

STANDISH NEIGHBOURHOOD PLAN

Submission Draft Version

**A report to Wigan Council
into the examination of the
Standish Neighbourhood Plan
by Independent Examiner, Rosemary Kidd**

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1.0 Summary

- 1.1 The Standish Neighbourhood Plan has been prepared to set out the community's wishes for neighbourhood area of Standish which is located in the north westerly part of the Borough of Wigan and has a population of over 15,000. It includes most of the electoral ward of Standish-with-Langtree and parts of the wards of Aspull, New Springs, Whelley, Shevington with Lower Ground and Wigan Central.
- 1.2 The Plan has been prepared by the Neighbourhood Forum, Standish Voice. They are to be congratulated on the work they have undertaken in consulting the community of this large area and drawing up a plan to address the issues that have been identified particularly to ensure that the village centre and community facilities are enhanced and improved to meet the needs of this growing population. The Plan also seeks to ensure that the housing needs of the population are addressed especially for the ageing population and that provision is made for affordable homes.
- 1.2 I have made recommendations to ensure that the Plan meets the Basic Conditions including:
 - The deletion of Policies VE2 and H5; and parts of Policies VE3, OS3, OS5 and H4;
 - clarification to the wording of various policies and their application; and
 - corrections and improvements to the mapping of sites referred to in policies.
- 1.3 Section 6 of the report sets out a schedule of the recommended modifications.
- 1.4 Subject to the recommended modifications being made to the Neighbourhood Plan, I am able to confirm that I am satisfied that the Standish Neighbourhood Plan satisfies the Basic Conditions and that the Plan should proceed to referendum.

2.0 Introduction

Background Context

- 2.1 The Standish Neighbourhood Area lies in the north of Wigan borough. It includes most of the electoral ward of Standish-with-Langtree and parts of the wards of Aspull, New Springs, Whelley, Shevington with Lower Ground and Wigan Central.
- 2.2 Standish is classed as a 'smaller town centre' in Wigan Council's Adopted Core Strategy and Wigan Council regularly refers to Standish as a 'town'. However, the area of Standish is commonly referred to as a 'village' by residents due to it being a much smaller, tight-knit, rural settlement in the recent past. I will use the term "village" in my report to reflect the term used in the Standish Neighbourhood Plan (SNP). The Neighbourhood Plan area has a population of approximately 15,191 in 2013.

Appointment of the Independent Examiner

- 2.3 I was appointed as an independent examiner through the Neighbourhood Plan Independent Examination Referral Service to conduct the examination on the SNP by Wigan Council with the consent of Standish Voice, the Neighbourhood Forum, in December 2018. I do not have any interest in any land that may be affected by the SNP nor do I have any professional commissions in the area currently. I possess appropriate qualifications and experience: I am a Member of the Royal Town Planning Institute with over 30 years' experience in local authorities preparing Local Plans and associated policies.

Role of the Independent Examiner

- 2.4 As an Independent Examiner, I am required to determine, under paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990, whether the legislative requirements are met:
- The Neighbourhood Plan has been prepared and submitted for examination by a qualifying body as defined in Section 61F of the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004;
 - The Neighbourhood Plan has been prepared for an area that has been designated under Section 61G of the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004;
 - The Neighbourhood Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004, that is the Plan must specify the period to which it has effect, must not include provisions relating to 'excluded development', and must not relate to more than one Neighbourhood Area; and

- The policies relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of the Planning and Compulsory Purchase Act 2004 Section 38A.
- 2.5 An Independent Examiner must consider whether a neighbourhood plan meets the “Basic Conditions”. The Basic Conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. The Basic Conditions are:
1. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;
 2. the making of the neighbourhood plan contributes to the achievement of sustainable development;
 3. the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
 4. the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations; and
 5. prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan. The following prescribed condition relates to neighbourhood plans:
 - Regulation 32 of the Neighbourhood Planning (General) Regulations 2012 (as amended by the Conservation of Habitats and Species and Planning (various Amendments) Regulations 2018) sets out a further Basic Condition in addition to those set out in the primary legislation: that the making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.
- 2.6 Under the terms of the neighbourhood planning legislation I am required to make one of three possible recommendations:
- That the plan should proceed to referendum on the basis that it meets all the legal requirements;
 - That the plan should proceed to referendum if modified; or
 - That the plan should not proceed to referendum on the basis that it does not meet all the legal requirements.
- 2.7 If recommending that the Neighbourhood Plan is submitted to referendum my report must also recommend whether the area for the referendum should extend beyond the neighbourhood area to which the Neighbourhood Plan relates, and if it is to be extended, the nature of that extension.
- 2.8 The role of an Independent Examiner of a neighbourhood plan is defined. I am not examining the test of soundness provided for in respect of

examination of Local Plans. It is not within my role to comment on how the plan could be improved but rather to focus on whether the submitted Neighbourhood Plan meets the Basic Conditions and Convention rights, and the other statutory requirements.

- 2.9 It is a requirement that my report must give reasons for each of its recommendations and contain a summary of its main findings. I have only recommended modifications to the Neighbourhood Plan (presented in bold type) where I consider they need to be made so that the plan meets the Basic Conditions and the other requirements.

The Examination Process

- 2.10 The presumption is that the neighbourhood plan will proceed by way of an examination of written evidence only. However the Examiner can ask for a public hearing in order to hear oral evidence on matters which he or she wishes to explore further or so that a person has a fair chance to put a case.
- 2.11 I have sought clarification on a number of factual matters from the qualifying body and/or the local planning authority in writing. I am satisfied that the responses received have enabled me to come to a conclusion on these matters without the need for a hearing.
- 2.12 I had before me background evidence to the plan which has assisted me in understanding the background to the matters raised in the Neighbourhood Plan. I have considered the documents set out in Section 5 of this report in addition to the Final (Submission) draft of the Standish Neighbourhood Plan 2015 – 2030 dated October 2018.
- 2.13 I have considered the Basic Conditions Statement and the Consultation Statement as well as the screening statement for the Strategic Environmental Assessment and Habitats Regulation Assessment. In my assessment of each policy I have commented on how the policy has had regard to national policies and advice and whether the policy is in general conformity with relevant strategic policies, as appropriate.
- 2.14 I have undertaken an unaccompanied visit to the Plan area and viewed the sites referred to under the policies in the plan.

Legislative Requirements

Qualifying Body

- 2.15 The neighbourhood plan making process has been led by Standish Neighbourhood Forum known as Standish Voice which has been approved by Wigan Council as is a “qualifying body” under the Neighbourhood Planning legislation which entitles them to lead the plan making process. The Plan was prepared by the Standish Voice’s committee and working groups.

- 2.16 I am satisfied that the requirements set out in the Localism Act (2011) and in Section 61F(1) and (2) of the Town and Country Planning Act (as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act) have been met.

The Plan Area

- 2.17 The area was designated by Wigan Council on 23 April 2015 as a Neighbourhood Area. It is an area that most of the people in the Standish community identify as Standish. The Basic Conditions statement confirms that there are no other neighbourhood plans relating to that area.
- 2.18 This satisfies the requirements of preparing a Neighbourhood Development Plan under section 61G (1) (2) and (3) of the Town and Country Planning Act 1990 (as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004) and regulations 5, 6 and 7 of the Neighbourhood Planning (General) Regulations 2012.

Plan Period

- 2.19 A neighbourhood plan must specify the period during which it is to have effect. The front cover and the Foreword of the Neighbourhood Plan shows the date 2015 - 2030. The Basic Conditions Statement confirms this timescale for the Plan.

Excluded Development

- 2.20 The Plan does not include provision for any excluded development: county matters (mineral extraction and waste development), nationally significant infrastructure or any matters set out in Section 61K of the Town and Country Planning Act 1990.

Development and use of land

- 2.21 The Neighbourhood Development Plan should only contain policies relating to development and use of land. Subject to the modifications proposed, the SNP policies would be compliant with this requirement of Section 38B of the Planning and Compulsory Purchase Act 2004 as amended.
- 2.22 I am satisfied therefore that the SNP satisfies all the legal requirements set out in paragraph 2.4 above.

The Basic Conditions

Basic Condition 1 – Has regard to National Policy

- 2.23 The first Basic Condition is for the neighbourhood plan “*to have regard to national policies and advice contained in guidance issued by the Secretary of State*”. The requirement to determine whether it is appropriate that the plan is made includes the words “*having regard to*”. This is not the same as compliance, nor is it the same as part of the test of soundness provided for in

respect of examinations of Local Plans which requires plans to be “*consistent with national policy*”.

- 2.24 The Planning Practice Guidance assists in understanding “appropriate”. In answer to the question “What does having regard to national policy mean?” the Guidance states a neighbourhood plan “*must not constrain the delivery of important national policy objectives.*”
- 2.25 In considering the policies contained in the Plan, I have been mindful of the guidance in the Planning Practice Guide (PPG) that:
- “Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They are able to choose where they want new homes, shops and offices to be built, have their say on what those new buildings should look like.”*
- 2.26 In order to ensure that a neighbourhood plan can be an effective tool for the decision maker, the PPG advises that:
- “A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.”*
- 2.27 The NPPF of 2012 is referred to in this examination. Paragraph 214 of Appendix 1 of the February 2019 NPPF states that the policies of the 2012 NPPF will apply for the purpose of examining plans where those plans are submitted on or before 24 January 2019. The footnote to this paragraph confirms that this applies to neighbourhood plans.
- 2.28 NPPF paragraph 183 states that neighbourhood forums can use neighbourhood planning to set planning policies through neighbourhood plans to be used in determining decisions on planning applications. The Planning Practice Guidance on Neighbourhood Plans states that neighbourhood plans should “*support the strategic development needs set out in the Local Plan*” and further states that the neighbourhood plan must address the development and use of land by setting out planning policies to be used in determining planning applications because once the plan is made it will become part of the statutory development plan.
- 2.29 Paragraph 16 of the National Planning Policy Framework is clear that those producing neighbourhood plans should support the strategic development needs set out in local plans, including policies for housing and economic development. Qualifying bodies should plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan.

- 2.30 Section 3 of the Basic Conditions Statement shows how the neighbourhood plan meets the key 12 Core Planning Principles of the NPPF. I consider the extent to which the plan meets this Basic Condition No 1 in Section 3 below.

Basic Condition 2 - Contributes to sustainable development

- 2.31 A qualifying body must demonstrate how a neighbourhood plan contributes to the achievement of sustainable development. The NPPF as a whole constitutes the Government's view of what sustainable development means in practice for planning. The NPPF explains that there are three dimensions to sustainable development: economic, social and environmental.
- 2.32 There is no legal requirement for a formal Sustainability Appraisal to be carried out in respect of neighbourhood plans. Section 4 of the Basic Conditions Statement has considered how the SNP contributes to sustainable development and summarises how the plan contributes to the social, economic and environmental roles set out in the objectives.
- 2.33 I am satisfied that the Plan has considered the future social, economic and environmental needs of the neighbourhood area and therefore meets this Basic Condition.

Basic Condition 3 – is in general conformity with strategic policies in the development plan

- 2.34 The third Basic Condition is for the neighbourhood plan to be in general conformity with the strategic policies contained in the Development Plan for the area. The Development Plan comprises the Wigan Local Plan Core Strategy (2013) and the saved policies of the Wigan Unitary Development Plan (2006). The emerging Greater Manchester Spatial Framework (GMSF) will include new strategic policies once it is adopted. The emerging GMSF is at an early stage of preparation with consultation on the revised draft plan being in progress at the time of the SNP examination closing on 18 March 2019. As the plan has not been adopted, there is no requirement to assess the Neighbourhood Plan against the strategic policies it contains although relevant background evidence may be referred to.
- 2.35 The GMSF is considering the need for strategic allocations including housing to meet the needs of the conurbation to 2037.
- 2.36 The Council has raised no concern over general conformity with the strategic policies of the development plan. Sections 5 and 6 of the Basic Conditions Statement sets out an assessment of how the policies of the plan are in general conformity with objectives and policies of the Wigan Local Plan. I consider in further detail in Section 3 below the matter of general conformity of the Neighbourhood Plan policies with the strategic policies of the Local Plan.

