



**Golborne & Lowton West Neighbourhood Plan
Consultation Statement V1.1
September 2022**

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1. Introduction

This Consultation Statement accompanies the submission of the Golborne & Lowton West Neighbourhood Plan (2022). It summarises the earlier community engagement programme and then provides detailed analysis of the Regulation 14 statutory consultation that was undertaken early in 2022. The statement shows how the requirements of Regulations 14 and 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) have been satisfied.

Chapter 2 describes the community engagement undertaken throughout the neighbourhood plan process. This involved questionnaires, local press and social media. Chapters 3 and 4 are focused on the Statutory Regulation 14 Consultation, including detailed analysis of responses received and amendments made to the Neighbourhood Plan as a consequence.

2. Summary of Community Engagement

2.1 Engagement Activities

Community engagement has been an ongoing part of the neighbourhood planning process and is described in the accompanying neighbourhood plan. This included the COVID period, so the emphasis of engagement changed to use of social media and a newsletter.

Activities included:

- A community Survey was undertaken in July 2019, based on nine specific questions. responses helped to clarify the required focus and content of the neighbourhood plan.
- The Christmas Market 2019 was used for informal meet and greet, aimed at explaining to people the purpose of the Neighbourhood Plan and what it would mean in real terms for the area.
- A more in-depth survey was undertaken in 2020 and produced 284 responses, which informed the plan's content.
- Facebook was used to explain the neighbourhood plan through comic strips and this provided regular feedback.
- The Forum produced a printed monthly Newsletter until March 2021 to help engage with the community, providing information on progress with the Neighbourhood Plan, but also addressing aspirational concerns. This was distributed to 10,500 homes each month within the ward. Feedback on the newsletter was very positive. The newsletter continues in electronic format.

2.2 Outcomes from Community Engagement

The varied community engagement activities kept people informed and provided opportunities to contribute.

Various issues were raised by the public, including:

- Traffic and pollution;
- Need to improve shopping;
- Loss of green spaces;
- Need for affordable housing;
- Needs of the older generation;
- Need to open the station and improve public transport;
- Anti-social behaviour;
- Community facilities for all ages.

These issues, together with evidence and analysis of the area's needs, informed the drafting of policies in the Neighbourhood Plan.

3. Pre-Submission Consultation (Regulation 14)

3.1 How the Consultation Was Undertaken

A wide range of digital and non-digital methods was used to publicise the Plan proposals.

A pack of documents was produced including a map of the Neighbourhood Area and details of where the full plan could be viewed, a summary of policies, and explanation of the Regulation 14 consultation and how to respond, including forms.

Full details were also added to the Voice web site.

In the February edition of the local free magazine – Local Living - which is distributed to all households in Lowton and Golborne, reference to the Plan was made in the Forward of the magazine, and an article in the same issue gave details of the Plan and how to engage.

The documents were also available for the duration of the consultation at:

- Golborne Library (display board);
- Heath Street Methodist Church Community room.

In addition, the plan was available at Lowton Community Centre for two weeks beginning Monday 14th February. Paper response forms and a post box was provided for responses.

A poster was produced and was on display in the library, community centre, shops and community notice board.



Facebook pages used were used to signpost to the location and availability of the documents relating to the Plan and encourage inspection and feedback. These were:

- Golborne & Lowton West Voice
- Golborne Today,
- Golborne & Lowton : A Local Group For Local People
- Lowton and Golborne Traffic Action Group
- Golborne and Lowton Methodist Church
- Lowton West Residents
- Ye Olde Lowton
- Lowton & Golborne Central
- What's On In Golborne & Lowton
- Lowton Oldies.

An invitation to participate in the consultation included a link to the Survey Monkey site and an email address.

3.2 Legal Compliance

The consultation was undertaken fully in compliance with *The Neighbourhood Planning (General) Regulations 2012*. The Plan was made available (on-line and physical versions) and there were clear details on how to make representations (on-line or by printed form) and by what date. The duration of the consultation was 6 weeks, from 31 January to 14 March 2022.

Statutory consultees in Schedule 1 and the local planning authority were consulted (see 3.3 of this statement).

