



**Wigan Local Development Framework
Core Strategy Examination-in-Public
Additional Hearing Session**

**The supply of land and buildings for
new housing in Wigan Borough**

**Wigan Council
3 April 2012**

The purpose of this paper is to provide the Council's response to the questions asked by the Inspector in advance of the additional hearing session on 18 April. The paper outlines the Council's position and proposed way to proceed towards adoption of the Core Strategy.

The Council does not intend to withdraw the Core Strategy. It intends to carry out the necessary technical work and consultations and proceed to update the Core Strategy to ensure that there is sufficient and flexible supply of housing land for the plan period, bearing in mind the increased importance of having an up to date Local Plan in the light of the recently published National Planning Policy Framework.

It is the Council's position that the housing needs of the borough can be met in a way that is wholly consistent with the spatial strategy and which will ensure the appropriate level of community involvement. In short there is no sustainable basis on which to conclude that the plan making process should cease now.

1. Is it possible to address the shortfall?

- 1.1 Firstly, we consider that the Core Strategy should plan for 15 years from 1 April 2011. This is consistent with the new National Planning Policy Framework, paragraph 157, which indicates that plans should be drawn up over an appropriate time scale, preferably a 15-year time horizon. This is a considerable relaxation of the previous guidance in PPS 12.
- 1.2 The Council's position is that it is possible both in principle and in practice to identify and deliver sufficient housing land to cover a plan period of 15 years. In making this point we take into account the fact that the NPPF advises that Local Plans should be aspirational but realistic (paragraph 154).
- 1.3 Before addressing the ways in which sufficient housing land can be identified and delivered, we intend to clarify a number of issues that have arisen in relation to the approach that the Council has taken in identifying the likely level of housing delivery and to show that there are a number of additional and robust sources of housing land supply.

In principle

Replacing cleared dwellings

- 1.4 The replacement of cleared dwellings can be factored into the housing supply without a shortfall arising through to 2026. In our submitted Core Strategy, paragraph 9.35, we state that there are typically around 50 dwellings per year lost through demolition or conversion to other uses. If this is maintained through to 2026, 750 additional dwellings will be needed, a gross of 15,750 dwellings.

Windfall housing

- 1.5 We cannot accept that there is insufficient justification for the inclusion of a significant windfall allowance in the first 10 years of the plan.
- 1.6 A windfall is a site that comes forward but could not be identified in the plan or a subsequent plan. The basis of assessing whether there is sufficient land to meet housing requirements is being made at the Core Strategy stage. Therefore if a site is not identified in the Core Strategy, nor in the SHLAA at the base date for the Core Strategy, it will be a windfall in terms of assessing land supply for the period of the Core Strategy. It is therefore entirely appropriate that the Core Strategy makes an appropriate allowance for sites that are likely to come forward in the plan period but cannot now be identified either in the SHLAA or specifically allocated in the Core Strategy. Allocations will not be made until subsequent plans are adopted. This means that even though a site might be allocated in a subsequent plan, it is windfall for the purposes of the Core Strategy's housing supply assessment if it was not in the 2011 SHLAA. If it is not counted as

windfall it would not be counted at all at the outset, and the land supply would be under recorded. That is the position that we risk being in.

- 1.7 The justification for the inclusion of a windfall allowance was set out briefly at paragraph 2.2 of our written statement CS28 'Further information on Matter 4: Housing requested by the Inspector, 2 February 2012'. It is evidenced by past performance as set out in our Strategic Housing Land Availability Assessment Updates for 2010 and 2011. It also accords completely with the Government's SHLAA practice guidance (paragraphs 50-52) and specifically with footnote 28.
- 1.8 It is important at the outset to understand the particular context relating to employment land in Wigan. There is a clear trend of employment land falling out of employment use into other uses, predominantly housing. This is due principally to a significant stock of employment land which is a legacy of our industrial past but which is no longer needed for or attractive to the employment market. This is the reality of industrial land in Wigan and is not related to the recession. It has happened, happens now and will continue to happen in the future.
- 1.9 The issue arises in part from the employment policies in our Unitary Development Plan. Policy EM1A designates nearly 790 hectares as Primary Employment Areas and there is a policy presumption that these areas will remain in employment use subject to two policy clauses.
- 1.10 However, our experience has been somewhat different and this policy position has been difficult to maintain. We have instead required information on marketing and/or viability and accepted in many cases that redevelopment for other uses is often the only way to regenerate a site and meet modern needs. Even relatively modern premises (30-40 years old) are often no longer suitable or viable given the economic, technological and logistical changes that have taken place in the interim.
- 1.11 We intend to bring forward an Employment Land Review to inform a review of our Primary Employment Areas in our proposed Allocations and Development Management Plan. Indeed we had begun scoping out this work prior to notice of this additional hearing, in order to complete it by autumn 2012. It is likely that a significant amount of land will be released from the Primary Employment Area designation and this issue has been highlighted in our representations to the examination sessions on employment land.
- 1.12 Whilst an Employment Land Review would lead to the de-designation of Primary Employment Areas, and some could be reallocated as housing land in the Allocations and Development Management Plan, we cannot do that if a site is in active use and the owner has not made it clear that they intend to vacate the site. In such circumstances we cannot identify it in the SHLAA either, on the basis that it would not be reasonable to conclude that it was available for development. We can

do so quickly on annual update in response to a material change, from which point it will no longer be counted as a windfall.