Basic Condition 4 – Compatible with EU obligations and human rights requirements

- 2.37 A neighbourhood plan must be compatible with European Union obligations as incorporated into UK law, in order to be legally compliant. Key directives relate to the Strategic Environmental Assessment Directive and the Habitats and Wild Birds Directives. A neighbourhood plan should also take account of the requirements to consider human rights.
- 2.38 Regulation 15 of the Neighbourhood Planning Regulations as amended in 2015 requires either that a Strategic Environmental Assessment is submitted with a Neighbourhood Plan proposal or a determination from the responsible authority (Wigan Council) that the plan is not likely to have “significant effects.”
- 2.39 A screening opinion for the purposes of Strategic Environmental Assessment was undertaken in 2017 on the Regulation 14 draft Plan.
- 2.40 The SEA Screening Report concludes that:
- “It is considered that, with reference to the criteria for assessing the likely significance of effects as set out in Annex II of the SEA Directive (Table 2) and Schedule 1 of the SEA Regulations, a full SEA is not required. Where relevant in the future, as policies containing site allocations are progressed, project level environmental assessment will be undertaken.”*
- 2.41 A full HRA screening opinion was not undertaken during the preparation of the Plan. Consideration was given to the need for an HRA under the SEA question “*Will the plan, in view of its likely effect on sites, require an assessment under Article 6 or 7 of the Habitats Directive?*” The following comments were made:
- “For HRA Screening, consideration of European sites within 10 km should be ensured, due to the potential for connection via hydrological links or if mobile species from neighbouring sites have a significant functional link with areas within the plan boundary, such as for foraging. There are no European sites within the NP area, nor within 10km of the NP boundary. The nearest European site is the Martin Mere SPA, which is located approximately 12km from the NP boundary. Appropriate Assessment is therefore not deemed to be required.”*
- 2.42 The statutory environmental bodies: Historic England, Natural England and the Environment Agency were consulted in November 2017 on the SEA screening report. The Environment Agency made no comments.
- 2.43 Natural England advised that “*in so far as our strategic environmental interests are concerned (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan.*”
- 2.44 Historic England advised that “*We note that the Plan appears to propose no site allocations/policies which would have significant environmental effects*

upon the historic environment and as such we concur that in this regard Strategic Environmental Assessment is not required.”

- 2.45 I have asked that a formal HRA screening be carried out in accordance with the HRA Regulations; this was undertaken in February 2019. This concluded that:
- “Two European sites are within a 15km buffer zone of the Standish Neighbourhood Plan area. These are Martin Mere SPA / Ramsar and Manchester Mosses SAC. It is concluded that the operation (implementation) of the Standish Neighbourhood Plan will not have any likely significant effects on the special nature conservation interest of these designated sites. The Plan can therefore be Screened Out of any need for further Assessment.”*
- 2.46 Natural England was consulted on the screening report. They agreed with the report’s conclusions that the SNP would not be likely to result in a significant effect on any European Site, either alone or in combination and therefore no further assessment work would be required.
- 2.47 I am satisfied that the SEA and HRA screening opinions have been carried out in accordance with the legal requirements.
- 2.48 The Basic Conditions statement has not assessed the impact of the plan on human rights. I have asked the Qualifying Body for a statement on the matter and they have advised me of the measures they have taken to ensure that the values and constitution of Standish Voice and the consultation process have taken human rights into account.
- 2.49 From the evidence provided, I have no reason to believe that they have failed to address the Human Rights requirements. It would be helpful to include a brief statement in the Basic Conditions Statement on human rights.
- 2.50 I am not aware of any other European Directives which apply to this particular Neighbourhood Plan and no representations at pre or post-submission stage have drawn any others to my attention. Taking all of the above into account, I am satisfied that the SNP is compatible with EU obligations and therefore with Basic Conditions Nos 4 and 5.

Recommendation 1: Include a brief statement in the Basic Conditions Statement on how the Plan has considered Human Rights.

Consultation on the Neighbourhood Plan

- 2.51 I am required under The Localism Act 2011 to check the consultation process that has led to the production of the Plan. The requirements are set out in Regulation 14 in The Neighbourhood Planning (General) Regulations 2012.
- 2.52 The Consultation Statement sets out an overview of the various stages of consultation that have been carried out during the preparation of the SNP. Appendix A of the Consultation Statement sets out full diary of all events undertaken during the preparation of the Plan. The purpose of each stage of

the consultation is set out, together with the details of the publicity for the consultation and the responses received.

- 2.53 Work commenced on the preparation of the Neighbourhood Plan in 2015 following the establishment of the Neighbourhood Forum and the designation of the Neighbourhood Plan Area in 2015.
- 2.54 A widespread publicity programme was established with newsletters, posters, and through Facebook, Twitter and a dedicated website. The following consultation stages took place:
- Consultation was launched at a community event at Standish Library in May 2015 with 100 people in attendance. The views expressed were used in the formulation of the consultation questionnaire and the initial themes for the plan policies.
 - The Questionnaire Consultation was launched in June 2015. Local Life magazine distributed 5,000 copies to households in Standish, and 1000's were hand delivered. Forms were sent home via children at local secondary schools. Residents in care homes and sheltered accommodation were visited.
 - A business consultation event was held in July 2015. It was recognised that the response had been limited.
 - Feedback to the survey was given in September 2015 at a community event. Followed by a "Deal in Action" public meeting with Wigan MBC in January 2016.
 - Consultation on the Vision and Objectives and ideas for policies took place in December 2016 with a stall at the Christmas Market.
 - This was followed by an analysis of car parking and a petition was received in January 2016 requesting more car parking.
 - 'The Rec' Consultation was carried out in March 2017 to determine the opinions of the community on Southlands Rec and its future use.
 - The Regulation 14 Consultation of the draft Neighbourhood Plan was carried out between 29 September 2017 and 10 November 2017. This included drop in sessions and publication of the Plan on the Standish Voice website. It was also made available in the Standish Library.
 - The Regulation 16 consultation took place between 7 November 2018 and 19 December 2018. There was a high level of response to this consultation with 67 respondents supporting the Plan, 87 local residents commenting on various policies in the plan, 6 responses from statutory consultees and 8 from developers and landowners.
- 2.55 Whilst some of the respondents have commented on the way that the consultation was carried out during the plan making process, it is recognised that carrying out consultations in a large community such as Standish can present its challenges. It is often only when there is a local matter that raises controversy that the community may become engaged in the Plan making process. In the case of Standish, following receipt of a petition on the issue of car parking in January 2016, the options were explored and consulted on for

the provision of additional space which included consideration of the provision of some car parking on the recreation ground.

- 2.56 As a result, the local community rallied around the desire to save the recreation ground and to improve the quality of the facilities. This is evidenced by a detailed response from the community groups “Don’t Wreck our Rec” and “Friends of the Rec”.
- 2.57 I am satisfied that the pre-submission consultation and publicity has met the requirements of Regulations 14, 15 and 16 in the Neighbourhood Planning (General) Regulations 2012.
- 2.58 This report is the outcome of my examination of the Final (Submission) Draft Version of the SNP dated October 2018. I am required to give reasons for each of my recommendations and also provide a summary of my main conclusions. My report makes recommendations based on my findings on whether the Plan meets the Basic Conditions and provided the Plan is modified as recommended, I am satisfied that it is appropriate for the Neighbourhood Plan to be made. If the plan receives the support of over 50% of those voting then the Plan will be made following approval by Wigan Council.

3.0 Neighbourhood Plan – As a whole

- 3.1 Preparing a neighbourhood plan in an unparished urban area presents considerable challenges. Work began with the establishment of the Neighbourhood Forum, Standish Voice. They are to be congratulated on the work they have undertaken in consulting the community of this large area and drawing up a plan to address the issues that have been identified. The Plan focuses on ensuring that the village centre and community facilities are enhanced and improved to meet the needs of the growing population. The Plan also seeks to ensure that the housing needs of the current residents are addressed especially for the ageing population and that provision is made for affordable homes for young people.
- 3.2 The Neighbourhood Plan is considered against the Basic Conditions in this section of the Report following the structure and headings in the Plan. Given the findings in Section 2 above that the plan as a whole is compliant with Basic Conditions No 4 (EU obligations) and other prescribed conditions, this section largely focuses on Basic Conditions No 1 (Having regard to National Policy), No 2 (Contributing to the achievement of Sustainable Development) and No 3 (General conformity with strategic policies of the Development Plan).
- 3.3 Where modifications are recommended, they are presented and clearly marked as such and highlighted in bold print, with any proposed new wording in italics.
- 3.4 Basic Condition 1 requires that the examiner considers whether the plan as a whole has had regard to national policies and advice contained in guidance issued by the Secretary of State. Before considering the policies individually, I have considered whether the plan as a whole has had regard to national planning policies and supports the delivery of sustainable development.
- 3.5 The Plan contains a clear introductory section containing contextual material describing how the Standish Neighbourhood Area was created and Standish Voice was established as a Neighbourhood Forum. It explains why Standish needs a neighbourhood plan and summarises the consultation that has been carried out in preparing the Plan.
- 3.6 The Plan is clearly and coherently presented with policies addressing the village centre enhancement, employment, traffic and parking, open space, housing, funding infrastructure, sport, recreation and leisure, and renewable energy. The policies are clearly distinguishable by surrounding boxes.
- 3.7 Section 17 of the Plan contains a list of community projects that have been identified during the preparation of the SNP.
- 3.8 The Plan contains a Policies Map (Map 8) which includes the sites referred to in the policies and other designations. However, the key contains a number of errors which need correcting; I have highlighted these under the relevant policies. The Policies Map should be made available at a scale so that the

boundaries of sites can be identified clearly. If necessary Inset Maps may be included in the Plan. The sites under each policy should be referenced by a letter or number which should be included on the Policies Map.

- 3.9 Several policies in the plan include the phrase that development “will be permitted” subject to certain criteria being satisfied. Paragraph 11 of the NPPF states that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The development plan consists of the Local Plan and saved UDP policies as well as the neighbourhood plan. Decision makers also have to take account of national planning policy. It is not therefore appropriate for policies in neighbourhood plans to tie the hands of decision makers by stating what may or may not be permitted. I have proposed revised wording under each policy as applicable.
- 3.10 It would improve the clarity of the plan and ensure that it was interpreted consistently for the punctuation of policies to be corrected. If all criteria are to be applied each criterion should be followed by a semi-colon and the penultimate criterion concluded by “; and”. Where the criteria set out alternative options each should be followed by “; or”.
- 3.11 References in various places in the Plan to “Aecom one of the leading planning consultancies in the UK” should be revised to “an independent planning consultancy”.

Recommendation 2: Ensure that the Policies Map is available at a scale that the site boundaries can be clearly identified with Inset Maps where necessary. The sites under each policy should be referenced by a letter or number which should be included on the Policies Map.

Check the punctuation of the policies.

Revise the references to “Aecom one of the leading planning consultancies in the UK” to “*an independent planning consultancy*”.

The Neighbourhood Plan - Policies

Introduction

- 3.12 Section 4 of the Plan describes the area as it is at present, highlighting how the community has grown and changed over time. The key themes and issues that have been identified through consultation are identified in section 7. A clear vision statement and six objectives are set out in section 8. The objectives have been developed to address the themes and issues identified previously.

Village Centre Policies

Policy VE1: Enhancement of Village Centre Retail and Business Premises Offer

- 3.13 The boundary of the “Smaller Town Centre” was identified at Standish in a saved Replacement UDP policy. Core Strategy Policy SP2 sets out the policy for smaller town centres including Standish that “*They will be maintained and enhanced as the focus for a range of uses serving their respective communities*”. During the preparation of the SNP an enlarged Village Centre was drawn up with guidance from Wigan Council. This is shown on Map 4 and the Policies Map. The policy supports main town centre uses in the area subject to meeting criteria on scale and compatibility with the area.
- 3.14 Subject to the recommended modifications, the policy provides local policy guidance that supports the delivery of Core Strategy Policy SP2 and section 2 of the NPPF on ensuring the vitality of town centres.
- 3.15 In accordance with paragraph 3.9 above the policy should be revised to avoid the use of the phrase “will be permitted”. To improve the clarity of the policy to ensure that it can be interpreted consistently by decision makers, the policy should be cross referenced to the Policies Map and Map 4. The definition of main town centres uses set out in the Glossary should be referred to in the justification.

Recommendation 3: Revise Policy VE1 as follows:

“Within Standish Village Centre as shown on Map 4 and the Policies Map, new development and the use of buildings for main town centre uses will be supported provided that:”

Include a reference to the definition of Main Town Centre Uses in the justification to the policy.

Policy VE2: Village Centre Improvements – Preservation and Enhancement of Standish Centre Conservation Area

- 3.16 This policy adds little in the way of local policy guidance to Core Strategy Policy CP11 and it is therefore recommended that it be deleted. It is suggested that a paragraph should be added to the justification to highlight the importance of development proposals conserving and enhancing the conservation area in accordance with Policy CP11.

Recommendation 4: Delete Policy VE2.

Delete the second part of paragraph 10.46 and create a new paragraph in the justification based on the wording of Policy VE2 revised to read “conserve and enhance” and cross referenced to Core Strategy Policy CP11 and the Standish Conservation Area Appraisal.

