Wigan Borough Local Plan: Report of Consultation – Initial Draft Local Plan

30 April – 24 June 2025

August 2026

1. Introduction

1.1 Wigan Council is in the process of preparing a new Local Plan for the borough and consulted on an initial draft of the Local Plan from 30 April – 24 June 2025. This report sets out a summary of the responses received as part of this consultation and the council's responses, signposting content in the revised Publication and Submission version of the Local Plan and in supporting documents, as applicable.

1.2 Consultation on the Initial Draft Local Plan followed earlier full public engagement on Issues and Opportunities in Autumn 2022, and on Options and Preferences in Autumn 2023.

1.3 The Initial Draft Local Plan and associated documents were made available via the Council's website, with comments being able to be made online via a dedicated interactive consultation portal. Responses could also be submitted in writing and by email.

1.4 In total, 5,847 responses were submitted to the Initial Draft Local Plan. 2,081 responses were submitted via the consultation portal, with 3,898 responses received in the form of 7 standard letters, including 427 of which were annotated and 4 unique letters, as set out below.

Letter Ref	Total	No. annotated
Letter 1	263	23
Letter 2	589	160
Letter 3	31	13
Letter 4	2,827	204
Letter 5	138	11
Letter 6	26	12
Letter 7	20	0
Unique	4	4
Total	**3,898**	**427**

Table 1: Summary of standardised letters received to policy J3

1.5 However, once any duplicates and those with no contact details were removed, this amounted to a total number of 3,710 unique representors. Hence, across all platforms a total number of 4,076 unique representors were accepted on policy J3: Land north of M6 Junction 26, Wigan. All of the issues raised in these letters have been set out in the table covering policy J3 at Appendix A - see the link under paragraph 2.2 below.

1.6 A further 56 letters from school children to Policy H5: Remaining land South of Atherton. All of the issues raised in the 56 letters have been set out in Appendix A.

1.7 In addition, 3 petitions were received, as follows:

- 1 petition objecting to Policy J3: Land north of M6 Junction 26, Wigan (1,210 signatures)
- 2 petitions objecting to Policy J5: Bridgewater West, Astley (total of 3,585 signatures).

1.8 During the consultation period, Wigan Council hosted 7 consultation 'drop-in' events at venues across the borough. These provided residents with the opportunity to discuss the Initial Draft Local Plan and raise local issues with planning officers prior to submitting representations. Paper copies of the Initial Draft Local Plan and the proposed Policies Map were made available at 7 local libraries.

1.9 All the representations received have been considered by the council in preparation for the next formal stage of consultation.

2. Summary of issues raised:

2.1 A summary of all the representations received in response to the Initial Draft Local Plan, and the council's responses in considering changes that have been made in the Proposed Submission version of the Local Plan, are set out in a series of tables below. These are ordered by chapter and proposed policy. Representations received by local residents in response to the proposed site allocations have been summarised in Appendix A.

2.2 You can navigate to the representations for each chapter via the links below.

- Introduction
- Spatial portrait
- Key evidence
- Vision and Strategic Objectives
- Homes
- Jobs
- Town and local centres
- Transport
- Places
- Environment
- People

- What happens next?
- Appendix 2: Car Parking Standards for New Developments

Appendix A: Summary of representations received by residents on the proposed site allocations:

- Policy H4: South Hindley
- Policy H5: Remaining land south of Atherton
- Policy H6: East of Atherton
- Policy H7: Remaining land at Landgate, Ashton-in-Makerfield
- Policy H9: Sustainable housing growth in Standish
- Policy J3: Land north of M6 Junction 26, Wigan
- Policy J4: Moss Industrial Estate Extension, Aspull Common, Leigh
- Policy J5: Bridgewater West, Astley
- Policy J6: Land west of Winwick Lane, Lowton

Ref:	Who:	Summary of comments	Our response
Introduction			
Plan period			
1091-1; 1092-2; 1095-1; 1096-1; 1099-1; 1102-1; 1103-1; 1122-1; 1125-1; 1126-1; 1132-1; 1133-1; 1104-1	Northern Trust; Wainhomes; Strategic Land Group; Taylor Wimpey; Morris and Persimmon Homes; Persimmon Homes; Story Homes; Miller Homes; Barratt Homes; The Baldwin Estate; Trustees of Legh Estate and Bloor Homes; MCI Developments; Harworth Group	The Local Plan contains strategic policies and therefore should have a plan period of at least 15 years from adoption, in line with the NPPF and PfE paragraph 1.56, which therefore should be at least 2042. This will result in the need for an increased housing supply.	A plan period to 2039 aligns with the plan period of the Places for Everyone Plan. It is premature to plan for housing needs beyond 2039 in the Local Plan. We are committing to an early Plan update - see policy UP1 in new section 12 'Update' of the Local Plan.
1021-2	Home Builders Federation	The NPPF requires a minimum plan period of 15 years from adoption and that where larger scale	See above.

