Ms R Huxtable  
LDF Programme Officer  
Wigan Town Hall  
Library Street  
Wigan  
WN1 1YN

Dear Sirs,

RE: Wigan Core Strategy Examination – Response to Further Matters and Additional Information

Further to the undertaking of the Examination and in response to the submission of additional information this letter and accompanying statement provides a brief response to those matters raised during the course of the Examination and in particular the following documents:

- Further Proposed Change to Policy CP6 – 30 January 2012
- Housing trajectory and brownfield supply information – 30 January 2012
- CS15 Letter from Acland Bracewell (South of Atherton) – 1 February 2012
- CS16 C1 8 Appendix H - SA of Alternative Broad Locations (South of Atherton) – 1 February 2012
- CS17 Strategic Site Appraisal Revision (South of Atherton) – 1 February 2012
- CS18 South of Atherton Hindsford – 1 February 2012
- CS19 Land South of Atherton – 1 February 2012
- CS20 Settlements - excluding sites of 30 units or less – 1 February 2012
- CS26 The Implications of Including Astley in the East West Core – 6 February 2012
- CS27 The Inclusion of South of Atherton in the Housing Land Supply – 6 February 2012
- CS28 Further Information on Matter 4: Housing (Amended) – 7 February 2012
- WS60 Policy CP6 Proposed Policy Mechanism by Peel Holdings
In response to the Inspectors request for written statements to be received by 5pm of the 17th February 2012 please find attached a further statement which deals specifically with the following matters:

- SHLAA, Housing Land Supply and the Trajectory
- Land South of Atherton
- East Lancashire Road Corridor (ELRC) Policy SP4

For the sake of brevity, this statement does not repeat all of those matters raised in respect of these issues previously, but responds to the additional information that has been received.

If you have any queries or require any clarification on any matter relating to this letter and the accompanying statement please do not hesitate to contact me.

Yours sincerely

Simon Pemberton MA(Hons) MRTPI AIEMA
Director
JASP Planning Consultancy Ltd
WIGAN CORE STRATEGY EXAMINATION

RESPONSE TO MATTERS ARISING FROM ADDITIONAL INFORMATION AND EVIDENCE PROVIDED BY THE COUNCIL DURING THE COURSE OF THE EXAMINATION

BY

JASP PLANNING CONSULTANCY LTD

ON BEHALF OF

A F BRIDEOAKE WILL TRUST

REPRESENTOR REFERENCE: 2936

February 2012
1.0 Introduction

1.1 The main issues for consideration in respect of the matters arising from the additional information presented to the Examination during the course of the consideration of the Core Strategy relate to housing matters (Policy CP6) together with related delivery policies, i.e. SP4.

1.2 In general, it is considered that the Council’s approach to housing land supply, the approach set out in the submitted Core Strategy and the associated evidence base, including the SHLAA, is not robust and this is reflected in the need for the production of these documents at a late stage.

1.3 It is considered that the Core Strategy period should be extended to cover at least a 15 year period, i.e. up to 2028. The housing and employment land and other requirements should be amended accordingly. It is also considered that the 1000 dwelling should be expressed as a minimum. It is also considered that the five year supply should be based upon then annualised average of the total requirement across the plan period as the Council have not proposed a specific phasing policy as part of the Core Strategy.

SHLAA, Housing Land Supply and the Housing Trajectory

1.4 In general, it is considered that the housing land supply demonstrated by the Core Strategy is over reliant on key sites in the East West Core (EWC). Whilst the regeneration of those sites is clearly important, the consequential benefits in terms of wider regeneration remain unclear. The delivery and viability of those sites which are reliant upon the delivery of significant infrastructure also remains in doubt. However, the greatest concern lies with the anticipated speed of delivery of those sites.

SHLAA

1.5 It appears that the SHLAA has not been prepared to an appropriate methodology and that the evidence which is contained within it is not sufficiently robust in order to make the assumptions of delivery of these sites. Fundamental concerns about assessment process and the fact that the consideration of deliverability clearly does not match performance. This is reflected in the Housing Trajectory which indicated a situation where the SHLAA identifies a deliverable supply of 1000+ dwellings each and every year in the first five years, and yet for the first 5 years of the trajectory
the council only expects to deliver between 400 and 900 dwellings per annum. This equates to only 58% of the target of 1000 dwellings over that period and equates to only a 2.9 year supply of deliverable housing land.

