basic conditions. The area of land under discussion is within green belt. No further action necessary.</p>
Resident 20	TM1	<p>Our access to the network railway network is non existent, bus transport is poor and any efforts to reduce the necessity to drive is welcomed.</p>	<p>Thank you for your positive feedback</p>

Resident 21	TM1	Absolutely the A573 is dreadful with terrible congestion and nothing to promote any one to stop and enjoy what Abram village has to offer	Thank you for your positive feedback
Resident 22	TM1	Agree	Thank you for your positive feedback
Resident 23	TM1	Development with the requirement of merely 'including public transport' as opposed to prioritising access to it as the dominant and easiest method to travel around the community is not aligned with biodiversity net gain or maintaining legal commitments to greenhouse gas reductions. There is no provision in this section for improving infrastructure to make public transport the most accessible form of transport; recent commitments by the Mayor to introduce price caps are all well and good but without the infrastructure to make a 2.5 mile (10 minute) drive from Platt Bridge to Ince take less than 40 minutes with long waiting times for required transfers, the local community will not be incentivised or often capable of commuting to sustainable transport methods because of the sheer amount of time this would consume from their day e.g. 1.5 hours for a 5 mile journey. Any development plans, without this action, will either continue to provide substandard transport routes across the board making the Mayor's price caps unaffordable or will exploit existing communities which will still have an underdeveloped transport network. Parking infrastructure should encourage more sustainable travel but if all parking infrastructure is implemented at the current pace, even with the provision of EV charging units, this will not align with previously asserted commitments to biodiversity net gain which fundamentally requires a reduction in car use and not merely a transition to electric vehicles. Likewise, where driveways and parking	The neighbourhood plan has been written by local residents' groups and is not a council-developed document; its remit is to provide planning regulation for the neighbourhood as a whole. Any specific requests/queries should be taken up directly with the council. No further action required.

		<p>spaces continue to be normalised, even with water permeable surfaces, this reduces the space committed to gardens and green space which is more effective than any artificially constructed surface would be, making greater investment in prioritising an accessible and integrated public transport network essential. Currently bus and train times not only keep people waiting for, commonly delayed or cancelled, services (despite inaccurate reporting on live updates on bus services), but also don't even align with the commitments required by local education facilities e.g. the bus services from Ince to Platt Bridge do not arrive in alignment with the starting time attendance requirements of the school.</p>	
Wigan Council	TM1	<p>This policy lacks clarity and will be difficult for plan users when preparing or determining planning applications.</p> <p>It would be more effectively split into 2 policies, one promoting sustainable travel – walking, cycling and public transport (covering criterion 1, 2 and 4); and the other dealing with parking provision (covering criteria 5 and 6). Criterion 3 is sufficiently covered in DES1.</p> <p>The use of ‘where appropriate’ or similar will add necessary flexibility to the policy to cover scenarios where it can be robustly demonstrated that schemes are unable to satisfy all policy requirements due to site characteristics and constraints etc.</p>	<p>Policy use of ‘must’ replaced with ‘should’.</p> <p>Deletion of criterion 3 would be unhelpful – the intention is to link the design and transport policies.</p> <p>Clauses 3 and 4 have been switched, to create a more logical order.</p>
Resident 24	TM2	<p>Fully supported. We must not allow development which will restrict access to footpaths and cycle ways. Footpaths and cycle ways as outlined in the document will allow us to have a much more healthier society.</p>	<p>Thank you for your positive feedback</p>

Resident 25	TM2	I agree but I'm not aware of any cycleways in Abram village. Not including the canal! Nor am I aware that we have Abram ward circular walks....despite walking many of these paths on a daily basis. Why are we not promoting these routes?	Your comment has been taken on board; however this does not necessitate a change to the neighbourhood plan, which has been written by local residents' groups and is not a council-developed document. The remit of the neighbourhood plan is to provide planning regulation for the neighbourhood as a whole; any specific requests/queries should be taken up directly with the council. No further action required.
Miller Homes	TM2	We are supportive of the principles of Policy TM2. Development can create opportunities to enhance pedestrian and cycling access into villages to/from the Abram Ward Circular Walk. A public right of way (PROW) runs along the northern boundary of the site following the line of Park Lane. A further PROW bridlepath runs along the eastern boundary of the site past the woodland. There are also recreational routes along the Leeds – Liverpool Canal to the South-West.	T
Resident 26	TM2	Agree	Thank you for your positive feedback
Resident 27	TM2	Agree	Thank you for your positive feedback
Resident 28	TM2	Great. What improvements to cycling and pedestrian infrastructure will there be to ensure pedestrians and cyclists can travel efficiently and safely and to demonstrate their prioritisation in travelling space, rather than being squashed into narrow gutters and pavements at the side of the many vast lanes of space dedicated to motor vehicles? How will development support inter-ward commuting to pedestrians and cyclists of all ages and abilities?	The neighbourhood plan has been written by local residents' groups and is not a council-developed document; its remit is to provide planning regulation for the neighbourhood as a whole. Any specific requests/queries should be taken up directly with the council. No further action required.
Wigan Council	TM2	The policy (particularly criterion 1) is too stringent and could jeopardise the delivery of appropriate development where an existing footpath or cycleway	Clause 1 amended as suggested.



