

Statement by Wainhomes Developments Ltd  
Wigan Core Strategy Examination

MATTER 7B EAST LANCS ROAD CORRIDOR

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## 1. INTRODUCTION

- 1.1 This statement has been prepared in answer to the questions set out by the Inspector. Our client's key interest is the land at Stone Cross Lane, Lowton which is one of the 4 potential sites on the East Lancs Road Corridor (ELRC).
- 1.2 Our overall position is that the Core Strategy is not providing the necessary certainty, transparency and clarity and changes are required to ensure that sufficient land is brought forward to meet the development needs to 2026. This includes allocating additional land and our client's site is one such site that should be allocated now in the Core Strategy. We accept that this will require changes to the Core Strategy and further public consultation, but in our view this is necessary for the Core Strategy to be found sound.

## 2. MATTER 7B – EAST LANCS ROAD CORRIDOR

### **Matter 7b/1 - What is the justification for including four site options spread over a broad area in a submitted Core Strategy and retaining the potential for more than one or even all the sites to be developed? Does it provide sufficient guidance for later DPDs? How?**

- 2.1 This question is principally directed towards the Council as it is their decision to insert the four sites in the ELRC within the Core Strategy and leave the actual allocation of one or more of the sites to the Site Allocations DPD. We clearly support the principle of development in the ELRC, although our concern is that the Core Strategy, whilst accepting that development in the ELRC is crucial to diversifying the housing offer in the Borough and regenerating the east-west core, does not actually allocate one or more as strategic sites.
- 2.2 Paragraph 15.1 of the Council's response justifies the inclusion of the four site options as being the key decision with the details of the development to be deferred to the Site Allocations DPD. We consider that the Council cannot absolve responsibility for determining which sites to allocate in the Core Strategy as the supply in the 2010 SHLAA (Document 7.5), on which their case is based, has been proved to be overly optimistic by both the 2011 SHLAA and the 2011 Annual Monitoring Report (Document L1). Our initial assessment of the supply is set out under Matter 4. This concludes that the Council's supply is 3.1 years at best which requires a number of new strategic sites to be allocated in the Core Strategy.
- 2.3 The Core Strategy does not provide the necessary guidance for the Site Allocations DPD. As paragraph 4.2 of PPS12 states, the Core Strategy needs to set out "*how much development is intended to happen where, when, and by what means it will be delivered*".

We would expect the Core Strategy to state how much development is expected from the strategic site and broad locations and how they are to be phased. The amount of development for the strategic site and broad locations varies depending on which document is examined.

2.4 For example the sole Strategic Site in the Core Strategy is Northleigh Park. The table in Policy SP3 states that 50% of the houses are proposed in years 0-5, 47% in years 6-10 and 3% in years 11 to 15. However the Core Strategy is silent on how many houses this site will deliver so the question is 50% of how much in the first 5 years. We note that the Council's response to Inspector (Document EX05) assumes 1,664 dwellings off this site. Based on Policy SP3 this translates to 832 houses in the next 5 years. This is on a site where only an outline application is expected to be submitted in early 2012 so that level of completions is unrealistic. The 2011 SHLAA is more realistic in that the site will deliver 910 dwellings over the plan period and only 364 in the next 5 years. We still have concerns over that level of development in the first 5 years.

2.5 We have sought to rectify this confusion in our Matter 4 statement by including out a table setting out where and when development will be provided. For ease of reference it is as follows.

*"The following table shows the approximate distribution of housing development in Wigan up to 2026, including a predicted distribution based on the potential for housing development at Strategic Sites and Locations".*

#### Housing Trajectory

	Years 1-5	Years 6-10	Years 11-15	Total
Requirement	6,150	5,000	5,000	16,150
Sites with Planning Permission	1,013	248	0	1,261
Northleigh Park	150	455	305	910
South of Hindley	0	510	1189	1,699
East of Atherton	0	211	211	422
Garrett Hall	0	600	0	600
East of Wigan Road, Landgate	0	270	0	270
Stirrups Farm/east of Stone Cross Lane	276	460	0	736
Other SHLAA	2,854	2,246	3,295	10,252
Other Allocations	1,857			

2.6 The table is not set in stone but is an example of what should be in the Core Strategy. This is similar to the changes made to the Central Lancashire Core Strategy following the concerns by the Inspector following the Examination in 2011 (submitted to library and awaiting reference).

- 2.7 The final two rows (Other SHLAA and Other Allocations) is the balance to be made up in each of the 5 year periods after taking account of completions and strategic sites. For years 1 to 5 the figure of 2,854 is taken from the Council's SHLAA. The figure of 1,983 dwellings (Other Allocations) would be made up by bringing forward other SP4 broad locations and safeguarded land or new sites into the first phase. This is a decision to be taken by either the Inspector or the Council in changes to the Core Strategy.