1.6 The disparity between SHLAA assessment and actual estimated delivery fundamentally undermines the evidence base in the SHLAA relating to the delivery of housing sites. The issue of housing land delivery in Wigan is clearly tied to the release of large strategic sites starting in 2014 but with a large number of them delivering from 2016 onwards.

1.7 Furthermore, the assessment of SHLAA sites is further flawed by their categorisation. The published information indicates that sites are classified into whether they are likely to come forward in years 1 to 5, 5 to 10 or 10 to 15 years. The distribution beyond that is not apparent, it appears that there has been no detailed assessment of what an individual site might deliver in each period, for example, it is our assertion that it should be assumed that each developer on a site will deliver 25 units per annum and therefore one site should not contribute more than 125 dwellings in any one 5 year period. Sites that are large could be assumed to be split with two developers, particularly if the site is over 250 dwellings.

Housing Trajectory (Table 1)

1.8 It remains a source of both amazement and concern that the Council are able to provide a number of versions of the housing trajectory all of which manage to add up to precisely the correct figure depending upon whether the Core Strategy period as submitted is retained, or it is extended to cover the period up to 2028. Firstly, it suggests that the figures are being adjusted to suit the requirement, in which case the information cannot be relied upon. Secondly, it suggests a situation where there is absolutely no flexibility within the scope of the Core Strategy to ensure delivery of the appropriate quantum of housing over the plan period.

1.9 In terms of the contribution which individual sites will make, it is considered that a delivery rate of 200 units per annum on any site across the borough is simply not achievable. This is particularly the case bearing in mind these sites are in areas in need of regeneration where even in a strong market, sales rates might be suppressed until that regeneration has taken place. At present, apart from building new houses (thus increasing the local population) and providing related infrastructure it is unclear what regeneration effects these developments will have
on the wider area. As such, it should be expected that sales rates would be lower than that which could be achieved on sites in non-regeneration areas.

1.10 Taking the example of North Leigh Park, the evidence presented to the Examination was that there would be 4 developers each with two outlets on the same site. This claim is without any precedent or evidence. It may be that there are 4 individual developers on this site, but there is no real prospect for each developer having multiple sales outlets. There was no evidence from any housing developers that this delivery rate was achievable.

1.11 Furthermore, as discussed during the Course of the Examination, there is the prospect of three or four large strategic sites all in close proximity to each other. These include:

- Northleigh Park
- South of Hindley
- East of Atherton
- South of Atherton

1.12 According to the Council's assessment that these sites will be producing 550 dwellings per annum between them. Bearing in mind the relative proximity of these sites, taken with the likelihood that an individual developer would not want to be on more than 2 of these sites (with a single sales outlet on each) such delivery rates are unachievable. Again, there were a number of developers expressing concern regarding the interrelationship of these sites and the capacity of the market to accommodate the proposed build rates bearing in mind the proximity of all these sites.

1.13 This is not to say that the Council's aspirations to see these sites come forward is wrong, but the rate of delivery and the viability of these sites needs to be properly considered. At present, it appears that based upon the suggestion by one party and without any impartial independent assessment, the Council have assumed an over optimistic delivery rate for key sites. As such it is considered that the expectations for delivery in the ELRC should be increased to provide for supply across the plan period rather than just part of it as indicated by the Council in their most recent trajectory.

1.14 In the revised evidence the Council have stated that windfalls in years 1 and 2 have been incorporated into the sites with planning permission. They appear to have
simply added 54 units on to the sites with planning permission in those years. If they were windfalls before (i.e. unforeseen sites without planning permission), it is unclear how they can suddenly change categories. In subsequent years the windfall allowance has been increased from 54 units per annum to 100. It is considered entirely inappropriate to rely upon windfalls as part of the housing land supply in the first 10 years.

1.15 Reference was made during the examination to scenarios such as employment areas which needed regeneration and redevelopment partly funded by residential development. In fact, the Councils evidence on employment land should have appraised these sites to ascertain which would be likely to come available. The council asserted that they did not want to indicate that such sites were going to come forward in the SHLAA, but this is a component of what the council evidence base should be considering. Indeed, the SHLAA does make reference to some sites within the existing “Primary Employment Areas” which will be developed. The SHLAA should be sufficiently robust to predict to a greater of lesser extent which sites are likely to come forward. Whilst it is understood that this is only an assessment, and a few extra sites might appear, but inevitably a few sites will also drop out. Thus the SHLAA should be a best assessment tool, and not need to be supplemented by windfalls.

