

Integrated Appraisal of the Wigan Local Plan

Interim IA Report

Wigan Council

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Quality information

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1. Introduction

1.1 Background

1.1.1 AECOM has been commissioned by Wigan Council to lead on an Integrated Appraisal (IA) in support of the new Local Plan.

1.1.2 IA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. IA involves undertaking the legally required Sustainability Appraisal (SA)¹ process alongside: Equality Impact Assessment (EqIA), which is undertaken in order to discharge the Public Sector Equality Duty; Health Impact Assessment (HIA) to have regard to health impacts and promote the reduction of health inequality.

1.2 IA explained

1.2.1 It is a requirement that IA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.

1.2.2 In-line with the Regulations, a report (known as the IA Report) must be published for consultation alongside the draft plan that essentially 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be considered alongside consultation responses when finalising the plan.

1.2.3 More specifically, the IA Report must answer the following three questions -

- What has Plan-making / IA involved up to this point?
 - including with regards to consideration of 'reasonable alternatives'
- What are the IA findings at this stage?
 - i.e., in relation to the draft plan
- What are next steps?

1.3 This interim IA Report

1.3.1 Currently the Council is not consulting on a draft plan; rather, the Council is consulting on policy preferences and options. There is no strict requirement for IA work at this early stage in the plan-making process; nonetheless, this 'Interim' IA Report is produced with the intention of informing plan-making, and presenting stakeholders with insights in respect of the sustainability implications of the various options presented the consultation document.

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of IA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2018). The Town and Country Planning (Local Planning) Regulations 2012 require that an IA Report is published for consultation alongside the 'Proposed Submission' plan document

2. What is the plan seeking to achieve?

2.1 Why a new Local Plan?

- 2.1.1 The Council have started the conversation with local communities and businesses to ensure they are engaged in the preparation of a new Local Plan from an early stage.
- 2.1.2 A new Local Plan is needed to reflect and update the challenges and opportunities facing the borough, including meeting housing needs, delivering an improved economic offer, reinventing town centres, creating thriving communities, the delivery of key and supporting infrastructure, and protecting the environment.
- 2.1.3 It is also necessary for Local Plans to be reviewed at least every five years to ensure they are up to date.
- 2.1.4 The new local plan presents an opportunity to address changing national policy and legislation and reflect spatially the Council's key strategies:
- 2.1.5 The new Local Plan will look forward to 2040 replacing the Core Strategy and saved policies in the Unitary Development Plan.

3. What is the scope of the IA?

3.1 Introduction

- 3.1.1 The aim here is to introduce the reader to the scope of the IA, i.e., the sustainability objectives that should be a focus of (and provide a broad methodological framework for) the integrated appraisal. Further information on the scope of the IA - i.e., a more detailed review of sustainability issues/objectives as highlighted through a review of the sustainability 'context' and 'baseline' - is presented in the IA Scoping Report.
- 3.1.2 The SEA Regulations require that "When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e., the IA scope], the responsible authority shall consult the consultation bodies". In England, the consultation bodies are the Environment Agency, Historic England and Natural England. A Scoping Report was sent to the statutory consultees for comment in May 2023. The responses received have been taken into account and amendments made to the baseline information, policy context and IA Framework where deemed necessary. It should be noted that scoping is not a static process and further updates can be made as the IA (and plan making) process progresses to reflect important changes in evidence, baseline information and policy context.

3.2 IA objectives

- 3.2.1 Table 3.1 presents the sustainability objectives - grouped under 13 topic headings - established through scoping.
- 3.2.2 Taken together, the sustainability objectives (presented in Table 3.1) and supporting criteria provide a methodological 'framework' for appraisal. Full detail is provided in the accompanying scoping report.

Table 3.1 IA Topics and Objectives

IA topic	IA objective
Housing	To provide an appropriate quantity and quality of new homes to meet needs.
Health and Community	Enable and support people to be active, safe and healthy by ensuring good access to a range of services / facilities and the natural environment, and creation of well designed, inclusive and beautiful places.
Equality and Diversity	To provide equality of opportunity for people with a protected characteristic whilst celebrating diversity.
Climate Change	To adapt to, mitigate and be resilient to the impacts of climate change.
Water	To positively address the issues of water quality and quantity and manage flood risk
Environmental Quality	To minimise the adverse impacts of development on environmental resources and amenity.

IA topic	IA objective
Historic Environment	To protect and enhance the quality, integrity and distinctiveness of the historic environment of Wigan.
Landscape and Townscape	To protect and enhance the quality, integrity and distinctiveness of the borough's landscapes and townscapes.
Biodiversity and Geodiversity	To protect and enhance biodiversity and geodiversity, ensuring that current ecological networks and future improvements in habitat connectivity are not compromised.
Resource Efficiency	To improve resource efficiency in design, construction and operation, increase energy generation from renewable sources and support the circular economy.
Land and Soil Resources	Protect, preserve and promote the efficient use of land, soil and other natural resources.
Transportation	To support the delivery of an improved and integrated transport system that provides good alternative choices to travel by car.
Economy	To support the development of an innovative, diverse, competitive, higher value and low-carbon economy locally that supports job growth and good access to jobs training and education.
Town and Local Centres	To improve the vitality and viability of our town and local centres.

Part 1: What has plan-making involved

4. Introduction (to Part 1)

4.1 Background

- 4.1.1 This section of the report sets out the work undertaken by the Council to date in terms of the preparation of the Options and Preferences document, and identifies high level 'policies' to be assessed through the IA.
- 4.1.2 As set out in Chapter 2, the Council have been developing and preparing the evidence base to inform the new Local Plan and are now looking to continue engagement with local communities and businesses.

4.2 Issues and Opportunities Consultation document

- 4.2.1 In October – December 2022, the Council held an extensive public focused consultation on Issues and Opportunities, primarily through the use of a questionnaire.
- 4.2.2 The consultation was organised by key themes and sought to invite local residents to have their say on the future of the borough.
- 4.2.3 Over 1,400 local residents completed the questionnaire, with a range of common messages being put forward for the Council to take into consideration.

