



Standish Neighbourhood Plan

Response from Wigan Council to the Examiner's questions sent 12 March 2019

3 April 2019

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Village Centre and Employment	
<p>Policy VE2 adds no locally specific guidance to the strategic policy so I shall be recommending that it be deleted. The text may be included in the supporting text to highlight the importance of the conservation area with a cross reference to Policy CP11.</p>	<p>Support deletion from the policy and inclusion within the supporting text.</p>
<p>Policy VE3(ii) is not a planning policy and I shall be recommending that it be included in the Community Projects. A reference to the Standish Village Centre Masterplan could be included in the justification (para 10.45 – 46).</p>	<p>Support deletion and inclusion within the Community Projects.</p>
<p>Policy VE4 would the QB explain what is the reason for the inclusion of the word “private” in the first line of the policy?</p>	<p>n/a</p>
<p>Paragraph 10.29 states that the following policies (VE6 - VE10) apply to all commercial, business and retail premises in the Plan area. This contradicts the wording of the policies which apply to particular uses or the Employment Area.</p>	<p>Agree. We suggest that the end of paragraph 10.29 is deleted from “and are applicable....”</p>
<p>Policy VE6 uses the term “hospitality and leisure use” in VE6.1 and “public house and hospitality venues” in 10.30. Would the QB define the meaning of the term “hospitality venue” and “leisure use” applicable to this policy in the local context as this could include a wide range of uses. Should paragraph 10.31 refer to a permitted “A4” use?</p>	<p>The QB will provide definitions and add them to the glossary. Paragraph 10.31 should refer to A4 uses.</p>
<p>Policies VE7, VE8 and VE9 – Refer to Employment Areas in the plural. The Policies Map and paragraph 10.32 indicate that there is only one Employment Area. The key to the Map link to V6 and V9. Would you confirm that the Bradley Hall Estate is the only site that the three policies apply to and that the key to the map requires amending.</p>	<ul style="list-style-type: none"> • On the Policies Map, employment areas should refer to VE7, VE8 and VE9. • There are two employment areas identified: Bradley Hall Trading Estate and an additional area Mayflower Employment Area, Bradley

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	<p>Lane. We propose the following revision to paragraph 10.32 which refers to this additional area:</p> <p>“In order to retain and enhance a quality employment offer in Standish, two Employment Areas are designated in the Neighbourhood Plan, at:</p> <ol style="list-style-type: none"> 1. Bradley Hall Trading Estate; and 2. Mayflower Employment Area, Bradley Lane <p>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.”</p>
<p>Policies VE7 and VE8 are both concerned with the loss of business / employment uses on the Employment Area.</p> <ol style="list-style-type: none"> 1. Would it be practical and feasible to require marketing for at least one year before an application can be considered against Policy VE8? 2. Would the LPA comment on whether this length of time is usually required for employment land in the local area. Does Wigan Council have any local guidance of the matter? 3. Should considerations of viability be included in Policy VE7? 4. Are the differences in wording intentional: VE7 refers to loss of business space whereas VE8 refers to change to a non-employment use. Should a consistent form of wording be used? 5. Does the QB have a definition of “employment uses” that could be included in the Glossary. 	<ol style="list-style-type: none"> 1. The Council has a Supplementary Planning Document associated with saved policy EM1B of the Unitary Development Plan on the re-use of employment land and buildings for non-employment uses. This ‘expects employment sites and premises to be marketed for a reasonable period before an application for a change to alternative use can be considered’ (see paragraph 4.5). It then states, as a guide, that a period of 12 months is an appropriate timeframe. The Council broadly follows this timeframe but different timeframes are sometimes negotiated on a site-by-site basis. 2. The SPD referenced above. 3. The Council believes that considerations of viability should be included. 4. A consistent wording should be applied. The QB are happy to change the wording to non-employment use in both VE7 and VE8. 5. The QB wish to use the definition of ‘employment uses’ set in the Wigan Local Plan Core Strategy (page 65).

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<p>Policy VE10 proposes support for a site for mixed uses. Is this the site shown as V9 on the Policies Map? Would you provide me with a more detailed location plan of this site. Does this policy allocate the site for mixed` use or does it just lend support to the uses?</p>	<ul style="list-style-type: none"> • A detailed location plan is included at Appendix A. • The Policies Map should refer to Policy VE10, not V9. • The policy does not allocate the site; it lends support to the uses.
Traffic	
<p>Policy T3 – I have concerns that the wording of this policy would be unduly onerous and prescriptive. I am proposing that the last two lines of the policy should be revised to give some flexibility as follows: <i>“Developers will be encouraged to provide some of this parking for public use for short stay parking. The number of parking spaces and length of time for parking will be subject to negotiation.”</i></p>	<ul style="list-style-type: none"> • This relates to Policy T4, not T3. • The Council supports the revised wording, however the QB want to retain the need for longer stay parking in the policy.
Open space	
<p>Policies OS1, OS2 and OS4 – would the QB confirm that all the landowners of sites proposed for designation under these policies were consulted on the proposed designation.</p>	<p>OS1 – Almond Brook Road and Victoria Pit (Council) OS2 – Robin Hill Field, Southlands Rec (Council) OS4 – A land ownership map is included at Appendix B. This confirms that the Council owns the majority of the sites proposed for designation under these policies. However, a search of the land registry has identified that 20 of the sites are in other land ownerships, including five that are unregistered. Discussion with Standish Voice has confirmed that the landowners of only 4 of these sites (sites 9, 10, 11 and 15 on the map in Appendix B) have been consulted directly on the Plan, these being sites owned by Bloor Homes, Morris Homes or Persimmon Homes. Given the lack of notification to the landowners of these other sites, Standish Voice has confirmed to the Council that they are willing for these proposed designations to be excluded from the Plan.</p>
<p>Policy OS1.1ivA refers to “the land in between” and OS1.1ivB refers to “link up with other nearby green corridors”. Would the QB confirm that only those sites shown on Maps 6 and 7 are to be protected under this part of the policy. Would the QB/LPA</p>	<p>The map in Appendix C confirms that there is no conflict between these areas and any planning permissions for housing.</p>

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confirm that there is no conflict between these areas and any planning permissions for housing development.	
Policy OS3.1 I consider that this amounts to an unjustified blanket protection and I shall be recommending that this part of the policy should be deleted. There are other means of protecting trees and hedgerows.	Agree. This does not take into account the quality of the tree or enable a balanced and wider assessment of proposals.
Policy OS3.5 Has a suitable location been identified where tree planting off site could be delivered?	The QB will identify suitable locations in their response.
<p>Policy OS4 – Is it intended that this policy designates these areas as Amenity Green Spaces? Would you provide me with a list of the names of these sites and inset maps. It is not clear whether this policy is intended to address the circumstances of parts of the area being lost for built development. I have sought to address these comments through the following revisions to the wording of the policy. Would the QB comment on the proposed revisions.</p> <p><i>“The following areas as shown on the Policies Map are designated as Amenity Green Space: List of names of sites.</i></p> <p><i>“The Amenity Green Spaces shall be retained and enhanced, including where appropriate, improvements to the visual, landscape and nature conservation value of the site.</i></p> <p><i>“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.”</i></p>	The QB support the revised wording.

