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Planning. Design. Economics.

Wigan Core Strategy EiP

Written Statement in respect of Matter 7b:
East Lancashire Road Broad Location for
Development

Taylor Wimpey

12 January 2012

40957/03/MWa/JM

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1.0 Introduction

- 1.1 Nathaniel Lichfield & Partners [NLP] is instructed by Taylor Wimpey UK Limited [Taylor Wimpey] to make representations on the Wigan Core Strategy [CS].
- 1.2 The following supplementary statement forms the basis for the representations that will be made on behalf of Taylor Wimpey at the forthcoming Examination in Public [EiP] hearing session concerning Matter 7b: East Lancashire Road Broad Location for New Development.
- 1.3 Separate written statements have been lodged on behalf of Taylor Wimpey to address Matters 1 and 4.
- 1.4 This statement responds to the issues and questions identified by the Inspector in respect of Matter 7b and supplements Taylor Wimpey's earlier duly made representations. Where relevant, the comments made are assessed against the tests of soundness set out in Planning Policy Statement [PPS] 12.

2.0

Policy Context

2.1

The policy context for this written statement is summarised at Appendix 1.

3.0

Planning Issues

Introduction

3.1 Taking account of the policy context outlined in Section 2.0, this section comments on whether Policy SP4, in respect of the East Lancashire Road Broad Location for Growth is justified, effective and consistent with national policy. The following comments broadly respond to questions identified by the Inspector in relation to Matter 7b.

Spatial Justification for East Lancashire Road Broad Location

3.2 Taylor Wimpey has prepared a separate written statement, in respect of Matter 1, which comments on the soundness of the proposed spatial strategy and approach to the distribution of housing development. This demonstrates:-

- There is justification for the identification of a broad location for new development outside of the east-west core, to the south of the borough.
- The broad location for growth should be focussed on Golborne in order to implement a settlement based approach to strategic growth and deliver sustainable patterns of development.
- The majority of housing growth to be delivered outside of the east-west core (i.e. 10% of the requirement) should be focussed on Golborne in accordance with an East Lancashire Road strategic location for growth.

3.3 The Council's rationale for the identification of a broad location for new housing development in the East Lancashire Road Corridor, outside of the east-west core, is set out in the Housing Final Topic Paper (August 2011) [¶3.75-¶3.76] and the CS [¶8.26-¶8.28]. In summary, this indicates that development in this location is required to help balance the housing market by providing lower density, high value housing, which is unlikely to be delivered in significant quantities within the east-west core.

3.4 Taylor Wimpey agrees that:-

- 1 There is a need for higher value, large family housing to address a current imbalance in the housing market in Wigan. Support for this is drawn from :-
 - i The Wigan Housing Needs and Demand Study 2008 [¶9.1.4 & Table 9-2], which indicates a strong market requirement for detached houses;
 - ii The Greater Manchester SHMA Update (2010) [Table 4.2], which makes clear that there is an imbalance in the stock of housing in Wigan, with disproportionately high quantities of terraced and semi-detached houses (i.e. over 75%); and,

- iii The Housing Topic Paper (2011) [¶3.47 & Table 14], which demonstrates that the borough has a significantly lower proportion of detached dwellings compared with the UK as a whole.
 - 2 That the provision of high value, aspirational housing in the borough will deliver regeneration by:-
 - i Addressing the current deficiency in the housing market;
 - ii Providing housing that will be attractive to business leaders and high earners, supporting opportunities for business investment, changing perceptions and increasing available expenditure; and,
 - iii Enabling a share of the value of development to be invested in essential infrastructure in the east-west core, through the application of CIL.
 - 3 The higher value family housing development required is not deliverable in the east-west core (with the exception of the proposed greenfield extension at Garrett Hall, Astley). Some support for this is drawn from the NLP Average House Price map (2010) and the NLP Average House Price Change (2007-2010) map, provided at Appendices 2 and 3 to the written statement on Matter 1. In general terms, this information shows significantly lower house prices within the east-west core. It also generally shows that the greatest fall in house prices have generally been within the east-west core. This is broadly consistent with the information in the Wigan Housing Market Update Issue 8 (October 2011). All of this evidence points to a significantly weaker housing market within the east-west core, with limited prospects of delivering high value housing.