Policy VE3: Village Centre Improvements – Enhancement to the Public Realm

- 3.17 The Standish Village Masterplan is one of the key background evidence reports of the SNP. It sets out a number of proposals to improve the village centre and surrounding areas. Key features include the improvement of the public realm, shopfronts, signage, pedestrian movement and parking. The implementation of the public realm improvements will require the co-ordination and input from the local authority. Community Project 1 includes improvements to the village centre.
- 3.18 Policy VE3(ii) sets out details of how the community wish to work with Wigan Council and includes proposals for improving the village centre derived from the Masterplan such as street furniture, landscaping, signage and removal of street clutter. It is not a planning policy to control new development proposals. It should therefore be included in the Community Projects.
- 3.19 The Masterplan notes that developer contributions through S106 agreements could be used to fund or assist in funding off-site works and infrastructure of benefit to the whole community.
- 3.20 I have recommended minor amendments to improve the clarity of the wording of the policy.

Recommendation 5: Delete Policy VE3(ii) and place it in the Community Projects.

Delete “Aecom” and “prospects for” from the first paragraph of Policy VE3.

Include a reference to the Standish Village Centre Masterplan in paragraphs 10.45 – 10.46 and a link to the Community Projects.

Policy VE4: Village Centre Improvements – Provision of Public Conveniences

- 3.21 The policy supports the development of new public conveniences in major retail developments provided they do not have impact on residential amenity. The policy also includes the word “private” and it is not clear what this refers to. The Qualifying Body has explained that it is intended to refer to smaller retail and café establishments.
- 3.22 It is considered that it would be unduly onerous to expect that smaller retail and café establishments should be asked to provide toilets other than for their customers’ use. I recommend that the word “private” is deleted in order to clarify the meaning of the policy.

Recommendation 6: Revise Policy VE4 as follows:

Delete “private or” from line 1 of the policy.

Policy VE5: Control of Hot Food Takeaways

- 3.23 This policy aims to control the number and location of hot food take away establishments where planning permissions is required for their establishment. Part V5.3 requires that they should not be established within 400m of the gates of Standish High School. I have been supplied with a map to show this area and it appears to be a realistic distance to apply. I have recommended modifications to improve the clarity of parts 5.1 and 5.3 of the policy.
- 3.24 There is a typographical error in paragraph 10.12. It should also refer to “planning policy” and not “planning law”.

Recommendation 7: Revise Policy VE5 to read:

“VE5.1 The development of new hot food takeaway businesses which would result in the number of hot food takeaway businesses exceeding 9% of the total number of business premises within Standish Village Centre will not be supported.”

“VE5.3 New hot food take-away businesses *will not be supported* within 400m of the main entrance gate of Standish High School.”

Revise paragraph 10.12 to read “Instilling *healthy* lifestyle habits....but planning *policy* can also help....”

Employment and Business Policies

Policy VE6: Retention of Public Houses and Hotel and/or Leisure Use

- 3.25 The policy sets out the matters that applicants will need to demonstrate to support a planning application that would result in the loss of a public house, hotel or leisure use. The policy and justification also refer to “hospitality venue and leisure uses”.
- 3.26 I have asked the Qualifying Body to define the type of premises that it is intended that this policy should apply to. They have suggested that the term “hospitality and leisure uses” should be replaced with “drinking establishment (A4 use) and hotels (C1)” and the term “leisure uses” should be deleted.
- 3.27 I agree that this revision would improve the clarity of the policy to ensure that it can be interpreted and applied consistently. A recommendation is made to this effect in the policy and justification. The definition should also be added to the Glossary.

- 3.28 Paragraph 10.29 is worded that the Plan's policies are designed to safeguard jobs and to enhance and retain employers. Unfortunately planning policy is unable to do this. It can help to safeguard buildings for particular uses and promote particular uses as suitable for the future of the building or site. The second part of the paragraph states that the policies are applicable to all commercial, business and retail premises in the SNP area, which is incorrect as each policy relates to a particular land use or the designated Employment Areas. A modification is recommended to better reflect the wording of the policies.
- 3.29 Part VE6.2 refers to proposals "only being permitted where:". A recommendation is made to amend this wording in accordance with paragraph 3.9 above.
- 3.30 Reference in paragraph 10.50 to the approach to the subject in other local authority areas is not relevant. The inclusion of a policy in a neighbourhood plan should be supported by robust local evidence.

Recommendation 8: Revise Policy VE6 as follows:

Revise the title to "*Drinking Establishments (Class A4 use) and Hotels (Class C1 use)*."

Revise VE6.1 to read: "...the loss of hotels and *drinking establishments* will be resisted.....supported."

Revise "VE6.2 to read: ".....of a *drinking establishment* or hotel will only be *supported* where:"

Replace paragraph 10.29 to read: "The following business policies are designed to safeguard sites and buildings for particular business uses and support the retention and enhancement of business sites and buildings."

Revise paragraph 10.30 to read "...loss of existing public houses, *drinking establishments and hotels and guest houses* which are important to"

Revise paragraph 10.31 to read: "...apply to public houses, *wine bars or other drinking establishments (but not night clubs)* where the last lawful use of the premises was a permitted *A4 use*, whether currently in *such* use or not."

Include the following definition of uses to which this policy applies in 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).”

Policy VE7: Development that Would Result in Loss of Business Space in Employment Areas

- 3.31 The policy sets out criteria to be considered by developers of proposals that would result in the loss of business space. There is a degree of overlap and inconsistency between this policy and Policy VE8. The wording of both policies requires review to improve their clarity.
- 3.32 Policies VE7 and VE8 add local guidance to Core Strategy Policy CP5 which seeks to safeguard existing employment sites and buildings that are capable of continuing to meet the needs of employment uses and for which there is likely to be sufficient demand. Employment uses are defined in the Core Strategy.
- 3.33 The title of the policy refers to business space in employment areas. Paragraph 10.32 refers to one Employment Area at Bradley Lane. The Policies Map also shows a small area at the junction of High Street and Grove Lane. The key to the map appears to be incorrect. I have raised my concerns about where it is intended that Policies VE7, VE8 and VE9 are to be applied; whether they apply only to the Employment Areas shown on the Policies Map or whether they are to be applied throughout the Plan area. The Qualifying Body has confirmed that these policies are to be applied to two employment areas, both on Bradley Lane. They have stated that the small site near the junction of High Street and Grove Lane is not to be covered by these policies and should be deleted from the Policies Map. Modifications are proposed to paragraph 10.32 to improve its clarity and to delete the small site from the Policies Map.
- 3.34 A representation has been made that a marketing period of 12 months is too prescriptive and a period of 6 months would suffice. They also state that the policy does not include consideration of viability concerns.
- 3.35 Wigan Council’s Supplementary Planning Document on the Re-use of Employment Land and Buildings for Non-Employment Uses (2006) provides guidance on the appropriate marketing period in paragraph 4.5:

“The Council expects employment sites and premises to be marketed for a reasonable period before an application for a change to alternative use can be considered. It accepts that it is difficult to set precise requirements about the length of time sites should be marketed. However, as a guide, the Council considers that active marketing of an employment site should be undertaken for at least twelve months in the current market situation. This timescale may need to be reviewed according to the market circumstances prevailing and the size and nature of the premises concerned, e.g. a longer period if the market is slow or the premises are large.”

- 3.36 The period of 12 months accords with the Council's SPD, although this also makes provision for other periods to be agreed, where appropriate. A modification is recommended to reflect the guidance.

Recommendation 9: Revise Policy VE7 as follows:

“Proposals that would result in the loss of business space to a non-employment use in an Employment Area will not be supportedthat”

Revise (i) to read *“That the site is not viable due to the absence of market demand determined after active and continued marketing for a period of at least 12 months or such other period agreed with Wigan Council in accordance with the guidance in the Wigan SPD on the Re-use of Employment Land and Buildings for Non-Employment Uses or”*

Revise the Policies Map key to link the Employment Areas to Policy VE7.

Delete the small site shown as an Employment Area near the junction of High Street and Grove Lane from the Policies Map.

Revise paragraph 10.32 to read:

“In order to retain and enhance a quality employment offer in Standish, two Employment Areas are designated in the Neighbourhood Plan, at:

- 1. Bradley Hall Trading Estate; and***
 - 2. Mayflower Employment Area, Bradley Lane.***
- Policies VE7, VE8 and VE9 apply to these Employment Areas.***

In addition, land to the rear of 24-82 Preston Road is designated as a mixed-use site for retail, business and leisure uses, to provide employment in the local area without harming the sustainable development of other uses.”

Policy VE8: Non-Employment Uses in Employment Areas

- 3.37 The policy sets out factors to be taken into account in considering proposals for development or change of use to a non-employment use. It repeats most of saved UDP Policy EM1B which is set out in Appendix A of the Wigan SPD on the Reuse of Employment Land for Non-Employment Uses. Policies in neighbourhood plans should add locally specific detailed considerations to policies set out in strategic plans and not simply repeat them. However as this policy has not been replaced by a strategic policy and provides an essential policy direction for decision making in the neighbourhood area, it is considered that it would be appropriate to include it in the neighbourhood plan. It would be helpful to include a reference to Wigan Council's SPD on the subject in the justification to this section of the Plan.

- 3.38 The heading and criterion (i) refer to the Employment Area although the Policies Map does not link to this policy. The recommendation proposes modifications to improve the clarity of the policy and to aid its interpretation by stating that it applies to the Employment Areas. The key to the Policies Map should be revised to link to this policy.
- 3.39 Use of the phrase “will be permitted” is to be avoided in accordance with paragraph 3.9 above. Part G should refer to the Development Plan instead of the SNP as the Development Plan includes the Core Strategy and saved UDP policies as well as the SNP.

Recommendation 10: Revise Policy VE8 as follows:

“Development or change of use *from an employment use to a non-employment use within the Employment Areas* will only be supported when:”

“G.....in accordance with other policies in the *Development Plan*...”

Revise the Policies Map key to link the Employment Areas to Policy VE8.

Include a reference in the justification to Wigan Council’s Supplementary Planning Document on the Re-use of Employment Land and Buildings for Non-Employment Uses (2006).

Include the definition of employment uses from the Core Strategy revised as necessary to be locally applicable in the Glossary.

Policy VE9: Proposals to Upgrade or Extend Designated Employment Sites

- 3.40 This policy supports improvements to the employment sites in the Employment Areas particularly for new business accommodation for managed incubator or start up units. Core Strategy Policy CP5 supports the development of managed incubator or start up units.
- 3.41 The recommendation is to improve the clarity of the wording of the policy to ensure that it uses consistent terminology with Policies VE7 and VE8. There is a typographical error in paragraph 10.54.

Recommendation 11: Revise Policy VE9 as follows:

“Proposals to upgrade, extend or improve existing employment sites *and buildings within the Employment Areas* will be supported, particularly for the development of managed “incubator” or “start up” units, provided that.....community.”

Revise the title to read: “*Improved business accommodation and sites within the Employment Areas*”.

Revise paragraph 10.54 to read: “...including flexible units *capable of being altered to meet business needs.*”

Policy VE10: Preston Road Mixed Use Area

- 3.42 The policy supports the development of an area of land at Preston Road for mixed uses. The site is close to the village centre; it is a brownfield site that has been cleared and has received planning permission for retail and other businesses and associated car parking. To improve the viability of the site some residential development may be necessary.
- 3.43 The policy accords with national and strategic planning policy to make good use of brownfield land, supports sustainable development and the enhancement the village centre. It is recommended that the term “hospitality offer” in criterion (i) should be revised to be consistent with the revisions to Policy VE6. The key to the Policies Map should be corrected to refer to Policy VE10, not V9.

Recommendation 12: Revise Policy VE10 as follows:

Revise criterion (i) to read: “i) it enhances the retail, business and/or *food and drink offer in the village centre.*”

Revise the key to the Policies Map for the Preston Road site to link to Policy VE10.

Policy VE11: Agricultural Use Retention, Enhancement and Expansion

- 3.44 The policy supports the diversification of agricultural businesses to help retain, enhance and extend the agricultural use subject to it not having any unacceptable impacts. Paragraphs 10.23 and 10.55 highlight the retention of agricultural land to help maintain access to open space and to sustain open space which is highly valued by the community.
- 3.45 NPPF paragraph 28 supports economic growth in rural areas by promoting the development and diversification of agricultural and other rural businesses.
- 3.46 I have recommended modifications to the policy and paragraphs 10.23 and 10.55 to improve the clarity of the wording of the policy and justification to ensure that its emphasis reflects that of the NPPF on supporting appropriate economic growth in rural areas.

Recommendation 13: Revise Policy VE11 as follows:

“Proposals *for the diversification of an agricultural business will be supported where they help to maintain and enhance the viability of the agricultural use provided that.....community.*”

Revise paragraph 10.23 to read: “Retaining and enhancing existing agricultural *businesses through their diversification* is seen as playing a key role in helping to maintain *the attractive countryside* in the Standish Neighbourhood Area.”