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<p>Policy OS5 – Have the distinctive local character of local landscape and valued public views and vistas been defined, identified and mapped? If not, how is it intended that this part of the policy should be interpreted.</p>	<p>The distinctive local character of local landscape and valued public views and vistas have not been defined, identified or mapped in the NP. Following discussion with the QB, they had assumed that this policy would be sufficient to enable the Council to determine planning applications. However, with hindsight, the identification of key views and vistas either within the policy (and shown on the Policies Map) or at least within the supporting text, and accompanied with a map, would be both informative and enable effective interpretation by applicants and Development Management officers. Key views and vistas identified by the QB include:</p> <ul style="list-style-type: none"> • Views of the Grade I Listed St Wilfrid’s Church • Views of Winter Hill • Views of Haigh Hall and Haigh Upper Plantations <p>The council is supportive of these. However, there are three other proposals, as follows:</p> <ul style="list-style-type: none"> • Views of Parbold Hill. <p>The council is not supportive as Parbold Hill is viewed principally from the west and Standish is on relatively high land which is effectively a continuation of Parbold Hill eastwards.</p> <ul style="list-style-type: none"> • View of open countryside, Elnup Wood and Birley Wood from land between 302 and 314 Wigan Road, Standish at entrance of Gidlow Cemetery. • Views of open countryside to the north of Standish on land east of 351 Preston Road. <p>The council is not supportive of these, as these are views of adjacent countryside, which would be lost if the land was developed but is nevertheless protected from development anyway, as it is Green Belt.</p> <p>The policy could also be usefully explained in the supporting text, concerning inappropriately large development close to the church, or an inappropriately sited taller building blocking a distant view of the church spire from a key gateway location, for example. Similarly, glimpses of Winter Hill and Haigh Hall from within the town centre are valued as providing context and place.</p>

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	<p>The policy could require applicants to demonstrate that the protection of key views and vistas have been taken into account in schemes.</p>
<p>Policy OS5.2 and 5.3 repeat parts OS3.7 and 3.8. It is suggested that it be retained in the general policy OS5. Would the QB and LPA comment on the suggestions put forward by the Environment Agency and United Utilities concerning land and development adjacent to watercourses. Is this matter adequately addressed in strategic policies?</p>	<p>United Utilities: The surface water hierarchy proposed by United Utilities is not included in the Wigan Local Plan Core Strategy but was proposed in the Draft Allocations Plan. This however has not progressed and carries very little or no weight. The Greater Manchester Spatial Framework (GMSF) is only at draft stage but it includes a detailed policy on flood risk and the water environment which takes an integrated catchment-based approach to protect the quantity and quality of water bodies and managing flood risk. However, given the adopted Core Strategy does not include this, and the GMSF is yet to be adopted, the Council considers there to be some merit in including this in the Neighbourhood Plan. Whilst this hierarchy is set out in national planning policy guidance, this only forms a material consideration.</p> <p>Environment Agency: Given the ecological value of watercourses within the Standish Neighbourhood Area, namely the River Douglas, it is considered that the Environment Agency's proposed additional clause to Policy OS5 would be of merit and worthy of inclusion.</p>
Housing	
<p>The Evidence Base report states that "<i>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</i>". Further "<i>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</i>). This will mean no further housing development can take place on this land." Would the LPA confirm whether it is proposed to</p>	<p>An area of safeguarded land to the east of Standish (off Rectory Lane) was proposed to be added into the Green Belt in the initial draft of the GMSF (2016). However, this Green Belt addition is no longer proposed in the current draft of the GMSF (January 2019). The paragraph identified in Evidence Base report is therefore inaccurate and should be deleted. The land will remain as land safeguarded for future development as designated in Policy GB2 of the Wigan Replacement Unitary Development Plan.</p>

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<p>include this revision in the GMSF and the current status of the Safeguarded Land. Would they also confirm whether or not it is proposed to include any strategic allocations for housing in the Standish plan area in the GMSF. It would be helpful if the LPA and QB would agree revisions to this wording.</p>	<p>The GMSF does not propose any strategic allocations for housing within the Standish plan area.</p>
<p>Policy H1 is adapted from a policy proposed in the Wigan Allocations DPD which has not been tested at examination. Would the LPA:</p> <ol style="list-style-type: none"> 1. Comment on whether the proposal for phasing the release of safeguarded land in Policy H1 is considered to be deliverable; 2. Comment on whether the figure of 75% can be justified. 3. Respond to the points made in the representations by Indigo, Emery and Mosaic. 4. Confirm that they will be able to maintain up to date records on housing completions and occupations and the availability or need for a wide range of infrastructure to accommodate for further development as required by the policy. 	<ol style="list-style-type: none"> 1. As set out in the 2018 update of the Wigan Strategic Housing Land Availability Assessment (SHLAA), the council is not currently reliant upon the residual safeguarded land in Standish to meet housing needs to 2037, or to demonstrate a 5-year supply of deliverable housing sites. The Council 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. 2. The council believes the policy would be clearer if Clause (i) of Policy H1 specifically stated the number of homes that need to be completed and occupied prior to permitting further development, rather than stating 75%. As it is an historical position it is a fixed and non-changeable figure. 1,530 homes had been approved on safeguarded land in Standish as at 31 July 2017, as set out in Appendix D, so 75% of that figure is 1,148 homes. An explanation of this figure can be provided in the supporting text. <p>As a result, the balance of 25% equates to 382 homes. However, 131 more homes have been granted planning permission since 31 July 2017, and any of these that are built out would count towards the figure of 1,148 homes. Therefore, the balance of permitted homes left over once 1,148 homes have been completed and occupied is 513 homes. This equates to 31% of capacity on sites with planning permission on safeguarded land in Standish, meaning</p>

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that 1,148 homes equates to 69% of the total as it stands now, not 75%.

This means that 513 homes would still be under construction or awaiting development once 1,148 homes have been built and occupied, subject to all material considerations, and for reasonable lead-in times to the delivery of new homes on those sites. The lead-in times assumed in the council's SHLAA, which have been accepted by the development industry, are set out below. For clarification, the lead-in times represent the timeframe to the completion of the first dwelling on site.

Site status	Below 50 dwellings	50+ dwellings
Under construction	n/a	n/a
Full Planning Permission / Reserved Matters	1.5 years	2 years
Outline Planning Permission	2 years	2.5 years
Sites without planning permission	2.5 years	3 years

Appendix D sets out the rate of housing completions on safeguarded land in Standish since 2014. It shows that in the last two full years, annual housing delivery is around 150 homes. The buffer of 513 homes therefore equates to around 3.4 years supply. This is more than the lead-in time of 3 years for sites of 50+ homes without planning permission, as shown above. We therefore consider the figure of 1,148 (75% of 1,530 as set out in the policy at present) justifiable on the basis that the residual capacity from committed developments (513 homes) would be expected to come forward during the lead-in period of future sites (subject to planning