3.5 In respect of the general CS approach to directing new housing development towards the south of the borough, accessible to the East Lancashire Road, Taylor Wimpey considers this to be the most appropriate approach to addressing the identified imbalance in the housing market. In support of this position, the following key points are made:-

- 1 In general terms, with the exception of Standish and Golborne (including Lowton) all of the settlements outside of the east-west core (i.e. Aspull, Shevington, Orrell and Billinge) have only a limited range of services and facilities available. These settlements are all served by local and neighbourhood centres, as defined by proposed CS Policy SP2 and UDP Policy S1. As such, small scale growth and development within these settlements, as proposed by the CS [Policy SP1] is appropriate and in accordance with national planning guidance and the RS.
- 2 Whilst Standish and Golborne are both ranked as towns, in the context of proposed CS Policy SP2 and UDP Policy SP2, the urban area of Golborne (including Lowton) is more sustainable than Standish and a more appropriate location for accommodating strategic housing growth. This is because:-
 - i It is a larger urban area with a population of 19,919 compared with Standish, which has a population of 11,704 (based on 2001 census data).

- ii Whilst Standish and Golborne both have good public transport links to Wigan, Golborne has better connections to the regional centres of Manchester and Liverpool and the wider region. In particular, there are excellent high frequency bus services, which use the East Lancashire Road, providing access to the regional centres.
 - iii Golborne is better provided for in terms of education facilities than Standish. In particular, Golborne benefits from two secondary schools, whereas there is only one secondary school in Standish. Based on DfE information ¹ the Golborne secondary schools have capacity for additional pupil intake. Conversely, the Standish secondary school is currently at capacity.
 - iv Golborne has much better access to employment opportunities than Standish. This is shown on the NLP Employment: Number of Jobs by Lower Super Output Area (2010) map, provided at Appendix 4 of the written statement on Matter 1. This clearly demonstrates that there is currently a significantly higher concentration of employment opportunities clustered around Golborne than there are at Standish. In terms of future provision, the proposed CS seeks to direct as much new employment development to Golborne as it does to the settlements of Standish, Shevington and Aspull combined.
- 3 A strategic location focussed on Golborne, to the south of the borough is the most capable of delivering the type of housing required to address the identified imbalance and support economic growth and regeneration in Wigan. Support for this is drawn from the NLP Average House Price (2010) and Average House Price Change (2007-2010) maps, provided at Appendices 2 and 3 to the written statement on Matter 1. This information demonstrates that house prices in Golborne are amongst the highest in the borough. Perhaps more significantly, it demonstrates that house prices, in and around, Golborne have increased during 2007-2010 despite the poor economic climate. This points to a strong market demand for housing in this area. This position contrasts with Standish, which is traditionally seen as having a strong housing market, where there has been a significant decrease in house prices over the period 2007-2010.
- 4 In terms of the availability of suitable land for housing development, there is Safeguarded Land (as designated in the current UDP) around Golborne that can be brought forward for development. The majority of the other settlements outside of the east-west core (i.e. Aspull, Shevington, Orrell and Billinge) do not have designated Safeguarded Land available for development and are generally tightly constrained by Green Belt. In respect of Astley, as set out above, this functions as part of Tyldesley and effectively forms part of the east-west core. Whilst there is

¹ DfE School and Local Statistics 2011

Safeguarded Land on the edge of Standish, the locational characteristics of Golborne and the strength of its housing market mean that it is a more appropriate location for growth than Standish to deliver the type of housing required.