4.3 Options and Preferences Consultation Document

- 4.2.4 The Options and Preferences document represents the Council's current stage of plan preparation in accordance with the Town and Country Planning Regulations (2012). In line with Regulation 18 the Council are undertaking consultation to inform future stages of the new Local Plan.
- 4.2.5 The latest document builds on the issues and opportunities consultation, setting out the Council's preferred approach to policy development under a range of themes.
- 4.2.6 Policy preferences and 'options' for addressing key issues and opportunities are presented under one of seven different themes.
- 4.2.7 The document also sets out questions, accompanying the options, in order to focus responses on the key issues going forward.

5. Considering options

5.1 Policy preferences and options

5.1.1 The consultation document sets out, under a series of themes, some of the planning issues the Local Plan will need to address and identifies options for how to respond to these. The themes are as follows:

- 1: Homes
- 2: Jobs
- 3: Town and Local Centres
- 4: Transport
- 5: Places
- 6: Environment
- 7: People

5.1.2 While options are presented under each theme, none of these are strategic spatial options that need special consideration through the IA at this stage. It is therefore considered that an appropriate approach is to provide an overall commentary narrative on the emerging preferences (and on policy 'options' if appropriate).

Part 2: What are the IA findings at this stage?

6. Introduction (to Part 2)

- 6.1.1 As discussed in Part 1, the Options and Preferences document sets out the key borough-wide challenges that need to be addressed through the new Local Plan for Wigan (in the context of the emerging Places for Everyone Plan).
- 6.1.2 Primarily, it provides an early opportunity for stakeholders to comment on the emerging policy approaches and to suggest alternatives. It is important to note that, at this stage, no firm decisions have been made and that further work looking at detailed options may be required for certain themes once the evidence base progresses (most likely in relation to the provision of employment land).
- 6.1.3 The aim of this section of the IA Report is therefore to present an appraisal of the policy preferences presented within the document against the IA Objectives.
- 6.1.4 **Chapter 7** explores the policy preferences relating to key planning themes to be explored through the new Local Plan. Conclusions are presented in **Chapter 8** in relation to the document as a whole.

7. Appraisal of policy preferences

7.1 Background

- 7.1.1 The aim here is to present an appraisal of the ‘content’ of the options and preferences document. This focuses on the indicative content and scope of policies under the seven planning themes. As mentioned previously, where relevant, discussion of options is presented (though it should be clarified that most options are procedural, rather than content based).

7.2 Approach and methodology

- 7.2.1 A narrative discussion is presented under the ‘IA framework’, which essentially comprises a list of sustainability objectives (as set out in Ch3). Under each of the IA framework objectives, the aim is to present an informal discussion highlighting the merits and drawbacks of the preferences and broad commentary on the ‘options as relevant.
- 7.2.2 A narrative appraisal is considered appropriate given the early, high-level nature of the policy preferences presented for consultation at the current time, and on the basis that the options presented are not in the form of mutually exclusive alternatives.
- 7.2.3 The aim is to ensure that IA work is focused, concise and proportionate, focusing only on effects judged to be potentially ‘significant’ (as opposed to every conceivable effect). This is a key element of best practice in the opinion of AECOM, mindful of recent experience and the Planning White Paper (2020). There will be the potential to undertake more formal work to explore reasonable alternatives at subsequent stages of the plan-making process.

7.3 Housing

IA Objective: *To provide an appropriate quantity and quality of new homes to meet needs.*

- 7.3.1 The current housing position suggests that there is sufficient supply in Wigan to meet the housing need set out in the emerging Places for Everyone Plan (972 new homes per year on average). Therefore, at this stage, there is no intention to allocate new sites in the new Wigan local plan. The exception is to provide policies to support the remaining strategic site allocations which would benefit from coordinated approaches to growth. This is considered to be an appropriate approach to housing delivery, as the current distribution of supply will provide a mix of housing in a range of locations. It is recognised that careful planning is necessary to ensure sufficient infrastructure is delivered alongside such development, an acknowledgement of one of Wigan's key issues.
- 7.3.2 The borough possesses diverse housing needs, meaning there is a demand for a variety of housing types and tenures, as well as affordable housing. The borough's age profile is becoming older, which will have implications for the development types necessary. It is noted however in the Options and Preferences consultation document that responses to the earlier Issues and Opportunities consultation highlighted desires for more housing for first-time buyers, more family homes and more social housing alongside increased accommodation for older people. With this in mind, the Council intends to bring forward a policy on 'providing an appropriate mix of housing', to influence the mix of housing types, tenures and affordability. This is likely to have positive effects in terms of delivering housing to meet community needs (and is broadly reflective of the issues and needs identified by respondents to the Issues and Opportunities consultation and in the IA Scoping Report).
- 7.3.3 There is also a focus in the document upon the role that residential development can have to support the vitality and viability of town centres. This should provide opportunities to further boost housing and create a market for specific types of new homes. Given the changing role of centres, it would be a disadvantageous approach to take a more restrictive approach to residential development in town centres. The preferred approach is therefore likely to have positive effects.
- 7.3.4 Though there is a preference to include a specific policy that will seek to manage HMOs, this is considered appropriate and unlikely to significantly affect housing delivery.
- 7.3.5 In terms of gypsy and traveller provision, the option to expand existing sites is likely to perform well in terms of accommodating pitches in established locations. There may be other suitable locations to explore, but at this stage none have been identified and it would be premature to appraise such an option without knowing the sites that could be involved. As the evidence base progresses, it would be useful to revisit this issue.