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	<p>permission being granted), without restricting housing delivery in Standish.</p> <p>The Council considers it important that clause (i) does not apply to applications for additional homes on sites that already have planning permission. This is on the basis that amendments to permitted schemes (such as the replacement of house types to smaller units) are sometimes required to address market-related issues on sites, which we believe should not be prevented by this clause.</p> <p>3. The council's response to the representations submitted by Indigo, Emery and Mosaic are included at Appendix E.</p> <p>4. The council monitors housing completions (and occupation) on a real time basis through council tax registrations and the local land and property gazetteer. Therefore the point that 1,148 homes are completed and occupied will be known within days and will be clear in terms of when it can be expected for many months ahead, allowing prospective developers to prepare their planning applications for submission in a timely manner. The council therefore has the capability of publishing completion figures on a monthly basis on the council website which could be used as an agreed source to establish when this figure has been reached.</p> <p>The council is well placed to report on the availability or need for a wide range of infrastructure to accommodate for further development as required by the policy.</p> <p>The council prepared the Standish Infrastructure Assessment in November 2013 which assessed the capacity of transport, education, health, open space, community and utilities infrastructure in Standish (the infrastructure typologies covered in the policy). The infrastructure assessment has informed planning decisions on</p>

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	<p>residential planning applications on safeguarded land in Standish to date. Further to this, the council has recently commissioned Transport for Greater Manchester to undertake updated traffic modelling in Standish which reflects the current level of permissions.</p> <p>The council also has an established multi-disciplinary working group which meets regularly to consider infrastructure capacity issues in parts of the borough, including Standish. The group is currently testing a number of potential mitigation measures in Standish and intends to engage with the community including Standish Voice on these in the summer.</p>
<p>Paragraph 13.20 states that “the Standish Housing Needs Assessment concluded that 65% of homes built as part of all future developments should be constructed for older people to address the imbalance.” This is in fact only one of several conclusions set out in Table 19 of the Standish Housing Needs Assessment. I am proposing that the paragraph should be revised as follows: “Table 19 of the Standish Housing Needs Assessment sets out the latest evidence of the type, size and tenure of housing required and highlights the challenge of providing suitable housing to meets the needs of the ageing population.”</p>	<p>The Council supports the proposed revisions.</p>
<p>Policy H3 - Have any maps been prepared to show the availability of bus stops in relation to new development areas? The CIHT guidance on “Buses in Urban Developments” encourages a degree of flexibility in applying their guidance and suggests a lesser distance for housing for housing for older people. I am proposing to add the following to the end of Policy H3 and paragraph 13.27: H3 “....unless the housing development is specifically for older people or specialised housing where a lesser</p>	<p>A map showing the availability of bus stops in relation to new development areas is included at Appendix F. The Council supports the proposed revisions to Policy H3 and paragraph 13.27.</p>

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<p><i>distance may be required or where new or improved public transport services and/or bus stops can be provided as part of the development.”</i></p> <p>Paragraph 13.27 <i>“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.”</i></p>	
<p>Policy H4 Consultation with Standish Voice is a procedural matter and it is not appropriate to include it in a planning policy. I shall recommend that it be deleted from the policy wording here and in other policies. It should be addressed in the Community Projects.</p>	<p>The Council supports the deletion of this policy and agrees that it should be addressed in the Community Projects.</p>
<p>Policy H4.4 is unclear and I propose to delete it. The subject is clearly addressed in the SPD.</p>	<p>The Council supports the deletion of this policy.</p>
<p>Paragraph 13.36 is unclear and I propose that it be revised as follows: <i>“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.”</i></p>	<p>The Council supports the proposed revisions.</p>
<p>Policy H5 – I shall be recommending that this policy should be deleted, although the supporting text, may be retained and adapted where appropriate:</p> <ul style="list-style-type: none"> • H5.1 adds no local guidance to the SPD. 	<p>The Council supports the deletion of this policy. This reflects previous feedback from the Council to the QB. The QB however seek to retain elements of the policy, notably H5.2, H5.4(iii) and H5.5.</p>

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<ul style="list-style-type: none"> • H5.2 and H5.5 are deleted in view of national guidance in the Written Ministerial Statement of March 2015 which states that neighbourhood plan should not include reference to the National Technical Standards; and the Building Regulations address thermal performance. • H5.3 and H5.4(iii) are procedural matters and included in Community Project 7. • H5.4 (i) and (ii) add no locally specific guidance to that set out in Wigan Council SPD on Design Guidance for Residential Development. • No explanation is given as to how the QB is proposing to scrutinise the design of major housing development through a “Design Champion”. In any case this is a procedural matter and should be addressed through the Community Projects and not planning policy. 	
<p>Policy H6 seeks to allocate 2 sites for housing development to accommodate housing for older people or 100% affordable housing.</p> <ol style="list-style-type: none"> 1. I understand that planning permission has been granted for both sites. Would the LPA confirm the details of the development approved. 2. Would the LPA and QB comment on whether the two criteria on the type of housing are deliverable. Has any work been undertaken to demonstrate how a site can be delivered for 100% affordable housing (e.g. cross funded by market housing elsewhere)? Has the Council or Registered Social Landlord made any commitment to support the delivery of sites for 100% affordable housing? 	<ol style="list-style-type: none"> 1. Details have been provided by post. Details are also available on the Council website via: https://www.wigan.gov.uk/Resident/Planning-and-Building-Control/Planning/Search-planning-applications.aspx 2. The Council can deliver 100% affordable housing schemes via its direct delivery programme using the council’s Housing Revenue Account capital programme. The Council has an ongoing programme of sites and delivered 49 units in 2018/19 and have 136 units currently on site for delivery in the next two years and will be continuing the programme beyond this. The Council also has affordable housing programmes with a number of registered providers delivering homes for both affordable rent and shared ownership on various sites across the borough.

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<p>3. Would you supply me with a detailed map to show the location of both sites.</p>	<p>There are no current Registered Provider development sites in Standish although the Registered Providers are taking Section 106 affordable units on sites and are very keen to deliver affordable homes in Standish. 100% affordable housing sites are usually grant funded via the Homes England affordable housing programme. The Council also receives some Section 106 commuted sums that can be utilised for affordable housing schemes in the borough, £700k of which is to be utilised in Standish specifically.</p> <p>The Council has not looked at the Chinese Delight site in terms of its delivery for affordable or older persons housing. However, the Council has recently appraised the Standish Ambulance Station site, and is considering the possibility of developing this within our direct delivery programme using HRA capital and S106 receipts, subject to the acquisition of the site.</p> <p>3. Detailed maps of both sites are included at Appendix G.</p>
<p>Policy H6: The representation from Homes England concerning the Barrowcroft site (former Bradley Hall Trading Estate) refers to a site location plan and indicative masterplan. The site is shown on the Policies Map as a housing allocation under Policy H6 which is incorrect, and I will recommend that it should be deleted</p>	<p>Agree, the housing allocation should be deleted as it is not consistent with policy H6. It is though noted as part of the housing land supply in Table 1 on page 55 of the Neighbourhood Plan.</p>
Funding	
<p>Policy F1:</p> <p>1. This includes a requirement on “any” or “all” development which does not accord with NPPF guidance on planning obligations. It also includes an aspiration for Standish Voice to be involved in negotiations on planning obligations. This is a procedural matter which is not appropriate for inclusion in a planning policy. Paragraph 14.8 should acknowledge that contributions may be required towards strategic infrastructure. Would the LPA and QB comment on the proposed revisions to the policy and justification:</p>	<p>1. The Council supports the proposed revisions.</p> <p>2. The latest assessment of infrastructure capacity in Standish is the Standish Infrastructure Assessment (November 2013). Further to this, updated traffic modelling is currently being undertaken by Transport for Greater Manchester (TfGM).</p>