Revise paragraph 10.55 to read “*Maintaining the prosperity of the agricultural economy is an important means of helping to ensure that agricultural land is retained in active use and contributes to the attractiveness of the countryside. The SNP consultation showed that the countryside is highly valued.*”

Justification: Business and Employment Policies

- 3.47 There are a number of references in the justification to the Business and Employment Policies to “hospitality” development or businesses. It is recommended as a consequence of the revision to the wording of Policy VE6 that this term should be revised. The justification should refer to the local evidence and should not rely on the approach adopted in other local authority areas should be deleted. Reference to this in paragraph 10.50 should be deleted as not relevant.

Recommendation 14: Revise paragraphs 10.48 to 10.51 and 10.53 to 10.54 as follows:

“10.48 Current house building will increase the village population by about 25%. Having *and retaining a good offer of suitable retail and other town centre uses and providing opportunities for new businesses to invest and existing businesses to grow* will help support the local economy and reduce the need for commuting. This *should help* to limit the increase in traffic and air pollution *within Standish*.

“10.49 The designation of a site on Preston Road as ‘Mixed Use’ *should* encourage retail, *business and other appropriate town centre uses* in line with achieving sustainable development and help deliver *new independent shops* the Plan consultation shows are highly valued. *The policy allows a small element of housing within the development if needed to enable the viable delivery of the site.*

“10.50 Pubs help create community cohesion, enhance local character, contribute to the local economy and are important focal points. Residents do not want to lose pubs in *the Standish Neighbourhood Area*. The Plan survey records that 63% of people feel Standish has the right amount of pubs with 13% saying there were too many. The NPPF supports *the retention of local services and community facilities, including public houses*.

“10.51 Standish currently has a mix of retail and business use premises within Standish Neighbourhood Area. *There are two Employment Areas*

on Bradley Lane. Outline planning permission has been granted for 148 houses *on former employment land at the larger site on Bradley Lane.*

“10.53 The above policies are designed to protect the Employment Areas at Bradley Lane and other retail, mixed use and employment land within the Standish Neighbourhood Area to protect jobs and create opportunities for economic, retail and *other town centre uses* as part of a sustainable village in line with Wigan Council’s strategic policies. *They do not apply to the vacant employment site on Bradley Lane which has received planning permission for housing development.*”

“10.54 The general business policies support and value the contribution of small and start-up ventures as part of a vibrant village, *including flexible units capable of being altered to meet business needs.*”

Reducing Traffic Congestion and Better Parking

Policy T1: Provision of Enhanced Footpaths, Bridleways and Cycle Paths in and around Standish

- 3.48 The policy supports enhancements to the network of footpaths, cycle paths and bridleways with improved links to the village centre. It supports sustainable transport in accordance with national planning guidance and helps to deliver Core Strategy Policy CP7.
- 3.49 I propose no modifications to the policy.

Policy T2: Protecting Route of ‘The Standish Loop’

- 3.50 This policy supports the work undertaken by a community cycling organisation to develop a new linked route around most of Standish. The policy seeks to protect and enhance the route. It supports sustainable transport in accordance with national planning guidance and helps to deliver Core Strategy Policy CP7.
- 3.51 I propose no modifications to the policy.

Policy T3: New Developments to Provide for Footpaths and/or Bridleways into the Village Centre

- 3.52 This policy requires new development to include new footpaths and/or bridleways to link into existing routes where appropriate. It includes guidance on the design of new paths, including the provision of bins and lighting. It supports sustainable transport in accordance with national planning guidance and helps to deliver Core Strategy Policy CP7.
- 3.53 I propose no modifications to the policy.

Policy T4: New Business/Retail Developments to Provide Car Parking for Public Use

- 3.54 This policy proposes that new retail and business premises of more than 200 sq metres total floor area and within 400 metres of the village crossroads should include car parking that is made available for public use for a period of three hours.
- 3.55 This is an innovative policy to address the issue of the lack of car parking in the village. However I have concerns that to include a minimum time period of 3 hours may be onerous and unduly prescriptive. Most large supermarkets allow people using their shop a period of two hours parking; those in Standish have a limit of one and a half hours. Business premises usually only make provision for staff and for short stay parking for their clients.
- 3.56 The Qualifying Body has highlighted the concerns of local businesses that the limited amount of parking and time limitations is affecting their businesses.
- 3.57 Whether or not new retail and business premises can make car parking available for public use will depend on the needs of the business and the available land within the site. As worded the policy may have implications for the deliverability of a development proposal. To ensure that the policy is deliverable, I am recommending that the policy be revised to encourage the provision of car parking for public use for a short to medium stay period and that this will be subject to negotiation.

Recommendation 15: Revise Policy T4 as follows:

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

Policy T5: Car Parking in the Village Centre

- 3.58 The Plan makers have been seeking to secure additional car parking spaces to serve the village centre. This policy provides guidance on the design of a new car park in the village centre as and when a site becomes available.
- 3.59 The policy helps support sustainable development by meeting the needs of shoppers and visitors to the village centre. It confirms that existing public open space is not to be used.
- 3.60 I propose no modifications to the policy.

Open Space and Recreational Open Space

Policy OS1: Creation of Green Corridors for Access and Enhanced Biodiversity

- 3.61 The policy supports the creation of new green/wildlife corridors between existing housing and proposed development, to improve accessibility to green space and woodland and to mitigate the loss of green infrastructure by new housing development. It adds local detail to Core Strategy Policy CP9.
- 3.62 The protection and enhancement of green areas in two locations within the Safeguarded Areas is proposed. Some of land is also designated under Policy OS2 as Local Green Space and Policy OS4 as Amenity Green Space. Parts of the areas are designated as Local Sites of Biological Importance.
- 3.63 The location of the proposed wildlife corridors is shown on the Policies Map and on Inset Maps 6 and 7. However the wording of Policy OS1.1(iv) A and B is unclear as it refers to “and the land in between” and “to link up with other nearby green corridors”. Modifications are proposed to refer to the sites on the Policies Map to improve the clarity of the wording of the policy.
- 3.64 Revisions are proposed to OS1.2 to improve its clarity.

Recommendation 16: Revise Policy OS1 as follows:

Revise OS1.1 (iv) A to read “The area of the ponds.....Pepper Lane as shown on the Policies Map and Map 6.”

Revise OS1.1 (iv) B to read: “The Victoria Pit.....Chorley Road as shown on the Policies Map and Map 7.”

Revise Policy OS1.2 to read: “Improvements to public accessibility....rights of way *will be supported.*”

Policy OS2: Designated Local Green Spaces

- 3.65 Policy OS2 proposes the designation of 4 areas as Local Green Space. An assessment of the sites has been undertaken. I am satisfied that they meet the criteria set out in paragraph 77 of the NPPF.
- 3.66 The second part of the policy sets out the policy towards development on the Local Green Space which accords with NPPF paragraph 78. I have recommended minor modifications to ensure consistency of wording.

Recommendation 17: Revise Policy OS2 (a) to read “...its function as a *Local Green Space*; or”

Revise title of Policy OS2 to “Local Green Spaces”.

Policy OS3: Protection of Trees, Hedgerows and Woodland

- 3.67 Part OS3.1 seeks to protect trees, hedgerows and woodland. It is considered that this would amount to a blanket protection that takes no account of the age, condition or location of the trees and hedgerows. There are alternative means of protecting trees, woodland and hedgerows which should be used to protect features that are considered worthy. I am recommending that this part of the policy should be deleted.
- 3.68 A representation has been made that supports part OS3.2 that requires adequate compensatory measures for any tree loss so that there is a net gain in overall quality of the environment. The representation considers that this provides a more flexible approach than the blanket approach in part OS 3.3 on a one for one basis. I agree that part OS3.3 is too prescriptive and should be deleted. Part OS3.2 provides an adequate and flexible approach to securing environmental improvements on major development schemes.
- 3.69 There is a typographical error in OS3.2.
- 3.70 Part 3.4 seeks new tree planting on the basis of one tree for each new dwelling and one per 100 sq metres of floor space for non-residential development. Part 3.5 of the policy makes provision for tree planting to be undertaken on a location off-site elsewhere in Standish where it is not possible to achieve it on site. I have asked the Qualifying Body about the deliverability of this part of the policy. They have confirmed that two Council owned sites have been identified for tree planting and discussions are underway on two further reclamation sites.
- 3.71 The remainder of the policy is innovative and adds local detail to Core Strategy Policy CP9 as it will help to strengthen green infrastructure. It will also contribute to delivering Policy CP10, CP12 and CP13.
- 3.72 Parts OS3.7 and 3.8 repeat OS5.2 and 5.3. The matter is adequately addressed in Policy OS5 and I recommend that the paragraphs should be deleted from Policy OS3.

Recommendation 18: Revise Policy OS3 as follows:

Delete part OS3.1.

Revise OS3.2 to read “...individual trees not protected by a Tree Preservation Order....”

Delete Parts OS3.3, OS3.7 and OS3.8.

Policy OS4: Retention and Enhancement of Amenity/Open Green Spaces

- 3.73 This policy designates a number of other green spaces as Amenity Green Spaces and seeks to retain and enhance them. The policy provides local guidance to Core Strategy Policy CP9.
- 3.74 I have proposed modifications to refer to the designation of the sites and to use a consistent form of wording in the title and the policy itself. A list of the names of the sites should be included in the policy.
- 3.75 I have asked the Qualifying Body to confirm that the landowners of all the open space sites have been informed of the proposed designation. The Council has confirmed that they own most of the sites. However, some of the sites are privately owned and some of these are not registered with the Land Registry and as a consequence the Qualifying Body has not been able to ascertain their ownership. It is evident that not all landowners have been notified of the proposed designation. The Qualifying Body has proposed that those sites where the landowner has not been notified of the proposed designation should be deleted from the Plan. I agree with this course of action and have included a modification to this effect.
- 3.76 The Policies Map shows the area of the playing fields at Ashfield Park as amenity green space but does not include the surrounding amenity / landscaped areas. I have asked the Qualifying Body for their reasons for omitting these areas. They have indicated that this is an error and they should be designated under Policy OS4. (Note this should not include the curtilage of Ashfield House.)

Recommendation 19: Revise Policy OS4 as follows:

“The following areas as shown on the Policies Map are designated as Amenity Green Space:

- 1. Langtree Lane***
- 2. Quakers Burial Ground***
- 3. Almond Green Avenue***
- 4. Primrose Lane***
- 5. Cranborne Close***
- 6. Woodhurst Drive/Almond Brook Road***
- 7. Corner of Almond Brook/School Lane***
- 8. Woodhurst/Hampstead Road***
- 9. Land adjacent to 71 Woodhurst Drive***
- 10. Bradshaw Close***
- 11. Land adjacent Beech Walk***
- 12. Calveley Walk/Aldford Way***
- 13. Byley Rise***
- 14. Walkway between Wigan Road and Green Lane***
- 15. Hartington Drive***
- 16. Ashfield Park***

- 17. Land off Lordy Close**
- 18. Land off Cranleigh**
- 19. Ashfield Park Drive/rear of Birch Avenue**
- 20. War Memorial, High Street/Church Street**
- 21. Standish Library, Cross Street**
- 22. Cross Street/Market Place**
- 23. Broomfield Place**
- 24. Bradley Lane/Sheldon Avenue**
- 25. Templegate Close/Copeland Drive**
- 26. Otter Close Wood**
- 27. Whelley Loop Line Linear Walkway**

“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.”

Delete those areas from the Policies Map where the landowner has not been notified of the proposed designation.

Revise the Policies Map to include the amenity and landscape areas around the playing fields at Ashfield Park.

Revise the title of the policy to “Amenity Green Spaces”.

Revise paragraph 12.27 to read “...smaller Amenity Green Spaces...”

Policy OS5: Protection and Enhancement of the Natural Environment

- 3.77 The policy sets out general principles to be taken into account to ensure that development protects and enhances the environment. I have recommended a modification to the opening paragraph of the policy to simplify and clarify it.
- 3.78 Part (ii) seeks to ensure that development does not affect the distinctive local landscape character and valued public views and vistas. I have asked the Qualifying Body for their evidence on the location of the views and vistas. They have suggested that key views include those of St Wilfred’s Church, of Winter Hill and of Haigh Hall and Haigh Upper Plantations. They have also proposed views of Parbold Hill and open countryside around the village.
- 3.79 During my site visit I was aware only of an occasional glimpse of the church spire and nearby hills from within the built up area. In view of the lack of evidence on the location of the valued views and vistas and to ensure that the

policy can be interpreted consistently by decision makers I have to recommend that part (ii) is deleted.

- 3.80 The Environment Agency has advised that the policy should include the safeguarding of undisturbed ecological buffer zones adjacent to watercourses which are valuable for wildlife. I have made a recommendation to include this under point (i).
- 3.81 United Utilities has recommended that additional text be added to criterion (v) concerning the discharge of surface water and to set out the surface water hierarchy from the paragraph 80 of the NPPG on Flooding and Coastal Change in the justification to the policy. As the requirement is not explicit in strategic plan policies, I have made a recommendation to include this under point (v).
- 3.82 There is a typographical error in paragraph 12.23.