		could be adequately rerouted or replaced. As such, the following wording, or similar, should be added to the end of criterion 1: “...unless it can be demonstrated that it can be effectively rerouted or replaced to an equivalent or improved standard.”	In clause 2, the word ‘must’ has been replaced with ‘should’.
Wigan Council	TM2	<p>The ‘Amberswood off-circular route’ and the cycle route network (as shown on the Policies Map) both cross a proposed road link across Amberswood Common which the council has included as part of a wider ‘Large Local Majors’ (LLM) funding bid to the Government which seeks to enhance east-west transport connectivity across the borough. If successful, the LLM bid will also fund the continuation of this route over the West Coast mainline into Westwood, via a new connection from Seaman Way to Phoenix Way. Enhancing east-west transport connectivity is a longstanding objective and ambition of the Council, and a new link road across Amberswood Common is a key component of this. This ambition is set out in Transport Strategy 2040 and also set out in emerging PfE Policy JP-Strat 8: Wigan-Bolton Growth Corridor.</p> <p>On this basis, the need for Policy TM2 to allow footpaths and cycleways to be rerouted appropriately and effectively is essential. Otherwise, the policy would not be in conformity with emerging PfE Policy JP-Strat 8 Wigan Bolton Growth Corridor, and be in breach of basic conditions.</p>	This would make the policy more compatible with emerging PfE policy. However, for accuracy, this is good practice, rather than being a Basic Conditions (general conformity) issue, as the comment suggests.
Resident 29	INF1	The infrastructure priorities are noted, as set out in Policy INF1. It is not clear however what is meant by ‘Planning Infrastructure Funds’. This is not defined within the draft NP.	The neighbourhood plan has been written by local residents’ groups and is not a council-developed document; its remit is to provide planning regulation for the neighbourhood as a whole. Any specific requests/queries should be taken up

		<p>New development would be expected to deliver infrastructure via S106 contributions. It is not clear what other infrastructure funding is being sought to support delivery of new infrastructure; and where it would be sought. This should be clarified in the NP. S106 contributions only arise from new development to offset any impacts i.e. if there is no development then there will be no S106 contributions.</p> <p>In general terms, the ambitions and prospects of the creation of new business premises and job opportunities will be enhanced by an increase in footfall in the local area; this can be achieved by the creation of new homes to attract new families and residents and in turn, additional footfall and local expenditure. As noted above, the current housing strategy contained within the ACT Neighbourhood Plan is not likely to create sufficient growth to attract and sustain wider economic and business objectives.</p>	directly with the council. No further action required.
Resident 30	INF1	Agree. Abram village needs not just bus stops increasing but a wider range of destinations to be able to connect to	Thank you for your positive feedback
Resident 31	INF1	Agree	Thank you for your positive feedback
Resident 32	INF1	<p>Consideration needs to be paid to what types of businesses are supported and their impact on the wellbeing on the community; not just bringing in business hubs purely for economic benefit. Improved paths accessible to wheelchair users and mobility impaired crucial. Additional buses and bus services essential in addition to bus stops or there will be no significant improvement in infrastructure. Improvement to cycling infrastructure; currently there is very little in the way of cycling infrastructure - painted lines in the gutter of a road space dedicated to motor vehicles does</p>	The neighbourhood plan has been written by local residents' groups and is not a council-developed document; its remit is to provide planning regulation for the neighbourhood as a whole. Any specific requests/queries should be taken up directly with the council. No further action required.

		not count. An integrated cross-ward/borough network removed from or replacing motor vehicle space is crucial to biodiversity and climate gain commitments	
Wigan Council	INF1	<p>Where are additional bus stops needed where there is a service to serve them? Is the issue as much about bus services themselves?</p> <p>As noted in comment 46 above, development is likely to be relatively small scale in the Neighbourhood Area so the ability to raise funding from development for these infrastructure priorities will be negligible, and is unlikely to be sufficient to fund bus services. This should be acknowledged.</p> <p>Funding from development also needs to relate back to that development, in terms of helping to mitigate the adverse impacts of the development (as set out in <a href="#">Regulation 122 of the Community Infrastructure Levy 2010 Regulations</a>). This should be acknowledged also.</p>	<p>Wording amended to refer to 'use of infrastructure monies' and to delete explicit reference to Section 106.</p> <p>This is now a statement of preference in a chapter, rather than policy.</p>
Resident 33	BEC1	Our Group fully support the content of the document on the above subjects and the identification of the Community facilities in our area. This document epitomises our efforts to nurture community pride and stronger sense of local identity and culture.	Thank you for your positive feedback
Resident 34	BEC1	Totally agree, however Abram village has now just become a place to drive through with increasing traffic issues. If any new business are attracted to Abram we need to consider the increase traffic and reduction in air quality this may cause. The small businesses left in Abram differ considerably but some look so unattractive that it detracts from the great service they offer. Can development in the visual attractiveness be considered.	The neighbourhood plan has been written by local residents' groups and is not a council-developed document; its remit is to provide planning regulation for the neighbourhood as a whole. Any specific requests/queries should be taken up directly with the council. No further action required.
Resident 35	BEC1	Agree	Thank you for your positive feedback

