

QUALIFYING BODY (STANDISH VOICE NEIGHBOURHOOD FORUM) RESPONSE TO 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.

QB: Noted and agreed.

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).

QB: We agree to VE3 (ii) being included as a community project and reference to the Standish Village Centre Masterplan being 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?

QB: The word 'private' was to include, for example, smaller retail and cafe establishments and we agree this explanation should be included in the glossary.

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.

QB: We agree that with words "and are applicable to all commercial, business and retail premises within the Standish Neighbourhood Area" should be deleted.

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?

QB: We agree that all references can be changed to “drinking establishments and hotels (A4 and C1 uses)” and references to ‘leisure’ use should be deleted, which would give clarity. Paragraph 10.30 and 10.31 should be amended to include the words “drinking establishments and hotels (A4 and C1 uses)”.

The following should also be added to the glossary:

A4 Drinking establishments - Public houses, wine bars or other drinking establishments (but not night clubs), including drinking establishments with expanded food provision.

C1 Hotels - Hotels, boarding and guest houses where no significant element of care is provided (excludes hostels).

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?

QB: There are two designated Employment Areas in the Neighbourhood Area, which are both on Bradley Lane - Bradley Hall Industrial Estate and another smaller one to be known as Mayflower Employment Area. Wigan Council is to amend VE numbers on the policies map.

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?

QB: We believe this gives adequate time for new tenants to come forward ahead of a decision that use of the premises or site is redundant. We also believe employment site landowners can work to this timescale as many decisions about such sites are made well in advance. It also gives Wigan Council adequate time to consider the viability of the site. This policy is reflective of the important nature of Bradley Hall and Mayflower as the only designated Employment Areas in the Neighbourhood Area, and especially on the Bradley Hall site, where a portion of it has already recently been lost. We have had experience of a local public house being saved from re-development because of an adequate and suitable period of marketing. We therefore consider that this timescale is both practical and feasible. We are aware that there is

a similar requirement of 12 months marketing of Employment Area space in a Wigan Council SPD.

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?

QB: For Wigan Council to comment.

Should considerations of viability be included in Policy VE7?

Suggest: "i) That the site is not viable due to absence of market demand determined after active and continued marketing for a period of at least 12 months or"

QB: We consider that the question of viability is addressed and is inherent in the 12 month marketing period and agree to the suggested amendment i).

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?

QB: Yes, we agree there should be consistency and agree to the change of "business space" to "non-employment use".

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

QB: Yes, the definition is the same as that contained in the Wigan Council Core Strategy page 65. This will include this 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?

QB: We consider that this lends support to mixed uses on the site. However, a purely retail development would also be appropriate, so this is not an allocation. We confirm that this relates to VE10 not VE9.

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.”***

QB: This relates to Policy T4, not T3. The subject of adequate parking has been thoroughly debated within Standish and the QB is of the opinion that a period of three hours for parking would encourage and allow people to make the most of the facilities and range of activities in the village centre, e.g. shopping, visiting the hairdressers, having a coffee/meal in the centre of Standish etc. The main complaint we have received from businesses in the village centre is the lack of parking, especially longer stay as most current parking is for less than two hours - with some being as little as half an hour - and businesses consider that this is affecting their trade. We would, therefore, like this policy to remain unamended.

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.

QB: OS1 – are all owned by Wigan Council and consultation has taken place.

OS2 – are all owned by Wigan Council and consultation has taken place.

OS4 – the majority of these sites are owned by Wigan Council and consultation has taken place. On the small number of remaining private sites, some consultation has taken place. Where we have not consulted with the landowner, these amenity areas can be exempted, though continued use as amenity space should be presumed.

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?

QB: We confirm that it is only those sites on Maps 6 and 7 which are to be protected under this policy. To our knowledge there is no conflict between these areas and any planning permissions.

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.

QB: Noted and we agree to the deletion.

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

QB: Yes, sites has been identified for this policy and two Wigan Council-owned sites (Almond Brook Road and at Robin Hill) have been identified for tree planting and discussions have been underway with the council on this for a number of months. Gidlow Tip (a council designated reclamation area) and Stars Brow (a landfill site

currently in use but which has with a condition on it to return it to countryside in the medium term) could also be suitable sites, conditional on agreement with the landowners.

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.”

QB: Agree with the revised wording. The list and names of these sites are contained in Appendix E.