7.4 Health and Community

IA Objective: *Enable and support people to be active, safe and healthy by ensuring good access to a range of services / facilities and the natural environment, and creation of well designed, inclusive and beautiful places.*

- 7.4.1 The Options and Preference document states the Council's intention to strongly support the delivery and upgrading of digital infrastructure across the whole borough. Although it does not quantify future requirements, the stated preference is to require that new development has the capacity to accommodate existing and future needs. This ought to have positive effects for all communities by improving access to high-speed broadband and other digital facilities.
- 7.4.2 Acknowledging responses to the Issues and Opportunities consultation which demonstrated the value of having shops and services close to home, the stated preference for local centres is to support the development of community hubs including convenience retail and other services such as cafes and health and social care. Similarly, the 'sustainable communities' policy preference seeks to deliver community provision in which friends and neighbours can interact. No specific commitment is made regarding the protection or provision of places of worship or libraries though, which could be an area for improvement. Nevertheless, the emerging approach is likely to help sustain strong communities and build community capacity.
- 7.4.3 Stated preferences for 'sustainable communities' and 'planning for healthier living' include enhancing the safety of places, in order to reduce the potential for crime and anti-social behaviour, as well as the fear of it. It is noted that such efforts should not detract from the overall quality of design.
- 7.4.4 The 'active travel' preferences include making local streets and roads in town centres feel safer and more appealing to those not travelling by car. These measures could be particularly beneficial for groups that experience greater fear of crime and feel unsafe in public spaces such as women, elderly and young people. Policy preferences to continue investment and repurposing of town centres should also help in this respect, given that there is an emphasis on supporting active uses, residential and safe access throughout centres.
- 7.4.5 Equality of access to health and social care services as well as community groups and facilities is an important element of the stated preferences of 'planning for healthier living' and 'sustainable communities'. Access to green infrastructure and suitable work and training is also sought to be ensured. The promotion of economic inclusion, including physical access to on-site training, is also included in a proposed policy on 'community wealth building'.
- 7.4.6 The 'sustainable design' proposals include several good design principles with the intention of delivering high-quality development, integrating with local characteristics and adopting good landscape design. The alternative options for proposals relating to conservation areas and amenity include their being covered by this more general good design policy – this is a procedural matter and should not detract from positive effects arising, whichever approach is decided upon. Moving forward, it would be helpful to ensure that policies regarding design support measures that reduce fuel poverty and improve living environments.

- 7.4.7 A focus on active and healthy lifestyles can be found throughout the Options and Preferences document. The preference for ‘sustainable communities’ seeks to provide access to sport and recreation, while it is sought to promote healthy and active lifestyles through good landscape design. Other preferences include ensuring universal access to healthier food options, limiting the availability of hot food takeaways to school children (and such shops’ dominance in local/town centres), and requiring a Health Impact Assessment (or completion of the Council’s Planning for Health Checklist) be undertaken as part of proposals for development. It is also a stated preference to seek developer contributions to new health facilities, following a four-step process.
- 7.4.8 Articulating the mechanisms and requirements for HIA within the policy will help to ensure that in practice this policy is used effectively and does not add undue burden on developers or Wigan Council planners / public health officers. There is already a supplementary planning document in place that addresses such factors, and this will remain to be used, so no further detail is considered necessary in the new Local Plan.
- 7.4.9 There is an appropriate emphasis on encouraging active travel, through new development and in town/local centre regeneration. Active travel is identified as one of the benefits of multifunctional green infrastructure.
- 7.4.10 Overall, the preferences identified are likely to lead to positive effects with regards to health and wellbeing.

7.5 Equality and Diversity

IA Objective: *To provide equality of opportunity for people with a protected characteristic whilst celebrating diversity.*

7.5.1 There is no explicit commitment within the Options and Preferences document to providing equality of opportunity based on protected characteristics, however there is also nothing that obviously suggests that any person or group might be put at a disadvantage by the proposals as a result of their protected characteristics). Indeed, there are several policy preferences that are likely to have some positive indirect effects upon particular community groups. For example:

- by seeking to improve accessibility by public transport and active travel, groups with lower incomes should see inequalities reduce in this respect.
- ethnic minority groups could benefit from increased provision of affordable housing and local facilities within the town centres of Wigan and Leigh in particular (given that there are concentrations of these groups in these locations).
- young people could benefit from improved education and leisure facilities being delivered as part of strategic developments and town centre investment.

7.5.2 As part of community wealth building, the Council's preference is "*to facilitate the ability of residents and vulnerable groups to participate in society*". Under 'planning for healthier living', it also emphasises that everyone should be able to access provisions such as secure, comfortable and affordable housing, as well as health and social care services. The accommodation needs of gypsies and travelling show people are discussed, with the Council preferring to expand existing sites in the case of the former and seek clarification on the needs of the latter. This may need to be revisited in response to any new evidence about needs or consultation feedback from these communities.

7.5.3 With regards to housing provision, the preferences are unlikely to significantly exclude any particular groups as a range of types, tenures and locations for growth would be supported. Restriction of HMOs could potentially affect groups that rely on such accommodation more disproportionately, meaning that access to an affordable home is more difficult. However, the provision of a wider range of housing in town centres (as well as supporting an appropriate delivery of HMOs) should ensure that this is not a significant issue.

7.6 Climate change

IA Objective: *To adapt to, mitigate and be resilient to the impacts of climate change.*

- 7.6.1 A key element of the options and preferences document in relation to climate change is a preference for a sustainable design policy that seeks energy efficient and resilient developments. This is also supported by the preference to work with partner authorities to ensure major developments are supported by whole life cycle carbon assessments. Though the level of detail and specific requirements are limited, it is acknowledged that the Places for Everyone Plan proposes to set a strong framework to achieve a carbon neutral Manchester by 2038. The Wigan Local Plan sits within this context.
- 7.6.2 For the North Leigh Park location, the preference is to seek higher standards of energy efficiency, design and low carbon technologies, which is likely to encourage lower per capita emissions for new development. There are no such policy preferences for the other five strategic locations for growth, which is perhaps a missed opportunity given the desire to achieve net zero carbon across Manchester. The Local Plan also provides the opportunity to explore and require new developments to implement district energy schemes.
- 7.6.3 Preferences in favour of encouraging active travel and increased public transport provision will contribute to reductions in greenhouse gas emissions. The nationwide ending of sales of new petrol/diesel cars expected within the likely local plan period should also contribute to this effort.
- 7.6.4 A benefit of multifunctional green infrastructure is the sequestration and storage of carbon, so the support given to wildlife corridors, protection and enhancement of the Greenheart, and restoration of Chat Moss peatlands, should all contribute to a reduction in greenhouse gas emissions to the atmosphere. This builds upon the priorities in the Places for Everyone Plan that seek to restore and expand lowland raised bog resources across the region.
- 7.6.5 It is a stated preference to support and encourage green sector businesses to locate in the borough and to support businesses to move towards zero-carbon production. Furthermore, the proposals seek to support the transition and provision within the borough to renewable energy generation, reducing the need for carbon-emitting energy generation.
- 7.6.6 Town centre regeneration is likely to play a positive role in terms of managing carbon emissions from new development. This relates to the reuse of land and buildings, and the higher density / lower resource intensity that such development usually exhibits. Furthermore, the emphasis on increased green infrastructure provision in town and local centres – urban greening measures such as street trees, green walls and green roofs – should, in addition to sequestering carbon, better regulate the temperature of urban areas. This will be important given an increased support for residential development in town centres (which are typically more sensitive to urban heating effects).
- 7.6.7 It is recognised that SuDS can provide urban cooling as well. Several preferences within the Options and Preferences document refer to the need to mitigate and adapt to climate change impacts.