Resident 36	BEC1	There are no parameters here outlining the types of business that will be supported and ensuring that these are in line not only with avoiding further unacceptable biodiversity loss and negative climate impacts (as opposed to merely impacting the 'open and rural landscape character') but with actively stimulating biodiversity recovery. No parameters are outlined for how 'equivalent or better facilities' will be measured to make sure these are just and equitable in all aspects (environmental, social, health etc) and not just in the promotion of economic profit.	The neighbourhood plan has been written by local residents' groups and is not a council-developed document; its remit is to provide planning regulation for the neighbourhood as a whole. Any specific requests/queries should be taken up directly with the council. No further action required.
Wigan Council	BEC1	Need to add an 'and' or an 'or' at the end of the penultimate sub-criterion in both criterion 1 and 2, to make clear to the policy user whether the development must apply with all or just one sub-criterion.	If there are sub-criteria listed, compliance with all is required, unless an "or" has been placed which sets out that criterion as an alternative. We consider that the policies are clear as drafted.
Wigan Council	BEC1 (first line of interpretation)	<p>The supporting text states that the policy only refers to employment uses within Use Class E (offices and light industrial uses) and community facilities only. Is it intentional that the policy does not apply to Class B2 (general industrial) and Class B8 (warehousing) employment uses and, indeed, other employment uses not covered by the Planning Use Classes? If so, criterion 1 of the policy should make clear that "New Class E employment space..." will be supported etc.</p> <p>Notwithstanding this, given the policy includes appropriate safeguards in terms of protecting residential amenity and character, it could also apply to all employment uses, more in line with the plan objective "to create local employment opportunities, including supporting the development of local community businesses and encouraging local and regional tourism".</p>	Enabling B2 and B8 development in the locations identified would be likely to result in incompatible land uses in close proximity and also development in places without adequate infrastructure. It is questionable whether the policy would meet the Basic Conditions if B2 and B8 were added in, even with the safeguards in place. More rigorous safeguards would be necessary for B2 and B8 uses. No change made.

		Given that safeguards are in place to protect amenity etc it is strongly recommended that this policy applies to all employment uses.	
Wigan Council	BEC1 (clause 2)	<p>Instead of 'rural parts of the area' the policy should refer to 'outside of the villages' (assuming our suggested amendments to the Policies Map are applied). This will ensure the policy criterion is spatially represented effectively on the Policies Map.</p> <p>Alternatively, if 'rural parts of the area' continues to be referred to, these areas do need to be marked on the Policies Map, which would make the Policies Map unnecessarily cluttered. This is avoidable if 'outside of the villages' is used instead</p>	Wording amended to 'rural parts of the area, outside of the urban areas'.
Resident 37	REF1	The objectives are sound and we support the refurbishment objectives.	Thank you for your positive feedback
Resident 38	REF1	Agree	Thank you for your positive feedback
Resident 39	REF1	Agree	Thank you for your positive feedback
Resident 40	REF1	<p>Refurbishment of existing vacant spaces is a valuable asset to ensuring a liveable planet. However, careful attention should be paid to how these refurbishments are conducted, whether the end goals are aligned with supporting the community and what heritage the council deems worthy of preservation. Much of the heritage of places like Wigan sees historical buildings which were made financially viable from the profits of slavery at a time when Wigan's global majority community was much smaller. Many buildings, road names, pubs etc in Wigan still carry the names and history of this time, embedding this legacy in the daily lives of the descendants of both slavers and the enslaved. Whilst people living today are not responsible for the transgressions of their ancestors, to uphold</p>	The neighbourhood plan has been written by local residents' groups and is not a council-developed document; its remit is to provide planning regulation for the neighbourhood as a whole. Any specific requests/queries should be taken up directly with the council. No further action required.

		these buildings and their initial owners/history as only pure and virtuous where this may not be the case (I am thinking of projects like Haigh Hall) in any refurbishment/restoration process is to continue to enshrine the racial biases that were created in the initial system, showing the global majority community of Wigan today that historically racist acts are still supported by the council because the local white community historically benefited from them. All refurbishments of heritage buildings in Wigan should be done so mindfully recognising the impact on communities of colour. Similarly, all refurbishment projects should prioritise enhancing biodiversity, climate and the environment over 'the urban and industrial character' of the area, thereby supporting all communities in the area to exist in a liveable planet.	
Wigan Council	REF1 (criteria 3)	Criterion 3 refers to conservation areas but there are no conservation areas in the Neighbourhood Area. The criterion should end after "setting" with all subsequent text removed.	Reference to conservation areas deleted. The Forum will seek to engage with Wigan Council over potential conservation area designations in the future.
Resident 41	AP1 (now AQ1)	We support promoting clean air proposal and the ability to reduce vehicle usage by cycling, pedestrian permeability and the provision of tree planting in our Ward.	Thank you for your positive feedback
Resident 42	AP1 (now AQ1)	Agree	Thank you for your positive feedback
Resident 43	AP1 (now AQ1)	This needs to go further. The A573 through Abram village has over the years become considerably busier with increasing levels of traffic including HGVs. In consequence the air quality has reduced significantly. We should be aiming to promote green development not just mitigate any further pollution. Street electric car charging points, promoting and providing a viable	The neighbourhood plan has been written by local residents' groups and is not a council-developed document; its remit is to provide planning regulation for the neighbourhood as a whole. Any specific requests/queries should be taken up directly with the council. No further action required.