Recommendation 20: Revise Policy OS5 as follows

“OS5.1 Development proposals *should take account of the statutory requirements, policies in the development plan and the following principles:*”

Revise criterion (i): “....Sites of Biological Importance *and undisturbed ecological buffer zones adjacent to watercourses, and contain....*”

Delete the following from criterion (ii) “or harm valued public views or vistas.”

Add the following after criterion (vB): “C. *Where discharge of surface water via a soakaway or other form of infiltration system is demonstrated not to be feasible, the watercourse should be utilised for the discharge of surface water, wherever possible, to adhere to the surface water drainage hierarchy set out in paragraph 12.30.*”

Add the following to the justification “12.30 *In line with paragraph 80 of the National Planning Practice Guidance on Flooding and Coastal Change, surface water should be discharged in the following order of priority:*

- 1. *An adequate soakaway or some other form of infiltration system.***
- 2. *An attenuated discharge to surface water body.***
- 3. *An attenuated discharge to public surface water sewer, highway drain or another drainage system.***
- 4. *An attenuated discharge to public combined sewer.***

***Applicants wishing to discharge to a public sewer will need to submit clear evidence demonstrating why alternative options are not available as part of the determination of their application.*”**

Revise paragraph 12.23 to read “...in accordance with the National Planning....”

Housing to Meet Current and Future Needs of Residents

- 3.83 The Wigan Core Strategy identifies Standish as a broad location for growth outside the main east-west core area. 80% of housing development during the plan period 2011 – 2026 is to be focused in the core area. Paragraph 8.5 states that “*a limited amount of new housing is to be developed at ...Standish. This will expand the range and choice of sites available for new housing whilst bringing flexibility in the supply of land to meet the borough’s housing needs*”. An indicative figure of 1352 dwellings is included in Table 9.2 for Standish.
- 3.84 The emerging GMSF is being prepared to provide sufficient housing for the conurbation up to 2037 and proposes strategic allocations; none of which is in the Standish Plan area. Although it has to be acknowledged that the GMSF is at an early stage of preparation and may be subject to change before it is adopted.
- 3.85 The Neighbourhood Plan makers commissioned independent planning consultants to prepare a Technical Housing Study and a Housing Needs Assessment for Standish. These reports have brought together a summary of the strategic policies and evidence base relevant to the Plan area and have highlighted the housing issues facing the community. The reports explain the background to the release of housing sites as a consequence of the inability of Wigan Council to demonstrate a 5 year supply of housing land. They also demonstrate the mix of housing required by the local population and the mismatch with that approved through planning appeals which have granted permission predominantly for larger 4 bedroomed detached homes.
- 3.86 The reports also conclude that the release of any further sites in the Standish area for this type of development could be argued to be not supportive of sustainable development as it is encouraging more car borne commuting and is undermining the development of brownfield regeneration sites in the Core Strategy’s east – west corridor.
- 3.87 A housing requirement figure has not been defined by the Plan makers or the Local Planning Authority for the SNP. The indicative figure set in the Core Strategy has been met and greatly exceeded. There is a cogent argument that the release of further Safeguarded Land should be carefully managed in order to support the Core Strategy policies on sustainable development and the overall strategy to prioritise the development of brownfield land in the core area of the Borough. Policy H1 sets out criteria that are to be satisfied before further Safeguarded Land is to be released.
- 3.88 The SNP timeframe extends four years beyond that of the Core Strategy. It is understood that Wigan Council will be preparing its Site Allocations Plan once

the emerging GMSF has been progressed. There will be scope for Wigan Council to set out a housing requirement figure for the longer term as advised by the 2019 NPPF which will be considered in any future review of the SNP.

- 3.89 There is no requirement for neighbourhood plans to allocate sites for housing development. The SNP has chosen to allocate two small brownfield sites for housing development under Policy H6, both of which had received planning permission at the time of the examination.
- 3.90 Table 1 lists the sites that have received planning permission for housing development since 2014. It would be helpful if this was updated to show completions since the start of the Local Plan period and commitments at the latest available date. Commitments could be mapped.

Policy H1: Sustainable Housing Growth

- 3.91 Policy H1 of the Plan is seeking to control the release of further areas of Safeguarded Land and sets out three criteria that have to be satisfied. These require that 75% of the homes permitted on Safeguarded Land in Standish at 31 July 2017 have been built and occupied; that the necessary infrastructure has been completed and implemented and that it can be demonstrated that the development can be accommodated across a wide range of community and utility infrastructure. The policy has been adapted from a policy included in the draft Wigan Allocations and Development Management Local Plan. It is noted that the policy has not been tested through a Local Plan examination.
- 3.92 Paragraph 184 of the NPPF 2012 states that “*Neighbourhood plan should not promote less development than set out in the Local Plan or undermine its strategic objectives*”. The overall strategy of the Wigan Core Strategy is to focus 80% of new housing development in the core area with a limited amount in the Standish area. Policy H1 aims to support this strategic objective.
- 3.93 Representations have been made to the policy stating that the plan should not be seeking to restrict the use of safeguarded land in the absence of a housing requirement and referring to the under-delivery of housing in Wigan and the possibility of the policy stifling development. Representations also comment that the figure of 75% is arbitrary and not justified. It would be onerous for developers to determine when the requirements in the criteria on housing occupation and delivery of infrastructure have been satisfied.
- 3.94 In response to my question on the deliverability of this policy, the Council has commented that they “*can currently demonstrate a 5-year land supply which currently stands at 5.84 years. The SHLAA does not identify the residual safeguarded land within its baseline land supply to 2037. As a result, the Council considers the proposed phasing of the release of safeguarded land in Policy H1 to be deliverable if those sites in the SHLAA are built out at the anticipated rate and a 5-year housing land supply is maintained.*”

- 3.95 The Council has suggested that the policy would be clearer if it stated the number of houses that need to be completed and occupied prior to permitting further development rather than stating 75% of the figure at 31 July 2017. They have provided me with information to justify their calculation of this figure which equates to 1148 dwellings. The Council has confirmed that it closely monitors the completion and occupation of new housing and intends to publish completion data on a monthly basis. They have added that it is important that criterion (i) does not apply to planning applications for additional homes on sites that already have planning permission.
- 3.96 I agree with the Council's suggestion to improve the clarity of and justify the deliverability of point (i). It is recommended that the figure of 1148 is substituted for 75% and additional text is added to the final paragraph of the policy to refer to the exception identified by the Council. Additional text should be added to the justification to explain how the figure of 1148 has been arrived at. The Qualifying Body has suggested that the figure should be updated to that at 1 April 2019. However, I consider that this would result in a significant revision to the terms of the policy which has not been subject to consultation and could leave the plan open to a legal challenge.
- 3.97 A representation has commented that the policy does not have regard to the NPPF's emphasis on boosting the supply of housing or the Core Strategy's policies on housing delivery. In response to this representation, the Council has suggested that the following caveat should be added to Policy H1:
- "Where the Council cannot demonstrate a sufficient supply of deliverable housing land to meet identified needs in line with national policy, regard should be given to the NPPF's emphasis on boosting the supply of housing and the Core Strategy's commitment to maintaining a rolling five-year supply of deliverable housing land."*
- 3.98 I agree that this additional clause would aid the interpretation of the policy by decision makers should the position on housing land supply change in the future.
- 3.99 The Council has confirmed that it monitors the availability of and need for infrastructure.
- 3.100 The evidence prepared for the SNP demonstrates that the amount of housing with planning permission in Standish is greatly in excess of the indicative number set out in the Core Strategy and there are concerns that this is undermining the sustainable development strategy of the Core Strategy.
- 3.101 Policy H1 seeks to support the Borough's housing strategy by controlling the release of further housing land in Standish. It also seeks to ensure that adequate infrastructure is in place to accommodate any additional housing development as advised in the NPPF. Exceptions are made for 100% affordable housing or housing for older people.

- 3.102 Paragraph 13.14 states that the Safeguarded Land identified in Wigan's SHLAA is to be brought forward after 2026. It is considered that this wording is not consistent with Policy H1 which does not indicate a timescale for the release of any further areas of Safeguarded Land. It is recommended that this paragraph be revised to be consistent with and better reflect the intentions of the policy wording.
- 3.103 In accordance with paragraph 3.9 above I am recommending that the first paragraph of Policy H1 should be revised to avoid the use of the phrase "will be permitted". Subject to the modifications recommended, I am satisfied that Policy H1 supports the delivery of sustainable development and the delivery of the housing strategy for the Borough of Wigan and therefore accords with national and strategic planning policy. The policy will help to ensure that Safeguarded Land is released when necessary when good progress has been made with the development of the current housing sites and appropriate infrastructure is made available.
- 3.104 The Background Evidence Base under Policy H1 against the Wigan SHLAA 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*".
- 3.105 Under the GMSF, the Evidence Base states "*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.*"
- 3.106 The Council has confirmed that the Green Belt addition is no longer proposed in the current draft of the GMSF (January 2019). The paragraphs in the Evidence Base are incorrect and should be deleted. The land will remain as Safeguarded Land under Policy GB2 of the Wigan Replacement UDP.

Recommendation 21: Revise Policy H1 as follows:

Revise the first paragraph to read: "Safeguarded Land within the Standish Neighbourhood Area *should only be released for housing development where it can be demonstrated that:*"

Revise criterion (i) to read "*1148 of the homes....*"

Add the following to the final paragraph of the policy: "*Additional homes on sites that already have planning permission.*"

Add the following after the final paragraph of the policy: "*Where the Council cannot demonstrate a sufficient supply of deliverable housing land to meet identified needs in line with national policy, regard should be given to the NPPF's emphasis on boosting the supply of housing and the Core Strategy's commitment to maintaining a rolling five-year supply of deliverable housing land.*"

Include a new paragraph in the justification to explain how the figure in criterion (i) has been derived as follows:

“The figure of 1,148 homes set in criterion (i) is 75% of the 1,530 homes that had been approved on safeguarded land in Standish at 31 July 2017. As at 1 April 2019, a further 131 homes have been approved, resulting in a total of 1,661 homes approved on safeguarded land in Standish overall. This means that the balance of permitted homes left over once 1,148 homes have been completed and occupied, is 513 homes. There will be sufficient time while those 513 homes are developed for other potential sites on safeguarded land in Standish to be considered for planning permission and, if granted, brought forward for development, meaning that a regular programme of housing delivery in Standish need not be prevented unless there are overriding planning reasons to do so, such as insufficient infrastructure capacity as covered in criterion (iii).”

Revise paragraph 13.14 to read: *“There is currently a large number of approved housing sites in Standish and Policy H1 will seek to ensure that the ‘Safeguarded Land’, identified in Wigan’s SHLAA which is intended to be available for development in the long term, will only be released when the current approved sites are substantially complete.”*

Update Table 1 to show housing completions and commitments.

Delete the paragraphs from the Evidence Base against Policy H1 concerning the reallocation of Safeguarded Land to the Green Belt.

Policy H2: New Developments to Meet Local Housing Need

- 3.107 Policy H2 provides a framework to deliver an appropriate mix of house sizes, types, price and tenure. The need for particular types of specialist housing has been identified through the background evidence. The policy supports the delivery of NPPF paragraph 50 and Core Strategy Policy CP6.
- 3.108 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.
- 3.109 Rather than focus on this one point, it is recommended the policy and justification highlight that the latest evidence of Housing Need should be considered in determining the appropriate mix of housing types, sizes and tenures when detailed planning applications are prepared.
- 3.110 Representations state that housing need should be informed by Wigan Council’s evidence base. The Standish Housing Needs Assessment has

drawn together data and evidence from a range of sources including that of Wigan Borough and is considered to be a robust study.

Recommendation 22: Revise Policy H2 as follows:

Add the following to the end of the H2.1 “in accordance with the latest evidence of housing need.”

Revise the second sentence of paragraph 13.20 to read: “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: Accessibility to Sustainable Transport/Bus Routes

- 3.111 Policy H3 states that all new housing should be within 400 metres of a bus stop. Representations have been received that the policy should be worded more flexibly and that new housing development could enhance or make provision for new bus stops and public transport services.
- 3.112 Wigan Council prepared the Standish Infrastructure Assessment in November 2013. This discussed the availability of public transport in considering the options for housing development on the three areas of Safeguarded Land in Standish. The assessment stated that *“Nevertheless in order to improve the accessibility of specific development sites; and encourage modal shift to mitigate against additional traffic congestion, it may be necessary to divert existing services, extend hours of operation or provide additional bus services. This will need to be assessed on a site by site basis.”*
- 3.113 The policy is derived from CIHT guidance on “Buses in Urban Developments” published in 2018. The guidance advises that *“The proportion of elderly people is increasing. A walking distance of 400 metres may be excessive when slower walking speeds are taken into account.”* and *“These standard distances should not be applied uniformly without regard to the specific characteristics of the particular location or route.”*
- 3.114 If new development in the plan area is to provide for the growing needs of older people it will be important that specialist developments are located with easy access to good public transport routes. There may also be a need to consider a reduced standard of accessibility to public transport. In other locations there may be scope to provide new bus stops or public transport services. It is therefore recommended that a degree of flexibility be introduced in the policy.