- 7.6.8 Doing so is a principle of the preferred option for a policy on landscape design of new development, as well as an element of proposals to support nature recovery and improvement (delivering climate-resilient ecosystems).
- 7.6.9 With regards to employment land and economic growth, the preferred approach may involve new employment locations being identified or a change of use in land. This could lead to significant increases in emissions from traffic depending upon locations and sectors for growth. Until further clarity and detail is provided regarding an employment land strategy, it is difficult to understand the effects. These issues will therefore need to be explored further as the plan is progressed and supporting evidence is finalised.

7.7 Water

IA Objective - *To positively address the issues of water quality and quantity and manage flood risk.*

- 7.7.1 The stated preference for a policy on development and flood risk is to ensure development does not have an adverse impact on the status of water bodies in the borough.
- 7.7.2 It is an objective however of the North West River Basin Management Plan to aim to achieve good status for all water bodies. At present, all water bodies with catchments in Wigan borough have a chemical status of 'fail', while all but one have a 'moderate' ecological status. The River Glaze has a 'bad' ecological status. The proposed policy preference could therefore seek to improve the status of Wigan's water bodies, not just ensure there is no deterioration (this would be in greater alignment with the Places for Everyone Plan, which does mention the need for enhancement/improvement in several policies).
- 7.7.3 The stated preference is to maintain the current policy position to ensure there are no unacceptable increases in water pollution as a result of development. The alternative option – to strengthen the policy position – would most likely improve the quality of water in the borough and would be preferable from a water quality perspective.
- 7.7.4 The Options and Preferences document proposes to safeguard the flood water storage area at Lilford Park so that its function is not limited by new development. This will continue to minimise flood risk to the existing population. While it is a stated preference to safeguard other areas for the future, more detail is necessary in order to determine if this will account for increased population and increased flood risk caused by climate change in the future.
- 7.7.5 The flood retention reservoir above Bottling Wood Dam, Wigan – the borough's other water storage area according to 'flood map for planning' – is not mentioned.
- 7.7.6 More broadly, there is a commitment to ensure that new development delivers greenfield run-off rates, that redevelopment on brownfield land delivers a 30% reduction in run-off, and that development in critical drainage areas delivers a 50% reduction. Additionally, there is a stated preference to ensure development moves away from combined sewerage and drainage towards a surface water drainage hierarchy, and that it incorporates 'green' SuDS. All these measures are likely to improve the baseline situation in terms of minimising flood risk and improving water quality.
- 7.7.7 Stated preferences regarding nature recovery, particularly relating to wetland habitats, could help to manage drainage and flood risk on a catchment wide basis. This is advocated in the National Character Area profile for the Lancashire Coal Measures, which covers much of the borough.
- 7.7.8 Four of the sites included in the housing land section of the Options and Preferences document either include or are immediately bounded by areas in flood zones 2 or 3 – South Hindley, Remaining Land South of Atherton, East

of Atherton, and Westwood Park. However, of the four, only the stated preference for Remaining Land South of Atherton acknowledges the presence of flood risk constraints.

- 7.7.9 The proposed policies could be clearer in seeking to mitigate any increases in flood risk, as is the case for North Leigh Park.
- 7.7.10 It is acknowledged that these sites are already allocated in the current local plan, and the principles of development are already established, but the review presents an opportunity to strengthen policy direction regarding flood risk and water quality.
- 7.7.11 There is a commitment within the stated preference regarding groundwater quality to ensure development in the source protection zones in the south of the borough does not have any adverse impacts on groundwater quality, however there is no reference to the drinking water protected area in the north of the borough nor the drinking water safeguard zone for ground water in the south of the borough.

7.8 Environmental quality

IA Objective - *To minimise the adverse impacts of development on environmental resources and amenity.*

- 7.8.1 The Options and Preferences document describes amenity as accounting for air quality, noise and sun/daylight among others. Such topics do not have their own policies and are instead covered by an overall 'amenity' policy. The content of the policy is broad enough to ensure that these individual elements are adequately covered though.
- 7.8.2 New development will be required to ensure it does not have unacceptable adverse impacts on amenity. The meaning of unacceptable here could benefit from clarification to ensure that no significant negative effects arise. Furthermore, there could be a greater commitment to actively enhance local amenity, not just protect present levels. Though 'amenity' and different elements are discussed separately in the Places for Everyone Plan, making environmental quality a local priority would help to manage the effects of development, particularly in the town and local centres.
- 7.8.3 Likewise, the stated preference for 'planning for healthier living' includes a commitment to minimise impacts of development on air quality and noise, rather than avoid impacts or actively improve amenity. The preference for a specific policy on amenity, rather than its inclusion in a general good design policy, is largely a procedural matter, but does perhaps bring greater focus to the issue.
- 7.8.4 On pollution control, the preference is to maintain the current position in ensuring that development does not cause unacceptable levels of pollution, and that development does not introduce receptors to unacceptable levels of pollution from neighbouring land uses. Again, the meaning of unacceptable could be clarified to ensure that negative effects do not arise. One of the alternative options is to strengthen the policy position, which could include actively improving the environmental quality of the borough, as far as pollution control is concerned. This would be a more proactive approach and could achieve heightened positive effects.
- 7.8.5 There is no reference to the part of the Greater Manchester AQMA located within the borough, nor to the Noise Action Plan Important Areas for Road and Rail found within the borough. There may therefore be room for improvement with regards to the contribution of proposals to the management of air and noise pollution at priority locations. However, measures ought to be locally specific and build upon the framework set in the Places for Everyone, which already sets out ambitious requirements in relation to managing air quality (through a 'clean air' policy).
- 7.8.6 With regards to the focus on town centre regeneration and investment, a range of impacts on amenity could arise depending on the nature of development. Large scale demolition and repurposing of buildings and land has the potential to have negative short-term effects with regards to amenity, including noise, air quality, dust and vibration. Conversely, an increase in active frontages, public realm improvements, urban greening and a focus on sustainable transport should all help to improve amenity in the longer term.