The consultation complied with the four Gunning Principles (consultation case law), as follows:

- 1. proposals are still at a formative stage**

The consultation was pre-submission, so the plan could still be changed (and was changed).



- 2. there is sufficient information to give 'intelligent consideration'**

Both summary and full versions of the Plan were made available, together with relevant background evidence.

- 3. there is adequate time for consideration and response**

The 6-week duration of the consultation is set out in planning legislation, and was communicated in consultation materials. Materials made clear how to respond and by what date.

- 4. 'conscientious consideration' must be given to the consultation responses before a decision is made**

This statement is evidence that the consultation responses have been considered conscientiously. Numerous changes have been made the Plan as a consequence of representations received.

3.3 Statutory Consultees

The following bodies were consulted:

Name	Response (where received)
Wigan Council	11 March 2022
West Lancashire Borough Council	1 February 2022
Warrington Borough Council	
Bolton Council	
Chorley Council	
Salford City Council	
Haigh Parish Council	
Shevington Parish Council	
Culcheth and Glazebury Parish Council	
Coal Authority	14 March 2022
Homes and Communities Agency	
Natural England	11 March 2022
Environment Agency	
Historic England	4 March 2022
Network Rail	
National Highways	15 February 2022
NHS Wigan Borough Clinical Commissioning Group	
United Utilities	
National Grid	11 March 2022
Cadent Gas	
Transport for Greater Manchester	March 2022
Canal and River Trust	15 February 2022
Sport England	3 February 2022
Greater Manchester Ecology Unit	
Lancashire Wildlife Trust	

4. Representations and Responses

The following table includes a summary of all representations received (representation column), with details of whether or not the plan was amended as a consequence, and why (Response column).

Name	Section/ Page No.	Policy/ Site Ref.	Representation	Response
Murphy Group - 14 March 2022				
		GLW-D4	Comments supportive. Clarification is sought on Policy GLW-D4, as land is in the Green Belt.	The policy addresses coalescence to ensure that this is considered at neighbourhood level. Whilst it is noted that there is some cross-over with Green Belt purposes, the coalescence policy emphasises the community's particular concerns. There is no clash with Green Belt policy and identification of coalescence gaps could be helpful in the application of green belt policy. No change made.
Individual – no date				
		GLW-R5	There should not be industrial uses alongside residential buildings.	The policy supports Use Class E activities, but not general industry or distribution. Mixed use is desirable as part of sustainable development of the site. No change made.
		GLW-D5	Heyward Avenue Park should be included.	The policy protects two key parks in the area, which have importance for the wider area. Hayward Avenue Park is an informal space, so would not fit into the parks policy. No change made.
		GLW-C1	Agree with the need for smaller houses, especially for rent and accommodation for older people.	This supports the content of the policy, as drafted.

		GLW-R7 GLW-D3	Agree that historic buildings, where feasible, should be conserved if they are listed buildings and policies in the document support the conservation area that is already protected.	Comments noted. Feasibility is addressed in the National Planning Policy Framework 2021, Chapter 16, Paragraph 201. No change necessary.
		GLW-C2	Agree the need for a community hub and strongly support the library (close to the car park). Other town centre potential venues have no parking, Unlikely that one such building could meet all the community leisure and sporting needs and there may need to be more than one.	The policy does not identify a specific site and it would support multiple community facilities in the Town Centre. No change necessary.
Canals and River Trust – 15 February 2022				
	all	n/a	Questions whether any of the canal is in the neighbourhood area.	No canal in the area. No change necessary.
Transport for Greater Manchester - March 2022				
			Active travel – various proposed interventions are detailed in the letter.	Active travel is dealt with by Policies GLW-D1 and GLW-I1. Proposed interventions noted. No change necessary.
			HS2 - The route of HS2 runs through the Neighbourhood Area and will create issues of severance, noise, visual impact and loss of open space.	The plan already recognises HS2, but has also been amended to mention HS2 in the list of challenges in 2.1 and in 3.1.
	16	GLW-R6	Proposed train station – Golborne New Station Online Business Case is underway. The ambition is for it to be situated opposite railway road. Wigan	Comment noted. The policy protects the station goods yard whilst options for the station are being considered, but also allows for other uses in the



