

Family Name	Graham
Given Name	Linda
Person ID	1286221
Title	Stakeholder Submission
Type	Web
Family Name	Graham
Given Name	Linda
Person ID	1286221
Title	JPA 36: Pocket Nook
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>I believe the Pocket Nook proposal is unsound as it is not positively prepared - it lacks essential detail, it is not justified - as projected population growth in the Borough is low, it is not consistent with national policy, and it is not effective.</p> <p>Because of excessive housing development in Lowton and adjacent Wards, main roads throughout Lowton are already at gridlock at peak time, and traffic levels are continually high throughout the day. Lowton and Golborne has already had more new housing than an Inspector concluded was appropriate in his examination of Wigan's Core Strategy in 2013. The Council also subsequently acknowledged that the cumulative effects of just the recommended 1,000 houses in the area would have a severe effect on traffic in its 2013 Infrastructure Assessment.</p> <p>1.The land under consideration is not brownfield land but is productive farmland, under the stewardship of the same family for three generations. The landowner does not want to sell, but has been threatened with compulsory purchase</p> <p>2.In their introduction to the Pocket Nook proposal, Wigan Council state that the principle of development on this site is established in the adopted Wigan Local Plan Core Strategy (2013), which identifies the site within a broad location for new development. However, in his letter to Wigan Council dated 14th March 2013, following his examination of the Core Strategy in 2013, Inspector Kevin Ward recommended that just 1,000 properties were appropriate for the Golborne and Lowton area: yet this has already been exceeded - disregarding the Inspector's findings. If approved, the Pocket Nook housing development will result in a total of over 2,000 new properties in the area - double the Inspector's recommendation in 2016. There have been no highway or community infrastructure improvements of any kind in Lowton in the interim.</p>

3. In November 2013, Wigan Council published the "Golborne and Lowton Infrastructure Assessment" which outlined their plans for over 1,000 houses in the Golborne and Lowton area. The document was based on 2001 Census data. The Assessment included a proposed housing development at Pocket Nook - as included in the Places for Everyone plan - though just 200 houses were envisaged in the scenario used in the assessment compared with the 600 houses in the new proposal. As part of its examination of the impact that a 1,000-house development would have in the area the document recognised the problems on the local highway network concluding that while proposals taken in isolation would not impact severely on the local transport network, the cumulative effect of the full 1,000 homes could be, and would be likely to be "severe", given the overall scale of development and the existing congestion issues in Golborne and Lowton." So far, planning consents have already exceeded the 1,000 houses. The Council consistently considers each application on a "stand alone" basis, ignoring the cumulative traffic effects

4. The current Pocket Nook proposal accepts that significant further congestion would result in the Lowton area. In examining the capacity of ten junctions within proximity to the allocation, it recognises that the majority are operating at or exceeding capacity during network peak periods but appears to consider this a "worst case scenario" which will somehow be alleviated by "active travel" though there is no detail of this in the plan. The document also recognises that cost and other restraints will prevent mitigation of the cumulative effects on traffic. Lowton roads are already extremely busy and traffic levels are high. There are proposals currently being developed by Wigan Council to spend a considerable amount of 106 money (c. £1m) on active travel provision in the Golborne area, but nothing in Lowton.

5. Regarding enforcement, Wigan Council appears to pay lip service only to Travel Plans, though the 2013 Infrastructure Assessment states that understanding travel patterns and behaviours will be another critical component to minimising the impact of development.

Freedom of Information requests during 2020 revealed that Travel Plans on new developments in Golborne (Rothwell's Farm), in addition to the adjoining Ward of Leigh West from which traffic passes through Lowton via Slag Lane (Pennington Wharf / Marina), were not enforced by the Council. This lack of enforcement has meant that the collection of valuable data regarding travel to work patterns was missed and the apparent lack of anyone employed by the Council to compile data and work with Travel Plan Co-ordinators, suggests this may possibly have been widespread. Surely these plans are to test assumptions made by pre-consent Traffic Assessments / reports by assessing the actual levels of car use from very large new housing estates, the travel to work and shopping distances, use of public transport etc, gaps in public transport - all of which are invaluable tools to try and reduce private car and emission levels.