Ref:	Who:	Summary of comments	Our response
		developments form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take in account the likely timescale for delivery. Suggest the plan looks ahead to at least 2045 to cover the 15 year plan period or longer given the proposed strategic sites.	
1092-1	Wainhomes	The plan contains strategic policies and therefore should have a plan period of at least 15 years in line with NPPF, which would be 2043 as an absolute minimum, or by at least 2045 to cover any potential delays through examination. Paragraph 1.56 of the Places for Everyone Plan recognises this.	See above.
1121-5	Peel Land	The plan period should extend to at least 2043 as the NPPF requires plans with strategic policies to look forward at least 15 years beyond the adoption date. This is also inconsistent with PfE paragraph 1.56.	See above.
Consultation methods			
15-1	Private Individual	Consultation at this stage and previous stages has been unsatisfactory.	Consultation at both the Regulation 18 and Regulation 19 stages have accorded with the Council's Statement of Community Involvement.

Ref:	Who:	Summary of comments	Our response
15-1; 276-1; 363-1; 1061-3	Private Individuals	The consultation portal is very hard to navigate, and is not accessible, especially on a mobile phone.	Consultation material was available in various formats including online and in paper copies in borough libraries.
159-4	Standish Voice	Disappointed no consultation event was held in Standish.	The seven consultation events were held in locations close to where site allocations for housing and/or employment development have been proposed.
450-1	Private Individual	People should be able to submit comments using a variety of methods including email or letter. Not everyone can access the portal.	Comments could be, and were, submitted via letter and email in addition to the portal.
637-1	Private Individual	Don't believe the Council has any interest in residents' views, even though we are invited to comment.	The views of all stakeholders, including borough residents, is of great importance to the council.
900-1	Private Individual	People have no trust in the Council. The A49 Link Road is an example of going through the motions of public consultation and then ignoring it. More local groups who help shape policy is needed.	Noted.
1067-5	Private Individual	The online form was useful. However, it would have been helpful if policies relating to specific parts of the borough could have been found more easily to help residents find topics of relevance to them.	Feedback welcomed. A contents page and list of policies with links are included in the revised Local Plan.

Ref:	Who:	Summary of comments	Our response
1090-1	CPRE	Welcome many of the key issues. The consultation workshops at the previous Options and Preferences stage were welcomed, but the Consultation Report did not indicate how they were advertised, how many people attended or what proportion of the overall responses came from these workshops and how participants felt about them.	Noted.
General objections			
372-2	Private Individual	Object to the plan.	Noted.
415-1	Private Individual	Object to building on green belt land.	Noted. No Green Belt land is proposed to be released in the Publication version of the Local Plan.
159-4	Standish Voice	Areas of the Local Plan could be strengthened, and further safeguards and policies added, to improve its effectiveness, and help Standish to flourish or protect its environmental and historic assets. Given the plan period of the Standish Neighbourhood Plan ends in 2030, we believe important policies within it should be adopted in the Local Plan to give them greater longevity. The level and speed of housebuilding in Standish has had a considerable, and	Some policies in the Local Plan replicate Policies in the Standish Neighbourhood Plan, including Policy H9 on housing and Policy PE2 on hot food takeaways. Other policy matters are better addressed at the neighbourhood level.