- 1.13 By way of illustration of this point, within the last two months we have held pre-application discussions with developers about redeveloping two existing employment sites, which together could potentially yield over 400 housing units and investment into the residual employment part of those estates. These discussions are confidential in order to not jeopardise existing businesses on the sites which need to be relocated. These are typical of older employment sites in Wigan Borough.
- 1.14 In addition to the redevelopment of designated Primary Employment Areas, there is an ongoing process of the redevelopment for housing of other, undesignated employment sites under policy EM1B in the Unitary Development Plan. While the policy position is more relaxed, evidence is required to justify the loss of employment areas and the same limitations to identification in the SHLAA apply.
- 1.15 When planning applications are submitted for these two sites, and the principle established, they can be identified in the SHLAA at that time. However, as we have already highlighted, these sites would be additional supply to that possible to identify at the 2011 base date of the Core Strategy.
- 1.16 Further analysis of residential completions that have been developed on employment sites over the last 5 years (1st April 2006 – 31st March 2011) has identified 1340 residential units from this source. This equates to an annual average of 268 units.
- 1.17 Another form of windfall is any small site below the site size threshold in the SHLAA (developments of 9 or less dwellings). The SHLAA 2011 records 62 dwellings from this source. Analysis of planning permissions over the last 5 years (1st April 2006 – 31st March 2011) shows that there has been 739 dwellings granted permission on these small sites, an annual average of around 148 dwellings.
- 1.18 Likewise, small-scale conversions / changes of use to housing, or subdivisions of housing into more housing units are another form of windfall. Analysis of planning permissions over the last 5 years shows that there has been an annual rate of 15 dwellings from this source.
- 1.19 The table below identifies the contribution from windfall sites during the 5 year period 1 April 2006 – 31 March 2011 and provides an annual average. Details of all the permissions and completions which make up this total are set out in Appendix 1 which is separate to this statement.

Source	Total dwellings (1 April 2006 – 31 March 2011)	Annual average
Completions on employment sites	1340	268
Developments of 9 or less dwellings	739	148
Small scale conversions / change of use	74	15
Total	2153	431

- 1.20 This demonstrates that over the past 5 years an average of 431 units per annum have come from windfall developments. This is much higher than the windfall allowance of 100 dwellings identified in the housing trajectory (page 3 of document CS28). The windfall allowance in the trajectory is therefore a conservative figure.
- 1.21 The CLG guidance on SHLAA specifically provides for windfall allowances to be made if there are local circumstances that justify them. Additionally the National Planning Policy Framework states that an allowance for windfall sites may be made albeit in the context of the five year supply, which is helpful as far as it goes.
- 1.22 On the basis of the above we are entirely satisfied that the historical trend and the prevailing situation provide compelling evidence (as now required by paragraph 48 of the NPPF) to justify 10% of our annual housing provision to come from windfalls from year 3 onwards, amounting to 1,300 dwellings.

South of Atherton

- 1.23 South of Atherton is not presently a broad location for development but bringing it forward for housing is clearly in line with the spatial strategy. It is consistent with Policy SP1 which sets out the spatial strategy which clearly includes Atherton as a focus of new development within the east west core. The site adjoins an existing town and is within close proximity to the town centre of Atherton. It is therefore in a sustainable location and suitable for residential development. In addition Policy CP8 of the of the submitted plan clearly states that safeguarded land within east west core will be reviewed and allocated for development in a subsequent development plan document.
- 1.24 The extent to which the identification of the land south of Atherton is in line with the spatial strategy can be illustrated by a scenario whereby a planning application is received for housing development for the whole site and it falls to be considered against the Core Strategy as it stands. Although safeguarded land policy would appear to be a reason for refusal, the council would have great difficulty in resisting the proposal if it could not demonstrate a five year supply of deliverable housing sites. This is because it would be likely to be overridden by the requirement to consider such applications favourably with regard, to the

presumption in favour of sustainable development set out in NPPF. Against this it would be difficult to refuse planning permission for this site within the east-west core where, according to our spatial vision, most new development is to be accommodated.