		healthy public transport system. Promoting walking to school groups etc	
Resident 44	AP1 (now AQ1)	Not causing net gain in air pollution is a weak standard for development regulations where many areas continue to surpass legal limits on a daily basis; all development should prioritise net reduction in air pollution by discouraging motor vehicle travel and enabling an infrastructure that makes active travel and public transport the easiest option. Mitigating measures to keep air pollution levels at the current illegal standard does not demonstrate care for the communities claimed to be served by the project given that people are now recognisably dying because of existing pollution levels. All development should support transition to greater green spaces and less road use rather than more road use which then requires mitigation.	The neighbourhood plan has been written by local residents' groups and is not a council-developed document; its remit is to provide planning regulation for the neighbourhood as a whole. Any specific requests/queries should be taken up directly with the council. No further action required.
Wigan Council	AP1 (now AQ1) (criteria 1)	<p>The term "net gain" implies an improvement – we are gaining. It is used here to describe a worsening of air quality. It should be replaced with the word "increase".</p> <p>However, it remains too stringent. As written, it would be in breach of the basic condition which requires the plan to have regard to national policy.</p> <p>The Council's <a href="#">Development and Air Quality Supplementary Planning Document</a> was adopted in 2021 and there is opportunity to tie this policy with the SPD by suggesting potential mitigation measures such as electric vehicle charging points; the provision of safe, direct and good quality walking and cycling connections; the provision of secure cycle storage; green screens etc.</p>	<p>Wording amended to:</p> <ol style="list-style-type: none"> <li><b>Development that generates vehicle movements or has other potential to increase in air pollution should include mitigation measures as part of the scheme.</b></li> </ol> <p>Interpretation amended to add reference to additional mitigation measures, as suggested.</p> <p>The intention is for the policy to apply generally, rather than setting thresholds. Even small-scale development could include some mitigation.</p>

		<p>Any development will generate vehicle movement (including single house developments, retail, employment, potentially even change of use).</p> <p>Suggest rewording to: Development should seek to mitigate the impact on air quality. An Air Quality Assessment should be submitted alongside planning applications where applicable.</p> <p>Justification should include a minimum target for the above, e.g. developments of 10 or more houses, square metre thresholds for other types of development (see page 11-12 of the Air Quality SPD).</p>	
Resident 45	DES1	<p>This is fully supported. There is a necessity reduce carbon and support our wildlife. Any future development must include positive design features. Cycle links and pedestrian are a must in today's society.</p>	Thank you for your positive feedback
Resident 46	DES1	Agree	Thank you for your positive feedback
Resident 47	DES1	Absolutely agree	Thank you for your positive feedback
Resident 48	DES1	<p>Fantastic to see that a net gain in biodiversity is actually a priority in development plans, which a person could be forgiven for not believing given there is no mention of it in questions 1-7. Whilst I am supportive of much of the things laid out in this section and do agree that they require special consideration, their omission from the previous sections which do repeatedly focus on industrial and urban improvements, suggest that the council does not consider them as an inherent and vital part of those considerations which would mean that any commitment to biodiversity net gain which focused on areas out of the scope of those considerations with weaker listed standards and measured results</p>	<p>The neighbourhood plan has been written by local residents' groups and is not a council-developed document; its remit is to provide planning regulation for the neighbourhood as a whole. Any specific requests/queries should be taken up directly with the council. No further action required.</p>



		<p>accordingly would not accurately highlight the environmental destruction of the development process and so may be likely to enable climate and ecologically damaging development projects to be presented as inaccurately having a biodiversity net gain and general environmental benefit. The measures and regulations required are quite vague; 'greenery' could refer to aesthetically green astroturf which provides some with the illusion of an environmentally stable greenspace, it could mean aesthetically pleasing organic greenspace or carefully considered wildflower, food growing and woodland increasing sites. Without a clear indication of how biodiversity net gain is to be managed and measured, it is impossible to offer informed support, many claims at biodiversity net gain having been poorly managed, inaccurately reported and lazily implemented to secure consent for development projects which damaged the community. Many current pathways around Platt Bridge and other areas are completely overgrown and inaccessible to active travel and/or those with mobility difficulties</p>	
Wigan Council	DES1	<p>There is potential conflict between Policy RD1 which supports and encourages smaller 1, 2 and 3 bedroom homes and criterion 2 which seeks 2-3 storey development. In addition, there may be circumstances where bungalows are the best option to meet older person housing need.</p> <p>The policy is overly stringent and inflexible, and contrary to national policy. For example, it may not be possible for all schemes to fulfil all the criteria due to specific site characteristics or constraints. Adding a 'where appropriate' or similar to the policy retains the presumption that these will be delivered but allows</p>	<p>The criterion states “complementing the predominantly 2-3 storey character of the area”. This does not mean that bungalows can't be included; but for example that tower blocks, which would not complement the character of the area, would not be appropriate.</p> <p>Wording amended to replace 'must' with 'should' and to provide greater clarity, as follows:</p> <p><b>1. Development should be well-designed and sustainable and reinforce the locally</b></p>