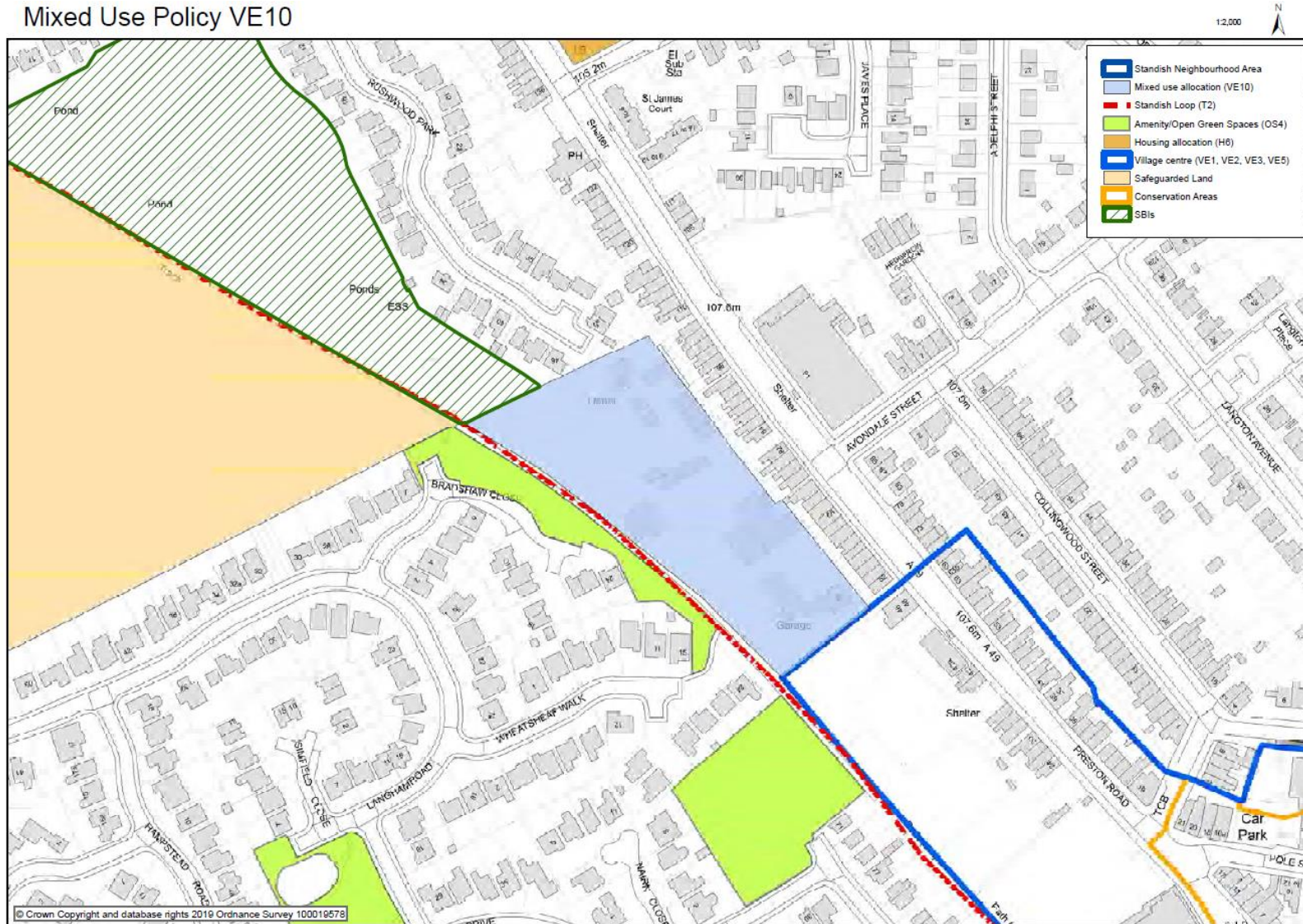
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<p><i>“Developer contributions towards improved community infrastructure will be sought where it is shown that the obligation is necessary to make the scheme acceptable in planning terms, is directly related to the development and is fairly and reasonably related in scale and kind to the development.”</i></p> <p>Add the following to paragraph 14.8: <i>“It is acknowledged that contributions may be sought for any future strategic infrastructure.”</i></p> <p>Add a paragraph after paragraph 14.6 to read: <i>“Whilst the SNP allocates only a limited amount of development, improvements to the community infrastructure are required to support the scale of the additional housing development that has been approved. The SNP has also identified the need for affordable housing and housing for older people as priorities.”</i></p> <p>2. Has an up to date Infrastructure Delivery Plan been prepared for Standish?</p>	
Sport, Leisure and Community	
<p>Policy SLC2 There has been considerable interest from the local community about the future layout and use of the recreation ground. To avoid being too prescriptive, the following revisions are proposed:</p> <p><i>“Southlands Rec should become a community park with improved leisure and sports facilities.</i></p> <p><i>“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</i></p>	<p>The Council supports the proposed revisions.</p>

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<p>impact on the <i>residential amenity of neighbouring dwellings and shall have due regard for the prevention of anti-social behaviour.</i>"</p> <p>The second paragraph of the policy and the bullet points should be deleted. A new community action should be included "<i>to work with the community and Wigan Council to enhance the Southlands Rec</i>".</p>	
Renewable energy	
<p>Policy R1: The use of Gidlow Tip for renewable energy generation is noted as a potential opportunity site in paragraphs 15.38 to 15.44. As it is not an allocation it should not be shown on the Policies Map. A site location plan should be included within the text.</p>	<p>Noted. A proposed site location plan of Gidlow Tip to include within the supporting text is included at Appendix H.</p>
Further questions raised by Examiner on 21 March	
<p>Policies VE7, 8 and 9: Is the small parcel of land near Grove Road shaded mauve identified under these policies?</p>	<p>The QB has confirmed that this can be deleted.</p>
<p>Policy VE8D: Are there any listed buildings in the Employment Areas identified on the Policies Map? If not, is this criterion necessary?</p>	<p>Yes. Bradley Hall is located within the Bradley Hall Trading Estate and is a Grade II* Listed Building.</p>
<p>Policy T5: There is a large private car park serving Chadwicks Butchers which was almost empty at the time of my visit. Has any work been undertaken to seek use of the site for public parking?</p>	<p>Yes, but this is unavailable. This site is now the subject of a planning application for older people's apartments by McCarthy And Stone.</p>
<p>Policy OS1: Would you confirm that there is no conflict between the areas identified under this policy and planning permissions for housing in the areas. In particular with the new access road serving the development in the Almond Brook area.</p>	<p>The Council can confirm that there is no conflict as shown in the map at Appendix C.</p>