Recommendation 23: Revise Policy H3 as follows:

Add the following at the end of the policy: “....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.”

Add the following to 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: Affordable Housing Provision in Standish

- 3.115 The policy includes a provision for Standish Voice or other qualifying successor organisation to be consulted on the affordability and housing mix strategy for a site and negotiations between Wigan Council and developers on the S106 agreements or modifications from the stated policy in the Affordable Housing SPD, including discussions on a schemes viability.
- 3.116 It is considered that the arrangements for consultations on these matters is a procedural matter and is not appropriate for inclusion in a planning policy. A recommendation to delete reference to consultations in Policy H4 is proposed. The matter is in any case included in Community Project 7. Reference to this community aspiration could be included in the justification to the policy.
- 3.117 The policy should refer to the latest Housing Needs Assessment in H4.1.
- 3.118. The Wigan SPD on Affordable Housing 2013 states that the Council expects affordable housing need to be addressed on-site, unless off-site provision or a financial contribution can be robustly justified. It includes guidance on the circumstances where off site provision may be acceptable exceptionally and the evidence needed to demonstrate its appropriateness.
- 3.119 It is usual practice to require that affordable housing is provided within the development site. However there may be circumstances where this is not feasible or practical and the SPD sets out the evidence needed to justify these exceptional cases.
- 3.120 The SNP sets out a limiting requirement that developments in the SNP area must locate their affordable housing element in the Standish area and not elsewhere in Wigan Borough. Whilst this approach is more restrictive than proposed in the SPD, I have concluded that this approach is a means of implementing national guidance in NPPF paragraph 184 for neighbourhood plans to ensure that they get the right types of development in their community and to support the delivery of sustainable development by ensuring that the affordable housing that is needed is delivered locally. The policy would support the delivery of Core Strategy Policy CP6 on affordable housing.
- 3.121 A representation has been received highlighting the difficulties that may arise for a site that is partly within the Standish plan area. However I can foresee

that there should be no difficulty in a proportionate approach to the delivery of affordable housing units across the site.

- 3.122 The wording of section H4.4 is vague. As the matter is addressed clearly in the SPD and there is no evidence to support a different approach locally, I am recommending that the matter be deleted from Policy H4.

Recommendation 24: Revise Policy H4 as follows:

Revise H4.1 to read “...the latest Standish Housing Needs Assessment and Wigan Council’s Supplementary Planning Document and any subsequent guidance on affordable housing.”

Revise H4.2 to read: “...identified in the latest Standish Housing Needs Assessment.”

Delete H4.4 and H4.5.

Revise paragraph 13.36 to read: “*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.*”

Add a new paragraph in the justification: “*Standish Voice, or its successor organisation, welcomes the opportunity to be consulted on planning applications for housing development, S106 agreements and planning obligations on the mix, type and tenure of housing including affordable housing. Community Project 7 sets out this aspiration.*”

Policy H5: Housing Design and Quality Standards

- 3.123 Wigan Core Strategy Policy CP10 sets out general principles for promoting good quality design in accordance with section 7 of the NPPF. Paragraph 58 of the NPPF states that design policies in neighbourhood plans should be based on an understanding and evaluation of the defining characteristics of the area.
- 3.124 Section 5.1 states that new housing development should be in accordance with the Wigan Supplementary Planning Document on Design Guide for Residential Development or any successor document. This adds no local design guidance to that adopted for Wigan Borough. Reference to the SPD should be included in the justification to the policy.

- 3.125 Part H5.2 states that new homes should meet the spatial standards in the 2016 Nationally Described Space Standards.
- 3.126 The Written Ministerial Statement of March 2015 states that “*the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need and where their impact on viability has been considered. Neighbourhood plans should not be used to apply the new national technical standards.*”
- 3.127 The PPG was updated in March 2015 to state “*Where a local planning authority (or qualifying body) wishes to require an internal space standard, they should only do so by reference in their Local Plan to the nationally described space standard*”. Paragraph: 018 Reference ID: 56-018-20150327.
- 3.128 The latest guidance in NPPF 2019 footnote 46 states that “*policies may use the nationally described space standards, where the need for an internal space standard can be justified.*”
- 3.129 The Qualifying Body has referred me to the draft Greater Manchester Spatial Framework Policy GM-H3 which requires all new housing in Greater Manchester to be built to the nationally described space standards in response to the downward pressure on the size of new built housing. As the GMSF is at an early stage of preparation with consultation being undertaken on the draft Plan between January and March 2019, I can only note the aspiration.
- 3.130 National planning policy is clear that the introduction of nationally described space standards in planning policy must be justified by evidence. I have considered the material included in the Housing Technical Evidence and Housing Needs Assessment. No consideration has been given to the introduction of the national space standards in the background evidence and no local evidence has been submitted to justify the need. It is therefore recommended that part H5.2 should be deleted as it is not in conformity with national planning policy.
- 3.131 Part H5.3 is a procedural matter concerning consultation on planning applications. It is not appropriate to include it in a planning policy and I recommend its deletion.
- 3.132 Section H5.4 requires the submission of a bespoke “Design and Standards Statement” with major development proposals. This states that such Statements should relate to Standish and its architectural heritage and should be accompanied by floor plans at 1:50 scale showing furniture layouts and circulation space.
- 3.133 The submission of a Design and Access Statement is a national requirement for major planning applications. The Wigan Supplementary Planning Document on Design Guide for Residential Development sets out the type of information that is to be included in such statements and the level of detail. Policy H5.4 (i) and (ii) do not add any locally specific policy requirements to

ensure that the design of development reflects the characteristics of the Standish area.

- 3.134 Section H5.4(iii) provides for the Design Statements to be scrutinised by a Design Champion nominated by Standish Voice to provide a written statement on behalf of the village. The concept of Design Champions was pioneered by the Commission for Architecture and the Built Environment to provide an independent review of major development schemes. It is not clear how Standish Voice intend to implement this proposal. In any case it is a procedural matter and would be more appropriately set out as a Community Project.
- 3.135 Part H5.5 sets out standards for thermal performance to reduce heating costs and carbon emissions. The Written Ministerial Statement 2015 also highlights that energy performance standards are not a matter for neighbourhood planning policy as they have been included in the Building Regulations. It is therefore recommended that part H5.5 should be deleted as it is not in conformity with national planning policy.
- 3.136 Despite my recommendation to delete the Housing Design and Quality Policy, this is an important topic for the Plan. Consequently it is recommended that the supporting text should be retained in the Plan and it should be cross referenced to Wigan Council's SPD on Design Guidance and other relevant national standards under the subject heading of Housing Design and Quality.

Recommendation 25: Delete Policy H5:

Retain paragraphs 13.38 – 13.43. Delete “which has been adopted by Manchesterauthorities.” from paragraph 13.41

Move paragraph 13.44 to after paragraph 13.40 and revise to read: “*The Plan seeks to promotecommunity.*”

Add the following text from section H5.1: “*All new housing should, where appropriate, be in accordance with Wigan Council’s Supplementary Planning Document Design Guide for Residential Development.*”

Revise Community Project 7 to read “....and that the *design* quality of new housing....”

Delete paragraph 13.62.

Policy H6: Allocation of Sites for Housing

- 3.137 The Policy seeks to allocate two brownfield sites for housing development and specifies that they should be developed for accommodation for older people or for 100% affordable housing to address the need for this type of housing in the plan area.

- 3.138 A site assessment report is contained in the evidence base. This considered 13 sites that were put forward in response to the call for sites undertaken as part of the preparation of the draft GMSF. The assessment considered the suitability of each site for older people's housing using the Locality toolkit. The assessment identified three sites as potentially suitable: two were included under Policy H6. The other is safeguarded land at Langham Road which has the benefit of full planning permission.
- 3.139 Since the submission of the SNP, outline planning permission has been granted for the Ambulance Station site and full permission for the site at Preston Road for apartments blocks containing 21 flats which will contribute towards the delivery of smaller homes identified in the Housing Needs Assessment.
- 3.140 I have asked the Council whether it would be feasible to deliver 100% affordable housing. They have replied to confirm that they have an ongoing programme to deliver such sites. The Council has confirmed that it has appraised the Ambulance Station site and is considering the possibility of delivering this site.
- 3.141 I have made a recommendation to revise the wording of Policy H6 to improve its clarity and to ensure that it refers to development contributing towards the delivery of identified local housing need. It would be helpful to plan users to include an inset map to show the location and boundaries of the two sites.
- 3.142 A representation has commented that the site at Barrowcroft (the former Bradley Hall Trading Estate) is shown on Map 8 with a link in the key to Policy H6. The site has planning permission for housing development and is a housing commitment listed in Table 1. It is not an allocation under Policy H6 and should not be shown on the Policies Map as such.
- 3.143 Representations have been received proposing six additional sites for allocation for housing development under this policy. An examiner of neighbourhood plans is required to consider whether the plan as submitted satisfies the Basic Conditions. It is not within my remit to determine whether alternative or additional housing sites should be allocated.

Recommendation 26: Revise Policy H6 as follows:

"...are allocated for housing development. The sites shall be developed for housing of a size, mix and tenure that contributes to the delivery of housing that meets local housing needs as evidenced in the latest Housing Needs Assessment. The sites should provide: criteria (i) and (ii).

Include an Inset Map to show the boundaries of the housing allocations.

Delete the Barrowcroft site from the Policies Map as a housing allocation under Policy H6.

Policy H7: Major Housing Developments to Provide Air Quality Assessment and Mitigation Measures

- 3.144 Policy H7 supports the NPPF aim of reducing pollution and the delivery of Core Strategy Objective NRP 1 and Policy CP17. The policy addresses the identified local issue of air quality management.
- 3.145 In accordance with paragraph 3.9 above I have included a modification to replace the words “will not be permitted” from the wording of the policy.

Recommendation 27: Revise Policy H7.2 as follows:

“Housing development will not be supported that would result in unacceptable levels of.....”

Maximising Funding for Standish

Policy F1: The Use of S106 Agreements and/or Community Infrastructure Levy Funding to Support Community Development

- 3.146 Policy F1 sets out a requirement for contributions to be made towards the delivery of community development from “any new development” or “all developments”. There are caveats in the policy that it will be subject to the guidance in the NPPF and viability assessment.
- 3.147 The PPG on Planning Obligations advises that “*Planning obligations assist in mitigating the impact of unacceptable development to make it acceptable in planning terms. Planning obligations may only constitute a reason for granting planning permission if they meet the tests that they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind.*” These tests are set out in NPPF paragraph 204.
- 3.148 The National Planning Policy Framework requires that the sites and the scale of development identified in a plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. Planning obligations should not be sought where they are clearly not necessary to make the development acceptable in planning terms. Certain types of development are exempt from certain obligations eg small housing sites and self build housing.
- 3.149 Planning obligations are subject to negotiation and cannot be imposed as a requirement of all development through a neighbourhood plan policy. I have recommended a revision to the policy to ensure that it satisfies the national planning guidance on the subject.
- 3.150 The final sentence of the policy seeks to have Wigan Council involve Standish Voice or any successor organisation in discussions on S106 agreement at an early stage. Whilst it would be good practice to consult with

a Town or Parish Council or Neighbourhood Forum on the use of planning obligations, this is a procedural matter and cannot be applied through a policy of the neighbourhood plan. Consequently, I shall recommend that this aspect of the policy is deleted.

- 3.151 Paragraph 14.8 reflects the response to the consultation that developer contributions should be spent in Standish rather than other areas of Wigan. However, a word of caution may be needed with this statement as no evidence has been supplied as to whether contributions may be required towards strategic infrastructure.
- 3.152 It may be helpful to include a paragraph in the justification on the priorities for new and improved community infrastructure that have been identified through the preparation of the SNP. It should be noted that these are to meet the needs arising from new housing (and other developments) and to note the sources of funding may be sought to fully fund them (eg grants). Reference to the Standish Infrastructure Assessment (2013) could also be added to the justification for information.
- 3.153 A representation has been made to the suggestion in paragraph 11.10 that any new S106 agreement should take account of the need to provide a new railway station. It advises that there are no proposals in local or regional plans for a new railway station. Contributions towards it cannot therefore be included in S106 agreements. I concur with this and recommended that paragraph 11.10 should be revised.

Recommendation 28: Revise Policy F1 to read:

“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 a paragraph after paragraph 14.6 to read: “Whilst the SNP allocates only a limited amount of development, it is evident that improvements to the community infrastructure are required to support the development of the additional housing that has been approved. The SNP has also identified the need for affordable housing and housing for older people as priorities. The latest assessment of infrastructure capacity in Standish is set out in the Standish Infrastructure Assessment (November 2013).”