- 3.6 For the reasons set out above, Taylor Wimpey supports the identification of a broad location for housing growth in the south of the borough, outside of the east-west core. Furthermore, as is set out in detail in the accompanying written statement, in respect of Matter 1, Taylor Wimpey submits that in order to be sound and consistent with the RS, a settlement based approach to strategic growth must be identified. As such the broad location for new housing development to the south of the borough should be focussed on Golborne.

Site Options within the East Lancashire Road Broad Location

- 3.7 The East Lancashire Road corridor broad location for growth, as defined in the Submission CS includes Golborne (including Lowton), a small area of Astley and a linear strip of Green Belt land to the north of the East Lancashire Road. The draft Policy SP4 identifies four site options for housing growth within the identified area. Taylor Wimpey has a number of concerns about the soundness of the proposed approach as set out below.

- 3.8 Firstly, in respect of the extent and boundary of the broad location for new housing, the position of Taylor Wimpey is set out in the accompanying written statement on Matter 1. This demonstrates that the broad location for new housing development should be focussed around Golborne. Furthermore, Astley should be considered as part of a wider urban area including Tyldesley, within the east-west core. As such, the need to release Safeguarded Land at Coldalhurst Lane, Larkhill, Astley should be considered in the context of the east-west core.

- 3.9 In the context of the above, the site options that are potentially available to deliver strategic housing growth in the suggested East Lancashire Road Broad Location around Golborne are:-

- Land at Rothwell's Farm, Golborne;
- Lans east of Stone Cross Lane, Lowton; and,
- Land at Pocket Nook Lane, Lowton

Taylor Wimpey considers that Policy SP4 should be amended accordingly.

- 3.10 Taylor Wimpey is also concerned that the draft Policy SP4 and reasoned justification fail to provide clear guidance on how many of the identified site options will be needed to deliver requirements in this area.

Housing Land Supply in Golborne (including Lowton)

Council Position

- 3.11 The Council's most recent housing land supply position is set out in the Wigan SHLAA 2011 Update. In terms of Golborne, Table 3.1 summarises the total potential housing land supply identified in the SHLAA [Appendix 3].

Table 3.1 SHLAA Supply Summary

Period	SHLAA Site Status	SHLAA Supply (Dwellings)
0-5 yrs	Previously Developed Land	75
	Greenfield	233
	Sub Total	233
5-10 yrs	Previously Developed Land	129
	Greenfield	2917
	Sub Total	3046
10-15 yrs	Previously Developed Land	0
	Greenfield	0
	Sub Total	0
15+ yrs	Previously Developed Land	0
	Greenfield	413
	Sub Total	413
Total		3692

Source: SHLAA 2011

- 3.12 The information in the SHLAA has been used to produce a trajectory table for the Council's position. This is set out at Appendix 1.

Taylor Wimpey Position

- 3.13 NLP has undertaken a detailed review of the Council's assumed housing land supply position, as identified in the SHLAA. In undertaking this, the yield projections from sites with planning permission (equating to a total of 144 dwellings) were accepted, although minor adjustments have been made to the delivery timescale assumptions, where appropriate.
- 3.14 It is clear from the assessment of the SHLAA that the majority of the projected supply comes from the Safeguarded Land on the edge of Golborne / Lowton, i.e. Rothwells Farm, Stone Cross Lane (Stirrups Farm), and Pocket Nook Lane. The SHLAA indicates that these sites could potentially deliver 2917 dwellings in the 6-10 year period. Taylor Wimpey is concerned that the projected capacity and delivery rates assumed are not robust.
- 3.15 In terms of projected capacity, the SHLAA indicates that Rothwells Farm could deliver 513 dwellings. This assumes a gross development density of 30dph. In this context, Taylor Wimpey has undertaken technical analysis and prepared

an illustrative masterplan for Rothwells Farm, which indicates that the site could deliver approximately 400 dwellings. A Development Statement has been prepared and submitted to the Council, demonstrating how this could be delivered. This achieves a gross development density of approximately 23 dph.