Ref:	Who:	Summary of comments	Our response
		detrimental, impact on the infrastructure of Standish, which has been only partly mitigated by improvements. This is particularly evident in health provision and highways. Also been a heavy environmental cost with reduced biodiversity and green spaces.	
526-1	Private Individual	The Local Plan is just a wish list if money was no object. It should just concentrate on a few important targets such as social housing for Wigan residents (not prioritising asylum seekers); road infrastructure; Wigan town centre - we need a multimedia theatre that can support theatrical events, concerts, music, pantomimes and movies, not a cinema, bowling alley or indoor golf; improved capacity at hospitals and GP surgeries.	The Local Plan is not just a wish list but does set out to be ambitious for our borough in alignment with Progress with Unity. Private sector investment is needed to help deliver many of our objectives, including affordable housing and town centre improvements.
571-5	Private Individual	The proposed allocation at Bridgewater West contradicts the purposes set in paragraph 1.4 to 'lead the regeneration of our towns and neighbourhoods' and 'identify designations for the protection of the borough's environmental and historical assets'. Support the purpose in paragraph 1.4 to 'allocate land to meet our future housing needs' but the need is for social housing not large executive homes in the Green Belt.	We are no longer proceeding with the site allocation at Bridgewater and no Green Belt land is proposed to be released in the Publication version of the Local Plan.

Ref:	Who:	Summary of comments	Our response
750-1	Homes England	Do not wish to make any representations at this time but will continue to engage with the Council as appropriate as the Local Plan progresses.	Noted.
923-27	The Lancashire Wildlife Trust	The third point in paragraph 1.4 could be expanded to include the aim that the plan will seek to address the biodiversity crises we are currently facing by providing policies that seek to not only protect the existing biodiversity resource but reverse the current declines in habitats and species to create a nature rich borough, with a flourishing natural environment that is both resilient, connected and sustainable.	Noted, but it is considered that this is sufficiently covered in the strategic objectives and Environment policies.
1002-1	Cllr John Harding	Agrees with the submission by the Golborne and Lowton West Neighbourhood Forum.	Noted.
1024-1	Golborne and Lowton West Neighbourhood Forum	Support many of the plan's aims and objectives which broadly align with the Golborne and Lowton West Neighbourhood Plan. Welcome the Council's vision for a sustainable and prosperous borough but urge a more detailed, place sensitive approach in areas where strategic infrastructure and development proposals intersect with existing communities.	Noted.

Ref:	Who:	Summary of comments	Our response
1074-1	Private Individual	Clear introduction.	Noted, with thanks.
1088-1	Canal & River Trust	All references to the Leeds & Liverpool Canal should include an ampersand (&) instead of 'and'.	Content in the Local Plan has been amended accordingly.
1101-1	NFU	Recognise the need for sustainable development to meet housing, employment, and infrastructure needs, but urge the Council to ensure that this does not come at the expense of the borough's many agricultural businesses and associated rural community. Gravely concerned that there are many references suggesting that 'topsoil from any best and most versatile (BMV) agricultural land within the site should be conserved and managed for suitable use.' Consideration does not appear to have been given to the impact of the loss of high-quality, productive farmland to development. We urge the Council to prioritise brownfield and lower grade land for development; avoid allocating Grade 1, 2 and 3a land for housing or industrial use; include robust policies to protect agricultural land from unnecessary development; and ensure that, if BMV must be taken, policies mean existing farm businesses	Whilst the Council seeks to optimise brownfield land to address identified development needs, there is an insufficient supply of deliverable brownfield land to meet needs to 2039 without greenfield development. No Green Belt land is proposed to be released in the Publication version of the Local Plan. Notwithstanding this, policy EN6 seeks to safeguard soil resources in the borough.

Ref:	Who:	Summary of comments	Our response
		can expand to become more profitable and therefore sustainable. The industry is undergoing transition, driven by significant changes in government support for agriculture & horticulture, with an emphasis on rewarding farmers for delivering public goods. As businesses adapt, planning policies that are flexible and responsive to the evolving needs of rural enterprises are crucial. As a result, there's an opportunity for the plan to support diversification opportunities for farmers, such as investment in renewable energy, farm shops, or tourism ventures.	
1106-1	Harworth Group	The plan would benefit from an overt discussion on the role of land currently allocated as Green Belt, in the context of the wider national debate on 'grey belt' land. The plan does not contain specific policies directed towards either protecting the Green Belt or justifying releasing land from it. The impact of development on Green Belt land is instead set out in a series of site specific policies. Suggest a section early in the plan that explores and explains how the council has approached the requirement to review Green Belt boundaries in order to meet identified development needs.	As set out in chapter 12 of the Local Plan, the council is committing to an early update of the Local Plan at least in relation to meeting identified housing and employment needs to at least 2045. An early update of requirements for homes and jobs will allow us to adopt a more strategic approach as part of a deep and wide conversation with residents and other stakeholders on what growth means locally. This can incorporate a comprehensive Green Belt Review, updated evidence on transport