- 7.8.7 Moving forward it will be important to explore how economic growth sectors will affect key environmental factors such as air quality, particularly if this involves increased HGV movements.

7.9 Historic Environment

IA Objective - *To protect and enhance the quality, integrity and distinctiveness of the historic environment of Wigan.*

- 7.9.1 One of the Council's stated preferences is "to protect and conserve the historic built environment in the borough", primarily through the requirement that proposals for development near particular heritage assets include detailed Heritage Impact Assessments.
- 7.9.2 In addition to a clear commitment to protect the historic environment, it is also a stated preference to facilitate "the restoration, renovation and/or sensitive regeneration of heritage assets at risk", addressing the need to go further than protection and to enhance the historic environment of the borough. Examples of heritage assets at risk are not given at this stage. It would be beneficial to expand the definition beyond those included on the Historic England List (i.e., to increase the potential for a wider range of heritage assets to be addressed).
- 7.9.3 Not facilitating the restoration, renovation and/or regeneration of heritage assets at risk is one of the stated alternative options, but this would not bring about the same benefits as the preferred approach with regards to heritage.
- 7.9.4 The considerations applied within the Council's stated preference to "retain our approach to development in Conservation Areas" demonstrate a commitment to preserve the character and appearance of Conservation Areas, of which there are 23, comprising an important element of the borough's historic environment. The stated preference also demonstrates consistency with the NPPF's encouragement of enhancement of Conservation Areas, by encouraging "the improvement or appropriate replacement of buildings detrimental to their character".
- 7.9.5 Several of the assets listed under the 'Our Historic Environment' policy are also proposed as priority locations for green infrastructure, such as:
- the Flashes of Wigan and Leigh;
 - the Leeds and Liverpool and Bridgewater Canals; and
 - town centres.
- 7.9.6 There is therefore a need for sensitivity towards the historic value of such assets when developing green infrastructure, however the multi-functional benefits spoken of in the stated preference could include enhancing the setting of heritage assets. The increased provision of street trees, as is another stated preference, could serve to do the same.
- 7.9.7 Another stated preference is "to support the growth of our visitor economy by focusing on protecting and enhancing the special features of the borough that attract visitors". Many of the listed special features are also heritage assets, such as Haigh Hall, town centres and the Flashes of Wigan and Leigh.

- 7.9.8 This preference would contribute, in a multi-functional way, to the protection and enhancement of Wigan's historic environment.
- 7.9.9 Of the nine town centres (Wigan, Leigh, Ashton-in-Makerfield, Atherton, Golborne, Hindley, Pemberton, Standish, Tyldesley) proposed for regeneration, all but one (Pemberton) include Conservation Areas. All include, or are in close proximity to, listed buildings. Furthermore, Wigan's only registered park or garden – Mesnes Park – is situated on the edge of Wigan town centre.
- 7.9.10 The settings of all such assets may be potentially affected (either positively or negatively) by the preferred policies. This is recognised however, with an emphasis placed on “conservation-led regeneration” in places such as Wigan's King Street, Wigan Pier Quarter, Atherton's Market Place and Hindley's Market Street. This should represent a positive contribution to the settings of the heritage assets. The condition of buildings themselves are also likely to be improved and protected by finding active uses for buildings that are currently unused, this should help to prevent buildings falling into disrepair.

7.10 Landscape and Townscape

IA Objective - *To protect and enhance the quality, integrity and distinctiveness of the borough's landscapes and townscapes.*

- 7.10.1 There is an emphasis in the Options and Preferences document on the regeneration or improvement of underused, hidden and derelict areas of Wigan's town and district centres. This would likely be a positive contribution to the fabric and cohesion of the borough's townscapes, such as through landscaping and the provision of street trees in places such as Leigh and Atherton. There is also a focus on supporting independent retailers and services, to better integrate disparate parts of town centre with one another, and to create residential markets in the towns to help support their vitality. These measures should all help to improve townscapes in the key centres within the borough.
- 7.10.2 On the contrary, it is possible that changes to the fabric of town centres and district centres could be perceived negatively by local communities. It will therefore be important to ensure that important local buildings, cultural and historic features are respected and incorporated into the re-purposing of centres. This could include policy requirements for public art, exhibitions and civic spaces that capture the character of centres (building upon the 'sustainable places' policy in the Places for Everyone Plan).
- 7.10.3 Efforts to conserve or enhance the setting of historical assets such as listed buildings and conservation areas should contribute to the maintenance or enhancement of its distinctive townscapes. Similarly, stated preferences to protect and enhance the historical environment outside the major settlements should contribute to the maintenance and enhancement of the borough's landscapes, for example the Greenheart – historically industrial, now a provider of green infrastructure.