		<p>developments to proceed where robust justification can be provided.</p> <p>To achieve this, it is suggested that the policy includes a lead-in sentence from where the criteria can flow from such as:</p> <p><i>To ensure the delivery of sustainable design, and the preservation and/or enhancement of local character and biodiversity, new developments should, where appropriate:</i></p> <ol style="list-style-type: none"> <li>1. <i>Be well designed and.....</i></li> <li>2. <i>Complement the character....</i></li> <li>3. <i>Where located within the five villages, complement their.....</i></li> <li>4. <i>Etc</i></li> </ol> <p>This approach will add necessary flexibility (without weakening the policy) and be easier to apply for plan users</p>	<p><b>distinctive character of the area's villages, built environments and landscapes, meeting the following requirements of this policy, proportionate to the scale and nature of the scheme.</b></p> <ol style="list-style-type: none"> <li><b>2. Development should complement the character of the surrounding townscape in terms of height, scale, massing, and set-back from the road.</b></li> <li><b>3. Development within the five villages should complement their urban and industrial character.</b></li> <li><b>4. High quality materials should be used to complement the existing palette of traditional local materials and use of recycled materials and materials from sustainable sources are also supported.</b></li> <li><b>5. Development should provide convenient pedestrian and cycle links to surrounding paths and footways and allow for easy movement within the site, for people with different levels of mobility.</b></li> <li><b>6. Development should provide active frontages (elevations with windows) to streets and spaces and avoid flanking them with high enclosures or blank walls.</b></li> <li><b>7. Development should have no detrimental impact on the area's protected landscapes, wildlife habitats, ecology or biodiversity.</b></li> </ol>
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			Interpretation amended to state 'Complementing height should take account of the predominantly 2-3 storey character of the area. This would not prevent one story development in appropriate locations'.
Wigan Council	DES1	Green design is strongly encouraged in the 'Interpretation' section but is not referenced in the policy. There is scope to reference this in criterion 7	Clause amended to refer to <b>... positive green design features ...</b>
Wigan Council	5.7.2.2 - 106 Housing Funds	<p>This section needs to be reworded to improve clarity. With the exception of the title, the section does not reference Section 106 planning obligations. Regardless, planning legislation (<a href="#">Regulation 122 of the Community Infrastructure Levy 2010 Regulations</a>) sets limitations on the use of planning obligations, whereby they can only be imposed if they are:</p> <ul style="list-style-type: none"> <li>(a) Necessary to make the development acceptable in planning terms</li> <li>(b) Directly related to the development; and</li> <li>(c) Fairly and reasonably related in scale and kind to the development.</li> </ul> <p>The measures listed in this section are effective and sustainable means of improving and creating healthy environments, however, their on-site delivery, where appropriate, should be built into Policy DES1, or policies in Section 5.6 (Open Spaces) rather than being required through S106.</p> <p>Notwithstanding this, development is likely to be relatively small scale in the Neighbourhood Area so the ability to raise funding from development, through Section 106 or other mechanisms, will be limited.</p>	Deleted and replaced with statement of infrastructure priorities chapter at the end of the plan.

Resident 49	Additional Comments	I'm not from the Wigan area but have lived in Abram village for 20years (one of those professionals that appear to be rare in these parts!) I love living here with the green space and bio diversity but the village lacks ambition and vision. The document discusses pride and local identity.... Yet I see little from Wigan borough council to really support this. The atrocity that is the derelict Dover Lock pub and it's proposed development is testament to this. We need true business and housing investment in our village not just semantics. Are we the forgotten ward of Wigan Borough?	The neighbourhood plan has been written by local residents' groups and is not a council-developed document; its remit is to provide planning regulation for the neighbourhood as a whole. Any specific requests/queries should be taken up directly with the council. No further action required.
Wigan Council	Appendices	These need to be labelled as Supporting Documents as they do not form part of the Plan.	The appendices have been removed, to make clear that they do not form part of the neighbourhood plan. All evidence documents, including LGS appraisal are available on the web site. In addition, they will be included in the NP submission.
Wigan Council	Neighbourhood Area	The plan refers to Abram Ward throughout. The Neighbourhood Area is slightly different to the Ward boundary and should be referred to instead for accuracy, unless it is referring to Ward based data, in which case it will be needed to be dated given pending Ward boundary changes.	The NP has been amended to refer to the Neighbourhood Area. It should be noted that some evidence relates to Abram ward, so this has been made clear.
Wigan Council	Inconsistency in terminology	There is inconsistency in terms of how the plan is referred to throughout the plan; for example, ACT Plan (in para 4.2.1), ACT Neighbourhood Plan (4.2.1), Neighbourhood Plan. For consistency and clarity, it is suggested that it is referred to consistently as the 'Neighbourhood Plan' throughout.	For consistency and to avoid confusion, reference is now made to 'Neighbourhood Plan' throughout the document.
Wigan Council	Paragraph numbering	The plan would benefit greatly if all paragraphs were numbered, rather than just each section. This will enable the plan to be read much easier and will help plan users to effectively reference relevant plan content	For clarity, the numbering system has been simplified. A single number is used for chapter headings. Main sub-headings are also numbered (1.1, 1.2, etc.). The over-complex numbering