- 1.25 There are no known constraints on the site or off-site that would prohibit development within the timescales stated. The principal landowner is appointing specialist consultants, to gather further evidence to inform the designation of the site. The Council is one of the other two landowners and will support this work.
- 1.26 The principal landowner's agent has also had approaches from developers who have expressed an interest in taking the land at South of Atherton forward and housebuilders are interested in the site. However they intend to fund the process of taking the land through the planning system themselves and deliver it to the market for development. They will negotiate with housebuilders near that time.
- 1.27 The landowner also has additional land available to the south of 'South of Atherton', west of Bee Fold Lane and adjacent to the existing Howe Bridge Sports complex, in the Green Belt. In principle, this could be used for soft infrastructure such as sustainable drainage or additional or replacement playing fields / open space to meet the requirements of the development without taking up capacity on the site.
- 1.28 The Leigh-Salford-Manchester Busway will be operational by late 2014. Work has commenced and the design and build contract will be let by the summer. Funding for the complete project has been secured and approved. It will run on a special guided carriageway from Leigh to Ellenbrook in Salford and will have dedicated road space in the form of bus lanes for the majority of its route on road. The business case for this £68 million scheme assumes four buses per hour will originate in Leigh. A further 4 buses per hour will originate in Atherton and connect into the busway at Tyldesley. This will result in 8 buses per hour serving Tyldesley. All buses will provide connections to Salford and Manchester city centres and the university and health precincts.
- 1.29 The South of Atherton site is well placed to take advantage of this investment as an attractive location to live and commute from the job and educational opportunities in the Manchester/Salford city centre. The eastern end of the site abuts Tyldesley, 800 metres from the main bus stop on the busway in Tyldesley, where buses from Atherton will transfer from road to the busway. These services will use the A577 from Atherton town centre. The northern end of the site is 500 metres from the town centre (Market Street), which suggests that there is scope for development of a higher density than 30/hectare on the northern part of the site. The north east of the site is within 30 metres of the A577. While it is not a new railway station or Metrolink line, the busway will be a considerable step-up from conventional bus travel and will not share the majority of its route with other traffic. This will help to

make the South of Atherton site sustainable and the site itself will help to protect the investment that has been made in the busway project.

- 1.30 For these reasons, but most particularly the fact that it is in line with the spatial strategy, the South of Atherton site should be the preferred location for meeting any shortfall in housing in the Core Strategy as submitted. It can be expected to contribute 850 dwellings by 2026, potentially more if needed.
- 1.31 Consultation can be scheduled as part of the proposed modifications.
- 1.32 Whilst the sustainability appraisal undertaken previously was for mixed use development, it can be readily reappraised for housing using up-to-date evidence.

Rates of development at South of Hindley, Northleigh, East of Atherton and South of Atherton, their proximity and the market

- 1.33 Some comments have been made as to the robustness of the rates of development that have been assumed for some of the preferred locations for residential development.
- 1.34 However the anticipated annual rates of development at South of Hindley, Northleigh Park, East of Atherton and South of Atherton are not unduly optimistic and unrealistic when seen together given the overlap in phasing, the proximity of those sites and the potential market.
- 1.35 The assumptions that we have made on the annual rates of completions at South of Hindley and Northleigh Park were those presented by the principal owners and developers. The council is a key landowner at both of these locations and would bring its influence to bear as a landowner in facilitating development.
- 1.36 As noted in Document CS27, South of Atherton is at least a mile away from Northleigh Park and nearly two miles from South of Hindley.
- 1.37 Evidence on housing markets in the borough is available from 'Wigan's Changing Housing Markets' (2005), to which Peel referred to at the hearings and which is identified in our 'Evidence Review 6: Housing' (supporting document 5.6, table E2) and Making Housing Count (supporting document 7.4).
- 1.38 This evidence shows that Wigan Borough is a relatively self contained housing market overall but is both fragmented within and linked to adjacent housing markets externally. Within that evidence, three main housing market areas can be identified: Wigan, Leigh and Manchester, the latter covering Tyldesley, Atherton and the East Lancashire Road corridor in particular. Clearly these markets are not mutually exclusive but there is a strong case that the four sites concerned are located across these three housing markets. The western part of South of Hindley is in the Wigan market, the eastern part of South of Hindley and North Leigh within Leigh and South of Atherton partly within Leigh

and partly within Manchester housing market. East of Atherton is within the Manchester market as is the East Lancashire Road corridor.