- 3.16 In respect of Stone Cross Lane (Stirrups Farm) and Pocket Nook, the SHLAA makes assumptions about the developable areas of these sites and applies a density multiplier of 30dph to calculate capacity. We are not aware of any evidence in the public domain to justify the assumptions used and Taylor Wimpey has concerns that the developable area estimates are over optimistic and do not fully reflect site constraints. In these circumstances, it seems more robust to apply a gross development density multiplier of 23 dph (which Taylor Wimpey has demonstrated to be achievable at Rothwells Farm) to estimate capacity on these sites.
- 3.17 Taylor Wimpey considers that a lower density multiplier than 30dph density is more consistent with the strategic objective to deliver a high proportion of low density, high value housing in this location. In support of this point, the reasoned justification for Policy SP4 of the CS [¶8.26] states:-
- “The East Lancashire Road corridor...is identified as a broad location for new development to help balance the local housing market. Specifically it will provide primarily for lower density, higher value housing that would be unlikely to be developed in a significant quantity in the ‘east-west’ core, at least prior to 2026, except at Garrett Hall...Lower density means lower than average density for new development across the borough, with some development likely to be around 10 houses per hectare” (our emphasis).*
- 3.18 In respect of the SHLAA delivery assumptions from these sites, Taylor Wimpey considers that, notwithstanding the capacity issue, it is unrealistic to assume that the safeguarded sites could deliver 2917 units within the 5-10 year period. Based on current rates of development, it is considered more likely that approximately 50 dpa would be delivered on each site (on the basis that the sites would be built out by two developers), in the medium term, rising to 70dpa once the economy has fully recovered.
- 3.19 The SHLAA also identifies a potential longer term (15+ year) supply of 413 dwellings from existing school sites (i.e. Golborne High School, Lowton High School, and Lowton Junior and Infants School). It is understood that this would only be delivered following the rationalisation of existing education facilities in Golborne. Whilst this was proposed as part of a Building Schools for the Future [BSF] project (involving the closure of these schools and the development of a new facility on land adjacent to Lowton Civic Hall) this has now been abandoned². Therefore, the identified supply from these sites will not be delivered in the foreseeable future and should be removed from the SHLAA.

² Following the Government’s abolition of the Building Schools for the Future programme in July 2010.

- 3.20 On the basis of the SHLAA evidence, it is clear that there is a strong reliance on the Safeguarded Land in order to deliver housing requirements and strategic growth in Golborne / Lowton over the CS period. Having regard to the fact that these sites are only likely to deliver 50 - 70dpa, it is considered essential that these sites are released for development early in the CS period so that they are capable of making a significant contribution towards meeting housing need. This is particularly important given that part of the wider strategy is for the release of these sites to make a contribution towards regeneration in the east-west core.
- 3.21 Taking account of the above issues, an adjusted housing trajectory has been prepared, which sets out the position of Taylor Wimpey on the likely delivery of housing from the identified SHLAA sites. This is provided at Appendix 2. This demonstrates that:-
- 1 Without bringing forward any of the Safeguarded Land on the edge of Golborne for development, the potential supply from the other sites identified is only 340 dwellings. This represents a significant shortfall in delivery against the suggested requirement of 1,750 dwellings.
 - 2 Some of the identified supply (i.e. 144 units) comprises sites with planning permission. These permitted forms of development will deliver denser housing than that required to address the identified imbalance in the housing market.
 - 3 Due to generally small site size and location, the other sites without planning permission are not considered to be capable of delivering low density, high value housing in any significant quantity.
 - 4 All three of the safeguarded sites need to be brought forward for development early in the plan period to have a reasonable prospect of delivering development requirements over the CS period.
- 3.22 On the basis of the foregoing, Taylor Wimpey considers that in order to be effective and have a realistic prospect of delivering requirements in Golborne, the CS must provide specific support for the release of all three safeguarded sites on the edge of the urban area.