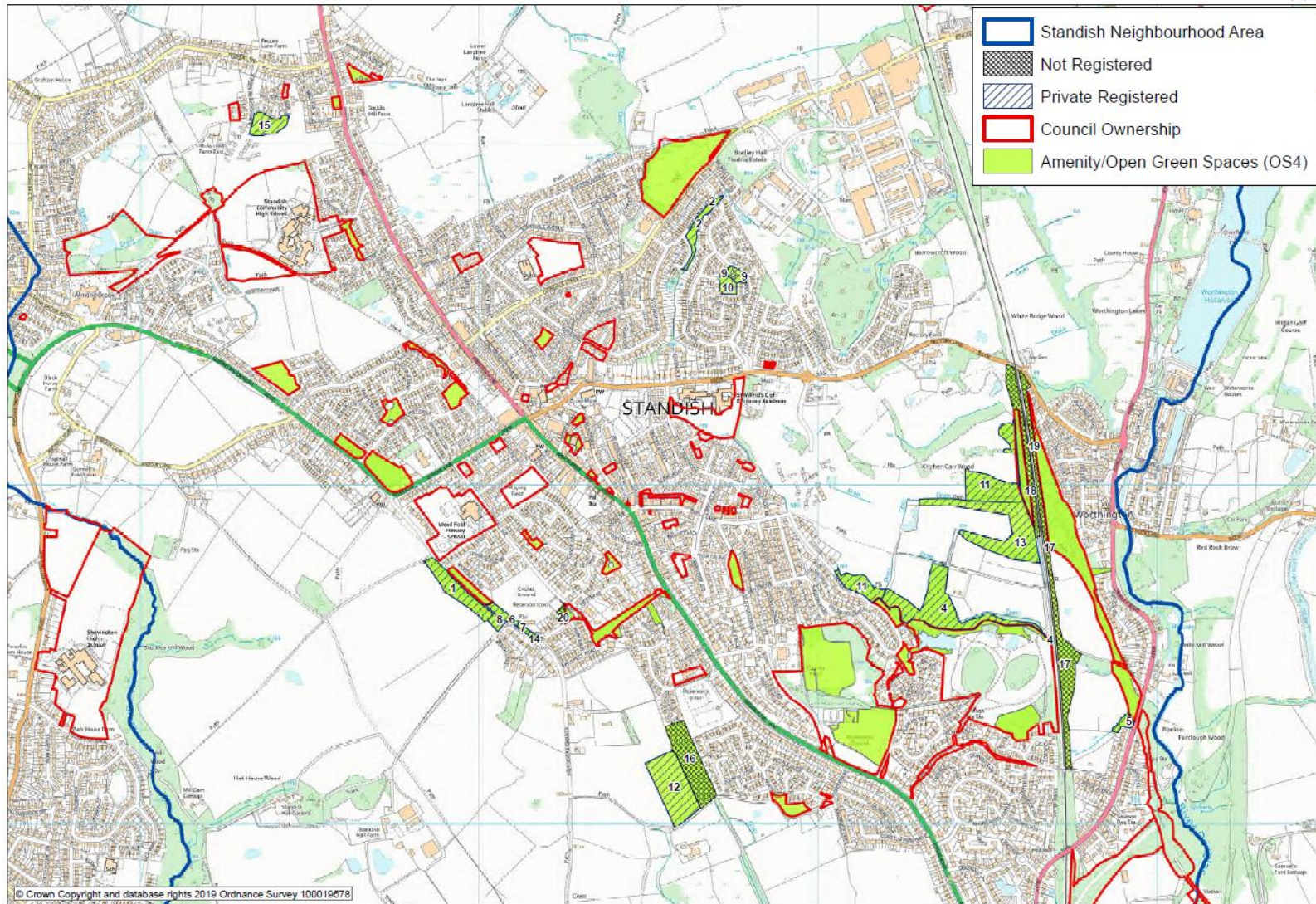
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<p>Policy OS4: Ashfield Park – Is there any reason why the amenity / landscape areas around the main pitches have not been identified under Policy OS4?</p>	<p>The QB has confirmed that these areas should be included.</p>
<p>Policy SLC1: Ashfield Park - is there a reason for including the Ashfield House Events Facility in the area covered by this policy? It is a private facility and not part of the park.</p>	<p>The QB has confirmed that the premises should be excluded from the boundary.</p>

Appendix A: Detailed site location plan of the Preston Road mixed use site (Policy VE10)

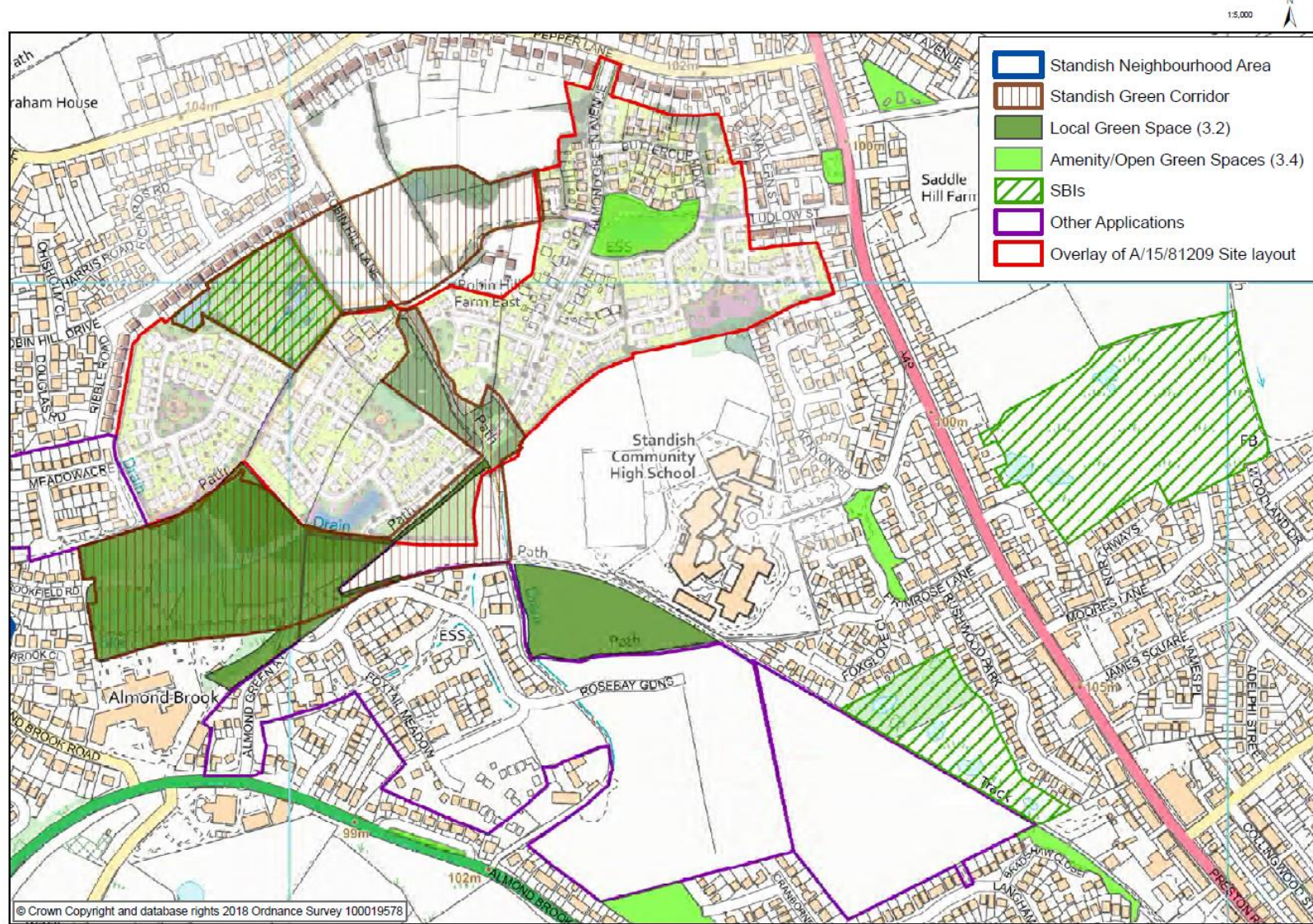
Mixed Use Policy VE10



Appendix B: Land ownership of proposed Amenity Green Space



Appendix C: Map confirming that the proposed green corridors do not conflict with extant planning permissions for housing