			Council is commissioning a masterplan study for Golborne Station and surrounding area.	meantime. The plan has been amended to take account of the comments (page 16, rationale to policies).
			Detailed changes are proposed to text on page 6 (challenges), page 7 (aims) and page 8 (The Area), page 14 (rationale to urban regeneration and growth policies).	Changes made to text on pages 6, 7, 8. The change suggested for page 14 was not directly relevant to this policy rationale, relating more to the transport policy.
		GLW-1T	Additional wording proposed for policy GLW-1T to address public transport and cycle provision.	Suggested changes made to policy GLW-1T and its interpretation.
	56/57		Detailed suggestions made for changes to the wording in the Green Development Guidance Note.	Suggested changes made to pages 56 and 57.
The Coal Authority – 14 March 2022				
			There are recorded coal mining features present at surface and shallow depth including; mine entries, shallow coal workings and reported surface hazards. These are predominantly in the northwest part of the neighbourhood plan area. These features pose a potential risk to surface stability and public safety.	A paragraph has been added to 3.3 of the Plan, drawing attention to the coal mining features. Such features mainly affect land in the Green Belt, identified coalescence areas and Golborne Park. So there is no conflict with the Plan's strategy for sustainable development.
Natural England – 11 March 2022				
			No comment, but generic guidance note included.	<p>The natural and green is addressed by Policies GLW-D1, GLW-D2, GLW-D5, GLW-D6, GLW-C2 and GLW-I1.</p> <p>Guidance note is noted and is compatible with policies. No change necessary.</p>

National Grid (Avison Young) – 11 March 2022				
			A gas transmission pipeline lies within the neighbourhood area.	Comments noted. Responsibility for consulting the national grid would lie with the local planning authority and developers. No change made.
Historic England – 4 March 2022				
			<p>The Golborne & Lowton West Neighbourhood Plan area contains a small number of designated heritage assets. These include listed buildings/ structures as well conservation areas. The plan area is also likely to contain many other features of local historic, architectural or archaeological value.</p> <p>The letter includes generic guidance on heritage in neighbourhood plans, but does not comment on specific policies.</p>	<p>Heritage is addressed in the Plan by Policies GLW-R3, GLW-R7, GLW-D1, GLW-D3, GLW-D5.</p> <p>Letter noted. No change necessary.</p>
West Lancashire Borough Council – 1 February 2022				
			No comment.	No change necessary.
Sport England – 3 February 2022				
			<p>The letter does not comment on specific policies, but included generic guidance on sports in neighbourhood plans.</p> <p>New housing will generate additional demand for sport. If existing facilities do not have capacity for additional demand, planning policies should address this.</p>	<p>Recreational facilities and opportunities for healthy lifestyles and active travel are dealt with by Policies GLW-D1, GLW-D2, GLW-D5, GLW-C2 and GLW-I1.</p> <p>Advice noted, which is compatible with policies. No change necessary.</p>

			New development should provide opportunities for healthy lifestyles and active travel.	
National Highways – 15 February 2022				
		GLW-R2	<p>The Plan covers a small section of the A580 East Lancs. Road within a short distance of M6 J23. This is a known congestion hot-spot and any planning applications which may come forward within the Plan area will need to pay due consideration to the impact at this junction.</p> <p>In particular, Policy GLW-R2, which deals with Stone Cross Park, would be of interest, with the potential for future developments in this area requiring mitigation works to the SRN if they were to come forward.</p>	<p>Comment noted. Mention of the congestion hot-spot has been added to the rationale to Policy GLWI1.</p> <p>Policy GLW-R2 already addresses highway impacts, including those from HGVs. No change necessary.</p>
		GLW-I1	<p>Supportive of proposals that promote the use of sustainable methods of transport ahead of private vehicle usage. In particular, encourage the promotion of safe walking and cycling routes, including where they may start or end with other forms of public transport, such as trains, trams or buses.</p>	<p>Sustainable transport and active Travel are dealt with already in policies GLW-D1 and GLW-I1. Additional reference to links to public transport routes has now been added into the policy.</p> <p>The rationale to the policy has been expanded to place greater emphasis on sustainable modes of transport, including active travel.</p>