**Matter 7b/2 - How much housing could be delivered on each site option or all of them together? How would this relate to the overall scale and pattern of housing development planned in the Borough?**

**Matter 7b/3 - What is the justification for development on this scale outside the EW core? How would the proposal fit with the spatial strategy?**

- 2.8 Paragraph 15.4 of the Council's response to the Inspector (EX05) states that depending on the size of the site or sites allocated, the contribution to the overall housing supply will be between 2% and 22%, based upon 30 dwellings per hectare. These percentages are based on the smallest site (Larkhill) coming forward (2%) to all four being allocated (22%). The table below sets out the capacity of each of the sites in the 2011 SHLAA.

Wig 151 Stirrups Farm/east of Stone Cross Lane	736
Wig 149 Rothwells farm	513
Wig 157 Pocket Nook	1668
Wig 148 Larkhill	324
Total	3241

- 2.9 The percentage in Policy CP6 is 6% for Golborne/Lowton and 7% for Tyldesley/Astley. Tyldesley is within the east-west core whereas Astley is within the ELRC. In the Council's response to the Inspector, Golborne/Lowton is given 7% of the total requirement which equates to 989 dwellings. Astley has now been split from Tyldesley and is given 0%. Therefore on the basis of this information, the 989 dwellings is the preferred number of dwellings by the Council. This level of development can only be met by three sites, these being Wig 149, 151, and 157. This is because Astley is given 0% and Wig 148 is located adjacent to it. As Pocket Nook is 1,668 dwellings, it is too large to meet the Council's requirement. On the councils figures, this leads us to the conclusion that Wig 149 and Wig 151 can come forward without harming the spatial strategy.
- 2.10 Our statement on Matter 4 proposes a requirement of 16,150 dwellings for the plan period. This is to account for the shortfall since 2003. On the basis of 7% at Golborne/Lowton, this equates to 1,130 dwellings. Under Matter 1 we consider that the

percentage applied to the ELRC should be increased and therefore this level of development should be seen as a minimum.

- 2.11 We note that paragraph 15.4 of the Council's response proposes 5% of the development requirement for Golborne and Lowton, which equates to 736 dwellings. There is a clear contradiction in the Council's position particularly as paragraph 11.12 of the Key Site and Broad Locations Evidence Paper (Document 13.2) states that although it is "*unknown at this stage which, if any, of these sites might be formally allocated for new housing in a future Allocations Development Plan Document, a general assumption of 1668 new dwellings is used for the East Lancashire Road corridor as a whole*". This paper was published in August 2011 so is clearly up to date and shows that this level of development is considered appropriate.
- 2.12 Therefore the Council's position is that between 736 dwellings and 1668 dwellings in the ELRC would fit within the spatial strategy. Our position is that this should be at least 1,130 but on the basis of housing need and the economic objectives of the Council should be greater. We deal with the spatial distribution in greater detail in Matter 1.

**Matter 7b/4 - How in practical terms will development in the East Lancs Road Corridor benefit regeneration in the EW core? How will it be phased? Could investment and demand be diverted from the EW core, particularly in difficult market conditions?**

- 2.13 The Council's answer in Section 16 of their response to the Inspector (Document EX5) sets out their position as to how development in the ELRC would benefit regeneration in the east-west Core. Paragraph 16.1 sets out three key benefits which are:
- providing high value housing;
  - enabling a share of the development value to be invested in the East-West Core; and,
  - providing a more balanced housing offer in the borough.
- 2.14 In light of these three benefits, we do not understand why the Council has not decided to prioritise these sites coming forward through the Core Strategy. The only way for these benefits to be realised is through the early delivery of land in the ELRC. Indeed paragraph 4.9 of the Infrastructure Delivery Plan (Document J1) states "*significant developer contributions are required if the spatial strategy, in particular the delivery of the key strategic site and broad locations for development, is to be realised*".
- 2.15 It is clear from the Council's Viability Advice (Document 13.1) that all but one of the sites in the east-west core are not viable. Even when the market improves and the viability of these sites potentially increase, they cannot meet paragraph 4.9 of the Infrastructure

Delivery Plan because these sites in themselves have significant infrastructure costs. For example Document 13.1 states that the road costs are £7.3m and remediation costs for Northleigh are £11.6m. For the land south of Hindley the new road is £10.3m. Therefore any financial contributions from these sites will be spent on site and not assist with delivery on the wider east-west core. That is where the early delivery of the ELRC sites is important as they can provide contributions for sites in the east-west corridor whilst also meeting the identified housing need and economic objectives of the Council.