Appendix D: Annual housing completions* on safeguarded land in Standish

Address	Homes permitted	Completions				
		14/15	15/16	16/17	17/18	18/19**
Sites under construction or built out						
Land south of Pepper Lane	351	0	0	0	1	23
Land to the north and south of Rectory Lane	250	0	0	0	46	38
Land north of 23 Old Pepper Lane	39	0	6	20	11	2
Cat l'Th' Window Farm Almond Brook Road	298	0	0	9	44	43
Land to rear of 214 Almond Brook Road	5	0	3	2	0	0
Land to the north of Rectory Lane	150	0	0	42	43	49
Sites not started						
Land at Rectory Farm, Rectory Lane	128	0	0	0	0	0
Former Standish Court Golf course, Phase 2	250	0	0	0	0	0
Land at Lurdin Lane	110	0	0	0	0	0
Land at Langham Road	80	0	0	0	0	0
	1,661	0	9	73	145	155

Permitted at 31 July 2017	Date approved	Post 31 July 2017	Date approved
300	28-Jan-16	51	12-Nov-18
250	28-Jan-16		
39	26-Jun-15		
298	02-Jul-15		
5	13-Mar-14		
150	08-Jul-15		
128	17-Jul-17		
250	26-Aug-15		
110	26-Aug-15		
0		80	06-Mar-18
1,530		131	

*Completions are defined as homes that are completed and occupied

**2018/19 completions to 31 March 2019 but subject to late notice of earlier completions

75%	1,148
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Appendix E: Wigan Council response to comments submitted by Housebuilders on Policy H1 (clause i)

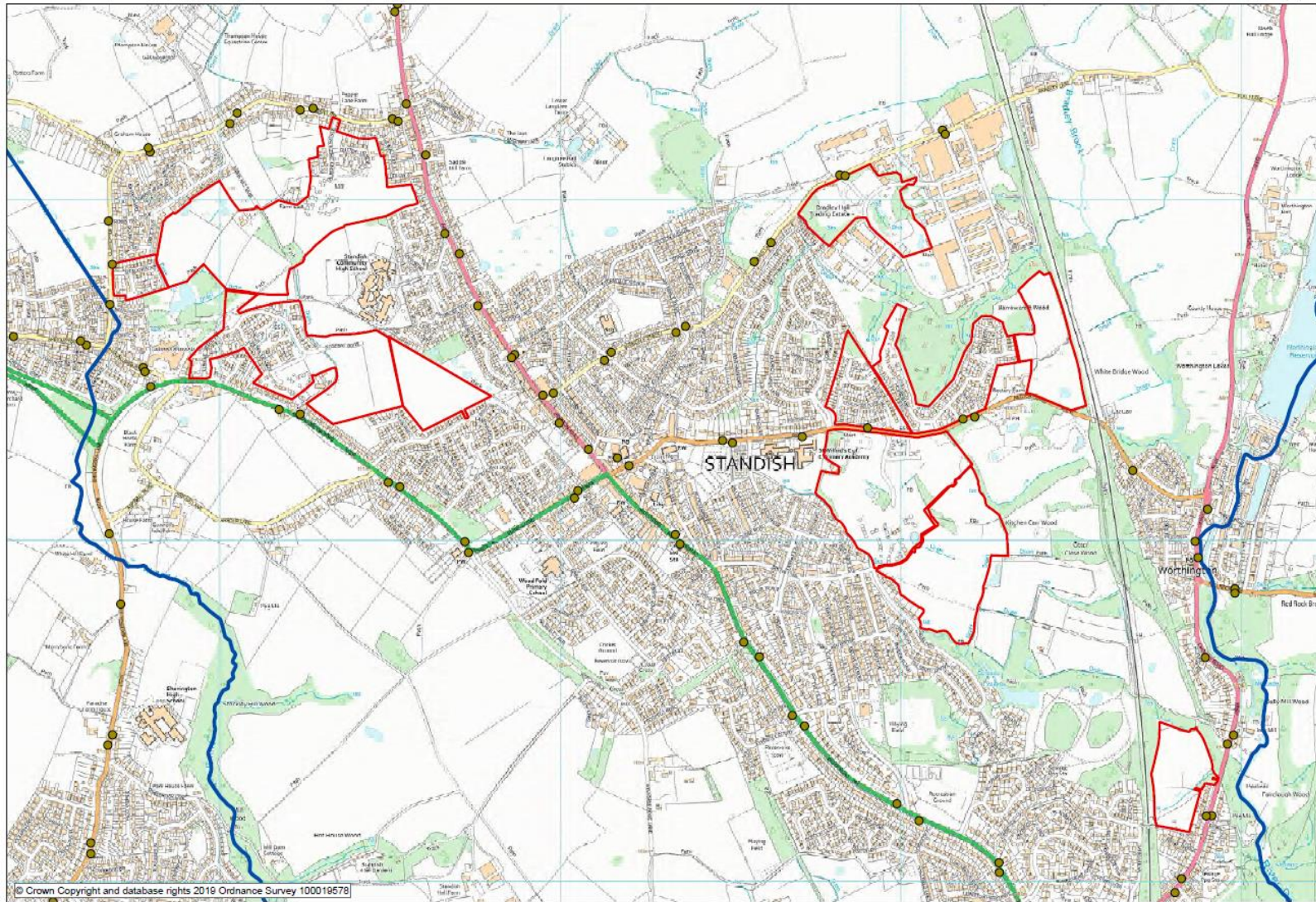
Representor	Comment	Council Response
Seddon (Indigo Planning)	<p>There is a record of persistent under-delivery of housing in Wigan. Placing an arbitrary threshold on the completion of extant permissions may have the result of stalling the much needed growth in the local area. This policy as currently drafted would limit the delivery of the Local Plan where evidence demonstrates that some extant permissions have either stalled or will take longer to come forward on site. This policy requirement should be removed. As currently drafted, this policy does not meet basic conditions of having regard to NPPF's emphasis on boosting the supply of housing, or the Core Strategy's strategic policies for housing delivery. This policy requirement should be removed.</p>	<p>The Council can demonstrate a 5.8 year supply of deliverable housing sites, as set out in the 2018 SHLAA. It can also demonstrate a sufficient supply to 2037 to accommodate proposed levels of housing in the Draft GMSF.</p> <p>The Council notes the view that the policy as currently drafted would not meet the basic conditions. However, it is considered that the inclusion of an additional caveat to clause (a) where the Council cannot demonstrate a sufficient supply of deliverable housing land to meet identified needs in line with national policy, would show regard 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. This additional caveat is therefore suggested by the Council.</p>
Morris and Persimmon (Mosaic)	<p>The approach of only allowing further housing development on Safeguarded Land if 75% of those permitted have been <i>built out and occupied in line with respective permissions</i> is flawed in several respects. The figure of 75% is arbitrary and not justified by the policy. It is noted that this wording was taken from draft Policy H3 of the Allocations and Development Management Local Plan initial draft, which was subsequently put on hold pending production of the GMSF. Such a restriction to further development would be contrary to NPPF, which seeks to <i>support the Government's objective of significantly boosting the supply of homes</i> and in doing so ensuring that a "sufficient amount and variety of land can come forward where it is needed..." (paragraph 59)</p>	<p>The Council concur that the Draft Allocations Plan carries very limited weight and forms an inappropriate basis for policies in the Neighbourhood Plan. However, the proposed Neighbourhood Plan should be assessed on its own merits.</p> <p>As stated above in response to Indigo Planning's comment, an additional caveat where the Council cannot demonstrate a sufficient supply of deliverable housing land to meet identified needs in line with national planning policy would show regard 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.</p>

