

Wigan Local Development Framework
Core Strategy Development Plan Document
Public Examination

LDF Programme Officer
Wigan Town Hall
Library Street
Wigan WN1 1YN
Tel: 01942 487321
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Dear Mr Worden,

Wigan Core Strategy Examination: Modifications in respect of housing land supply

I can now confirm my position on the way forward for the examination following the additional hearing sessions held between 5-8 March 2013. I have reached this view following very careful consideration of all relevant evidence and information, discussions at the hearing sessions, written submissions and representations made.

As I have previously stated, I consider the submitted Core Strategy to be unsound in a number of respects. The Council has formally requested that I recommend modifications to address matters of soundness under Section 20(7c) of the Planning and Compulsory Purchase Act 2004. The modifications necessary to address issues of soundness relate to various aspects of the submitted Core Strategy. However, the main purpose of this letter is to outline the modifications required specifically in respect of the supply of housing land to give the Council an opportunity to consider its own position before detailed work on the wording of modifications and subsequent further consultation and appraisal is undertaken.

In assessing the Core Strategy against national policy concerning housing land supply, I have taken account of the generally strategic nature of the document and the future role of the Allocations and Development Management Plan. The ability of the Council to demonstrate a supply of specific deliverable sites at this point in time is clearly affected by this. However, in order for the Core Strategy to be sound it must at least set out a policy framework which allows for an adequate supply of housing land over the plan period as a whole and a five year supply of deliverable sites to be identified. In addition to being positively prepared to meet objectively assessed needs and consistent with national policy, the policy framework provided by the Core Strategy must be effective in terms of deliverability and justified as the most appropriate when considered against reasonable alternatives.

You are already aware that I consider the submitted Core Strategy to be unsound in that it would not provide for an adequate supply of housing land given the need for an average of 1,000 additional dwellings per annum (net of demolitions) identified by the Council itself. Following the suspension of the examination in May 2012, the Council has sought to address my concerns and demonstrate how adequate housing land could be provided both in terms of a five year supply and the plan period as a whole. In reaching my conclusions on the Council's proposals to address the shortfall of housing land I have taken account of the housing trajectories submitted as part of the Housing Land Report (Table 3.1) and the Council's hearing statement (App. C). I have also taken account of the further trajectory produced for the final hearing session (EX36) although I note the Council's position regarding assumptions used. I must stress that housing trajectories are not in themselves a policy mechanism, they provide an

illustration of how policies and proposals in the Core Strategy would deliver housing over the plan period.

Taking the plan period as a whole (2011-2026), I have concerns about the introduction at this stage of a general assumption of a density of 33 dwellings/Ha for other SHLAA sites. I have some doubts over the assumed combined annual rates of delivery at Northleigh, South of Hindley and East and South of Atherton at times during the plan period, given the number of developers and sales outlets that would be required. I also have specific concerns over whether the proposal to identify safeguarded land at Golborne and Lowton would be justified (I return to this in more detail later in the letter). Notwithstanding these concerns, and taking account of how the Council's proposals and assumptions may need to be amended, I am satisfied that the trajectories all indicate sufficient flexibility and illustrate that the Core Strategy could be modified to provide the policy framework for an adequate supply of housing land over the plan period as a whole.

I now turn to the issue of a five year supply. The Council identify a five year requirement (including replacement of demolitions and a 20% buffer) as 6,300 dwellings. In addition to concerns over the density multiplier for other SHLAA sites, I see insufficient justification for the general assumption of a development rate of 31 dwellings per annum, per sales outlet. There is little if any support from those involved in the development industry for this increased rate or indeed the principle that the previously agreed rate of 25 per annum did not include affordable housing. There is insufficient evidence to support the view that the level of affordable housing required to achieve these build rates is realistically viable or that funding is in place to support schemes on this scale. I note that the latest trajectory (EX36) removes this assumption and I consider this to be more realistic. I also consider it more realistic in not assuming completions on land South of Atherton in the five year period. If it were to come forward in the short term, it is likely to affect development rates at other sites in the locality. I consider that the trajectory set out in EX36 provides the most realistic assessment overall.

The trajectory in EX36 shows a supply for the five years from 2013/14 of 6,305 dwellings, only marginally above the requirement. Whilst I note the Council's reference to discussions with developers and landowners, I have a number of concerns in terms of the realism of this supply, particularly in the light of the typical lead in times referred to in the SHLAA 2012 update. It includes sites with outline planning permission delivering houses within the first two years. It also includes other SHLAA sites without planning permission delivering houses within the first two years. There is a significant reliance on sites without planning permission to achieve a five year supply overall. In some cases sites which the SHLAA 2012 update categorised as developable in the 6-10 period have been included as delivering houses in 2017/18. Clearly a key purpose of the SHLAA is to identify deliverable housing sites for the immediate five year period. I appreciate that the base date for the SHLAA is 2012 and the five year supply calculation now has a base date of 2013. However, the sites in question were not considered by the SHLAA to be deliverable within five years and I see insufficient basis in terms of evidence to assume that they will now contribute to a five year supply. The SHLAA provides the key evidence base in this respect and I see nothing in it to support the Council's current assumption.