Ref:	Who:	Summary of comments	Our response
			implications and full consideration of other issues and constraints.
1118-1	Liverpool City Region	Wish to continue constructive engagement with Wigan Council concerning strategic cross-boundary planning and other matters within the LCRCA's remit including transport and the environment. Key matters to highlight at this stage are: Development of Parkside and proposed allocation of adjacent land west of Winwick Lane, Lowton (Policy J6) - Given the strategic significance for both St Helens Borough and wider city region, we would request that the LCRCA is included in the Draft Statement of Common Ground as a key stakeholder on this matter. Sustainable transport - including public transport infrastructure/provision and promotion of active travel. Nature recovery - including implementation of Local Nature Recovery Strategies.	Welcomed. LCRCA has been added as a key stakeholder in the Statement of Common Ground. We are no longer proceeding with the proposed site allocation at land west of Winwick Lane, Lowton and no Green Belt land is proposed to be released in the Publication version of the Local Plan..
1137-1	United Utilities	Suggest additional policies on the following topics for inclusion in the Local Plan - investment in future water and wastewater infrastructure; coordinated infrastructure	These topics are sufficiently covered in other proposed Local Plan policies and in the Places for Everyone Plan.

Ref:	Who:	Summary of comments	Our response
		provision; delivery of infrastructure associated with self-build and custom housing; and tree lined streets.	
1356-1	Green Earth Development Group	With reliance being placed wholly upon the GM Joint Minerals and Waste Plans, which are both dated and largely inconsistent with national policy, the emerging plan could be at risk of challenge, particularly as the PfE has replaced the mineral and waste policies of the Core Strategy but not provided for mineral development or safeguarding. As such, there will be a policy vacuum between the expiration of the GM Joint Minerals and Waste Plans in 2027 and the adoption of new minerals and waste plans, placing the Council at risk of failing to meet statutory duties, and the plan being found unsound. To address this, the Local Plan should incorporate an Area of Search that includes the entirety of the proposed Morley's Quarry Southern Extension and reinforce Policy 3 of the GM Joint Minerals Plan which grants planning permission for mineral extraction within the Area of Search where the mineral is required to meet the relevant landbank. The emerging minerals and waste policies should replicate the broad objectives set out under	A Joint Greater Manchester Waste and Minerals Plan is under preparation with adoption scheduled in 2028.

Ref:	Who:	Summary of comments	Our response
		Policies CP14 and CP15 of the Core Strategy, where it is consistent with national policy.	

Ref.	Who	Summary of comment	Our response
Spatial portrait			
241-21	Private Individual	No mention of wildlife which will be at risk with all the proposed development and additional traffic.	There is an 'Environment' infographic relating to wildlife designations in the borough.
296-4	Private Individual	The spatial portrait seems to create more urban sprawl. We can go forward with Unity but cut out building on Green Belt. Build on brownfield sites instead.	The spatial portrait is a portrait of the borough as it is now.
372-13	Private Individual	Object	Noted.
562-1	Private Individual	There has been too much housing and employment development already and you need to stop rather than building more including at M6 J26, Bridgewater West and the remaining fields at Standish.	We are no longer proceeding with the proposed site allocations at M6 J26 and Bridgewater West and no Green Belt land is proposed to be released in the Publication version of the Local Plan. Proposed housing development is in response to identified needs. Within Standish, Policy H9 seeks to maintain the role of Policy H1 in the Standish Neighbourhood Plan.
573-3	Private Individual	Support. The spatial portrait provides a good introduction to the details of the Local Plan.	Noted, with thanks.
576-26	Private Individual	The spatial portrait is misleading. It infers that all towns are treated equally, but investment funding in the borough is allocated	Noted. Policy T1 does include proposals for improved services on the Atherton rail line and policy TC3 does refer to