- 1.39 Peel has expressed confidence in the deliverability of South of Hindley at the rate, and within the timeframe presented in the trajectory. In referring to 'Wigan's Changing Housing Markets', they have stated that South of Hindley serves a different housing market to Northleigh, at least from the west and centre of the site, and we concur. Hindley is within the Wigan housing market together with Ashton, Platt Bridge and Standish. There are relatively few market connections eastwards. With no safeguarded land around Wigan itself, the South of Hindley site has the opportunity to capitalise on demand arising from Wigan, while helping to regenerate part of the east-west core.
- 1.40 Northleigh Park is within the Leigh housing market. The Northleigh Park Group is absolutely convinced that the delivery rates are achievable and have a national house builder, Taylor Wimpey, secured and now working together to prepare the detailed application for the first phase. They have invested heavily in the proposal, and submitted a planning application for the whole site on 29 February. They have prepared a detailed financial appraisal of the first phases and are in detailed discussions with AGMA to secure Greater Manchester Investment Fund support to help deliver an early and greater level of housing completions.
- 1.41 Northleigh Park will be a new and desirable residential location between Hindley Green and Leigh, on a site that is currently scarred by past activities and is largely unproductive. As such it will regenerate the area at the heart of the east-west core and provide a significant community uplift.
- 1.42 The East of Atherton site is well located to serve the Manchester housing market. It is the only large housing site close to a railway station on the Wigan-Manchester line. It is 300 metres walking distance to Atherton Station. It is also located close to a high frequency 'quality bus corridor' between Leigh and Bolton.
- 1.43 South of Atherton is also well located to serve the Manchester housing market. It has the potential to be a high quality development taking advantage of its location on a south facing slope overlooking the Green Belt to Lilford Park. It is adjacent to some relatively higher quality residential areas with good access to local green spaces, leisure facilities at Howe Bridge Sports Centre and the town centre.
- 1.44 We have submitted evidence on its deliverability previously, notably in written statements CS18 and CS27. As noted above it is well placed to take advantage of the Leigh-Salford-Manchester Busway which will uplift the housing market in that area. It is also close to the high frequency 'quality bus corridor' between Leigh and Bolton at its western end.

- 1.45 These sites – excluding South of Atherton that has been accounted for already - can be expected to contribute over 3,400 dwellings by 2026.

Other sites within our Strategic Housing Land Availability Assessment

- 1.46 The 2011 SHLAA and the tables submitted within the Council's additional paper on housing land supply includes general information on constraints, but it is important that this does not present an unduly pessimistic view of the deliverability of sites.
- 1.47 One frequent example from the 'Constraints to overcome' column is the references to "major highway improvements required". This arises from the assessment system used for the original Strategic Housing Land Availability Assessment in 2007 and is misleading especially as more updated information has become available since then. It portrays an overly pessimistic view of the deliverability of sites. For example, the site infrastructure and remediation for Bickershaw has been completed and the site is now in a detailed procurement process by its owners HCA to appoint a housebuilder by the summer to take it forward. Another example is the Orica site which the tables identified the majority of the site as being covered by Tree Preservation Orders. The reality is that these are not constraints whatsoever to the delivery of the site and indeed the management of the woodlands has now been secured, help to make the site attractive and the development now has full planning consent and houses are being constructed.
- 1.48 In Wigan most housing sites will have the potential for contamination issues to be overcome. Experience tells us that its significance in terms of affecting the viability of schemes is generally low, given that it is often reflected in the land value of the site. The current position on all sites identified as having constraints in the SHLAA is set out in a table in Appendix 2, which is separate to this statement.
- 1.49 In addition, these 'constraints' need to be seen in the light of the inclusion of the sites concerned in the SHLAA. If the constraint would genuinely prevent the site coming forward within the plan period or alternatively, early within the plan period, it would not be in the SHLAA or would be in a later time period within the SHLAA to reflect its deliverability.
- 1.50 We are therefore confident that the sites identified in the SHLAA are deliverable and can be relied upon to deliver up to 6,400 or more dwellings by 2026 (plus around 230 at Coldalhurst Lane), to meet the borough's housing needs, in line with the spatial strategy. These sites either have planning consent or are in line with Policy SP1 of the submitted Core Strategy.

Higher densities

- 1.51 In the two most recent updates of our SHLAA we have calculated site capacities conservatively at 30 dwellings per hectare. This reflects the

current housing market in terms of the nature of schemes being submitted for planning approval over the last three years. However between April 2004 and March 2008 housing development was at average density of 57 dwellings per hectare (all sites greater than 0.25 hectares or 7 dwellings). Clearly therefore it is reasonable to expect development at greater than 30 dwellings per hectare over the 15 years of the Core Strategy. It would also be consistent with the principles in national planning policy retained in the National Planning Policy Framework, to encourage the effective use of land (paragraph 17) and, in line with paragraph 47, potentially to set out our approach to housing density to reflect local circumstances, possibly on a site by site basis in the Allocations Development Management Plan. By way of example, if the average densities on the broad locations (including the proposed broad location at South of Atherton) were increased by 5 dwellings per hectare from 30 to 35, this would yield nearly 700 additional units.

- 1.52 East of Atherton (Wig 155) is suitable for high density development due to its close proximity to Atherton railway station and a high frequency bus route. Due to its size and sustainable location, South of Atherton (Wig 156) has potential for high density development on parts of the site in close to Atherton town centre.
- 1.53 Examples of other SHLAA sites likely to achieve higher densities include:
- Wigan and Leigh College, Railway Road, Leigh (Wig 66) which has potential for conversion, at least in part, and is located in Leigh town centre surrounded by high density development.
 - Site of Grand Arcade Tower, Riverway, Wigan (Wig 838), which is located in Wigan town centre in close proximity to major public transport connections and town centre facilities. This site has previously had planning permission for 156 residential units (now lapsed) which equates to over 600 dwellings per hectare.
 - Land adjacent to Frog Lane Council depot (former fork lift truck company), Frog Lane, Wigan (Wig 870). The site now has a pending planning application for mixed use development comprising 85 units (A/11/75748), despite only 17 units estimated in SHLAA.
 - Victoria Mill, Bolton Old Road, Atherton (Wig 47), which is a mill building with potential for conversion on the edge of Atherton town centre.
- 1.54 Furthermore, the planning application submitted in February 2012 for the development at North Leigh includes 1800 dwellings, higher than the estimated capacity of 1663 identified in the SHLAA based on 30 dwellings per hectare.
- 1.55 It therefore can be legitimately anticipated that significantly more housing can be delivered across the sites covered above.