Effect of Development on the East-West Core

- 3.23 The EiP Inspector³ has questioned how housing in the East Lancashire Road location for development will help secure regeneration in the east-west core. As a general point, Taylor Wimpey accepts the Council's response⁴, which, in summary, states that housing in this location will benefit regeneration by:-

³ Inspector's Note Regarding Initial Concerns Over Soundness [¶5 & ¶6]

⁴ Response of Wigan Council to the Inspector's Note Regarding Initial Concerns Over Soundness [¶16.1]

- 1 Providing housing that will be attractive to business leaders and high earners supporting opportunities for business investment, changing perceptions and increasing available expenditure; and,
- 2 Enabling a share of the value of development to be invested in essential infrastructure in the east-west core, through the application of CIL.

3.24 Securing regeneration through the application of CIL will require the Council to take action and approve an appropriate charging schedule for qualifying development.

3.25 Taylor Wimpey has provided evidence that the type of low density, high value housing required is unlikely to be deliverable in the east-west core. As such, the release of sites for this type of development around Golborne will not compete with or divert investment away from the east-west core. The release of the identified site options around Golborne will therefore not undermine regeneration in the east-west core.

Viability and Deliverability of Site Options

3.26 Taylor Wimpey is unable to comment on the viability and deliverability of Stone Cross Lane and Pocket Nook Lane. However, it is confirmed below that the land at Rothwells Farm is deliverable in the context of the requirement of PPS3 [¶54] and SHLAA Practice Guidance (in that it is available, suitable and achievable).

Available

3.27 Taylor Wimpey has secured an option with the land owner of the Rothwells Farm site. The adjoining land is owned by Legh Estates, who is working jointly with Taylor Wimpey in promoting the site. The site is therefore substantially within the control of a major house builder and can be delivered for housing within the initial phases of the LDF. Taylor Wimpey UK Limited is seeking to develop the site at the earliest opportunity and the site could be brought forward for development within the first five year period. It therefore satisfies the requirements of PPS3.

Suitable

3.28 The site is considered suitable for housing development as it:-

- 1 Offers a suitable location for development and can be developed now;
- 2 It would integrate well with existing residential development to the north of Golborne and is well contained by strong physical features;
- 3 It could utilise existing infrastructure surrounding the site and there are no utilities or drainage constraints preventing the site coming forward for development;
- 4 Satisfactory vehicular access can be provided to the site and existing bus stops are located approximately 90m from the site;

- 5 The local highway network can accommodate the provision of approximately 400 dwellings at the site;
- 6 There are no ecological or environmental constraints preventing the development of this site for development; and,
- 7 It has impressive sustainability credentials with numerous local facilities and services with 2 km of the site boundary including Primary Schools and Secondary Education, shops and healthcare.

3.29 The site is therefore suitable in accordance with the requirements of PPS3.

Achievable

3.30 Taylor Wimpey has reviewed the economic viability of a number of development scenarios on the site, including options with a high proportion of low density, high quality housing. The viability exercise has taken into account land value, attractiveness of the locality, level of potential market demand and projected rate of sales, as well as all cost factors associated with development. Where potential constraints have been identified, Taylor Wimpey has considered the necessary mitigation measures and investment required to overcome any deliverability barriers.

3.31 Taylor Wimpey can therefore confirm that the development of the site is economically viable in accordance with PPS3 and the CLG SHLAA Practice Guidance (2007). The company is committed to investing in the development of the site and is confident that residential development can be achieved within five years.

4.0 Proposed Changes

4.1 In order to address the issues of soundness identified above, Taylor Wimpey submits that the wording of CS Policy SP4(6) should be amended so that it is clear that the broad location for new development alongside the East Lancashire Road is focussed on Golborne / Lowton.