Given that the Council is yet to determine the application for outline planning permission at Stone Cross Lane, the delivery of houses in 2013/14 appears unduly optimistic. Likewise, I am concerned over the realism of expecting 50 houses to be delivered at Garrett Hall in 2014/15 given that a planning application has not yet been submitted.

Taking account of all of these factors, I consider that the Council's proposals to address my earlier concerns would not provide a policy framework which allows for a realistic five year

supply of deliverable sites to be identified. In this respect, the Council's proposals would not result in a plan that is positively prepared, effective and consistent with national policy.

In addition, I am not satisfied that the Council's preferred option of bringing forward all of the safeguarded land at Golborne and Lowton for development and none elsewhere beyond the East West Core is justified in terms of it being the most appropriate approach when considered against reasonable alternatives. The Council's proposal would introduce significant additional development to Golborne and Lowton in relation to their size and level of service provision, resulting in some 13% of overall housing development within the plan period being focussed in this one particular area (EX37). I am not satisfied that evidence in relation to the existing and potential capacity of local infrastructure, in particular the road network and public transport supports the scale of development proposed.

Turning to the other options to address the shortfall in housing land supply which were considered, I agree with the Council that the release of Green Belt land as part of this plan process would be inappropriate, given the existence of significant areas of safeguarded land. I do not share the Council's view as to the relative merits of safeguarded land at Standish and Golborne/Lowton however and in particular the merits of some combination of these options. Whilst there would clearly be some adverse impacts from the use of safeguarded land in both locations, I consider that the evidence in terms of transport and technical assessments along with the Sustainability Appraisal does not support the view that in principle the use of safeguarded land would only be appropriate at Golborne and Lowton and not at Standish. Clearly the potential scale of development envisaged is a key factor.

Returning to the issue of deliverability, a policy framework which allowed for the use of safeguarded land at Standish, in addition to Golborne/Lowton would provide for a greater range and choice of genuinely deliverable sites to come forward. It would add flexibility and make an important contribution to the supply of housing land particularly in the short to medium term.

In addition to other necessary modifications I therefore intend to recommend that the submitted Core Strategy is modified to allow for development of safeguarded land at both Golborne/Lowton and Standish for housing. This is necessary to ensure that the Core Strategy is positively prepared, effective and consistent with national policy in relation to a realistically deliverable five year supply of housing land and to ensure that the Core Strategy is justified.

Taking account of the above, along with the potential capacity of areas of safeguarded land, overall housing requirements and the need to retain sufficient focus on the East West Core, I consider that the Core Strategy should make provision for approximately 1,000 dwellings on safeguarded land at Golborne/Lowton and approximately 1,000 on safeguarded land at Standish. Taking account of other sources of supply, some 7% of overall housing development in the Borough would be in each location. Whilst there would be significant benefits in terms of contributing to a five year supply, there would be a minimal effect on the total potential supply over the whole plan period in net terms compared with the Council's proposals. Increasing the range of development options would clearly have benefits in terms of flexibility and delivery however.

Such modifications would represent a significant change to the submitted Core Strategy. However, this would also be the case with the Council's proposals. The options for addressing the shortfall in housing land have been subject to consultation and sustainability appraisal and there is scope to undertake further consultation and appraisal on specific modifications. I have taken account of the advantages of having an up to date plan in place as soon as possible and the benefits in providing a policy framework to assist the delivery of sufficient housing. I have also taken account of the Council's wish to continue with the Core Strategy. I can confirm that I

am able to proceed to recommend the modifications outlined above subject to further consultation and appraisal.

As I said however, I wish to give the Council the opportunity to consider its own position before detailed work on the wording of modifications and subsequent further consultation and appraisal is undertaken. In doing this I must stress that I am not seeking discussion as to the merits of my conclusions. I have provided an overview of my reasoning to assist the Council and others in understanding the situation. As I have made clear I have reached this view following very careful consideration of all relevant evidence and information, discussions at the hearing sessions, written submissions and representations made. I am fully aware of the Council's position and the evidence it relies on to justify it.

The Council has requested me to recommend modifications that I consider necessary to address matters of soundness. I am simply seeking confirmation that this is still the case. The alternative would be that the Core Strategy is withdrawn. Theoretically the Council could withdraw its request for me to recommend modifications but this would inevitably result in my report recommending non-adoption and serve no purpose.

I would like to emphasise again that a number of other modifications to the submitted Core Strategy are necessary in addition to the matters discussed above.

I would be grateful for the Council's response to this letter by Friday 22 March 2013 confirming whether or not it still wishes me to recommend modifications. If it does I would hope to liaise with you and your colleagues via the Programme Officer in order to prepare the detailed wording of modifications for consultation and sustainability appraisal in due course.

Yours Sincerely,

Kevin Ward
INSPECTOR