Ref.	Who	Summary of comment	Our response
		disproportionally, with more bias towards Wigan. There is a bias of investment in this plan including the construction of a new road, investments in the railway stations in Wigan town centre etc. It does not include plans to better connect the south east of the borough to Wigan town centre, Haigh Hall, hospitals etc by public transport.	improved rapid transit between Manchester and Leigh. The east-west road link would also enable improvements for public transport to be delivered on the A577 and A58.
923-18	The Lancashire Wildlife Trust	The Environment section needs to highlight the biodiversity emergency we are facing and the current decline in wildlife habitat and species.	The spatial portrait is specific to Wigan Borough. The decline in wildlife habitat and species is covered in policy EN4 Nature Recovery and Improvement.
995-4	Private Individual	The proposed allocation at Bridgewater West contradicts the Progress with Unity claims in the spatial portrait, particularly "As nature reclaimed the scarred mining landscape, green shoots of a new borough grew. A borough with a greenheart and blue veins."	Bridgewater West is no longer proposed to be allocated for employment-led development in the Local Plan and is proposed to be retained in the Green Belt Notwithstanding this, a key element of achieving Progress with Unity is for the borough to be "at the heart of a growing region", "a place with new industries", and have a "fast paced modern economy".
1121-6	Peel Land	This data reinforces the need for the Local Plan to include positive policies of change in relation to both the economy and housing. As the evidence base of the plan is collated, and policy	The role of the spatial portrait is to set out how the borough is now.

Ref.	Who	Summary of comment	Our response
		proposals evolve, it will be essential that the plan demonstrates how its policies and proposed allocations will help to address the identified issues and improve the lives of the borough's residents.	
1129-1	Historic England	Replace all references to Scheduled Ancient Monuments (or similar) within the Local Plan with Scheduled Monuments.	Content in the Local Plan has been amended accordingly.

Ref.	Who	Summary of comment	Our response
Key Evidence			
Monitoring			
241-16	Home Builders Federation	The plan should include an appropriate monitoring framework.	There is now a monitoring framework at section 13 of the Local Plan.
Viability Assessment			
241-16	Home Builders Federation	A Viability Assessment also needs to be prepared to reflect the Plan policies and requirements and the current costs.	A viability assessment of the Local Plan has now been prepared and is published alongside the Publication and Submission version of the Local Plan.
Housing Needs Assessment			
100-40	Private Individual	The Housing Needs Assessment should be broken down at a sub-area level.	The Housing Needs Assessment is broken down into 10 sub-areas.
296-1	Private Individual	Disagree with the claim that the Local Plan puts forward a need for a "mix of housing types, sizes and tenures across the borough". This will just create more pollution, road congestion and overcrowding of social infrastructure. The evidence is flawed to fit in with Labour's objectives to build more houses regardless of the impact on the health and wellbeing of existing populations.	The Housing Needs Assessment identified the need for a mix of housing types, sizes and tenures across the borough with Policy H2 providing a framework to achieve this.
931-1	Ainscough Strategic Land	The Local Plan should take the affordable housing shortfall identified in the LHNA into	See above.

Ref.	Who	Summary of comment	Our response
		consideration alongside PPG which states that an increase in the housing requirement may need to be considered where it could help deliver the required number of affordable homes. Providing a supply of deliverable and viable sites delivering a mix of market and affordable homes will help close the gap in affordable housing provision, and support the retention of residents, first time buyers and workers. The site at Pepper Lane, Standish was not previously put forward for SHLAA assessment and is a suitable, deliverable and available site for development, which can deliver key benefits.	
1089-5; 1120-1	Applethwaite; Places for People	The Local Housing Needs Assessment identifies a gross affordable housing shortfall of 2,268 and a net shortfall of 283 homes per year. Therefore, the Local Plan should take this figure into consideration alongside the Planning Practice Guidance which states that "an increase in the total housing requirement included in the plan may need to be considered where it could help deliver the required number of affordable homes".	The affordable housing requitement of 25% in policy H2 relates to the percentage of homes in private developments. That is only part of how affordable housing is delivered with other significant contributions delivered by Registered Providers and the council. We have delivered a strong track record of delivery of around 283 new affordable homes per year.

Ref.	Who	Summary of comment	Our response
1121-4	Peel Land	Welcome the commission of an updated Local Housing Needs Assessment (LHNA). The Local Plan evidence base must consider the extent to which all housing needs will be met through the identified supply of land including consideration of sizes, types and tenures of housing. The LHNA limits itself to consideration of the housing requirement set out within the PfE Plan. This approach is not considered justified where there is evidence of higher levels of need. It is recommended that the Council revisits its LHNA to provide consideration as to the justification for a higher housing need, recognising the uplift in need under the standard method. The LHNA provides an assessment of the profile of need across Wigan by tenure and home size. In formulating policy to address these needs, the methodology does not seek to consider policy ambition, such as boosting northern competitiveness and the need to increase the supply of higher value housing. This should be recognised through supporting such provision in appropriate parts of Wigan Borough.	The Local Housing Needs Assessment will be reviewed alongside the update of the Local Plan, as applicable.