1.16 However, it is noted that the windfall allowance differs from that referred to in the various versions of Table 9.4 and 9.5 which refer to 810 dwellings. In those tables, it indicates that that windfall allowance includes a contribution from known small sites. If the sites are known they should be within the SHLAA and not therefore windfalls.

1.17 Irrespective of this, it is considered inappropriate to include an allowance for windfalls in the supply in accordance with the advice in PPS3 and the emerging NPPF. It is not considered that the situation is any different in Wigan than any other areas so there is no justification for the inclusion of this windfall allowance as a component of supply, at least for the first 10 years.

1.18 In terms of the assessment of the delivery of key sites, the Council have again failed to take into account their own timetable in that sites are indicated to result in completions in the same year that the Allocations DPD is expected to be adopted. This is a tight timescale in any event, bearing in mind the Council have not published any information yet on their Allocations DPD. However, bearing in mind it
relies upon the release of safeguarded land in 2014, the completion and occupation of dwellings in the same year, remains improbable.

**Short Term Supply**

1.19 The Council are seeking to achieve an average of 1000 net additional dwellings per annum. It is apparent from the trajectory provided by the Council that they do not consider that they will achieve that level of house building until year 6. The council are stating that they want to provide for an average of 1000 dwellings per annum, and yet they are not going to achieve that average until year 15 on their housing trajectory. Until that time they are yet to provide for the average number of dwellings being 1000.

1.20 In any event the housing trajectory indicates, when some realism is applied, that there are significant short term issues in housing land supply that can only be addressed through the release of sites earlier in the plan timetable. Whilst we accept that sites in the ELRC should not be brought forward in advance of some in the EWC, it is not necessary for those sites to be delayed. This is accepted by the Council, in that they expect the Broad Location in the ELRC to start contributing to supply in 2014.

**Land South of Atherton**

1.21 It was somewhat of a surprise when this sites was pulled, somewhat like the proverbial rabbit out of the magicians hat, at the prospect of further shortage of housing land as a result of the extended Core Strategy period. This site has not been the subject of specific identification and rigorous assessment as the other sites have. To add a further 1400 dwellings into supply in such a fashion suggest that the proper assessment and implications, on issues such as infrastructure, have not been properly considered. It was clear that the Council felt that such a site was either not appropriate to include in their original proposals, else it would have been a Broad Location, being comparable in size to other Broad Locations.

1.22 The revision to the Strategic Site Appraisal relating to land at the South of Atherton indicates the complete misinterpretation by the Council of the definition of previously-developed land (often referred to as brownfield land) at Annex B of PPS3. This states that ‘Previously-Developed Land’ (PDL) is:

"...that which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure."
1.23 It goes on to advise that the definition includes defence buildings, but excludes:

- Land that is or has been occupied by agricultural or forestry buildings.
- Land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures.
- Land in built-up areas such as private residential gardens, parks, recreation grounds and allotments, which, although it may feature paths, pavilions and other buildings, has not been previously developed.
- Land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time (to the extent that it can reasonably be considered as part of the natural surroundings).

1.24 The Council have suggested that the land to the South of Atherton is PDL because, whilst they accept that it has been remediated fully, that this was not achieved through the development management process. It has however been restored through the derelict land reclamation procedures. It has therefore been fully remediated and restored, to a large part, back to agricultural use. As such it can no longer be considered to be PDL and would be excluded from such by the fourth bullet identified above. The Council’s assessment is fundamentally wrong.

1.25 This calls into question their assessment on other sites and the deliverability of the Councils requirement that 70% of all housing being on brownfield sites. In addition, the Council have not taken into account the additional 1400 dwellings on Land South of Atherton in the wording of Policy CP6 which needs to be considered, at the very least to express as a target, and

**ELRC**

1.26 It is considered appropriate that the Core Strategy be amended to locate Astley as being within the EWC. A suggested change to Policy SP4 to take this into account is identified at Appendix 1. The boundary of the ELRC shown on the Key Diagram should therefore be amended to include only those three sites in Golborne and Lowton and the EWC amended to include Astley.

1.27 In respect of the remaining sites within the ELRC, all are considered to be deliverable and capable of meeting some or all of the need for new development arising from the submitted Core Strategy.