Wigan Council – 11 March 2022				
			Needs paragraph numbers. Suggest secondary headings are not numbered.	Pages are numbered. Headings and sub-headings are numbered. Policies are numbered and have numbered clauses. Numbering every paragraph, but not secondary headings, would confuse and clutter the document, and could make it less easy to use. No change made.
			Source referencing needed.	References added, including to the HNA 2020.
			Paragraph 16 of the NPPF requires policies to be clearly written and unambiguous. A number of policies need to be amended.	Specific suggestions for specific policies are dealt with in later comments.
	1.1		Replace 'The Greater Manchester Place for Everyone Strategic Plan' with 'Places for Everyone Plan' as it now exclude Stockport.	Reference changed as suggested throughout the document.
	1.2		Plan periods are generally based on the financial year (1 April to 31 March).	This is incorrect. Calendar year ends are more commonly used. It is for the Neighbourhood Forum to decide on the date. No change made.
	2.1		Add: <ul style="list-style-type: none"> • Strength: the area is in close proximity to the M6 via the A580 East Lancashire Road. • Challenge: The area has a relatively high affordable housing need, in comparison to other areas in the borough (as evidenced by the HNA). 	<p>The additional strength and challenge have been added.</p> <p>It is not helpful for the Plan to identify specific poorly designed schemes, but the policy rationale on page 30 has been amended to specifically address common problems with design quality.</p> <p>The Forum's concerns over design have been confirmed by an independent design expert.</p>



			The third challenge states that the area has suffered from poor quality development and regeneration recently. Which developments?	
	Vision & Aims		<p>The vision is overly general and does not relate strongly to the plan objectives and policies.</p> <p>Aims should be rebadged as objectives.</p> <p>Part of the vision is mention of local economic opportunity, but this is not reflected in the policies.</p> <p>The Urban Regeneration section broadly supports employment in the town centre and Stone Cross Park, but GLW-R5 proposes residential development on an existing employment site.</p>	<p>The vision has been expanded to be more specific, referring to economic, housing and community facilities and a sustainable environment.</p> <p>One of the aims has been amended to refer to 'car' journeys.</p> <p>Disagree that the policies do not address local economic opportunity. This is addressed in Policies GLW-R1, GLW-R2, GLW-R3, GLW-R4, and GLW-R6.</p> <p>GLW-I2 addresses broadband, so enables home working, recognising recent changes to live\work patterns.</p> <p>GLW-R5 includes employment uses as part of a mix, but also recognises the severe viability challenges affecting the site and the need for residential development close to the commercial centre, increasing the catchment (and viability) of the town. GLW-R5 was drafted to place emphasis on residential development in response to previous comments by Wigan Council.</p> <p>Given that this is a policy document, rather than action plan, 'aims' is the preferred term.</p> <p>There is a close correlation between the vision, aims and policies.</p>

	3.2		<p>The occupations add up to more than 100%.</p> <p>The affordability text may benefit from more explanation.</p>	<p>Some people have more than one job. The text has been amended to recognise this.</p> <p>Given that the plan does not amend affordability thresholds and proportions, unnecessary material has been removed from 3.2 in the interests of clarity.</p> <p>Text on population has been updated to take account of more recent data.</p>
	4.1		The newsletter is no longer in production.	Text amended to recognise that the newsletter changed to on-line format.
	5.1		Relate this section to vision and aims.	Reference to vision and aims added.
	6.1		Purpose would benefit from bullet points.	<p>For consistency, the purpose has been redrafted as a sentence. This brings it in line with other purposes.</p> <p>It should be noted that the purpose is intended as a general description of each group of policies, rather than a comprehensive overview.</p>
	Page 14		<p>Replace the GMSF with the 'Places for Everyone Plan'.</p> <p>Replace text with: 'The emerging Places for Everyone (Pfe) Plan, on adoption, will be a strategic joint development plan for Wigan Borough and eight other Greater Manchester districts to 2037. The Pfe was submitted to the Government in February 2022 for independent examination, with adoption scheduled for 2023. On adoption, the Places for Everyone Plan will supersede a number of</p>	Text replaced and added, as suggested.