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.

QB: The distinctive local character of the open landscapes have not been defined or mapped. However, we believe this would be a consideration for the planning department to make a judgement on during the planning application process. For example, the open views to Winter Hill are a distinctive vista with high amenity value, especially to existing residents as is the vista to the Grade I-listed St Wilfrid's Church, Haigh Hall, Parbold Hill and Elnup Wood. If a view onto these locations were in danger of being restricted, the planning department would take this into consideration in the planning process. The degree and extent of the restriction - the amount of adverse effect - of view or vista would be a material consideration for planning officers to consider and open to interpretation.

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.

QB: We agree.

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?

QB: Yes, we agree with the suggestions from the EA and UU relating to developments adjacent to watercourses and on surface water hierarchy. We consider they are 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.

QB: This was a draft policy in the previous GMSF version, but is not now the case and should be removed. Safeguarded Land is safeguarded for future development and Standish Neighbourhood Plan presumes this will come forward for development within the lifetime of the plan, though most likely between 2026 and 2030, although individual site planning permissions will be taken on their own merits and will need to be assessed against GMSF, Wigan Council and Standish Neighbourhood Plan policies.

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.

QB: For Wigan Council to respond. However, we consider that following our extensive discussions with Wigan Council that the figure of 75% is a reasonable figure and can be fully justified and the proposal for phasing release of Safeguarded Land is not an issue. We understand that Wigan Council have a five-year land supply and that the council is easily able to maintain records on house completions and occupancy to monitor the 75% figure.

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.”

QB: We agree to the revision.

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 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.”

QB: We understand Wigan Council has provided the relevant maps. We agree to the above amendments.

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.

QB: Noted and agree

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

QB: Noted and agree.

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.”

QB: Noted and agree.

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.

QB: We agree to the deletion of H5.1.

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.

QB: We disagree that these policies should be omitted for the following reasons: The written Ministerial Statement of March 2015 is, in our opinion, not now in keeping given the recent changes in the Government’s policies and ambitions on housing and climate change. The Chancellor’s Spring Statement of 13th March, 2019, states that the Government would work towards ‘Zero Carbon’ housing. Policy H5.5 supports this statement. In March, 2019, Prince Charles gave his support to the Greater Manchester proposals in the GMSF which he considers is leading to bring about change. Adoption of Nationally Agreed Space Standards (NDSS) is optional for each Local Planning Authority. Wigan Council has not adopted this standard as yet but we wish all new housing developments in the Standish Neighbourhood Area to achieve these higher standards so that families have adequate space in which to grow and thrive. The draft Greater Manchester Spatial Framework (GMSF) document has been out to public consultation and this consultation period closed on Monday, 18th March. The draft GMSF document recommends that NDSS is a required standard throughout all 10 GM Local Authority areas. Standish Voice wishes to ensure this standard is adopted within our Neighbourhood Area irrespective of whether the standard is adopted in Wigan or not. Manchester City Council and Oldham Council (two of the 10 Greater Manchester authorities) have already adopted NDSS. NDSS is a planning standard to ensure that habitable spaces within homes are ‘fit for purpose’, and an attempt to stop developers providing ever smaller housing units. Standish is one of the few areas of Wigan where land values and house prices can readily sustain these higher quality requirements – viability is not an excuse for developers to put profit ahead of decent

living standards. Policy H5.5 is a response to a recent Government call for improved thermal performance and reduced carbon emissions to help address climate change and fuel poverty. A similar policy is included in the Draft GM Spatial Framework document, which calls for a 'fabric first' approach to maximise the thermal performance of dwellings and to minimise energy usage. Building Regulations are a minimum permitted standard and this is likely to be revised shortly to set an improved minimum standard. It is also recognised by Government that this minimum standard is theoretical and is not achieved in reality by almost 25% of completed new-build houses (Government's own statistics). Standish Voice wishes to 'future proof' its housing stock by setting standards which will help to achieve 'Carbon Neutral' dwellings – another policy set out in the GMSF draft document. The minimum thermal performance standards we stipulate are readily achievable with minimal additional impact on profit and they will help to achieve Carbon Neutral properties. We wish to address fuel poverty through energy efficiency.

H5.3 and H5.4 (iii) are procedural matters and included in Community Project 7.