		when preparing or determining planning applications and help make the Neighbourhood Plan more effective.	system for lower sub-headings has been removed. The paragraph numbers have been removed from the policies and each policy is on a new and separate page. Chapter headings and sub-headings have been made more prominent, to create a clearer hierarchy of headings, making the structure of the plan clearer.
Wigan Council	Maps	A number of maps have been reproduced in line with these comments. The maps are included as Appendices A-D and have also been submitted in PDF format alongside this document.	The maps provided are included in the latest version. All maps have been rotated and moved to a separate page to allow a full A4 page format, making them easier to read.
Wigan Council	2.2	In third bullet, replace 'WLPCS and PfE' with 'the development plan for the borough'. This is consistent with the wording used in legislation. Reference to just WLPCS and PfE is also incorrect as the PfE Plan does not currently form part of the development plan as it is unadopted and currently being examined. Saved policies in the 2006 Wigan Replacement Unitary Development Plan (UDP) and Joint Greater Manchester Waste and Minerals Plans also currently form part of the development plan for the borough.	Comment on PfE not yet forming part of the statutory development plan noted. All abbreviations have been removed from the document and replaced with full wording. The first sentence of 2.2 has been deleted and replaced with 'Neighbourhood Plans must meet the Basic Conditions and these are:'. Third bullet point amended to 'be in general conformity with the strategic policies of the statutory development plan'.
Wigan Council	2.2	For the same reasons as above, replace WLPCS in the final paragraph with 'the development plan for the borough'.	Amendment made, as suggested.
Wigan Council	2.4 (Figure 1)	It is suggested that the 'Urban Borders' are removed from this map, to avoid confusion and unnecessary duplication with the Policies Map. The role of Figure 1 is just to identify the boundary of the Neighbourhood Area.	There must be consistency between terminology used on maps and in policies. The term 'urban areas' is now used for policies and maps.
Wigan Council	2.5.1	The sentence ("Key findings from...") above the bullets is misleading. It should state something like: "The consultation at this stage identified a number of key issues, including on the following themes:"	Suggested amendment made.

Wigan Council	3.2	<p>The Neighbourhood Area now also includes part of the <a href="#">Flashes of Wigan and Leigh National Nature Reserve (NNR)</a> which was formally designated in October 2022.</p> <p>The NNR replaces the three Local Nature Reserves (LNRs) that were within the Neighbourhood Area at Low Hall, Ince Moss and Three Sisters (edge is within NA). The Policies Map will need amending to reflect these changes. A revised Policies Map is provided at Appendix A.</p>	Plan amended as suggested to recognise designation of the NNR. Policies map amended, as suggested.
Wigan Council	3.4, 3.6, 3.7, 3.10	It would be useful to include a source for data included in this chapter notably in the population, occupation and employment sections.	References to data sources added to the paragraphs mentioned.
Wigan Council	4.2.1	Policy JP-P1 of the PfE is an emerging policy and is subject to change through the public examination process. Reference to this should make clear that this is just a proposed policy in an emerging plan.	Document amended to refer to Places for Everyone as emerging local policy.
Wigan Council	4.3.1.1	The borough does not have 'internationally significant landscapes and green spaces'. This section could refer again to the Flashes of Wigan and Leigh National Nature Reserve, but these are of national significance, not international. There is guidance on this at this website: <a href="#">Statutory Designations - GIGL</a>	The Plan has been amended to use the correct terminology, as suggested.
Wigan Council	5.1	There is a referencing error in the text above the Policies Map.	Text corrected as suggested.
Wigan Council	Figure 2. Policies Map	For clarity and effective use, it is essential that the Policies Map is larger in size - at least a full A4 landscape page or ideally an A3 landscape page that is folded within any paper versions of the plan. As presented in Figure 2, many of the features and designations on the map are difficult to read. This would likely result in plan users struggling to interpret the plan and its policies	All maps have been rotated and moved to a separate page, to allow a full A4 page format, making them easier to read.