			the core policies within the Wigan Local Plan Core Strategy’.	
	Page 15		Add UDP Policy S1D Local Centres.	Reference to Policy S1D added.
	Page 15		Congestion on or around the A580 is likely to come from a combination of issues, rather than solely the employment sites. Better to focus on the high proportion of private car users, which is evidence based.	Text amended to recognise the likely combination of causes of congestion.
	Page 16	GLW-R5	The text on Millingford is incompatible with the actual policy.	The text was from an earlier version of the plan, but had not been updated, so did not take account of the changes made to GLW-R5 in response to earlier comments by Wigan Council. The text has now been updated to reflect the current wording of GLW-R5 and to better explain the planning rationale behind the policy.
		GLW-R1	<p>Confusion over local centres. The clause refers to Stone Cross Lane North and Slag Lane Local centre, but Plan 3 shows different groupings of shops on Slag Lane and Crow Wood Road. Does the Plan intend to designate both local centres?</p> <p>Suggest replacing ‘or’ with ‘and’.</p> <p>Clause 3 could work better as a separate policy promoting sustainable travel.</p>	<p>Title of Plan 3 changed to ‘Slag Lane Local Centre’. Wording of GLW-R1 amended to refer to ‘Slag Lane Local Centre’. Similar amendment made to Policy GLW-R4.</p> <p>Mention of Slag Lane Local Centre also added to 3.1.</p> <p>Policy wording amended to refer to “the defined Town Centre (Plan 2) <u>and</u> Slag Lane Local Centre”.</p> <p>Clause 3 relates to residential amenity, not travel. There is already a separate policy dealing with active travel - GLW-I1.</p>

		GLW-R2	<p>NPPF states refusal on highways grounds only if unacceptable impact on highway safety or cumulative impacts on road network would be severe. The policy refers to 'the need to avoid adverse impacts' so is more stringent.</p> <p>Suggest that regard should be given to prioritising walking, cycling and public transport, to give workers opportunity for sustainable travel.</p>	<p>Clause 2.a) only requires particular regard to be made, so is compatible with NPPF policy. Clause 2.b) refers to impacts of traffic on residential amenity, rather than safety and capacity. No change necessary.</p> <p>An additional Clause 2.d) has been added, cross-referencing to the sustainable transport policy, which deals with sustainable and active travel.</p>
	Plan 4		The small residential development at Heath Field Close should be removed from the Millingford site boundary.	Plan 4 has been amended, removing the small residential area, as suggested.
		GLW-R3	<p>A large part of the town centre is in a conservation area. Not supporting residential uses in ground floor units could result in units remaining empty, to the detriment of the street scene. An exception could be added to the policy where a unit has been marketed (at market value) for a specified period of time, without any interest. This approach could be applied to the primary shopping area, rather than the whole town, perhaps.</p> <p>Rewording suggested to improve clarity and reduce repetition.</p>	<p>It should be noted that the purpose of the policy is to protect town centre vitality, not just character.</p> <p>The wording of the policy has been amended as suggested (with some adjustments) in the interests of clarity and to allow flexibility.</p> <p>The interpretation has been amended to recognise permitted development rights relating to changes of use from commercial to residential uses.</p>
		GLW-R4	<p>The wording should be amended to reflect changes to Policy GLW-R3.</p> <p>Is Clause 2 required, as it is covered by clause 1.</p>	<p>Wording of Clause 1 amended, as suggested.</p> <p>Clause 2 deleted.</p>