2.16 Provided it is allocated in the Core Strategy, we would expect our client's site to start delivering in 18 months time and be complete by year 10 at the very latest. As will be noted from the letter from Mr Robinson of Wainhomes, which is appended to the Council's response (Document EX05), our client is actively building throughout Wigan and wish to continue to do so. Therefore if the site is allocated the Council can have the confidence that the site will come forward as the market demand for housing in this location is strong. As the financial contributions are deemed to be necessary for the "*essential infrastructure in the east-west core*", then awaiting the Site Allocations DPD, which is at least 2 years at best away, will only result in significant delays and non delivery in the east-west core.

2.17 With regard to investment and demand being diverted from the east-west core, particularly in difficult market conditions, it is clear from the evidence base and the views of the private sector that the east-west core and sites outside the east-west core, particularly the ELRC are complementary and not competing. This is particularly relevant with regard to the adopted economic framework (page 19) (submitted to library and awaiting reference) which seeks to:

*"tackle the often poor housing standards and the lack of choice in the central core of the Borough and provide a range of accessible sites in the vicinity of the East Lancs Road to create strong cohesive housing markets which will be some of the most attractive residential offers in the Region".*

2.18 Therefore in the current market conditions and where the Council recognise that the majority of the sites are not viable, the need for early delivery at the ELRC is even more critical.

**Matter 7b/5 - What are the benefits of seeking lower density housing and how will this be achieved?**

2.19 Section 17 of the Council's response to the Inspector sets out the benefits of seeking low density (higher value) housing. This is supported by the 2008 Housing Needs and Demand Study (Document 7.8). This sets out the type and range of housing need. This is primarily set out in Tables 9/2, 9/3 and 9/4. The key points are:

- 39.3% of respondents require detached properties;
- 31.9% of respondents require semi-detached properties;
- 43.7% of respondents require 3 bedrooms and 25.9% 4 bedrooms; and
- 58.8% require a 4 bed detached property.

- 2.20 Table 9/6 then sets out the choice of location. This shows that areas outside the east-west core favoured locations for market housing. Orrell / Billinge / Winstanley were the most popular choice (20.6%), followed by Shevington / Standish / Aspull (15.4%) and Leigh (13.9%). Golborne/Lowton had 7.1%. Whilst these areas are attractive for market housing and should provide new housing, Golborne/Lowton is the only location to meet the Council's aspiration for higher value homes along the ELRC and should be prioritised.
- 2.21 The delivery of the lower density housing would be achieved through the development control process. However the Core Strategy and the policy that should accompany the Strategic Site should specify these details. To date the Council has not been clear as to the level of development expected from these sites.

**Matter 7b/6 - What potential adverse effects are there e.g. traffic, capacity of local infrastructure, open land/greenspace, biodiversity and residential amenity?**

- 2.22 With regard to the impact on traffic, capacity of local infrastructure, open land/green space, biodiversity and residential amenity, our client has undertaken a number of technical studies including transport, ecology, noise and air assessments.
- 2.23 The Transport Assessment has been prepared in accordance with an agreed 'Scoping Study' with Wigan Council, the local highway authority. A new priority T junction is proposed off Stone Cross Lane North with a ghost island right turn lane on Stone Cross Lane North. The design of the junction conforms to Manual for Streets 2. This is not the major highway works identified in the SHLAA and would not affect the viability and deliverability of the site.
- 2.24 These reports demonstrate that the site is deliverable without any significant infrastructure works particularly to the local highway network. This is vitally important for early delivery and providing financial contributions. The advantage of our client's site is that it is bounded on to the east and north by residential development, to the west by employment land and the East Lancs Road to the south. It is therefore a logical location for development and is in essence a large infill to Golborne/Lowton. It has excellent access to the employment land to the west, town centre to the north and other services and facilities. This is why the Council considered it to be a key candidate site.



2.25 The Key Site and Broad Locations Evidence paper (Document 13.2) sets out as assessment of each of the Strategic Sites and Broad Locations. Section 11 deals with our client's site. The issues assessed are:

- Accessibility;
- Housing Supply;
- Utilities and Waste;
- Education; and,
- Social Infrastructure.

2.26 Following the assessment there are no critical issues which would prevent the site from coming forward.

**Matter 7b/7 - Are the sites realistically viable and deliverable? What evidence is there?**

2.27 The Council's position on the viability and deliverability of the four sites are set out in the SHLAA and the Key Sites and Locations Viability Assessment (Document 13.1). This confirms that all but one of the broad locations and the strategic site are not viable as at November 2010. This assessment does not include the sites in the ELRC.

2.28 As noted above our client has undertaken a number of environmental and technical reports for this site and there are not the infrastructure costs associated with the sites in the east-west core. For example Northleigh and south of Hindley require multi-million road improvements whereas our client's site would be accessed from a new priority T junction off Stone Cross Lane North with a ghost island right turn lane on Stone Cross Lane North. There is no contamination on the site as it is greenfield and no other abnormal development costs. That is why they wish to see an allocation in the Core Strategy to ensure the site's delivery as soon as possible.