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Dear Ms Huxtable

RE: WIGAN CORE STRATEGY EXAMINATION – ADDITIONAL HEARING SESSION

Thank you for your letter dated 29th March 2012 enclosing the Inspector's concerns regarding the soundness of the submitted Core Strategy in terms of the implications for the realistic delivery of sufficient housing. I can confirm that I will be attending the hearing session on 18th April 2012 along with Sam Stafford of WR Estates Ltd.

As you will be aware WR Estates Ltd raised a number of concerns on this issue through written submissions and discussions at the hearing sessions. Our statement in response to the council's updated housing supply position dated 7th February 2012 remains our current position on the delivery of housing land within the Core Strategy. This response therefore seeks to comment on the Inspector's conclusions and the agenda for the additional hearing session scheduled for 18th April 2012.

Our understanding of the Inspector's conclusions is that a significant amount of land must be identified outside the east/west core in order to rectify the shortfall of housing planned in the submitted Core Strategy. The Inspector however has not quantified what he considers this shortfall to be.

WR Estates Ltd maintains that the trajectory appended in our response to CD CS28 is an accurate assessment of the shortfall. If our trajectory is accepted, it follows that an additional 3,508 dwellings are required to 2028. If the shortfall against the RSS requirement to date is also included, this amounts to an additional 4,511 dwellings being required to 2028.

Is it possible to address the shortfall?

We do not consider that the council's intended approach of allocating safeguarded land South of Atherton, as set out at the hearings, is sufficient to address the shortfall. Our position on South of Atherton is set out in our statement dated 17th February.

It is possible to address the shortfall through most, if not all, the remaining safeguarded land now coming forward. As we set out at the hearings, WR Estates Ltd considers that the shortfall should be addressed through the allocation of additional safeguarded land at

Standish, which is considered to be a sustainable location for growth. This land has been safeguarded to meet future development needs in the Wigan UDP. The only alternative to allocating additional safeguarded land outside the east-west core, including safeguarded land at Standish, would be to review the Green Belt.

The SHLAA demonstrates that there is safeguarded land outside of the east-west core which would be suitable and developable for some 6,713 dwellings:

Site reference	Settlement	Site Address	Site Suitable For Housing?	Deliverable / Developable	Site Area (Ha)	Estimated Capacity
Wig 149	Golborne and Lowton	Rothwells Farm, Golborne	Suitable for residential. Safeguarded land therefore not available until re-designated.	5-10 yrs	17.1	513
Wig 151	Golborne and Lowton	Stirrups Farm, Golborne	Suitable for residential. Safeguarded land therefore not available until re-designated.	5-10 yrs	26.65	736
Wig 154	Standish	Almond Brook, Standish	Suitable for residential. Safeguarded land therefore not available until re-designated.	5-10 yrs	50.4	1023
Wig 157	Golborne and Lowton	Pocket Nook, Lowton	Suitable for residential. Safeguarded land therefore not available until re-designated.	5-10 yrs	68.47	1668
Wig 158	Standish	Rectory Lane, Standish	Suitable for residential. Safeguarded land therefore not available until re-designated.	5-10 yrs	110.53	2773

WR Estates Ltd position is that safeguarded land at Standish should be allocated to make up the shortfall alongside allocations at Golborne. In the most recent housing trajectory, 600 dwellings are proposed at Golborne (i.e. the East Lancs Road Corridor). If the council seek to allocate additional land at Golborne only in response to the Inspector's findings on the shortfall, as can be seen from the table above this could only deliver 2,917 dwellings in total- or approximately 2,300 dwellings more than the East Lancs Road Corridor is currently identified to deliver. This would still fall somewhat short of addressing what WR Estates Ltd considers the shortfall to be.