			<p>Incorrect reference to GLW-E2 in the interpretation.</p> <p>Clarity needed on which local centre is being referred to (see comments on GLW-E1)</p>	<p>Interpretation amended to refer to GLW-E3.</p> <p>Title of Plan 3 changed to 'Slag Lane Local Centre'. Wording of GLW-R4 amended to refer to 'Slag Lane Local Centre'.</p>
		GLW-R5	<p>The Urban Regeneration section broadly supports employment in the town centre and Stone Cross Park, but GLW-R5 proposes residential development on an existing employment site.</p> <p>Currently employment is supported only as part of mix in residential-led scheme. Policy should state if the preference is retention of employment.</p> <p>The policy could set proportions, but would need to be supported by viability evidence.</p> <p>Clause 2 allows business/light industrial uses, but is not reflected in Clause 1.</p> <p>Remove 'an' from Clause 3.</p> <p>Clause 4 should be accompanied by supporting text to refer to potential mitigation.</p> <p>Suggest amending Plan 5 to follow Bridge Street. This is important as the policy promotes active frontages onto Bridge Street.</p>	<p>The emphasis of the policy has been informed by previous comments from Wigan Council, including their concerns over uncontrolled E Use Class development harming the Town Centre.</p> <p>The mix of uses is flexible, with no proportions, in recognition of the site's viability challenges and the need to enable realistic regeneration. It should be noted that residential development of the site would assist in town centre recovery and regeneration. The mixed-use site allocation responds to national policy and guidance.</p> <p>Wording of Clause 1 is amended to create greater emphasis on employment uses (Use Class E).</p> <p>The word 'an' has been removed from Clause 3.</p> <p>Text added to the interpretation on potential mitigation in relation to proximity of the railway line.</p> <p>Plan 5 has been amended, as suggested.</p>
		GLW-R6	<p>Include reference to the proposed railway station in the supporting text.</p>	<p>The policy rationale already refers to the proposed reopening of the railway station and this has been expended slightly (page 16).</p>


			<p>Land is currently used as informal parking. Has the loss of this parking to temporary uses been considered?</p> <p>Replace 'significant impacts' with 'significant adverse impacts'.</p>	<p>The policy protects the station goods yard and adjacent car parks. The clause allowing temporary uses has been modified to make clear that it applies to the station goods yard only. The interpretation has also been amended to clarify how the policy is applied.</p> <p>It is for the site owner (Wigan Council) to decide whether to retain the car parking area of the site.</p> <p>The word 'adverse' has been added to Clause 2.</p>
	Page 29		<p>Remove LPCS acronym.</p> <p>Add 'provision' after open space, sport and recreation.</p> <p>Change 'will improve' to 'seeks to improve'.</p> <p>Add closing quotation marks.</p>	<p>Changes made, as suggested.</p>
	Page 30		<p>Change Stonecross Industrial Park to 'Stonecross Park'.</p> <p>Capital letters for Conservation Area.</p> <p>Add colon after 'including'.</p> <p>Change 'listed' to 'Grade II listed'.</p>	<p>Changes made, as suggested.</p> <p>Bullet point list of buildings clarified.</p>

			Does Methodist Church refer to Golborne Pentecostal Church 94 High Street?	
		GLW-D1	<p>Use of the word 'must' is inflexible and could stifle development that is acceptable on balance.</p> <p>Suggested rewording is 'To contribute towards the delivery of sustainable development, which complements the local context, promotes active travel, and protects amenity, new developments should, as far as possible, incorporate the following sustainability principles:'.</p> <p>The opening sentence to clauses 2(a-c) relating to new layouts could be deleted.</p> <p>Suggest replacing 'pedestrian convenience and cycling' with 'pedestrians and cyclists'.</p> <p>Clause 4 appears to set a high bar, but actually sets a low bar, enabling little amenity to be provided on-site. The clause would benefit from supporting text to clarify level and proximity of provision. How would the policy apply to conversion of flats?</p> <p>Clause 5 could be reworded as 'Innovative and creative design which promote high levels of sustainability an/or help to raise the standard of design in the area, will be supported in principle'.</p>	<p>The word 'should' has been substituted for 'must' in places. This should not be interpreted as making sustainable design requirements optional.</p> <p>The suggested detailed replacement wording is weak and vague and could send out the message that developers only need to consider good design if they feel like it. Also, it is difficult to envisage how poor and unsustainable design could be acceptable on balance. This appears to be somewhat at odds with NPPF policy and the National Design Guide 2021. Given the poor quality of some recent development, the policy needs to set clear requirements.</p> <p>The sentence relating to layouts has been removed, as suggested. Clause 1(c) has been amended for clarity.</p> <p>Wording changed to refer to pedestrians and cyclists, as suggested.</p> <p>Clause 4 (now Clause 3) wording tightened and amended to relate to conversions. Interpretation has been expanded to give greater clarity.</p> <p>Wording of Clause 5 (now Clause 4) adjusted. Interpretation now links to Green Development Guidance Note more explicitly to this clause.</p>