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

Revise the last sentence of paragraph 11.10 to read: “Proposals for a new railway station are at an early stage and estimated to cost about £10m.”

Sport, Leisure and Community Facilities

Policy SLC1: Improvements to Sport, Recreational and Leisure Facilities at Ashfield Park

- 3.154 The policy sets out proposals for the improvement of Ashfield Park, the principal park in Standish to create opportunities to increase the capacity for usage for sport and recreation.
- 3.155 Ashfield Park is identified as a Township Park under Core Strategy Policy CP2 which is to be enhanced for improved play, recreation and sports activity. The policy sets out local guidance that will support national and strategic policies to promote healthy lifestyles.
- 3.156 Part (iv) of Policy SLC1 refers to “other routes (footpaths etc)”. To improve the clarity of the wording of the policy “etc” should be replaced with “cycleways and bridleways”.
- 3.157 The Policies Map shows the area to which the policy applies extending over the curtilage of Ashfield House. This is a private facility and not part of the park. The Policies Map should be corrected to delete the curtilage of Ashfield House. The key also needs correcting.

Recommendation 29: Revise Policy SLC1 to read:

“Improvements to other routes, including footpaths, cycleways and bridleways, being considered.....”

Correct the Policies Map to omit the curtilage of Ashfield House from the area covered by Policy SLC1 and correct the key.

Policy SLC2: Southlands Rec – Creation of a Park with Sport and Leisure Facilities

- 3.158 Policy SLC2 proposes improvements to Southlands Rec to create a community park. The area is proposed for designation as a Local Green Space under Policy OS2. It is proposed that the details of the improvements are to be worked on collaboratively with the community and Wigan Council although details set out in the policy propose improvements to include new play provision, informal footpaths and community growing areas. The proposed improvements for the recreation ground were developed from ideas contained in the Standish Village Centre Masterplan.
- 3.159 There has been considerable interest from the local community about the future layout and use of the recreation ground with the result that two community organisations “Don’t Wreck our Rec” and “Friends of the Rec” have been established to support improvements to the park. A number of comments were made by local residents about the nature of the proposals

with many commenting that the area should be retained and improved for a junior football pitch and that the community growing area and children's play area are not supported on this site.

- 3.160 The second part of the policy is a Community Project and should be included in Section 17 of the SNP. In view of the strength of community views on the future of this park it is recommended that the policy and paragraph 15.13 should not prescribe the type of uses that are to be included in the improved recreation ground. The layout and design of the park should be developed through further community consultation.
- 3.161 The policy sets out local guidance that will support national and strategic policies to promote healthy lifestyles.

Recommendation 30: Revise Policy SLC2 as follows:

“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.*”

Delete the second paragraph of the policy and the bullet points. Include a new community action to work with the community and Wigan Council to enhance the Southlands Rec.

Delete “as it is close to a primary schoolincredible edible food provision” from paragraph 15.13. Add “*Further consultation will be carried out with the local community and users of the recreation ground to determine the improvements required.*”

Policy SLC3: Improve Sport, Recreational and Leisure Opportunities

- 3.162 The policy supports the enhancement of and provision of new leisure and sporting facilities. The policy sets out local guidance that will support national and strategic policies to promote healthy lifestyles. I make no comments on it.

Policy SLC4: Enhancement and Protection of Community Facilities

- 3.163 The policy supports the enhancement of three community facilities: Standish Library, Standish Community Centre and The Line/Standish Cycleway. It also sets out matters that will have to be demonstrated by developments that would result in the loss of the facilities. The policy sets out local guidance that

will support national and strategic policies to promote healthy lifestyles. I make no comments on it.

Renewable Energy

Policy R1: Solar Farm Provision

- 3.164 The policy supports the development of solar farms up to 5MW on brownfield land and sets out factors to be considered in determining proposals.
- 3.165 Criterion (iv) of the policy and paragraph 15.33 refers to Environmental Impact Assessment of renewable energy projects. Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 sets out the thresholds whereby projects will require such as assessment. Solar farms will require an EIA but smaller projects for example of 0.5 hectares or less or one or two wind turbines will not require EIA. I therefore recommend that the words “where appropriate” should be added to paragraph 15.33.
- 3.166 Paragraphs 15.38 to 15.44 refer to the use of Gidlow Tip for renewable energy generation as a potential opportunity site. As the site is not allocated in the policy it should not be shown on the Policies Map. Its location should be shown on a suitably titled site plan within the text. Paragraph 15.52 appears to indicate that the Gidlow Tip site is a proposal or allocation under Policy R1. It is suggested that this text should be included under paragraph 15.41.
- 3.167 The policy provides local guidance on the delivery of renewable energy in accordance with national and strategic policies to supports the transition to a low carbon future.

Recommendation 31: Revise justification to Policy R1 as follows:

Delete the first sentence of paragraph 15.31 as a consequence of my recommendation on Policy H5.

Add “*where appropriate*” at the end of paragraph 15.33.

Move paragraph 15.52 to after paragraph 15.41. The site should be deleted from the Policies Map. It should be shown on a map within the text of the Plan with the title of Opportunity Site for Solar Farm or Renewable Energy Development.

Delivery of the Neighbourhood Plan Policies

- 3.168 Paragraphs 16.2 – 16.3 refer to the weight to be given to the SNP policies in determining planning applications and appeals. I have recommended a modification to better reflect the national guidance.

Recommendation 32: Revise paragraphs 16.2 to 16.3 to read:

“Once the SNP has been approved at a referendum, it will be made by Wigan Council. The Plan will then become part of the statutory development plan. Applications for planning permission and appeals must be determined in accordance with the development plan, unless material considerations indicate otherwise.”

Community Projects

3.169 This section includes proposals for 10 Community Projects. Revisions will be required to reflect recommendations on the policies in the Plan.

Minor Corrections

3.170 The following matters have been brought to my attention for correction:

- **Paragraph 2.2 should include reference to Wigan Central ward.**
- **Paragraph 4.2 should read Shevington with Lower Ground ward.**
- **Paragraph 4.10 note that a small area falls within the Green Hill Conservation Area.**

4.0 Referendum

4.1 The SNP reflects the views held by the community as demonstrated through the consultations and, subject to the modifications proposed, sets out a realistic and achievable vision to support the future improvement of the community.

4.2 I am satisfied that the Neighbourhood Plan meets all the statutory requirements, in particular those set out in paragraph 8(1) of schedule 4B of the Town and Country Planning Act 1990 and, subject to the modifications I have identified, meets the Basic Conditions namely:

- has regard to national policies and advice contained in guidance issued by the Secretary of State;
- contributes to the achievement of sustainable development;
- is in general conformity with the strategic policies contained in the Development Plan for the area;
- does not breach, and is otherwise compatible with, EU obligations and human rights requirements

4.3 **I am pleased to recommend to Wigan Council that the Standish Neighbourhood Plan should, subject to the modifications I have put forward, proceed to referendum.**

4.4 I am required to consider whether the referendum area should be extended beyond the Neighbourhood Plan area. I have considered whether any of the adjacent residential areas should be included in the referendum area; however, in all the matters I have considered I have not seen anything that suggests the referendum area should be extended beyond the boundaries of the plan area as they are currently defined. I recommend that the Neighbourhood Plan should proceed to a referendum based on the neighbourhood area designated by the Wigan Council on 23 April 2015.

5.0 Background Documents

5.1 In undertaking this examination, I have considered the following documents

- Standish Neighbourhood Plan Submission Draft Version 2015 - 2030 October 2018
- Standish Neighbourhood Plan Basic Conditions Statement
- Standish Neighbourhood Plan SEA Screening Report (November 2017)
- Standish Neighbourhood Plan HRA Screening Assessment (February 2019)
- Standish Neighbourhood Plan Consultation Statement
- National Planning Policy Framework March 2012
- Planning Practice Guidance March 2014 (as amended)
- The Town and Country Planning Act 1990 (as amended)
- The Localism Act 2011
- The Neighbourhood Planning (General) Regulations 2012
- Wigan Local Plan Core Strategy 2013.
- Wigan UDP Saved Policies 2006.
- Wigan Council SPD on the Re-use of Employment Land and Buildings for Non-Employment Uses (2006)
- Buses in Urban Developments 2018 Chartered Institution of Highways & Transportation.
- Wigan Affordable Housing Supplementary Planning Document 2013
- Wigan Design Guide for Residential Development Supplementary Planning Document 2006
- Standish Village Centre Masterplan 2017 (Aecom)
- Standish Technical Facilitation – Housing Evidence and Policy (Aecom, 2016)
- Standish Housing Needs Assessment (Aecom, 2016)
- Standish Housing Sites Assessments 2018 (Standish Voice)
- Standish Conservation Area Assessment 2006 (Wigan Council)
- Standish Infrastructure Assessment November 2013 (Wigan Council)

6.0 Summary of Recommendations

Recommendation 1: Include a brief statement in the Basic Conditions Statement on how the Plan has considered Human Rights.

Recommendation 2: Ensure that the Policies Map is available at a scale that the site boundaries can be clearly identified with Inset Maps where necessary. The sites under each policy should be referenced by a letter or number which should be included on the Policies Map.

Check the punctuation of the policies.

Revise the references to “Aecom one of the leading planning consultancies in the UK” to “*an independent planning consultancy*”.

Recommendation 3: Revise Policy VE1 as follows:

“Within Standish Village Centre as shown on Map 4 and the Policies Map, new development and the use of buildings for main town centre uses will be supported provided that:”

Include a reference to the definition of Main Town Centre Uses in the justification to the policy.

Recommendation 4: Delete Policy VE2.

Delete the second part of paragraph 10.46 and create a new paragraph in the justification based on the wording of Policy VE2 revised to read “conserve and enhance” and cross referenced to Core Strategy Policy CP11 and the Standish Conservation Area Appraisal.

Recommendation 5: Delete Policy VE3(ii) and place it in the Community Projects.

Delete “Aecom” and “prospects for” from the first paragraph of Policy VE3.

Include a reference to the Standish Village Centre Masterplan in paragraphs 10.45 – 10.46 and a link to the Community Projects.

Recommendation 6: Revise Policy VE4 as follows:

Delete “private or” from line 1 of the policy.

Recommendation 7: Revise Policy VE5 to read:

“VE5.1 The development of new hot food takeaway businesses which would result in the number of hot food takeaway businesses exceeding 9% of the total number of business premises within Standish Village Centre will not be supported.”

“VE5.3 New hot food take-away businesses *will not be supported* within 400m of the main entrance gate of Standish High School.”

Revise paragraph 10.12 to read “Instilling *healthy* lifestyle habits....but planning *policy* can also help....”

Recommendation 8: Revise Policy VE6 as follows:

Revise the title to “*Drinking Establishments (Class A4 use) and Hotels (Class C1 use).*”

Revise VE6.1 to read: “...the loss of hotels and *drinking establishments* will be resisted.....supported.”

Revise “VE6.2 to read: “.....of a *drinking establishment* or hotel will only be *supported* where:”

Replace paragraph 10.29 to read: “The following business policies are designed to safeguard sites and buildings for particular business uses and support the retention and enhancement of business sites and buildings.”

Revise paragraph 10.30 to read “...loss of existing public houses, *drinking establishments and hotels and guest houses* which are important to”

Revise paragraph 10.31 to read: “...apply to public houses, *wine bars or other drinking establishments (but not night clubs)* where the last lawful use of the premises was a permitted *A4 use*, whether currently in *such* use or not.”.

Include the following definition of uses to which this policy applies in 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).”

Recommendation 9: Revise Policy VE7 as follows:

“Proposals that would result in the loss of business space *to a non-employment use in an Employment Area* will not be supportedthat”

Revise (i) to read “*That the site is not viable due to the absence of market demand determined after active and continued marketing for a period of at least 12 months or such other period agreed with Wigan Council in accordance with the guidance in the Wigan SPD on the Re-use of Employment Land and Buildings for Non-Employment Uses* or”

Revise the Policies Map key to link the Employment Areas to Policy VE7.

Delete the small site shown as an Employment Area near the junction of High Street and Grove Lane from the Policies Map.

Revise paragraph 10.32 to read:

“In order to retain and enhance a quality employment offer in Standish, two Employment Areas are designated in the Neighbourhood Plan, at:

3. Bradley Hall Trading Estate; and

4. Mayflower Employment Area, Bradley Lane.

Policies VE7, VE8 and VE9 apply to these Employment Areas.

In addition, land to the rear of 24-82 Preston Road is designated as a mixed-use site for retail, business and leisure uses, to provide employment in the local area without harming the sustainable development of other uses.”

Recommendation 10: Revise Policy VE8 as follows:

“Development or change of use from an employment use to a non-employment use within the Employment Areas will only be supported when:”

“G.....in accordance with other policies in the Development Plan...”

Revise the Policies Map key to link the Employment Areas to Policy VE8.

