

STANDISH NEIGHBOURHOOD PLAN

Submission Draft Version

**Examiner's Questions on
Standish Neighbourhood Plan
by Independent Examiner, Rosemary Kidd**

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Standish Neighbourhood Plan Examiner's Questions

Following my initial assessment of the Neighbourhood Plan and representations, I would appreciate clarification on the following matters from the Qualifying Body and/or the Local Planning Authority. Where I have proposed revisions to the wording of policies I would appreciate confirmation from the QB and LPA that they are satisfied with the wording proposed or that they would agree revisions.

In order to ensure openness and transparency of the examination process, these questions and the responses should be published on the Council's website.

I set out below matters on which I would appreciate additional information or agreement from the QB and LPA (as appropriate) of the modification to be proposed.

Policy VE2 adds no locally specific guidance to the strategic policy so I shall be recommending that it be deleted. The text may be included in the supporting text to highlight the importance of the conservation area with a cross reference to Policy CP11.

Policy VE3(ii) is not a planning policy and I shall be recommending that it be included in the Community Projects. A reference to the Standish Village Centre Masterplan could be included in the justification (para 10.45 – 46).

Policy VE4 would the QB explain what is the reason for the inclusion of the word "private" in the first line of the policy?

Paragraph 10.29 states that the following policies (VE6 - VE10) apply to all commercial, business and retail premises in the Plan area. This contradicts the wording of the policies which apply to particular uses or the Employment Area.

Policy VE6 uses the term "hospitality and leisure use" in VE6.1 and "public house and hospitality venues" in 10.30. Would the QB define the meaning of the term "hospitality venue" and "leisure use" applicable to this policy in the local context as this could include a wide range of uses. Should paragraph 10.31 refer to a permitted "A4" use?

Policies VE7, VE8 and VE9 – Refer to Employment Areas in the plural. The Policies Map and paragraph 10.32 indicate that there is only one Employment Area. The key to the Map link to V6 and V9. Would you confirm that the Bradley Hall Estate is the only site that the three policies apply to and that the key to the map requires amending.

Policies VE7 and VE8 are both concerned with the loss of business / employment uses on the Employment Area.

- Would it be practical and feasible to require marketing for at least one year before an application can be considered against Policy VE8?
- Would the LPA comment on whether this length of time is usually required for employment land in the local area. Does Wigan Council have any local guidance of the matter?
- Should considerations of viability be included in Policy VE7?
- Are the differences in wording intentional: VE7 refers to loss of business space whereas VE8 refers to change to a non-employment use. Should a consistent form of wording be used?

- Does the QB have a definition of “employment uses” that could be included in the Glossary.

Policy VE10 proposes support for a site for mixed uses. Is this the site shown as V9 on the Policies Map? Would you provide me with a more detailed location plan of this site. Does this policy allocate the site for mixed use or does it just lend support to the uses?

Policy T3 – I have concerns that the wording of this policy would be unduly onerous and prescriptive. I am proposing that the last two lines of the policy should be revised to give some flexibility as follows:

“Developers will be encouraged to provide some of this parking for public use for short stay parking. The number of parking spaces and length of time for parking will be subject to negotiation.”

Policies OS1, OS2 and OS4 – would the QB confirm that all the landowners of sites proposed for designation under these policies were consulted on the proposed designation.

Policy OS1.1ivA refers to “the land in between” and **OS1.1ivB** refers to “link up with other nearby green corridors”. Would the QB confirm that only those sites shown on Maps 6 and 7 are to be protected under this part of the policy. Would the QB/LPA confirm that there is no conflict between these areas and any planning permissions for housing development.

Policy OS3.1 I consider that this amounts to an unjustified blanket protection and I shall be recommending that this part of the policy should be deleted. There are other means of protecting trees and hedgerows.

Policy OS3.5 Has a suitable location been identified where tree planting off site could be delivered?

Policy OS4 – Is it intended that this policy designates these areas as Amenity Green Spaces? Would you provide me with a list of the names of these sites and inset maps. It is not clear whether this policy is intended to address the circumstances of parts of the area being lost for built development. I have sought to address these comments through the following revisions to the wording of the policy. Would the QB comment on the proposed revisions.

“The following areas as shown on the Policies Map are designated as Amenity Green Space: List of names of sites.

“The Amenity Green Spaces shall be retained and enhanced, including where appropriate, improvements to the visual, landscape and nature conservation value of the site.

“Development that would result in the loss of all or part of an area of Amenity Open Space will only be supported where the remaining area of Amenity Green Space or a nearby Amenity Green Space is enhanced. The development should not have an adverse impact on footpath or cycleway links to areas of open space or the countryside.”

Policy OS5 – Have the distinctive local character of local landscape and valued public views and vistas been defined, identified and mapped? If not, how is it intended that this part of the policy should be interpreted.

Policy OS5.2 and 5.3 repeat parts OS3.7 and 3.8. It is suggested that it be retained in the general policy OS5.

Would the QB and LPA comment on the suggestions put forward by the Environment Agency and United Utilities concerning land and development adjacent to watercourses. Is this matter adequately addressed in strategic policies?

Housing

The Evidence Base report states that *“It is noted that safeguarded land to the east of Standish without planning permission has been reallocated to be within Green Belt, as indicated in the GMSF proposals”*. Further *“It is understood that some previously designated ‘safeguarded’ land within Standish is to be moved into Green Belt in recognition of the extreme house building that has occurred within Standish). This will mean no further housing development can take place on this land.”* Would the LPA confirm whether it is proposed to include this revision in the GMSF and the current status of the Safeguarded Land. Would they also confirm whether or not it is proposed to include any strategic allocations for housing in the Standish plan area in the GMSF. It would be helpful if the LPA and QB would agree revisions to this wording.