		effectively. Making the map larger will provide greater clarity for users of the Neighbourhood Plan.  Replacement Policies Map is provided as Appendix A.	
Wigan Council	Policies Map	There is inconsistency in the terminology used for the five villages between the policies, the Policies Map and Figures 4-8, where the terms 'villages', 'village centres', 'urban borders' and 'urban areas' are interchangeably used. It is essential that terminology is consistent, particularly between the policies and the policies map so that it is unambiguous and clear to plan users when informing the preparation or determination of planning applications.  To correct this, 'Urban Borders' should be relabelled as 'Villages' on the Policies Map so they accord with the policies. For clarity and consistency, Figures 4-8 should be relabelled as 'villages' rather than 'urban borders / urban areas', given they are the same spatial areas as shown on the Policies Map.	There must be consistency between terminology used on maps and in policies. The term 'urban areas' is now used for policies and maps.
Wigan Council	Policies Map	The key needs to include policy references in brackets to show which policy or policies each feature relates to.	The new Policies Map provided has been added, showing the correct policy references.
Wigan Council	Policies Map	A revised map reflecting all of the changes suggested above is included in Appendix A. This includes the National Nature Reserve designation and the removal of the LNRs which it replaces.	The new Policies Map provided has been added, showing the correct policy references.
Wigan Council	Figures 4-8 Urban Areas	As above, for consistency with the Policies and the Policies Map, the figures should refer to villages rather than Urban Borders / Urban Areas.	There must be consistency between terminology used on maps and in policies. The term 'urban areas' is now used for policies and maps.
Wigan Council	5.2.2.1	The list includes Dover Lock which has now closed (as you reference in 5.2.2.2).	Plan updated as suggested.
Wigan Council	5.2.2.1	It also lists Abram Bryn Gates Primary School which is set to close at the end of December 2022 (see School	Plan updated as suggested.

		with 'no children' set to close for good on New Year's Eve - Manchester Evening News).	
Wigan Council	5.2.2.1	In the sixth paragraph, suggest "at around eight mainly private sports clubs" is replaced with "at a number of mainly private sports clubs"	Plan amended as suggested.
Wigan Council	5.3.2 Rationale and evidence.	This section refers to 2015 data - more up to date information should be used. This can be referenced or taken from the Wigan Housing Needs Assessment 2020, and the new Wigan Housing Strategy 2020-25, which can be viewed at <a href="https://www.wigan.gov.uk/housing-strategy-and-housing-needs-assessment">Housing Strategy and Housing Needs Assessment (wigan.gov.uk)</a> .  In the fourth paragraph, we suggest "sustainable homes" is replaced with "sustainable and affordable homes".	We have referenced both 2015 data and noted that "WHNA section 4 shows a worsening picture for 2018" with figures for that year, which is the most up to date provided by the Wigan Housing Needs Assessment 2020. All information is relevant.  Text in fourth paragraph amended as suggested.
Wigan Council	5.4.2 Rationale and evidence.	The second paragraph is inaccurate and inconsistent with national planning policy (NPPF 2021, Section 11: Making effective use of land) and should be amended. The NPPF requires plans to set out clear strategies for accommodating identified housing and employment needs in a way that makes as much use as possible of previously developed sites. However, the viability and deliverability of such brownfield sites are material factors when considering the need for Green Belt release, as demonstrated by the approach taken in the Places for Everyone Plan.	Second paragraph deleted and replaced with a more general support for a brownfield first approach. All references to the NPPF updated to 2023.
Wigan Council	5.4.3.1	The plan would benefit from some examples of 'meanwhile uses' e.g. The policy supports temporary or 'meanwhile' uses, such as pop-up shops, cafes etc, as a precursor to the more permanent regeneration of sites.	Examples of "meanwhile uses" added to the interpretation, as suggested.
Wigan Council	Maps	Green gyms do not need to be included on Figure 9, as this sets out existing environmental designations - LNRs,	Green gyms removed from maps.  LNR references changed to NNR.



		<p>SSSIs, SBIs. The LNRs also need to be replaced by the new National Nature Reserve designation.</p> <p>Figures 11 and 12 appear to be identical. On Figure 11, replace 'Abram wildlife corridor' with 'Abram green corridor' for consistency with Policy GS2. A replacement for Figure 11 is provided at Appendix B (which also replaces the LNRs with the NNR), though this does not reflect suggested changes as set out in comment 36 below.</p>	Changes made as suggested.
Wigan Council	Proposed Green Corridor (Figure 11)	<p>Parts of the green corridor boundary do not appear to be right, particularly to the south where it appears to follow a rudimentary straight line rather than features on the ground. It does not appear wide enough in some places or follow natural routes such as the Hey Brook Corridor, nor does it include Low Hall or Amberswood etc.</p> <p>Consideration of the ecological aspirations of Natural England and the GM Wetlands should be considered, likewise the National Nature Reserve.</p>	<p>The Wildlife Trust, Healthy Lifestyles and the Open Spaces department of the council worked out the location and route of the Green Corridor and Abram Circular walks, We are now working with Nomad Rangers to request the route be changed to one that is safer following consultation.</p> <p>The route may be updated if there are further changes.</p>
Wigan Council	LGS Assessment	The LGS assessments do not identify the land ownership of the sites or their current designations e.g. Green Belt, National Nature Reserve, Local Nature Reserve, SBI, SSSI etc. These should both form part of the criteria.	LGS documents have been updated to support the above changes and refer to current designations.
Wigan Council	5.7.2 (paragraph 2)	First sentence of second paragraph – confusion in terminology between villages and settlements. Suggest deleting “five settlements” to read “...although all feature Victorian terraces.”	Amendment made, as suggested.
Wigan Council	5.7.2 (paragraph 2)	As stated above, the PfE Plan has not yet been adopted, so reference to policies within the plan (such as JP-P1, JP-S4 and JP-S5 in this section) must make clear that they are proposed emerging policies. The GMCA is	Document amended to refer to Places for Everyone as emerging local policy.