What are the potential options?

- 1.56 The Council believes that with South of Atherton identified as a broad location, there will be sufficient housing land to meet our housing requirements to 2026. The options below present flexibility.
- **Safeguarded land in the East Lancashire Road corridor**
- 1.57 The Core Strategy as submitted does not specify the amount of development in the East Lancashire Road corridor. This, effectively, was the problem identified at the Exploratory Meeting and acknowledged by the Council, and addressed subsequently through the proposed changes that we have submitted. However there is nothing in the submitted Core Strategy to prevent all of the sites coming forward, either through policy SP1 or policy SP4.
- 1.58 The implications of bringing all of the sites forward would be that around 2,000 additional houses would be built outside of the east-west core. 2,000 houses are equivalent to 13% of the total housing requirement. The housing trajectory presented in written statement CS28 showed 88% in the east-west core. If 13% more were built outside of the east-west core and 13% less in the east-west core, it would still mean that three-quarters of all houses would still be built in the east-west core.
- 1.59 Whilst this would be less than the around 85% focus referred to in policy CP6, it is only a focus not a definitive statement and the focus would remain. More specifically, development would still be directed primarily towards to the east-west core, as stated in policy SP1.
- 1.60 The principle of development at each of the broad site options in the East Lancashire Road has already been the subject of specific consultations in the localities concerned
- 1.61 If needed, therefore, the East Lancashire Road corridor could be brought forward for more substantive development to meet any shortfall in housing without conflicting with the spatial strategy in the Core Strategy as submitted. We have already tabled a policy mechanism to enable it to come forward if needed. An alternative approach would be to include a mechanism within a policy in the Allocations Development Plan Document and this would seem to be preferable as it avoids the cost and time constraints involved in preparing a separate DPD.
- **Safeguarded land elsewhere e.g. Standish**
- 1.62 The safeguarded land in Standish is at Almond Brook Road (Pepper Lane), close to junction 27 of the M6 motorway and Rectory Lane to the east. Together these have a capacity of around 3,700 dwellings, based on 30 dwellings per hectare.
- 1.63 Standish is a peripheral location within the borough and the Greater Manchester city region. Unlike Wigan, Ashton and Golborne/Lowton, it is also peripheral from the other major city region of Liverpool. It has

no rail station, the nearest stations being at Wigan (3.6 miles) and at Appley Bridge (3.0 miles) and Gathurst (3.1 miles) on the Southport-Wigan line and no direct public transport services to Manchester or Liverpool. Nevertheless it has become a desirable place to live and, as a result, average commuting distances are the highest in Wigan Borough. This information is from the 2001 Census which is clearly somewhat dated but there is no reason to think it doesn't remain the case and hasn't increased in the intervening period. It would therefore not be sustainable to increase the numbers of people doing this significantly, but it would be an inevitable outcome of allowing the release of substantial amounts of safeguarded land within the town.

- 1.64 The release of safeguarded land in Standish would be contrary to the spatial strategy and would necessitate taking a step back in the process beyond the legitimate scope of the examination, leading to the need to withdraw the Core Strategy. The land is not needed so it is not necessary to take a step back or withdraw the Core Strategy.

- **Release of Green Belt land**

- 1.65 Given the extent of safeguarded land within the borough, there are no exceptional circumstances to justify the release of Green Belt land for new housing. Release of Green Belt land for housing does not have community support and in the Council's and stakeholders view is that such a release is clearly not needed to provide housing to meet our requirements. Green Belt release has not been proposed seriously by any representor during the whole process of preparing the Core Strategy and none of the housebuilders proposed it during the hearing sessions.

- **Some combination of the above**

- 1.66 A combination of windfall sites, identification of South of Atherton, SHLAA sites, higher densities, confidence in development rates at Northleigh Park and broad locations serving different markets, and the East Lancashire Road corridor would ensure that sufficient housing land is brought forward during the Plan period in a way that is consistent with the spatial strategy, which itself has already been examined through the Plan process.

- **Other options?**

- 1.67 There are no other options, other than to withdraw the plan. There is widespread support for the spatial strategy as evidenced at the hearings. The only exceptions are from housebuilders with a site that they want to develop which is not, or may not be, in line with the spatial strategy.