WR Estates Ltd is actively promoting a small-scale, sustainable urban extension at the land north of Rectory Lane, Standish for some 350 dwellings. This site forms part of a wider parcel of safeguarded land known as Rectory Lane, Standish (SHLAA ref: 158). However, should further land be required to address the shortfall, there is additional safeguarded land at Standish capable as the SHLAA has deemed suitable and developable land for 3,796 dwellings (SHLAA site references: Wig 154 and Wig 158), including the land north of Rectory

Lane. Even as a standalone allocation, the land north of Rectory Lane could form part of a comprehensive urban extension involving the wider area of safeguarded land to the south if additional land is required. However the most suitable and sustainable parts of the sites currently designated as safeguarded land should be prioritised, particularly for development needs earlier in the plan period to avoid the shortfall increasing to unachievable levels later in the plan period. It is in that context that the land north of Rectory Lane is proposed.

It is logical that safeguarded land at Standish should be prioritised ahead of Green Belt release. Indeed the purpose of allocating safeguarded land is to serve future development needs beyond the plan period, so as to avoid the need for Green Belt release in the future. The current UDP has a plan period to 2016. It is abundantly clear from the evidence examined at the previous hearing sessions that as the current UDP nears the end of that plan period, there is now a need for much of Wigan's safeguarded land to be allocated for housing.

A phasing mechanism, such as that proposed by Peel at the hearing sessions, would not address the overall shortfall. Such a phasing mechanism is usually only appropriate as a means of safeguarding against a potential shortfall in the future; a new plan should seek to address a shortfall as soon as possible. We agree with the Inspector's conclusion that there would be a shortfall against a housing requirement of 15,000 dwellings to 2026. The shortfall would be higher if our position on the requirement is accepted (i.e. if the plan period is extended to 2028 and the shortfall during the RS plan period is included). It is clear that the east-west core is being maximised, and that the quantum of development the council anticipates it to deliver is unrealistic. Even if a phasing mechanism included the release of additional safeguarded land at Golborne, this is still not enough to address the shortfall. In addition to the overall shortfall during the plan period, the shortfall against the 5 year requirement is already extensive and we have argued that sites are required now in order to address that shortfall. A phasing mechanism is only likely to result in additional delays in delivering sites.

Additional work required

The outstanding issues of soundness, individually and collectively, could only be resolved through extensive and significant modifications to the plan, including full public consultation and a new Sustainability Appraisal. However, these steps will be required under any scenario as a result of the other significant changes introduced during the examination, principally South of Atherton, and resolving other issues of soundness for example the plan period and addressing the RS shortfall.

The council will also need to re-assess the proposed distribution of development in the Sustainability Appraisal in light of the Inspector's findings on the housing supply position.

Procedural implications

Our position at the hearing sessions was that allocating additional land at Standish would not result in a significantly different spatial strategy. The overall focus would still be on the east-west core with the majority of development still being allocated there, and the overall objective of 'maximising' the east-west core would still be achievable. Furthermore, allocating land at Standish would not prejudice the delivery of the east-west core, as the proposed housing would meet the needs of a different market (i.e. larger executive housing, and affordable housing to meet need where it arises). Financial contributions could also be used to fund infrastructure projects within the east-west core, as is proposed for the East Lancs Road Corridor.

Nevertheless the changes required are significant, and it is difficult to envision how such changes can be made within the current examination. Indeed there are a number of fundamental issues outstanding, requiring extensive amendments to key elements of the plan. The most logical approach would be for the plan to be withdrawn and for the Inspector to advise on the required changes, including the extent of the shortfall. This would allow the council to re-appraise options in view of the Inspector's conclusions.

However we would stress that the options are fairly limited, in that it is clear that the only alternative to developing safeguarded land would be Green Belt release. In the circumstances the preference should be to allocate safeguarded land.

If the council still fail to acknowledge the existence and scale of the shortfall at the forthcoming hearing session, then the plan must be found unsound.

The above actions will inevitably result in significant delays. Whilst this is regrettable, the alternative of adopting an unsound plan is not an option.

We look forward to providing further input into the Core Strategy process on 18th April 2012. Should you require any further information, please do not hesitate to contact me.

Yours sincerely

EMERY PLANNING PARTNERSHIP LTD

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