Morris and Persimmon (Mosaic)	Policy H1 and in particular Clause i) pay no regard to the fact that Standish is not a freestanding rural village but integral to the Wigan Housing Market within which the Council currently cannot demonstrate a 5 year supply of housing land. This was confirmed with a recent planning decision for a residential development on safeguarded land in Atherton, where as part of the decision Wigan Council conceded that it cannot demonstrate a 5 year housing land supply (ref.: A/17/84560/OUTMAJ).	The Council can currently demonstrate a 5.84 year supply of deliverable housing land, as set out in the 2018 update of the Wigan SHLAA. At the time of the planning decision referred to by Mosaic, the Council could not demonstrate a 5 year land supply.
Morris and Persimmon (Mosaic)	It would be an extremely onerous task for a potential applicant to identify not only whether at least 75% of dwellings are completed but that they are also occupied. There is no up-to-date source of information which would be readily available.	The council monitors housing completions (and occupation) on a real time basis through council tax registrations and the local land and property gazetteer. Therefore the point that 1,148 homes are completed and occupied will be known within days and will be clear in terms of when it can be expected for many months ahead, allowing prospective developers to prepare their planning applications for submission in a timely manner. The council intends to publish completion figures on a monthly basis on the council website which could be used as an agreed source to establish when the figure of 1,148 homes has been reached.
Morris and Persimmon (Mosaic)	The wording does not acknowledge that alternative permissions may be sought and that these might involve an amended number of dwellings, a common occurrence during implementation of various phases when housebuilders react to actual market demand over an extended period of time.	Noted. The Council considers it appropriate that the policy is amended to allow, in principle, amendments to existing approvals whereby actual market demand is stifling delivery, subject to them demonstrating that the type, tenure and size of properties are able to better reflect identified local housing needs.
Morris and Persimmon (Mosaic)	Paragraph 13.57 of the NP housing policy justification makes an unsubstantiated claim that developers have been 'land banking' sites. This does not reflect the lead-in period whilst matters such as concluding land deals and discharging planning conditions are resolved. The Inspector in an appeal from May 20171 found <i>'the sites currently under construction appear to be delivering</i>	Noted. As evidenced in Appendix C above, the Council can confirm that delivery rates on the sites overall have been progressing at a reasonable pace. However, it is not understood why this means the policy is flawed or needs revisiting.

	<p><i>completions ahead of the SHLAA timetable. This suggests that delivery is progressing at a reasonable pace</i>. In our view these deficiencies in the justification confirm the need to revisit and amend a flawed policy.</p>	
HIMOR (Emery)	<p>Firstly, the proposed restrictions have no regard to the role of Standish in the adopted Local Plan Core Strategy. The safeguarded land is specifically identified as a broad location for new development to assist in meeting housing needs, particularly in the short term and to provide choice. The appeal decisions in relation to the development of safeguarded land in Standish in excess of the figure of 'around 1,000' have found that the proposed developments accord with the development plan. For example, we refer to the appeal decision in relation to the land south of Rectory Lane. A copy is appended at EP1. At paragraph 79, the Inspector concludes that the appeal scheme is in accordance with the development plan as a whole. The restrictive policy proposed under the Neighbourhood Plan is therefore not in general conformity with the strategic policies contained in the adopted development plan.</p>	<p>Whilst Standish is identified as a broad location for new housing development in the Core Strategy in Policy SP1 and Policy SP4, Policy SP1 is clear that the focus of new development is towards the east-west core of the borough (where areas with higher levels of deprivation and degradation are concentrated), in order to enable much needed regeneration and to reduce inequalities. The role of Standish set in the Core Strategy has therefore arguably been met with the level of housing commitments approved since the Core Strategy's adoption in 2013 (1,662 homes).</p>
HIMOR (Emery)	<p>Secondly, the proposed policy would provide a restriction at a time when the GMSF is under preparation, including potential Green Belt release across the conurbation and including Wigan. It may therefore frustrate the achievement of sustainable development, and would also be contrary to the Framework in particular paragraphs 11 and Section 5 of the Framework which seeks to significantly boost the supply of homes.</p>	<p>As set out in the 2018 SHLAA, the Council is not reliant upon the residual safeguarded land in Standish to meet housing needs to 2037, or to demonstrate a five-year supply of deliverable housing sites.</p> <p>As stated above in response to Gladmans, the inclusion of an additional caveat would show regard 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.</p>