Delivery

- 1.68 Across 15 years there is capacity in line with the spatial strategy to deliver 850 dwellings at South of Atherton; 3,470 at Northleigh Park,

South of Hindley and East of Atherton; 870 at other broad locations (not including the East Lancashire Road corridor as amended) 2,300 on sites with planning permission; 6,700 on other sites in the SHLAA (including Coldalhurst Lane); 1,300 dwellings from windfall development on existing employment sites; and up to 2,600 at the East Lancashire Road corridor. This is a total supply of around 18,000 – more if higher densities are achieved as anticipated. In addition, and as referred to in paragraphs 1.17-1.18, further analysis has identified a significant source of supply from small sites and change of use/conversions which were not taken into account in the windfall allowance set out in Table 1 of Document CS28.

Constraints on housing delivery

- 1.69 The recent and current figures for completions need to be seen in the context of the financial crash, recession and ongoing economic difficulties and it is relevant to consider this in the wider picture of assessing deliverability. Planning may be a constraint on housebuilding but nothing material has changed locally from a planning perspective since 2007. It is the economy that has changed and the council has been actively seeking to respond to that in planning terms, for example, through renegotiating existing requirements for s106 payments and reducing requirements for new s106 payments in line with evidence on viability, and actively seeking support for infrastructure and housing delivery through schemes such as the Greater Manchester Investment Fund.
- 1.70 Nevertheless, the early adoption of the Core Strategy and subsequent rapid progress to adoption of our Allocations and Development Management Plan is now needed to bring forward substantial new housing allocations.
- 1.71 Mortgage availability is a major constraint on housebuilding. Indeed, in March 2011 the Home Builders Federation said that “Mortgage availability, and especially the shortage of affordable higher loan to value mortgages, is the biggest immediate constraint on demand and house building” (16 March 2011, press release). Many people in jobs can afford mortgage payments but do not have the 20-25% deposit (typically £20,000+) required to secure a mortgage. A number of initiatives have been introduced, both locally and nationally, in response to assist first time buyers who do not have access to a large deposit into the home ownership market.
- 1.72 In recognition of the problems the Government has introduced successive schemes such as ‘HomeBuy’, ‘FirstBuy’ and ‘NewBuy’. The council has also been very active in working to unblock the housing market locally. For example, through taking advantage of grant funding from the Homes and Communities Agency, 127 new affordable homes for rent were built in 2010 and 49 in 2011. A further 150 affordable rented homes are in the pipeline for 2012-15.

- 1.73 The council has also introduced an equity loan scheme to help first-time buyers onto the 'housing ladder', funded through s106 developer contributions –currently operated at College Court, Scot Lane (Redrow), and shortly at Keats Avenue, Poolstock, (Seddens). Purchasers need to provide a minimum 5% deposit for a conventional mortgage to purchase a 70% equity share, with the remaining 30% equity share secured by the Council as a second charge on the property. The equity loan is non-interest bearing and only repayable after ten years or when the property is sold. Additional equity in the property can be purchased at any time. Purchasers need to live, work or have a family connection in the borough.
- 1.74 The council is also introducing a Local Authority Mortgage Scheme, which was established by Sector Treasury Services and has been operating nationally since March 2011. It allows first time buyers to purchase any property in Wigan borough, not just new build, up to £130,000 value, with 5% deposit. It is hoped that our scheme will be in place by May and allow first-time buyers to get a 95% mortgage on similar terms as a 75% mortgage but without the large deposit normally required, with the council providing an indemnity up to 20% of the value should the lender incur a loss in the event of mortgage default.
- 1.75 The scheme will assist the local housing market by helping first time buyers access the lower end of the second hand market, with evidence suggesting that each purchase will stimulate an average of 3 further sales in a chain and possibly assist moves into new build homes by easing the difficulty faced by those selling their existing home. It will also relieve local demand for social housing.
- 1.76 The council has also established a community interest (not for profit) company called Wigan Housing Solutions that is run for us by Wigan CAB. It supports the private rented sector through a variety of services including a Bond Scheme, tenant finder service, property management service and also managing properties that the council leases from private sector landlords.
- 1.77 The council is currently working with the other Greater Manchester councils to develop an investment fund in partnership with the GMPF. The investment fund will offer financial assistance to developers / landowners to bring forward new development in order to provide a high quality rental product in order to address the growing demand for rental accommodation that has resulted from the difficulty in accessing owner occupation and the insufficient supply of homes in the social sector.
- 1.78 Nevertheless, while there are signs of recovery, we are still some way off a healthy housing market. Savills Residential Property Focus Q4 2011 suggests that house prices in the North West are not expected to come out of decline until 2015.