In the Wigan Council Housing Needs Assessment published in May 2020, in the Golborne and Lowton section, only anecdotal information was provided by just one interview with a housing developer in the Golborne area who reported that that "few enquiries originated from Manchester or Liverpool." No comment was given for Lowton and no Travel Plan data was provided, but the opening statement in the Pocket Nook proposal that the site was selected because of its excellent road connections into Manchester and Liverpool would certainly indicate that these houses would attract commuters. There is anecdotal evidence locally of city dwellers moving into the area.

The Travel Plan produced at Outline for the Stone Cross (Seddons Farm) development in Lowton was significantly altered with the complete removal of the cycling and pedestrian provision detailed in the first Travel Plan at the Reserved Matters stage. This removal of the "active travel" element is at

odds with the requirement to promote walking, cycling □... and reduce car use. The proposed bus service in the Plan has still not yet materialised.

In the 2013 Infrastructure Assessment, a conclusion was reached that while some parts of the Pocket Nook area are within a "reasonable" distance to amenities on St Helens Road, and the far east of the site to amenities off the A579 St Mary's Bypass, the majority of the area is located too far away for walking trips to be considered a reasonable option." The most recent publication of the Bee Network (cycling) shows a tiny section to be constructed in Golborne in 2021 - again with nothing for Lowton.

6. The Pocket Nook proposal, with its "easy access" vehicular connection to the East Lancs Road and onwards for the M6, conflicts with the statement that "Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health." It is proposed that a new road - parallel to the A580 - will run between Newton Road and the Atherleigh Way - to access these properties and the industrial site - a potential "rat run". The proposal quotes Junction 23 at Haydock as access to the M6 but local drivers are far more likely to use the Winwick junction, which is closer and has far fewer traffic light sequences. This is evidenced by the very poor air quality on Winwick Lane in Lowton, the access road for the M6 on the South of Lane Head, which has been consistently above the legal limit of NO_x - 40 ug/m³ for 2018, 2019 and 2020 at 57.9, 57.1 and 41.9 respectively, bias adjusted, with the 2020 figure perhaps reflecting the significant reduction in traffic during the Covid pandemic. TfGM surveys show southbound vehicles per week rising from 49,578 per week in 2017 to 53,017 per week in 2019 - an increase of 6.93% and in September 2020 TfGM reported 82,620 vehicles passing through Lane Head per week.

7. The Stone Cross proposal indicates that at some time in the future □.. there may be a connection to the Leigh Guided Busway - but there is no time frame. Traffic problems throughout Lowton have grown year on year and the Council's only proposed 106 funded solution is to facilitate this additional traffic from new developments through Lowton and Golborne by adding extra lanes at several A580 junctions, rather than pursue the publicly supported extension of the Atherleigh Way by-pass which would relieve "through" traffic throughout the Lowton area.

8. It was stated in the 2013 Infrastructure Assessment that the Guided busway which became operational in 2016 would be "of significant benefit to the Golborne and Lowton broad location" by helping to reduce traffic queues and congestion along the A580; by providing more direct bus journeys to Manchester city centre; by reducing carbon emissions through the reduction in traffic, the use of Euro Standard 6 buses and encouragement of more walking and cycling along the multi-user path. It concluded that, through the reduction in traffic, the area would become safer for local community, particularly pedestrians and cyclists. As the figures in 6 above would confirm, this has not proved to be the case at all for Lowton. Traffic has continued to increase, undoubtedly accompanied by high pollution levels. For commuters, going into Leigh either on or to the Busway, and then on to Manchester would be an extremely lengthy and time-consuming journey to work - especially when there is "easy access" to a major road.

9. Wigan Council's own figures state that the population of the borough is only projected to increase over the period 2019-2037, from 326,300 in 2019 to 333,600 in 2037, an overall increase of 2.2%. The Council concludes that, "based on migration and travel to work data, the borough cannot be described as a highly self-contained housing market area. There are strong economic interactions with the wider Manchester City Region." Is the proposal for Pocket Nook a sustainable development, meeting local "assessed needs"? Or is already over-crowded, traffic laden and very poorly served Lowton with

	its ribbon development spread along the length of the East Lancashire Road through Lowton - to be made even worse by the Pocket Nook development - a very inappropriate, unjustified and ineffective dormitory area?
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	This entire section of the plan should be removed. The limits of development in Golborne and Lowton have already been exceeded.