		GLW-D2	<p>Policy wording is too inflexible and stringent, so contrary to national policy. Frequent use of 'must' require revision.</p> <p>Clause 4 – HS2 is proposed to cut through Byrom Wood, so will conflict. However, retention of the clause would protect Byrom Wood and its setting should HS2 Phase 2b not be implemented.</p> <p>Wording on pollution and air quality is too stringent.</p>	<p>Policy wording revised, replacing 'must' with 'should'. It should be noted that the Environment Act will bring in more stringent requirements for some kinds of development.</p> <p>Comments on HS2 noted.</p> <p>Policy on pollution and air quality amended to accord with NPPF policy.</p> <p>Interpretation amended to make reference to the Development and Air Quality SPD.</p>
		GLW-D3	<p>Use of 'must' rather than 'should' is contrary to NPPF.</p> <p>State that developments in breach of these requirements will only be permitted where they are clearly justified and outweighed by public benefits.</p>	<p>Wording changed from 'must' to 'should'.</p> <p>There is no need to repeat NPPF policy in GLW-D3, so the additional wording has not been added.</p> <p>Interpretation has been expanded to recognise the special statutory duties relating to Listed Buildings and Conservation Areas.</p>
		GLW-D4	<p>The policy should be removed as preventing coalescence is covered sufficiently by national policy, and any variance from Green Belt policy will risk not meeting the Basic Conditions.</p> <p>Areas in Plan 10 are within the Green Belt. Inconsistency between the Policy and Plan 10 as the blue area forms part of a wider swathe of Green Belt land between Golborne and Hindley.</p>	<p>The policy addresses coalescence to ensure that this is considered at neighbourhood level. Whilst it is noted that there is some cross-over with Green Belt purposes, the coalescence policy emphasises the community's particular concerns. There is no clash with Green Belt policy and identification of coalescence gaps could be helpful in the application of green belt policy. No change made.</p> <p>The wording has been simplified in the interests of clarity.</p>

		GLW-D5	<p>Requiring no adverse impact is very stringent and not in accordance with national policy.</p> <p>Suggest merging clauses 2 and 3. Also opportunity to merge Clauses 1, 3 and 5, as there is repetition.</p> <p>Replace 'viable' with 'needed'.</p> <p>Protection of playing pitches is also covered by NPPF 99.</p>	<p>Wording changed from 'must' to 'should'.</p> <p>It should be noted that different clauses relate to different parks.</p> <p>Policy restructured and simplified, to remove repetition and improve clarity.</p> <p>The word 'viable' replace with 'needed'.</p> <p>Comment on playing pitches noted.</p>
		GLW-D6	<p>NPPF Paragraph 103 states that policies for managing development should be consistent with Green Belts. Clause 2 should state that development should be permitted where impact is clearly outweighed by other considerations.</p>	<p>Whilst recognising Paragraph 103, it should also be noted that the purpose for LGS is quite different to the five purposes for Green Belts. There is no need to repeat national policy in the Neighbourhood Plan's policies (as the NPPF states). However, the wording of clause 2 has been simplified.</p>
	Pages 46-48		<p>Not much said on housing needs for an aging population.</p> <p>Recommend referencing Wigan Housing Needs Assessment as most recent evidence.</p> <p>Note that over 1,300 homes have been permitted since the adoption of the Core Strategy.</p> <p>Greater clarity on Core Strategy affordable housing requirement is required.</p>	<p>Need for housing suitable for elderly people is referenced on pages 47 and the summary of key needs at the end of page 48 and also in Clause 1 of Policy GLW-C1.</p> <p>Reference to the HNA and key statistics added. Specific figures for Golborne and Lowton added.</p> <p>Statistics on home approvals noted, though it is unclear what geographical area this applies to.</p> <p>Reference made to Core Strategy affordable housing requirement.</p>