- 7.10.4 It is another stated preference to continue to require development proposals to deliver and maintain landscaping measures which enhance landscape character and identity.
- 7.10.5 The stated preference seeks to “sympathetically manage” appropriate development in the green belt, rather than avoid it outright, ensuring though that any new development complements existing landscape/townscape character and minimises its impact on green belt openness. It is also a stated preference to amend the boundaries of the settlements of Haigh and Bickershaw, though this will not result in a net shrinking or expansion of the green belt. The preference with regards to extensions and alterations in the Green Belt is to limit developments to no more than a 30% increase in cubic content. This is more limiting compared to the existing policy position and ought to better preserve the character of settlements and landscape in the countryside.
- 7.10.6 The stated preference regarding development and green infrastructure includes requiring that development proposals consider and respond positively to landscape character.
- 7.10.7 Many of the sites included in the Homes section of the Options and Preferences document fall within landscape character areas of the Greater Manchester Landscape Character Assessment. These sites are already designated for development in the current Wigan Local Plan and some are partially developed. The principle of growth here is therefore established, but there is an opportunity to ensure landscape is protected and enhanced through policy.
- 7.10.8 Both the South Hindley and East Atherton sites are situated within the Reclaimed Land/Wetlands Landscape Character Type, the former in a landscape character area with moderate sensitivity to housing development and the latter in one that is of low-moderate sensitivity.
- 7.10.9 ‘Remaining Land South of Atherton’ is covered by the Historic Parks and Wooded Estate Farmland Landscape Character Type, in a landscape character area assessed as having moderate-high sensitivity to housing development, while ‘Remaining Land at Landgate, Ashton-in-Makerfield’ is situated in Urban Fringe Farmland, in a landscape character area with moderate sensitivity.
- 7.10.10 While proposed policies for South Hindley, East Atherton and Remaining Land at Landgate speak of the need to ensure physical/visual connections with countryside, maintain existing green infrastructure, and safeguard/enhance settings, no such commitment is made clear for Remaining Land South of Atherton (the most sensitive of the four). It is recommended that greater attention is given to the potential effects of development of the referred-to sites on the distinctiveness of the landscape character. Though the sites are already identified for development in the current plan and are committed to growth, the Plan review offers the opportunity to enhance consideration of landscape matters through updated policy to guide remaining development.

7.11 Biodiversity and Geodiversity

IA Objective - *To protect and enhance biodiversity and geodiversity, ensuring that current ecological networks and future improvements in habitat connectivity are not compromised.*

- 7.11.1 Nature recovery, ecological enhancement and green infrastructure feature heavily in the Environment and other themes of the Options and Preferences document.
- 7.11.2 One stated preference is to restore and enhance biodiversity throughout the borough, particularly in the Greater Manchester Wetlands Nature Improvement Area, strengthening current commitments. The proposed policy commits to protecting designated and other non-designated ecological sites in the borough as well as supporting the designation of new sites and wider connectivity.
- 7.11.3 The Options and Preferences document also promotes a cores-and-corridors approach to nature recovery, with the stated preference being to create buffers and linkages of sites. This should help to ensure improvements in habitat connectivity and improve resilience to climate change (which is important given that wetlands are more vulnerable to changes). Proposed policy on wildlife corridors seeks to revise the existing network of corridors and focus BNG offsets on these corridors, which is likely to lead to long term enhancements.
- 7.11.4 The consultation document acknowledges mandatory biodiversity net gain requirements but goes further by requiring specific provisions for certain species through new development, such as for hedgehogs, birds, bees, bats and bugs.
- 7.11.5 Chat Moss is an important area of peatland with value for ecology. The preferred option is to restore, protect and enhance the peat habitats, which is positive.
- 7.11.6 Regarding green infrastructure, the stated preference is to both support the existing network of green infrastructure in the borough, and to further develop the network. There is a clear emphasis on the commitment to maximise multifunctionality, demonstrated by proposed requirements of new development, for a combination of SuDS, BNG, active travel, play space etc. Multifunctional green infrastructure is referred to in five of the six housing land sites (all but Remaining Land South of Atherton).
- 7.11.7 The only reference to geodiversity is in the stated preference for nature recovery and improvement, in which there is a commitment to protect the regionally important geology of Haigh Plantations.

7.12 Resource Efficiency

IA Objective: *To improve resource efficiency in design, construction and operation, increase energy generation from renewable sources and support the circular economy.*

- 7.12.1 The strategic objective for 'Environment' includes ensuring new development utilises greener building methods. Specifically, the Options and Preferences document proposes following the Places for Everyone Plan in promoting the retrofitting of existing buildings with more energy efficient, low-carbon energy, heating and cooling measures. This will both encourage the more efficient use/reuse of land and buildings and make more efficient the use of natural resources. A commitment to require life-cycle carbon assessments of some new development will contribute to this effort, though it should be clearer which are the relevant development types/thresholds.
- 7.12.2 The stated preference for North Leigh Park specifies a requirement for high standards regarding energy efficiency and low-carbon technologies. The policy proposals for the other five sites could do the same.
- 7.12.3 Proposals to support, and therefore encourage, a mix of renewable energy provision in the borough – including solar, hydro, wind and hydrogen – should also reduce the use of natural resources, while the principled support of district heating schemes utilising spare heat from industrial processes should allow for a more efficient consumption of resources.

7.13 Land and Soil Resources

IA Objective - *Protect, preserve and promote the efficient use of land, soil and other natural resources.*

- 7.13.1 The stated preference regarding soils is to ensure they are protected, and their functionality retained during development. There is no commitment at present to enhancing the integrity of soil, which could form part of a comprehensive policy on environmental net gain, the opportunities of which it is the stated preference to investigate further.
- 7.13.2 It is proposed to continue the promotion of reclamation/renewal of several priority sites, in order to make them suitable for development, for active travel provision, or for nature improvement. This represents an encouragement of the positive remediation of sites.
- 7.13.3 The Options and Preferences document makes no reference to the protection of best and most versatile agricultural land, nor to the protection of mineral resources. However, the broad locations for growth are already established in principle as areas for growth, so it is difficult to avoid effects in these areas. Furthermore, the Places for Everyone Plan sets out principles for development in terms of avoiding the loss of soil resources and targeting biodiversity enhancement in areas with poorer soil quality. In the absence of further allocations in the Wigan Local Plan, effects on soil and land resources are therefore expected to be minimal.