1.28 The Council accepted the driver for the 600 units originally was the shortfall that existed that could not be made in the EWC and that which was considered to be
needed to provide balance to the housing market. The Council accepted the figure was driven by the need to make up that shortfall rather than any detailed analysis of the market and the interrelations between the various sites and the housing market across the Borough. This is reflected in the lack of a Borough wide SHMA and the reliance upon the Greater Manchester SHMA which is much more broad brush.

1.29 There is no clear evidence on the local housing markets that has informed the Core Strategy. That said, it was discussed at the Examination that, subject to suitable controls the complimentary nature of development in the ELRC to the EWC. It was not considered that there was any direct correlation between the two areas and provided that the number of dwellings was phased and the overall number of dwellings controlled, then the Spatial Vision and objectives of the Core Strategy would still be met. Suggested wording for an amended policy is included at Appendix 1.

1.30 Furthermore, the ambitions of the Core Strategy to balance housing markets and provide for executive and aspirational housing need to be properly realised. In addition, the proposed development needs to be sufficient to enable the Council to capture sufficient value to invest in infrastructure elsewhere, so as to allow those sites which are not viable in the EWC to be released. This is a fact that appeared to be accepted by the Council and other parties during the Examination. Bearing in mind the balance of all these considerations, and the significant concerns regarding the deliverability.

1.31 In their more recent publications, it would appear that the Council have simply massaged the remaining figures in Table 1 above to retain the 600 unit figure for the ELRC. This is not seemingly based upon sound and evidenced based spatial planning, but is a defensive reaction to a situation that has emerged though the Examination process.

**Conclusions**

1.32 The Councils overall vision and desire to target new development into the East West Core (EWC) are supported, however the ability to deliver that in its entirety over the Core Strategy plan period is over optimistic and unnecessary so. Whilst it is not considered that the focus of development should move away from the EWC it is considered that there is a significant role for the East Lancashire Road Corridor (ELRC) to provide complimentary development throughout the plan period.
1.33 There was general consensus that development in the ELRC would not harm or unduly compete or undermine the regeneration of the EWC provided that the overall quantum of development was not excessive, i.e. greater than around 1500 units over the plan period, or in any one year. Bearing in mind the significant concerns regarding the deliverability of the speed of development in the EWC this will provide for greater flexibility in the approach whilst not changing the broad spatial approach set out in the submitted Core Strategy.

1.34 In addition, further flexibility can be built into the policy to provide for proper balance between delivery and the regeneration ambitions of the EWC. However, in order to consider whether the release of sites could be speeded up, consideration should be given to identifying all sites Broad Locations within the EWC and ELRC as strategic sites.

1.35 The sites within the ELRC are deliverable and have no significant constraints. In respect of my clients land at Pocket Nook Lane, this is immediately deliverable for aspirational housing as part of the Councils overall strategy. To release land in this location will be in accordance with the Council Spatial Vision and Objectives, aiding the regeneration in the EWC and will have no demonstrable harm. Suggested alternative wording the Policy SP4 is attached at Appendix 1 together with supporting text to either this policy or CP6.
APPENDIX 1
Suggested Change to Policy SP4
Policy SP4

6. East Lancashire Road Corridor

A location for housing approximately 1500 dwellings primarily of lower density and higher value to help balance the housing market and enable a share of the value of that development to be invested in the delivery of essential infrastructure in the east-west core.

The broad site options are all designated as land safeguarded for future development in the 2006 development plan. They are:

- Land at Rothwell’s Farm, Lowton Road, Golborne
- Land east of Stone Cross Lane, Lowton
- Land at Pocket Nook Lane, Lowton
- Land at Coldhurst Lane, Larkhill, Astley.

Development of these sites should be phased so as to ensure that on average no more than 100 dwellings per annum are constructed over the duration of the plan period. If less than 80% of the housing trajectory has been delivered by April 2019 (end of year 8), additional land will be released within the broad location to meet any shortfall.

Supporting Text

“In the event of a demonstrable shortfall in the five year supply of deliverable housing opportunities before the adoption of the Allocations DPD, the Council will seek to make up any shortfall by the early release of suitable sites in the east-west core, including land within the broad locations identified by Policy SP4. If this is insufficient to provide a five year supply of deliverable housing land, the Council will give consideration to the early release of suitable sites within the East Lancashire Road Corridor broad location. The Council will seek to resist the release of sites not in accordance with the spatial strategy.”