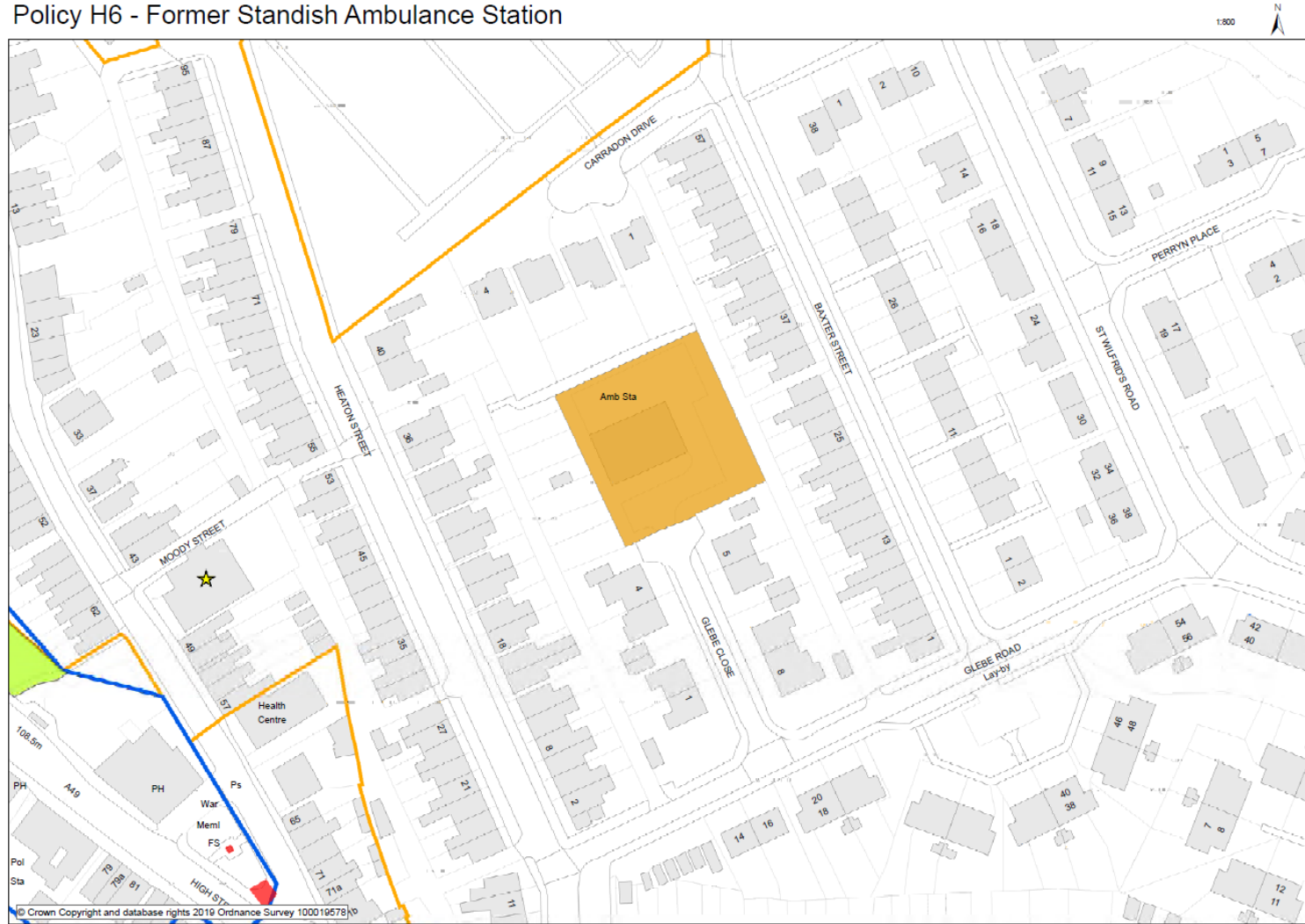
HIMOR (Emery)	Thirdly, much of the infrastructure to be provided through Section 106 agreements is in the hands of the Council, and not developers. There is no need to restrict new development unless that infrastructure is needed in order to enable a proposal to proceed and there is now no prospect of it coming forward.	The existing commitments on safeguarded land have collectively committed around £6.5 million in Section 106 agreements towards infrastructure capacity improvements in Standish, in accordance with the Standish Infrastructure Assessment. Around 30% of this will be assigned to specific projects; and around 25% ringfenced for education provision and community infrastructure. The remainder is not ringfenced, and it is anticipated that this will be spent predominantly on highway capacity mitigation measures.
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Appendix F: Bus stops in relation to committed housing developments




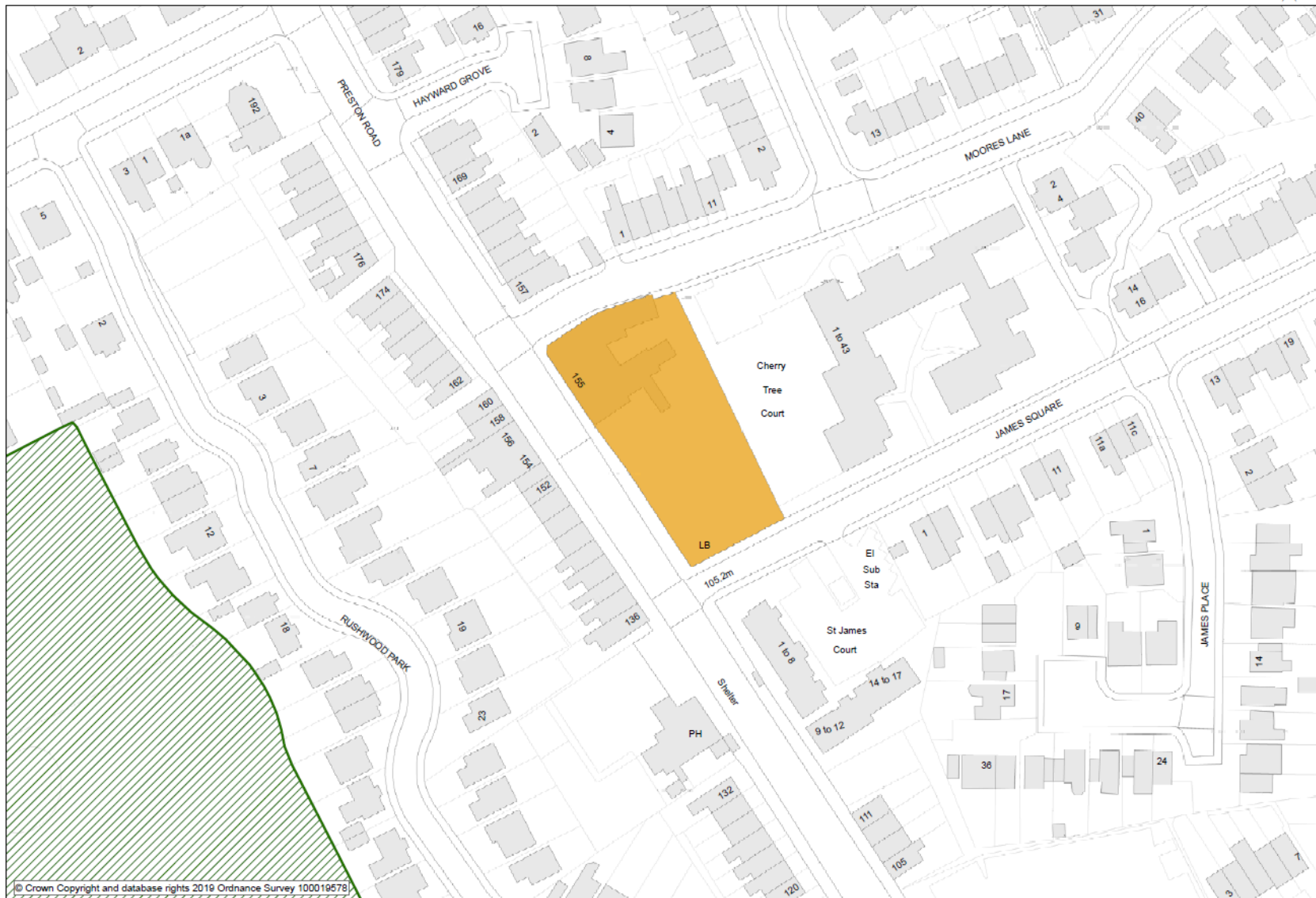
Appendix G: Site location plans of proposed housing allocations (Policy H6)

Policy H6 - Former Standish Ambulance Station



Policy H6 - Former Chinese Delight restaurant

1:800 



Appendix H:
Policy R1: Site location plan of Gidlow Tip to include within the text