Include a reference in the justification to Wigan Council’s Supplementary Planning Document on the Re-use of Employment Land and Buildings for Non-Employment Uses (2006).

Include the definition of employment uses from the Core Strategy revised as necessary to be locally applicable in the Glossary.

Recommendation 11: Revise Policy VE9 as follows:

“Proposals to upgrade, extend or improve existing employment sites and buildings within the Employment Areas will be supported, particularly for the development of managed “incubator” or “start up” units, provided that.....community.”

Revise the title to read: *“Improved business accommodation and sites within the Employment Areas”*.

Revise paragraph 10.54 to read: *“....including flexible units capable of being altered to meet business needs.”*

Recommendation 12: Revise Policy VE10 as follows:

Revise criterion (i) to read: *“i) it enhances the retail, business and/or food and drink offer in the village centre.”*

Revise the key to the Policies Map for the Preston Road site to link to Policy VE10.

Recommendation 13: Revise Policy VE11 as follows:

“Proposals for the diversification of an agricultural business will be supported where they help to maintain and enhance the viability of the agricultural use provided that.....community.”

Revise paragraph 10.23 to read: ***“Retaining and enhancing existing agricultural businesses through their diversification is seen as playing a key role in helping to maintain the attractive countryside in the Standish Neighbourhood Area.”***

Revise paragraph 10.55 to read ***“Maintaining the prosperity of the agricultural economy is an important means of helping to ensure that agricultural land is retained in active use and contributes to the attractiveness of the countryside. The SNP consultation showed that the countryside is highly valued.”***

Recommendation 14: Revise paragraphs 10.48 to 10.51 and 10.53 to 10.54 as follows:

“10.48 Current house building will increase the village population by about 25%. Having and retaining a good offer of suitable retail and other town centre uses and providing opportunities for new businesses to invest and existing businesses to grow will help support the local economy and reduce the need for commuting. This should help to limit the increase in traffic and air pollution within Standish.

“10.49 The designation of a site on Preston Road as ‘Mixed Use’ should encourage retail, business and other appropriate town centre uses in line with achieving sustainable development and help deliver new independent shops the Plan consultation shows are highly valued. The policy allows a small element of housing within the development if needed to enable the viable delivery of the site.

“10.50 Pubs help create community cohesion, enhance local character, contribute to the local economy and are important focal points. Residents do not want to lose pubs in the Standish Neighbourhood Area. The Plan survey records that 63% of people feel Standish has the right amount of pubs with 13% saying there were too many. The NPPF supports the retention of local services and community facilities, including public houses.

“10.51 Standish currently has a mix of retail and business use premises within Standish Neighbourhood Area. There are two Employment Areas on Bradley Lane. Outline planning permission has been granted for 148 houses on former employment land at the larger site on Bradley Lane.

“10.53 The above policies are designed to protect the Employment Areas at Bradley Lane and other retail, mixed use and employment land within the Standish Neighbourhood Area to protect jobs and create opportunities for economic, retail and other town centre uses as part of a sustainable village in line with Wigan Council’s strategic policies. They do not apply to the vacant employment site on Bradley Lane which has received planning permission for housing development.

“10.54 The general business policies support and value the contribution of small and start-up ventures as part of a vibrant village, including flexible units capable of being altered to meet business needs.”

Recommendation 15: Revise Policy T4 as follows:

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

Recommendation 16: Revise Policy OS1 as follows:

Revise OS1.1 (iv) A to read “The area of the ponds.....Pepper Lane as shown on the Policies Map and Map 6.”

Revise OS1.1 (iv) B to read: “The Victoria Pit.....Chorley Road as shown on the Policies Map and Map 7.”

Revise Policy OS1.2 to read: “Improvements to public accessibility....rights of way will be supported.”

Recommendation 17: Revise Policy OS2 (a) to read “...its function as a Local Green Space; or”

Revise title of Policy OS2 to “Local Green Spaces”.

Recommendation 18: Revise Policy OS3 as follows:

Delete part OS3.1.

Revise OS3.2 to read “...individual trees not protected by a Tree Preservation Order....”

Delete Parts OS3.3, OS3.7 and OS3.8.

Recommendation 19: Revise Policy OS4 as follows:

“The following areas as shown on the Policies Map are designated as Amenity Green Space:

28. **Langtree Lane**
29. **Quakers Burial Ground**
30. **Almond Green Avenue**
31. **Primrose Lane**
32. **Cranborne Close**
33. **Woodhurst Drive/Almond Brook Road**
34. **Corner of Almond Brook/School Lane**
35. **Woodhurst/Hampstead Road**
36. **Land adjacent to 71 Woodhurst Drive**
37. **Bradshaw Close**
38. **Land adjacent Beech Walk**
39. **Calveley Walk/Aldford Way**
40. **Byley Rise**
41. **Walkway between Wigan Road and Green Lane**
42. **Hartington Drive**
43. **Ashfield Park**
44. **Land off Lordy Close**
45. **Land off Cranleigh**
46. **Ashfield Park Drive/rear of Birch Avenue**
47. **War Memorial, High Street/Church Street**
48. **Standish Library, Cross Street**
49. **Cross Street/Market Place**
50. **Broomfield Place**
51. **Bradley Lane/Sheldon Avenue**
52. **Templegate Close/Copeland Drive**
53. **Otter Close Wood**
54. **Whelley Loop Line Linear Walkway**

“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.*”

Delete those areas from the Policies Map where the landowner has not been notified of the proposed designation.

Revise the Policies Map to include the amenity and landscape areas around the playing fields at Ashfield Park.

Revise the title of the policy to “Amenity Green Spaces”.

Revise paragraph 12.27 to read “...smaller Amenity Green Spaces...”

Recommendation 20: Revise Policy OS5 as follows

“OS5.1 Development proposals *should take account of the statutory requirements, policies in the development plan and the following principles:*”

Revise criterion (i): “....Sites of Biological Importance *and undisturbed ecological buffer zones adjacent to watercourses, and contain.....*”

Delete the following from criterion (ii) “or harm valued public views or vistas.”

Add the following after criterion (vB): “C. *Where discharge of surface water via a soakaway or other form of infiltration system is demonstrated not to be feasible, the watercourse should be utilised for the discharge of surface water, wherever possible, to adhere to the surface water drainage hierarchy set out in paragraph 12.30.*”

Add the following to the justification “12.30 *In line with paragraph 80 of the National Planning Practice Guidance on Flooding and Coastal Change, surface water should be discharged in the following order of priority:*

- 1. *An adequate soakaway or some other form of infiltration system.***
- 2. *An attenuated discharge to surface water body.***
- 3. *An attenuated discharge to public surface water sewer, highway drain or another drainage system.***
- 4. *An attenuated discharge to public combined sewer.***

***Applicants wishing to discharge to a public sewer will need to submit clear evidence demonstrating why alternative options are not available as part of the determination of their application.*”**

Revise paragraph 12.23 to read “...in accordance with the National Planning....”

Recommendation 21: Revise Policy H1 as follows:

Revise the first paragraph to read: “Safeguarded Land within the Standish Neighbourhood Area *should only be released for housing development where it can be demonstrated that:*”

Revise criterion (i) to read “1148 of the homes....”

Add the following to the final paragraph of the policy: “*Additional homes on sites that already have planning permission.*”

Add the following after the final paragraph of the policy: “*Where the Council cannot demonstrate a sufficient supply of deliverable housing land to meet identified needs in line with national policy, regard should be given to the NPPF’s emphasis on boosting the supply of housing and the Core Strategy’s commitment to maintaining a rolling five-year supply of deliverable housing land.*”

Include a new paragraph in the justification to explain how the figure in criterion (i) has been derived as follows:

“The figure of 1,148 homes set in criterion (i) is 75% of the 1,530 homes that had been approved on safeguarded land in Standish at 31 July 2017. As at 1 April 2019, a further 131 homes have been approved, resulting in a total of 1,661 homes approved on safeguarded land in Standish overall. This means that the balance of permitted homes left over once 1,148 homes have been completed and occupied, is 513 homes. There will be sufficient time while those 513 homes are developed for other potential sites on safeguarded land in Standish to be considered for planning permission and, if granted, brought forward for development, meaning that a regular programme of housing delivery in Standish need not be prevented unless there are overriding planning reasons to do so, such as insufficient infrastructure capacity as covered in criterion (iii).”

Revise paragraph 13.14 to read: *“There is currently a large number of approved housing sites in Standish and Policy H1 will seek to ensure that the ‘Safeguarded Land’, identified in Wigan’s SHLAA which is intended to be available for development in the long term, will only be released when the current approved sites are substantially complete.”*

Update Table 1 to show housing completions and commitments.

Delete the paragraphs from the Evidence Base against Policy H1 concerning the reallocation of Safeguarded Land to the Green Belt.

Recommendation 22: Revise Policy H2 as follows:

Add the following to the end of the H2.1 *“in accordance with the latest evidence of housing need.”*

Revise the second sentence of paragraph 13.20 to read: *“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.”*

Recommendation 23: Revise Policy H3 as follows:

Add the following at the end of the policy: *“....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.”*

Add the following to 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.”*

Recommendation 24: Revise Policy H4 as follows:

Revise H4.1 to read “...the latest Standish Housing Needs Assessment and Wigan Council’s Supplementary Planning Document and any subsequent guidance on affordable housing.”

Revise H4.2 to read: “...identified in the latest Standish Housing Needs Assessment.”

Delete H4.4 and H4.5.

Revise paragraph 13.36 to read: “*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.*”

Add a new paragraph in the justification: “*Standish Voice, or its successor organisation, welcomes the opportunity to be consulted on planning applications for housing development, S106 agreements and planning obligations on the mix, type and tenure of housing including affordable housing. Community Project 7 sets out this aspiration.*”

Recommendation 25: Delete Policy H5:

Retain paragraphs 13.38 – 13.43. Delete “which has been adopted by Manchesterauthorities.” from paragraph 13.41

Move paragraph 13.44 to after paragraph 13.40 and revise to read: “*The Plan seeks to promotecommunity.*”

Add the following text from section H5.1: “*All new housing should, where appropriate, be in accordance with Wigan Council’s Supplementary Planning Document Design Guide for Residential Development.*”

Revise Community Project 7 to read “...and that the *design* quality of new housing...”

Delete paragraph 13.62.

Recommendation 26: Revise Policy H6 as follows:

“...are allocated for housing development. *The sites shall be developed for housing of a size, mix and tenure that contributes to the delivery of housing that meets local housing needs as evidenced in the latest Housing Needs Assessment.* The sites should provide: criteria (i) and (ii).

Include an Inset Map to show the boundaries of the housing allocations.

Delete the Barrowcroft site from the Policies Map as a housing allocation under Policy H6.

Recommendation 27: Revise Policy H7.2 as follows:

“Housing development will not be supported that would result in unacceptable levels of.....”

Recommendation 28: Revise Policy F1 to read:

“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 a paragraph after paragraph 14.6 to read: “*Whilst the SNP allocates only a limited amount of development, it is evident that improvements to the community infrastructure are required to support the development of the additional housing that has been approved. The SNP has also identified the need for affordable housing and housing for older people as priorities. The latest assessment of infrastructure capacity in Standish is set out in the Standish Infrastructure Assessment (November 2013).*”

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

Revise the last sentence of paragraph 11.10 to read: “Proposals for a new railway station are at an early stage and estimated to cost about £10m.”

Recommendation 29: Revise Policy SLC1 to read:

“Improvements to other routes, *including footpaths, cycleways and bridleways*, being considered.....”

Correct the Policies Map to omit the curtilage of Ashfield House from the area covered by Policy SLC1 and correct the key.

Recommendation 30: Revise Policy SLC2 as follows:

“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.*”

Delete the second paragraph of the policy and the bullet points. Include a new community action to work with the community and Wigan Council to enhance the Southlands Rec.

Delete “as it is close to a primary schoolincredible edible food provision” from paragraph 15.13. Add “*Further consultation will be carried out with the local community and users of the recreation ground to determine the improvements required.*”

Recommendation 31: Revise justification to Policy R1 as follows:

Delete the first sentence of paragraph 15.31 as a consequence of my recommendation on Policy H5.

Add “*where appropriate*” at the end of paragraph 15.33.

Move paragraph 15.52 to after paragraph 15.41. The site should be deleted from the Policies Map. It should be shown on a map within the text of the Plan with the title of Opportunity Site for Solar Farm or Renewable Energy Development.

Recommendation 32: Revise paragraphs 16.2 to 16.3 to read:

“Once the SNP has been approved at a referendum, it will be made by Wigan Council. The Plan will then become part of the statutory development plan. Applications for planning permission and appeals must be determined in accordance with the development plan, unless material considerations indicate otherwise.”

Minor Corrections

- Paragraph 2.2 should include reference to Wigan Central ward.
- Paragraph 4.2 should read Shevington with Lower Ground ward.
- Paragraph 4.10 note that a small area falls within the Green Hill Conservation Area.