QB: We agree that H5.3 is a procedural matter and is covered by Community Project 7 so can be omitted. However, H5.4(iii) is a specific requirement for Standish Voice to respond in writing to Wigan Planning Authority when new housing developments are proposed in the Neighbourhood Plan Area and give an opinion as to the suitability and 'fit' with the village aesthetic. Too many housing developments use generic house types and materials that can be seen anywhere in the UK. Barratt Homes house types are a prime example, as are the house types used by Morris Homes and Wainhomes. Countryside plc has managed to create a suitable aesthetic which can be identified with Standish on its new Barrowcroft estate. If they can do it, so can others.

H5.4 (i) and (ii) add no locally specific guidance to that set out in Wigan Council SPD on Design Guidance for Residential Development.

QB: H5.4(i) is not intended as 'guidance', it is intended as scrutiny of aesthetic quality and an opportunity to intervene at an early stage so as to effect changes where necessary, and to help developers improve the design quality of their proposals before planning approval is achieved. Wigan Council does not have a design guidance document specifically written for Standish. We currently have expertise within Standish Voice membership for suitably qualified people to act as Design Champion, and in the assessment of Building For Life 12. Manchester City Council has included the requirement of a Design Champion within their adopted Residential Design Guide – we are following their lead.

H5.4 (ii) is a specific requirement that developers show furniture on a floor layout to prove at a glance that the required level of furniture and circulation space is achievable within their house types. This floor layout is useful to developers to indicate where power sockets, light switches and radiators should be positioned for maximum efficiency. The items of furniture and their sizes are included in the NDSS Technical Document and the requirement for a floorplan indicating the furniture layout was only removed from NDSS immediately before it was adopted – presumably at the lobby of major housebuilders. The Residential Design Guide for

South Yorkshire has a requirement for floor plans to be submitted at planning application stage to verify that room sizes are fit for purpose and meet required standards – we are following their lead.

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.

QB: Please see the explanation above.

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 (e.g. 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?

QB: Standish Voice requested that Wigan Council buy the Ambulance Station land (one of the allocation sites) when it first became available for purchase so that it could be developed with 100% affordable or housing for older people, given its close proximity to the village centre. We suggested to Wigan Council that the commuted sum from the Countryside development be utilised to purchase and part fund the development as 100% affordable or older people’s housing. We considered that both sites could be deliverable in this regard. Wigan Council have advised us that they have already undertaken schemes for 100% affordable housing in the borough.

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.

QB: Noted and agree.

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.”*

QB: Noted and agree.

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

QB: Wigan Council to respond. However, Standish Infrastructure Assessment was carried out and is dated as 2013.

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”**.

QB: Noted and agree.

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.

QB: Noted and agree.

QUALIFYING BODY FURTHER RESPONSES TO EXAMINER'S QUESTIONS AFTER SITE VISIT

Policies VE7, 8 and 9: Is the small parcel of land near Grove Road shaded mauve identified under these policies?

QB: This is Grove Lane. The shaded area should be white on the policies map as it is not an Employment Area.

Policy VE8D: Are there any listed buildings in the Employment Areas identified on the Policies Map? If not, is this criterion necessary?

QB: Bradley Hall is part of Bradley Hall Trading Estate. It is a Grade II* listed building and is offices for Ainscough Crane Hire Ltd.

Policy T5: There is a large private car park serving Chadwick's Butchers which was almost empty at the time of my visit. Has any work been undertaken to seek use of the site for public parking?

QB: Standish Voice has held a number of discussions with the owners of the car park to see if it can become public or be extended to include a public car park. The local authority was also involved with these negotiations. This was not fruitful. The owner prefers to keep the car park private. This site is now the subject of a planning application for older people's apartments by McCarthy And Stone. The scheme includes private car parking.

Policy OS1: Would you confirm that there is no conflict between the areas identified under this policy and planning permissions for housing in the areas. In particular, with the new access road serving the development in the Almond Brook area.

QB: Wigan Council has informed us that there is no conflict.

Policy OS4: Ashfield Park – Is there any reason why the amenity / landscape areas around the main pitches have not been identified under Policy OS4?

QB: No, the site boundary can be altered to include these areas.

Policy SLC1: Ashfield Park - is there a reason for including the Ashfield House Events Facility in the area covered by this policy? It is a private facility and not part of the park.

QB: No, The site boundary can be altered to exclude these premises.