Policy H1 is adapted from a policy proposed in the Wigan Allocations DPD which has not been tested at examination. Would the LPA comment on whether the proposal for phasing the release of safeguarded land in Policy H1 is considered to be deliverable and that the figure of 75% can be justified. Would they comment on the points made in the representations made by Indigo, Emery and Mosaic. Would the local authority confirm that they will be able to maintain up to date records on housing completions and occupations and the availability or need for a wide range of infrastructure to accommodate for further development as required by the policy.

Paragraph 13.20 states that “the Standish Housing Needs Assessment concluded that 65% of homes built as part of all future developments should be constructed for older people to address the imbalance.” This is in fact only one of several conclusions set out in Table 19 of the Standish Housing Needs Assessment. I am proposing that the paragraph should be revised as follows:

“Table 19 of the Standish Housing Needs Assessment sets out the latest evidence of the type, size and tenure of housing required and highlights the challenge of providing suitable housing to meets the needs of the ageing population.”

Policy H3 - Have any maps been prepared to show the availability of bus stops in relation to new development areas?

The CIHT guidance on “Buses in Urban Developments” encourages a degree of flexibility in applying their guidance and suggests a lesser distance for housing for older people. I am proposing to add the following to the end of Policy H3 and paragraph 13.27:

H3 “....unless the housing development is specifically for older people or specialised housing where a lesser distance may be required or where new or improved public transport services and/or bus stops can be provided as part of the development.”

Paragraph 13.27 *“The report also advises that these standard distances should not be applied uniformly without regard to the specific characteristics of the particular location or route.”*

Policy H4 Consultation with Standish Voice is a procedural matter and it is not appropriate to include it in a planning policy. I shall recommend that it be deleted from the policy wording here and in other policies. It should be addressed in the Community Projects.

Policy H4.4 is unclear and I propose to delete it. The subject is clearly addressed in the SPD.

Paragraph 13.36 is unclear and I propose that it be revised as follows:

“Wigan Council’s Supplementary Planning Document on Affordable Housing sets out guidance on the delivery of affordable housing. Affordable housing should be provided on site, but in exceptional circumstances where the developer can justify delivering the affordable housing off site, this should be on a site in the Standish NP area and not elsewhere in Wigan Borough. The size, type and tenure of affordable housing should meet local need and reflect the findings of the latest Housing Needs Assessment for Standish.”

Policy H5 – I shall be recommending that this policy should be deleted, although the supporting text, may be retained and adapted where appropriate

- H5.1 adds no local guidance to the SPD.
- H5.2 and H5.5 are deleted in view of national guidance in the Written Ministerial Statement of March 2015 which states that neighbourhood plan should not include reference to the National Technical Standards; and the Building Regulations address thermal performance.
- H5.3 and H5.4(iii) are procedural matters and included in Community Project 7.
- H5.4 (i) and (ii) add no locally specific guidance to that set out in Wigan Council SPD on Design Guidance for Residential Development.
- No explanation is given as to how the QB is proposing to scrutinise the design of major housing development through a “Design Champion”. In any case this is a procedural matter and should be addressed through the Community Projects and not planning policy.

Policy H6 seeks to allocate 2 sites for housing development to accommodate housing for older people or 100% affordable housing.

- I understand that planning permission has been granted for both sites. Would the LPA confirm the details of the development approved.
- Would the LPA and QB comment on whether the two criteria on the type of housing are deliverable. Has any work been undertaken to demonstrate how a site can be delivered for 100% affordable housing (eg cross funded by market housing elsewhere)?
- Has the Council or Registered Social Landlord made any commitment to support the delivery of sites for 100% affordable housing?
- Would you supply me with a detailed map to show the location of both sites.

The representation from Homes England concerning the Barrowcroft site (former Bradley Hall Trading Estate) refers to a site location plan and indicative masterplan. The site is shown on the Policies Map as a housing allocation under Policy H6 which is incorrect and I will recommend that it should be deleted.

Policy F1 – This includes a requirement on “any” or “all” development which does not accord with NPPF guidance on planning obligations. It also includes an aspiration for Standish Voice to be involved in negotiations on planning obligations. This is a procedural matter which is not appropriate for inclusion in a planning policy. Paragraph 14.8 should acknowledge that contributions may be required towards strategic infrastructure. Would the LPA and QB comment on the proposed revisions to the policy and justification:

“Developer contributions towards improved community infrastructure will be sought where it is shown that the obligation is necessary to make the scheme acceptable in planning terms, is directly related to the development and is fairly and reasonably related in scale and kind to the development.”

Add the following to paragraph 14.8: *“It is acknowledged that contributions may be sought for any future strategic infrastructure.”*

Add a paragraph after paragraph 14.6 to read: *“Whilst the SNP allocates only a limited amount of development, improvements to the community infrastructure are required to support the scale of the additional housing development that has been approved. The SNP has also identified the need for affordable housing and housing for older people as priorities.”*

Has an up to date Infrastructure Delivery Plan been prepared for Standish?

Policy SLC2 There has been considerable interest from the local community about the future layout and use of the recreation ground. To avoid being too prescriptive, the following revisions are proposed:

“Southlands Rec should become a community park with improved leisure and sports facilities.

“Proposals for improvements shall be subject to consultation with the local community and shall be designed and laid out to not have a significant adverse impact on the residential amenity of neighbouring dwellings and shall have due regard for the prevention of anti-social behaviour.”

The second paragraph of the policy and the bullet points should be deleted. A new community action should be included *“to work with the community and Wigan Council to enhance the Southlands Rec”*.

Policy R1 The use of Gidlow Tip for renewable energy generation is noted as a potential opportunity site in paragraphs 15.38 to 15.44. As it is not an allocation it should not be shown on the Policies Map. A site location plan should be included within the text.

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