

Given Name	Lane Head South Residents Group
Company / Organisation	Lane Head South Residents Group
Person ID	1286870
Title	Stakeholder Submission
Type	Web
Given Name	Lane Head South Residents Group
Company / Organisation	Lane Head South Residents Group
Person ID	1286870
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?	Yes
Compliance - In accordance with the Duty to Cooperate?	No
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>Summary</p> <p>Lane Head South Residents Group (LHSRG) believes the JPA36: Pocket Nook proposal is unsound for the following reasons.</p> <ul style="list-style-type: none"> - It is not positively prepared. It is based largely on land that is not for sale, it lacks detail and exacerbates the existing horrendous traffic congestion issues without any proposed mitigation. - It is not justified. The forecast population growth in the borough is low and does not justify 600 more houses in area that already exceeds its highway infrastructure. - It is not effective. The land availability issues and the uncertainty of the HS2 programme present significant risks to the delivery of this proposal. If 600 more houses really are required then it is irresponsible to base the delivery on a proposal with such risks. - It is not consistent with national policy. The proposal does not offer sustainable development, rather it promotes car based commuting. <p>LHSRG provide no comment regarding legal compliance.</p> <p>Regarding "Duty to Cooperate" LHSRG is not aware of any recent significant community engagement. LHSRG can report that the Pocket Nook proposal does not have the support of the local community.</p> <p>Supporting Information</p> <p>1. Pocket Nook is productive farmland. A significant part of the land is owned by a local farmer who does not wish to sell his land. Wigan Council may have to use compulsory purchase powers to acquire this land. Not only is the availability of the land a risk to delivery of the proposal the use of compulsory purchase powers without providing detailed evidence that no alternatives exist is morally wrong.</p>

2. The Pocket Nook proposal makes reference to the Wigan Local Plan Core Strategy 2013 as establishing the site for development. In 2013 an appointed government inspector examined the Core Strategy and made a recommendation that approximately 1000 houses would be appropriate for the Golborne and Lowton area. Planning approvals have already exceeded this figure and if the proposal for Pocket Nook goes ahead there will be ~2200 houses planned for Golborne and Lowton since 2013, double the inspector's recommendation. Also in 2013 Wigan Council assessed the impact of a 1000 house development on the Golborne and Lowton highway infrastructure to be severe. To date there have been no highway infrastructure improvements.

3. Traffic modelling to support the proposal acknowledges that the highway infrastructure will be overloaded with ten of the nearest junctions in the area operating at or exceeding capacity with and even without the proposal. Indeed this is already the case today and is evidenced by Wigan Council's objection to the proposed Parkside development in St Helens whereby Wigan cited the junctions in the Lowton area already exceeding capacity. No mitigations are detailed in the Pocket Nook proposal

4. Wigan borough is a "commute out" area. 43% of residents commute out of the area for work (Wigan Employment Land Review 2015). With the limited public transport options in the Lowton area much of this is commuting by car. Indeed the Pocket Nook proposal highlights the easy vehicle access to Manchester and Liverpool by the A580 and to M6 J23. The Pocket Nook proposal is actively promoting commuting by car and also acknowledging the limited options for travel by public transport. This proposal is in stark contrast to the definition of sustainable development in the NPPF. It is also in stark contradiction to Wigan Council's declaration of a climate crisis.

5. The proposal makes reference to easy access to J23 of the M6. In reality commuters from within and outside the area travel through the Lowton and Lane Head area to access the M6 at J22. This is evidenced by the Traffic for Greater Manchester (TfGM) surveys conducted on the A579 Winwick Lane. More than 90,000 vehicles per week use Winwick Lane. Surveys in 2017 and 2018 demonstrated an annual increase of more than 5% in vehicles using Winwick Lane heading southbound towards M6 J22. Not surprisingly Winwick Lane suffers from very poor air quality. NOx levels at Winwick Lane in recent years have been monitored by Wigan Council. Annual average NOx levels have been and continue to be significantly above the legal maximum.

6. The delivery of the Pocket Nook proposal has a large dependency on the HS2 programme. The proposal acknowledges that HS2 presents a risk to delivery, particularly the employment element of the proposal. The proposal states that the HS2 compound will be operational until 2028. We are in 2021, this element of HS2 has not yet had parliamentary approval, the HS2 programme is already suffering delays and at public briefings the HS2 team have informed that they will be in the area for 9 years. LHSRG suggest that this risk to the delivery of Pocket Nook has already materialised.

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.

LHSRG believe that the JPA 36 Pocket Nook proposal should be entirely removed from the Places for Everyone Plan.

Furthermore Pocket Nook should not even be considered for any development without the following issues being resolved.

Highway Infrastructure - The local highway infrastructure is already exceeding capacity at peak times. As a minimum an extension of the A579 Atherleigh Way to access J22 of the M6 is required.

HS2 - The HS2 programme for this area is immature and needs to be better understood. We should not be building houses alongside a high speed rail line.