		proposing to delete Policy JP-S4 from the Plan as its content is largely covered sufficiently by other policies in the proposed plan.	
Wigan Council	5.7.2 (paragraph 2)	<p>Strategic objectives of the PfE Plan are to promote carbon neutrality of new development by 2028 and for Greater Manchester to be a carbon neutral city region no later than 2038, not to lower the carbon footprint by 10% by 2035 as you have stated.</p> <p>Or is the target to lower the carbon footprint by 10% by 2035 an objective of the Abram Neighbourhood Plan? This is not clear. If it is an objective of the Neighbourhood Plan, this should also be referred to in the 'Vision and Objectives' section (Section 4).</p> <p>We support the reference and support to the carbon objectives in the PfE Plan (Policy JP-S2). Abram has got no exceptional position and the PfE approach is already ambitious and above national requirements. Therefore, support and contribution towards achieving the PfE objective being delivered in Abram would be most appropriate for inclusion in the Neighbourhood Plan, such as;</p> <ul style="list-style-type: none"> <li>- promoting the retrofitting of existing buildings with measures to improve energy efficiency and generate renewable and low carbon energy, heating and cooling</li> <li>- taking a positive approach to renewable and low carbon energy schemes, particularly schemes that are led by, or meet the needs of local communities</li> <li>- increasing the range of nature based solutions including carbon sequestration through the</li> </ul>	<p>Plan amended, as suggested.</p> <p>Reference to plan objective moved to vision and objectives section, as suggested.</p> <p>Suggested additions made to text.</p>

		restoration of peat-based habitats e.g. Amberswood, woodland management, tree-planting and natural flood management techniques	
Wigan Council	5.8.2 Rational and evidence, 2nd para.	<p>The second sentence of the second paragraph states that the borough has no train station and a poor bus service. This probably is meant to relate to the Neighbourhood Area, but this is unclear as written. Notwithstanding this:</p> <ul style="list-style-type: none"> <li>a) The Neighbourhood Plan could highlight the potential new rail station in Golborne, which is a short distance to the south of the Neighbourhood Area and will be an asset to residents.</li> <li>b) Whilst the 360 bus service serves only 2 of the 5 villages in the area, this is still an asset to the local community providing half hourly services to Wigan, Golborne, Newton-le-Willows (including the rail station) and Warrington.</li> <li>c) The statement that the area has poor rail and bus connection is inconsistent with the third paragraph which states that Abram Ward is a 'convenient place to live, for an easy commute within the borough or to surrounding cities of Manchester, Liverpool or Preston.'</li> </ul> <p>The 5th and 7th paragraph relate to cycling infrastructure within the Neighbourhood Area. Information on the GM Bee Network should be included here, there is some correlation between routes identified in the draft Plan and routes incorporated in the Bee Network.</p>	<p>The proposed station for Golborne is some distance outside of the neighbourhood area and for many people would be accessible only by taxi and/or indirect bus routes. So reference has not been added.</p> <p>Text amended to describe the villages served and not served by the 360 bus service.</p> <p>Text amended to clarify that the area is not an easy commute for those without easy access to a car.</p> <p>The GM approach and Bee network does not have any plans within the neighbourhood area.</p>

	5.8.2.1	<p>More clarity is needed in the bullets to explain how the five villages connect into the circular walk. Also, the third paragraph would benefit with the green spaces listed being set out in bullet points, ideally with reference to Figure 13.</p>	Text amended for clarity.
	5.8.2.1 Abram Ward Circular Walks	<p>Amberswood and Low Hall off-circular routes from the Neighbourhood Plan map are in part within the red line boundaries for the proposed E-W link road. The current Large-Local-Majors (LLM) bid includes the proposed link road section at Amberswood, and the road runs in part through the Neighbourhood Plan area – we can provide plans if helpful. The new road will include segregated cycling and walking facilities along its route so in part will likely deliver some of the route noted in the Neighbourhood Plan.</p> <p>The Low Hall route is on land South of Hindley which is not currently in the LLM bid. However, we would anticipate this section of the link road coming forward at a future date as part of the development of the South of Hindley site.</p>	<p>Similar to the Green Corridor, the Wildlife Trust, Healthy Lifestyles and the Open Spaces department of the council worked out the Abram Circular walks and off-circular routes. We liaised with them and they set out and agreed said routes; the forum didn't have any choice where it went, but simply documented it within the plan.</p>