2. Additional work required

Evidence gathering

- 2.1 The evidence is in place to demonstrate an appropriate supply of sites for new housing in Wigan Borough as part of a wider economic, social and environmental regeneration strategy. We have prepared or had prepared all of the evidence required by national planning policy to inform our Core Strategy. We are unsure of what is missing.
- 2.2 Some of the evidence produced does not cover the whole plan period in depth because to do so would be unreliable at this time. An example is our transport assessment work, in which traffic modelling was completed for the whole plan period, but included a number of assumptions and controlling factors that could not be relied on for evidence submission and accurate assessment, due to numerous variants in the current market and impact on trip patterns. More detailed modelling work has been undertaken for the first five years for the submitted version, as the parameters for this control period are more stable. This accorded with the agreed protocol with the Highways Agency and is consistent with, or in more depth than all the other Greater Manchester Core Strategies. Indeed two of the GM Core Strategies that have been adopted didn't have any traffic modelling, not even for the first five year period. However, through the transport strategy development work, each site was investigated to assess the impact on the transport networks and this could be developed further as we could revisit the traffic modelling within a short timeframe if needed to consider the likely impacts of South of Atherton and the build out of all of the sites in the East Lancashire Road corridor, as appropriate.

Assessment of options

- 2.3 Alternative options within the context of the spatial strategy appear to be to identify South of Atherton as a broad location for new development, or not; to include a mechanism for the release of more land in the East Lancashire Road corridor, or not; and to include Astley within the east-west core, or not. These have been assessed on capacity and deliverability and more work can be done if needed in partnership with landowners and developers as appropriate.

Consultation with local communities and other stakeholders

- 2.4 We can consult with local communities and other stakeholders on the above options in a timely manner.

Sustainability Appraisal

- 2.5 We can conclude the appraisal of these options in order to finalise the details and consult on them.

How long would this work take?

- 2.6 It appears necessary that we seek full Council approval for changes to the Core Strategy as submitted prior to consultations. This would mean taking the Core Strategy to Cabinet on 5 July and Council on 18 July. With a lead-in time from mid June, this would seem to be a reasonable timeframe to gather evidence, including completing the sustainability appraisal, and prepare consultation material. Consultations could be then take place although it would be appropriate to avoid the peak summer holidays. Doing so would cause a further delay meaning that consultations would not be concluded until mid October. If a further additional hearing was then needed it could have been pre-scheduled for late October / November. This would ultimately enable the council to adopt the Core Strategy by March 2013.

Is the Council willing and able to undertake such work?

- 2.7 Yes.

3. Procedural implications

Is it legitimate to undertake this work at this stage in the process?

- 3.1. Yes. It is critical for the borough to have an up to date Local Plan. Local Plans are the key to delivering sustainable development and this is made clear in NPPF. The Core Strategy is an extremely important document for the Council and is fundamental to the delivery of our Economic Framework, our Transport Strategy and our Housing Strategy. The Core Strategy leads the regeneration of our borough and helps to unlock funding opportunities.

Would it in effect be taking a step back in the process to look at options to accommodate housing growth?

- 3.2. This is not a step back in the process but identifying additional steps for the Core Strategy to proceed towards adoption.

Would the changes necessary result in a substantially different plan to that submitted?

- 3.3. No. For the reasons that we have already set out, the changes that we would propose are entirely consistent with the strategy set out in the submitted plan.

- **The role of the EW Core within the Borough and the policy position relative to other areas.**

- 3.4. Policy CP6 states that around 85% of new housing will be focused on the east-west core. With South of Atherton, in excess of 85% of new housing could be delivered in the east-west core. If 2,000 more houses were built in the East Lancashire Road corridor instead of the east-west core, the total within the east-west core would be reduced to around 75%. This is not substantially different. Development would still be directed primarily towards the east-west core as stated in policy SP1.

- **How would such changes affect the spatial strategy?**

- 3.5. Such changes would arise from the inability of the spatial strategy to deliver sufficient housing in the east-west core and therefore achieve the regeneration sought.

- **How would they affect the distribution of housing?**

- 3.6. The proportion of housing between the east-west core and elsewhere would change as set out above.

- **How would the approach to safeguarded land be affected?**

- 3.7. Safeguarded land other than at Northleigh Park would remain safeguarded until allocated through a subsequent plan. All safeguarded land within the east-west core would need to be allocated for development in principle. A policy mechanism will need to be

agreed and consulted upon for the release of safeguarded land in the East Lancashire Road corridor, as necessary. The safeguarded land at Standish would remain safeguarded at least until whole plan review.

- **How would particular parts of the Borough / individual settlements potentially be affected differently?**

- 3.8. Atherton would need to accommodate more development than was specifically envisaged in the submitted Core Strategy although it is identified in the wording of Policy SP1 as a settlement to accommodate growth. As a settlement in the east-west core with a significant amount of safeguarded land, more land could have been allocated in line with the Core Strategy and statutory procedures in a subsequent plan if needed.
- 3.9. Astley would be more certain to accommodate development as part of the east-west core but Coldalhurst Lane is already a site option within the East Lancashire Road corridor. Paragraph 8.27 of the submitted Core Strategy states that “a site or sites will subsequently be identified”, so there was no firm statement that all of the sites would not be needed.
- 3.10. Golborne and Lowton may have to accommodate more development but, again, paragraph 8.27 of the submitted Core Strategy states that “a site or sites will subsequently be identified”, so there was no firm statement that all of the sites would not be needed.
- 3.11. If Golborne and Lowton has to accommodate more development it will be needed as a result of delivery / 5 year supply issues in the east-west core, so a settlement or settlements will accommodate less development in consequence.