			<p>Good to include rental figures for Wigan Borough to draw comparison.</p> <p>Change 'reclamation' to 'remediation'.</p> <p>First Homes would be secured as part of affordable housing requirement, not in addition.</p>	<p>The policy seeks to complement Local Plan policies, rather than amend them, so it is useful to avoid over-complicating the rationale.</p> <p>Wording changed to 'remediation'.</p> <p>Wording relating to First Homes removed.</p>
		GLW-C1	<p>The policy could reference low carbon and the GM strategy.</p> <p>Disagree with Clause 2. Unviable schemes will be unable to compensate with higher quality scheme. Risk of conflict with Policy GLW-D1. Concern that developers may seize on Clause 2 by proposing homes marginally in excess of building regulations. Affordable housing need is relatively high in this area.</p> <p>Rear access to a garden or garage should be sufficient to accommodate a bicycle. Designated parking is required for apartments. Remove reference to scooters with charging, as they are illegal.</p> <p>An additional clause could deal with electric car charging points, though this is dealt with in Policy GLW-I1.</p>	<p>Clause on carbon use added. The Green Guidance Note also addresses this.</p> <p>Clause 2 has been changed in response to these concerns, now simply requiring a mixed provision of affordable housing. Consequential amendments have been made to the interpretation section.</p> <p>Disagree with comment on rear access being sufficient to accommodate a bicycle. It is unclear how rear access would ensure 'secure and covered' storage for cycles. So the requirement for secure and covered storage remains. Similar policies in other neighbourhood plans have been successful at the examination stage.</p> <p>However, the policy has been amended for clarity. Also, the interpretation now makes clear that garage space could be sufficient (where provided) and refers to communal provision for apartments.</p> <p>Additional clause on charging points added.</p>

		GLW-I1	<p>In Clause 2, suggest replacing 'pedestrian convenience and cycling' with 'pedestrians and cyclists'.</p> <p>Remove reference to scooters with charging facilities -they are illegal.</p> <p>In clause 4, suggest adding 'where applicable' and expanding the interpretation to refer to Development and Air Quality SPD.</p>	<p>Wording changed to 'pedestrians and cyclists'.</p> <p>The policy refers to scooters, rather than implying electric scooters. Scooters are not illegal. No change necessary.</p> <p>Adding 'where applicable' makes the policy vague and open to interpretation. Wording has been amended slightly to refer to schools and employment sites, given that electrical charging for new housing is now dealt with in the amended housing policy GLW-C1.</p>
		GLW-I2	<p>Add 'unless technically unfeasible' to clause 1, otherwise too ridged. </p> <p>Typo in interpretation (apples should be applies).</p>	<p>It is recognised that some sites are unlikely to be served by broadband infrastructure within the lifetime of the Plan. The interpretation has been expanded to deal with this.</p> <p>Typo corrected.</p>
	55		<p>Paragraph 1 of Infrastructure priorities – there is no CIL, so monies accrued from residential development would be through S106.</p> <p>Should highway capacity improvements to the A580/Golborne Roundabout be added to the priorities?</p>	<p>Text amended to refer to any future CIL monies.</p> <p>The priorities focus on environment and community. Highway improvements should be paid for by the Highways Authority.</p>
	56-58	Green Dev. Guidance Note	<p>Green Development Guidance Note – suggest reference to JP-2 of the PfE Plan for new development to be net zero carbon from 2028.</p> <p>Suggest creating link between this section and Policy GLW-D1.</p>	<p>Reference to the PfE and other plans is made in the various policy rationales. The Green Development Guidance Note is meant as a concise and convenient guide in the form of a check-list, to augment earlier policies. It is better to avoid complicating it unnecessarily with external policy references.</p>

			<p>Capitals needed for bullet points.</p> <p>Replace SUDS with Sustainable Drainage Systems (SuDS).</p> <p>Wildlife measures - replace Biodiversity with Biodiversity.</p> <p>Potentially merge last two bullet points and add hedgerows as an additional bullet.</p>	<p>The interpretations to Policies GLW-D1 and GLW-D2 and GLW-C1 all now make reference to the Green Development Guidance Note.</p> <p>Capitals added to all bullet point lists.</p> <p>References to 'SuDS' and 'biodiversity' changed, as suggested.</p> <p>Changes made to wildlife measures, as suggested.</p>
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5. Contact

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