7.14 Transportation

IA Objective - *To support the delivery of an improved and integrated transport system that provides good alternative choices to travel by car.*

- 7.14.1 Residents of the borough currently have a greater preference on the use of private vehicles compared to public transport, walking and cycling. The stated preference is to ensure that, for shorter journeys, active travel is the obvious choice, which will help to challenge the status quo. It is proposed to do this through establishing or reallocating existing road space for active travel infrastructure, and through ensuring new development incentivises active travel and use of public transport, by providing facilities aside from traditional car parking.
- 7.14.2 Stated preferences for North Leigh Park, South Hindley, East of Atherton, Remaining Land at Landgate, and Westwood Park include requirements for bus and/or active travel infrastructure provision. In addition, these sites will support new road infrastructure that will improve east-west links across the borough. This will help with the preference to drive private vehicle traffic away from town centres and onto strategic roads instead.
- 7.14.3 In terms of rail infrastructure, the preferred option is to secure improvements to capacity, services and stations within the borough (including a new station at Golborne). Elements of the stated preference regarding HS2 need to be reconsidered given recent government announcements.
- 7.14.4 With regard to the 2035 cessation of sales of new petrol/diesel cars, it is proposed to develop the provision of electric vehicle charging infrastructure across the borough, which will help in this transition.
- 7.14.5 There is an emphasis placed on establishing a more connected active travel and public transport network within the borough (and with destinations further afield), connecting new development to existing and planned future active travel networks. Better connections should help to encourage the feasibility of not using, and therefore a reduction in use of, private vehicles to travel within the borough. Proposals focused on improving the provision of community services and facilities and retail provision within local centres should additionally reduce the need to travel beyond the immediate area as frequently as at present. Respondent's desire for a more integrated public transport network is recognised, however there could be more explicit commitment made towards better integration between public transport and active travel modes.

7.15 Economy

IA Objective - *To support the development of an innovative, diverse, competitive, higher value and low-carbon economy locally that supports job Equality,*

- 7.15.1 A principle of the stated preference for ‘sustainable communities’ is that the borough’s communities are resourceful meaning they are ecologically and economically sustainable and support the building of community wealth – by prioritising the use of supply chains and labour within the borough. Another principle is that communities are accessible – ensuring fair/equal access to employment and training opportunities.
- 7.15.2 Foundation sectors include health and care services, food, retail, housing and tourism. It is a stated preference to grow such sectors – in which the borough has existing strengths. Policy proposals for town and local centres seek to ensure a mix of such business types is available in most communities (for example, not allowing high streets to be dominated by hot food takeaways), and therefore a range of business types. It is proposed to protect and enhance employment areas in 11 of the borough’s settlements as hubs for foundation businesses. A stated preference is to support the visitor economy by promoting the capitalisation of the borough’s cultural and natural assets.
- 7.15.3 Preferences regarding the green economy support both the creation of opportunities in a frontier sector, as well as the achievement of a low-carbon, competitive economy. There is also a commitment to support the establishment and growth of frontier sectors in the borough such as advanced manufacturing. The stated preference for Westwood Park, Wigan, includes establishing new employment space designed to cater for modern businesses. Part of the proposal for the East of Atherton site is to extend the existing industrial area, which contains more traditional industry. This is evidence of a commitment to support both traditional and frontier sectors.
- 7.15.4 Regarding education and skills, attention is given to ensuring capacity is increased as necessary. The stated preference is to secure contributions from developers to cater for increased demand for education and training that results from development.
- 7.15.5 There is a clear emphasis on enhancing transport networks, prioritising public transport and active travel through existing centres, whilst diverting car trips to new road infrastructure. There is also mention of improving key motorway junctions and the provision of parking facilities for lorries. Such measures are likely to support the economy by providing better conditions for existing businesses and attracting new investment in growing industries.
- 7.15.6 Wigan has higher levels of deprivation than the UK average, with some ingrained inequality in particular communities. However, deprivation and inequality are only addressed through forming part of one of the principles of the stated preference for ‘sustainable communities’, which calls for reduced poverty and unemployment. More detail regarding how the borough’s deprivation issues are to be tackled could be beneficial.

7.16 Town and Local Centres

IA Objective - To improve the vitality and viability of our town and local centres.

- 7.16.1 The town and local centre's objective of the IA is highly compatible with the town and district centres strategic objective of the Options and Preferences consultation document, which seeks to support town and local centres to thrive (=viability) and become vibrant and attractive spaces (=vitality). The stated preference is to continue a hierarchical approach to the borough's town and local centres, with Wigan being the foremost town centre, followed by Leigh and seven other towns, and then by 43 local/neighbourhood centres across Wigan borough. More detail, understandably, is provided regarding the regeneration and improvement of Wigan, Leigh and the other seven town centres. The main focus of a proposed policy for local centres is ensuring there is an appropriate balance of business types providing a retail function, as well as supporting housing markets and other complementary uses that ensure vitality.
- 7.16.2 The stated preference for the town and local centres is to establish them as the settings for a mix of retail, leisure, cultural, educational, health-related and residential provisions. This should help to ensure such town/local centres have a good offering to residents, workers and visitors, and encourage the building of community wealth, creating an element of self-sustainability. There may be some resistance to change in centres from parts of the community, so it will be important to ensure that important functions are retained or restored if possible (for example the stated preference for re-introducing a regular market in Hindley).
- 7.16.3 Although the six sites under the homes theme of the Options and preferences document are not located in any town/local centre, the preferences for South Hindley and Westwood Park are to deliver connections with Hindley and Wigan town centres, respectively. This should ensure these developments contribute to the vitality of their centres rather than detract from them.
- 7.16.4 Conversely, an approach that seeks to divert road traffic away from town centres (and manage parking) could be counterproductive to the preference to re-invigorate town centres / attract visitors. The solution is to make the centres places to live and also extremely accessible by public transport – which is clearly emphasised through the document. Therefore, whilst there is an element of uncertainty, it is likely that significant benefits would arise for town and local centres.

Part 3: What happens next?

8. Part 3: Conclusions and next steps

8.1 Introduction

- 8.1.1 The aim of this section is to present IA conclusions and recommendations at this stage and explain the next steps in plan-making /the IA process.

8.2 Conclusions

Below is a brief summary of the IA findings for each sustainability objective in relation to the Options and Preferences document considered 'as a whole'. It is important to remember that the high-level nature of the policies at this stage make it difficult to conclude in absolute terms with regards to significance. Therefore, the focus has been on identifying whether effects are likely to be broadly positive, negative, neutral and / or if there are uncertainties.