Overall, would the nature and extent of changes required and the process involved be beyond the legitimate scope of an examination into a submitted plan?

- 3.12. No.

Should the plan be withdrawn?

- 3.13. No.

What would be the implications of withdrawing the plan?

- 3.14. The implications of withdrawing the Core Strategy are extremely serious for Wigan Borough. It is a strategy which leads the regeneration of our communities and addresses the social, environmental and economic challenges the borough faces. It links to and supports our transport strategy, economic framework and corporate strategy amongst others. Without the Core Strategy significant amounts of new investment will be lost to Wigan Borough where it is needed and regeneration of the most deprived areas will not happen. Our Area Action Plan for Wigan Central will be put on hold,

many of our transport schemes will be jeopardised, we will not be able to put a Community Infrastructure Levy in place and our inner area will not get the focus of new housing, employment and community benefits that it requires.

- 3.15. The Core Strategy has been prepared in the context of steeply declining funding for area based regeneration. This has been compounded by the cuts in public sector funding in response to the 'credit crunch', recession and public deficit, and the more private sector-led approach to economic development being undertaken by the coalition government. As a result the regeneration-led approach of the Core Strategy is even more critical to the social, economic and environmental well-being of the borough, in particular its inner areas.
- 3.16. On 29 February, the planning application for Northleigh Park was submitted to the council, comprising a major urban extension of 1,800 houses, 8 hectares of employment development, 18 hectares of public open space and £8 million of new road infrastructure. If the Core Strategy is not progressed this proposal will not have the policy support needed across the site and will be a departure from the development plan.
- 3.17. If the Core Strategy is withdrawn we could expect a number of planning applications for new housing on safeguarded land in Standish, Golborne, Lowton and Astley. Many of these proposals, particularly in Standish, will have little or no advance community engagement and will accrue significant levels of opposition from residents in those communities. Importantly without an up-to-date plan in place they will be departures and will create uncertainty and conflict in those communities.
- 3.18. There would be a real prospect of planning by appeal and of development happening in an unplanned and non-strategic way. None will deliver the employment and other community benefits that the east-west core sites will. The best sites will be cherry-picked and our regeneration sites left behind as developers gravitate to deliver housing in the outer areas of the borough. This would affect the delivery of sites in the east-west core.
- 3.19. There is absolutely no doubt also that the development of substantial land on the periphery would detract from development in the east-west core at sites such as Bickershaw South, Northleigh Park and South of Hindley. Bickershaw South has outline planning permission and has benefited from large amounts of grant funding to prepare the site for development. It is now out to tender for the right to develop. One of the housing developers represented at the hearings has been actively engaged but since the examination hearing sessions in early February, they have withdrawn stating that they have other options to follow. This cannot be coincidental given that so much doubt has been expressed about our strategy. It is a self fulfilling situation and one that is unlikely

to result in a significant increase in housing over and above what the Core Strategy would deliver, and with little or none of the benefit.

- 3.20. The applications will generate no community infrastructure levy funding for investment in much needed infrastructure in the inner areas of the borough, because it will not be in operation by then. Indeed the introduction of the levy will have to be put back until we do have an up-to-date development plan. There would also be a significant reduction in Section 106 receipts due to the inability to pool funding after March 2014.
- 3.21. The development will be less sustainable than in inner areas. The communities mentioned are not served by rail or a dedicated busway for the purposes of travelling to main centres of employment, education, shopping and entertainment outside the borough. The development will not contribute to social, economic and environmental regeneration where it is needed.
- 3.22. Fundamentally substantial development in those areas is contrary to the regeneration strategy that is central to the Core Strategy. It would be putting the narrow objective of housing numbers in the short term ahead of the long term sustainable regeneration of the borough. It would be a massive opportunity lost and against the wishes of the community of the borough.
- 3.23. We believe that the Core Strategy is strongly in line with the approach put forward by the National Planning Policy Framework. Our strategy of seeking to focus most development in the 'east-west core' of the borough, is precisely the type of 'framework within which local people and their accountable councils can produce their own distinctive local and neighbouring plans, which reflect the needs and priorities of their communities' referred to in the introduction to the NPPF. It takes strong account of and supports local strategies to improve social, economic and environmental conditions in the borough, as evidenced above and places great emphasis on the reuse of brownfield land for development and focussing development on sustainable locations which make the fullest possible use of public transport, walking and cycling, all key elements of the NPPF's core planning principles.
- 3.24. It is therefore our view that the Core Strategy is or can be made sound without fundamentally changing it, that it is the right strategy for the borough and its people and that the principles and policies which comprise the strategy are vindicated by the NPPF with which it is perhaps more in sympathy than with the former planning policy regime set out in PPSs and PPGs which are no longer in force.