4.2 The site options identified in Policy SP4(6) should also be amended to the following (excluding Coldalhurst Lane, Astley):-

- Land at Rothwell's Farm, Golborne;
- Lans east of Stone Cross Lane, Lowton; and,
- Land at Pocket Nook Lane, Lowton

Appendix 1 Policy Context

Introduction

The relevant planning policy context for this statement is provided by national planning policy and the North West of England Plan - Regional Spatial Strategy to 2021 [RS]. Whilst the RS is to be rescinded as a consequence of the Localism Act 2011, it currently remains part of the statutory development plan. The key policy context points are briefly summarised below.

PPS1: Delivering Sustainable Development

PPS1 states that in preparing spatial plans, LPAs should:

- 1 Set a clear vision for, and guide future patterns of development, with clear objectives for achieving the vision, with strategies for delivery and implementation.
- 2 Consider the needs and priorities of communities, and relate them to the use and development of land; and,
- 3 Seek to integrate the wide range of activities relating to development and take account of other relevant strategies including the RS [¶32].

PPS3: Housing

LPAs should set out in LDDs their strategy for the planned location of new housing, setting out the criteria to be used for identifying broad locations and specific sites, taking into account evidence of current and future levels of need and demand [¶38]. Policies for delivering housing should take into account the level prescribed in the RS, identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years. LPAs should also identify sufficient specific deliverable sites that are available, suitable and achievable, to deliver housing in the first five years [¶54], and identify a further supply of specific, developable sites for years 6-10 and where possible years 11-15.

PPS12: Local Spatial Planning

PPS12 confirms that the CS should include an overall vision and strategic objectives, with a delivery strategy setting out how much development is intended to happen where, when and by what means; and a clear monitoring and implementation framework [¶4.1]. The CS should be in general conformity with the RS [¶4.32]; it may also allocate strategic sites for development, which are considered central to the achievement of the strategy [¶4.6].

The CS should be supported by evidence of what physical, social and green infrastructure is needed to enable the amount of development proposed for the area, taking account of its type and distribution [¶4.8]. CSs are intended to *'endure and give a degree of certainty to communities and investors...the need for frequent updating may be reduced by taking a long term view and providing some flexibility'* [¶4.14]. They should provide a framework for development over a timeframe of 15 years or more [¶4.46].

In addition to being legally compliant, PPS12 states that for a CS to be found 'sound', it should be justified, effective and consistent with national policy [¶4.52]. In order to be justifiable, a CS must be founded on a robust and credible evidence base and represent the most appropriate strategy when considered against reasonable alternatives [¶4.36]. For a CS to be effective, it must be deliverable; flexible; and able to be monitored [¶4.44].

North West Regional Strategy

The North West RS [Policy RDF1] identifies Wigan as an area for growth and development in the Manchester City Region. The RS [Policy MCR1] seeks to accommodate housing development in accessible locations and provide high quality housing to attract and retain new population and support economic growth. The RS [Policy L3] makes clear that plans should respond to and restructure housing markets to address identified needs.

The RS [Policy L4] sets a minimum housing requirement of 978 dwellings per annum (net of clearance replacement) for 2003-2021.

Draft National Planning Policy Framework (NPPF)

The Government published the draft NPPF in July 2011. The guidance is a material consideration in the making of planning decisions. The NPPF articulates the Government's commitment to ensuring that the planning system does everything it can to support economic growth. The guidance [¶14] establishes a "presumption in favour of sustainable development", which should be taken as a golden thread running through the plan making process.

The NPPF adopts a pro-growth stance. A key objective of the guidance is to significantly increase the delivery of new homes by increasing the supply of housing and widening opportunities for home ownership. To boost the supply of housing, the DNPPF requires that LPAs should (inter alia):

- *'Use an evidence base to ensure that their Local Plan meets the full requirements for market and affordable housing in the housing market area, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;*
- *Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements. The supply should include an additional allowance of at least 20% to ensure choice and competition in the market for land' [¶109].*

Appendix 2 SHLAA Supply – Council Position

Appendix 3 Position

SHLAA Supply – Taylor Wimpey