Housing

- 8.2.1 The new Local Plan is guided by the Places for Everyone Plan with regards to housing growth, and the current strategy and identified housing supply is sufficient to meet identified needs. In this respect, the Wigan Local Plan is unlikely to have significant implications with regards to housing. However, the stated preferences seek to influence the types, tenures and quality of housing, which is likely to have **positive effects**.

Health and Community

- 8.2.2 A range of policy preferences are included that ought to have **positive effects** on health and wellbeing, particularly those that support active travel, well served communities, an appropriate housing mix and environmental improvements.

Equality and Diversity

- 8.2.3 Measures which support town centre regeneration, vibrancy and accessibility are likely to benefit minority groups that reside in or close to such areas, including ethnic minorities. There are also likely to be some **positive effects** in relation to housing delivery and access to employment. It is noted however that there may be community resistance to large scale change of town centres, which could bring some **negatives**.

Climate Change

- 8.2.4 Several preferred approaches are likely to have **positive effects** with regards to climate change mitigation and resilience. This includes a focus on the reuse of land and buildings, support for active travel and sustainable transport, the enhancement of green infrastructure and the need for high quality design. There is a degree of **uncertainty** with regards to the potential effects of employment growth.

Water

- 8.2.5 Some key measures are likely to have **positive effects** with regards to water quality and flooding. Of particular importance is the proposed requirement to reduce surface water run off rates and promote the use of natural drainage.

Environmental Quality

- 8.2.6 Potential **mixed effects** are identified at this stage with regards to environmental quality. On one hand there could be increased noise, dust and traffic in town and local centres in the short term, whilst in the longer-term, there could be improved public realm and improved air quality. There is **uncertainty** regarding the effects of employment growth on air quality.

Historic Environment

- 8.2.7 There is potential for mixed effects on the setting and the significance of a range of heritage assets. However, given that there is a conservation-led approach to regeneration and development proposed in the town and local centres (and for selected heritage assets) it is more likely that **positive effects** will remain in the long term.

Landscape and Townscape

- 8.2.8 The proposed preferred policy approaches are likely to have **positive effects** upon landscape and townscape as there is a desire to achieve enhancements to the built environment as well as better managing changes of use in the countryside.

Biodiversity and Geodiversity

- 8.2.9 There are likely to be **positive effects** with regards to biodiversity, as there is a heavy focus on achieving biodiversity net gain, enhancement of strategic wildlife sites and corridors and urban greening.

Resource Efficiency

- 8.2.10 The preferred approaches touch upon the need for resource efficient developments. Whilst **positive**, there are no specific measures that are likely to lead to significant effects in this respect.

Land and Soil Resources

- 8.2.11 There is a focus on the reuse and regeneration of town and local centres, which is positive with regards to the efficient use of land and natural resources. With regards to soil and land, several preferences are likely to have some **positive effects** by promoting biodiversity net gain and green infrastructure enhancement. However, there is no explicit mention of the need to protect soils.

Transportation

- 8.2.12 The potential for mixed effects is identified. On one hand, there is a focus on making accessible town and local centres that are well served by public transport and active travel. There is also a heavy focus on active travel and enhancements to bus and rail infrastructure. This is likely to have **positive effects** in terms of reducing congestion and the need to travel by car.

8.2.13 However, there is also support for strategic road infrastructure that will encourage continued use of private vehicles. Some forms of employment growth may also be reliant on road transport, which together could lead to **negative effects**.

Economy

8.2.14 There is commitment to enhancing opportunities for traditional and growth sectors, including in the 'green' economy. There is also support given to infrastructure enhancement to help support sustainable economic growth. In this sense, **positive effects** are expected, but there is a need to explore further whether the existing employment land stock is sufficient to cater for Wigan's ambitions, as well as identifying opportunities.

Town and Local Centres

8.2.15 There are several policy preferences that should serve to improve the physical appearance and function of town and local centres. A focus on regeneration, active and sustainable travel and high-quality design should help lead to more attractive places to live, visit and work. Overall, it is likely that **positive effects** will arise.

8.3 Recommendations

8.3.1 The following recommendations are made from the integrated appraisal work, recognising that it is still early in the plan-making process and policies and approaches are yet to be confirmed.

8.3.2 When making recommendations it is also recognised that the new Local Plan for Wigan needs to be read in the context of the Places for Everyone Plan, which already sets out policy measures in relation to a range of factors. These matters are therefore considered to be addressed satisfactorily already.

- As the evidence base progresses, it would be useful to revisit the need for Gypsy and Traveller accommodation and whether there are alternative locations for accommodating needs.
- Explore the potential for setting higher environmental / sustainability standards for the strategic growth locations as appropriate.
- The effects of employment growth on road traffic and carbon emissions need to be explored further once a strategy and reasonable alternatives are clearer.
- Seek an overall improvement in the quality of Wigan's watercourses and other water resources.
- Set out the priority of actively enhancing local amenity and environmental protection, rather than only protecting present levels from unacceptable harm.
- Consider policy requirements for public art, exhibitions and civic spaces that ensure town and local centres do not lose their sense of identity and community spirit.
- The stated preference for North Leigh Park specifies a requirement for high standards regarding energy efficiency and low-carbon technologies. The policy proposals for the other five strategic locations could do the same.
- There are specific guiding principles for landscape proposed for all of the strategic locations with the exception of land South of Atherton. Consider articulating similar policy preferences for this location.
- The stated preference for North Leigh Park specifies a requirement for high standards regarding energy efficiency and low-carbon technologies. The policy proposals for the other five sites could do the same.
- Elements of the stated preferences regarding HS2 need to be reconsidered given recent government announcements.

9. Next steps

- 9.1.1 This Interim IA Report will accompany the Document for public consultation between October and November 2023. Any comments received will be reviewed and then taken into account as part of the iterative plan-making and IA process. Following the consultation, there will be further consideration of options and if reasonable alternatives are identified, further appraisal work will be undertaken before key decisions are made.
- 9.1.2 The representations received along with further evidence base work, including further IA work, will inform the development of a first draft of the Local Plan which is scheduled to be published for consultation in Summer 2024. An updated Interim IA Report will accompany the first draft Local Plan for consultation.