Ref.	Who	Summary of comment	Our response
1127-1	Private Individual	Table 2.2 shows a net migration from overseas in 2022 of 2,451 people compared to net 186 people leaving the borough for locations elsewhere in the UK. Where is the strategy to deal with this imbalance? Are any unemployed international migrants occupying houses that might normally be rented/owned by residents originating from the borough? What plans have been drawn up to accommodate migrants if they are able to remain? Do your plans take into account Table E82 in the Housing Needs Assessment? Cross boundary issues have been identified in the HNA (E83, E84 E85 and E88) but solutions are inadequate especially in relation to house pricing and lack of any plans to ease congestion on the A580 around Mosley Common. No consideration is given to high traffic volumes leading to the M60.	The Wigan Council website provides further information in relation to housing matters for those international migrants that are asylum seekers or refugees in the borough. Policy T1 sets out priorities to improve the Atherton rail line for travel into Manchester and policy TC3 prioritises improved rapid transit between Leigh and Manchester.
Economic Market and Employment Land Assessment			
100-40	Private Individual	Employment Market and Employment Land Assessment: Investment continues to cluster around Wigan and Leigh with limited focus on towns like Atherton. Can the Council commit to	The EMELA is an independent assessment of the economic market and employment land in the borough. Policy J2 designates a number of employment areas in the Atherton area which are safeguarded for continued employment

Ref.	Who	Summary of comment	Our response
		equitable spatial distribution of employment land investment?	uses, except where loss can be justified. PfE Policy JPA 34 also allocates land at West of Gibfield for mixed use development including around 45,500 sqm of new employment floorspace.
372-14	Harworth Group	Agree the EMELA is a key evidence document and support that the approach to allocating land is to ensure land is available to meet current business needs, particularly in manufacturing and logistics. However, there is a wider, regional context to allocate such land, which has been explored in support of allocations elsewhere in the region and by notable planning appeal, which the plan currently does not reflect on. The case for Wigan to meet a wider regional need is set out in the EMELA, as well as other documents submitted as part of previous iterations of the emerging local plan. It might be useful to set out in the Key Evidence section the quantum of the need, as well as explaining how Wigan is well placed to meet that need.	The quantum of need is covered in the supporting text to Policy J1 and the Jobs Topic Paper. The regional context is recognised through the Greater Manchester Strategy in the supporting text to policy J1 (para 6.20, now para 7.19) which recognises the importance of manufacturing, transport and logistics sectors, amongst others.
576-4	Private Individual	Section 4.2 identifies the Borough's travel to work area and Fig. 3 identifies a net outflow of 32,222 people out of the borough. People in Astley travel to work to Heywood, Middleton,	We have no control on who travels where for work but if there is an improved employment offer in the borough, it

Ref.	Who	Summary of comment	Our response
		Media City, Manchester Airport, Trafford Park for higher paid jobs on Motorways not always on the Guided Busway or the A580. This departure of people will not be mitigated by Bridgewater West. Greater efforts should have been made, in conjunction with Salford, to formulate a road plan to ease chronic congestion not build 2000 houses on various plots throughout the M60 catchment area. If the only way to earn better wages is to commute out of the borough this should be made easier not worse.	would enable more people to choose to work locally if they wish to.
Open Space Report / Playing Pitch and Outdoor Sport Study			
100-40	Private Individual	Can the Open Space Report and Playing Pitch Strategy include town-level scorecards that show where investment is needed most?	The Open Space Report and PPOSS both assess needs at a sub-borough level.
1140-2	Sport England	The Playing Pitch and Outdoor Sport Strategy 2025 identifies shortfalls in pitch provision for football, cricket, 3G, Rugby Union and Rugby League. It currently relies on several 'undetermined' factors i.e. borough wide pitch improvements; additional pitch provision on existing sites; which may not be a realistic position and strategy to avoid the need for new pitch provision. As such we encourage the Council to consider the potential for new playing field allocations to accommodate, in	Policy PE3, now PE4 protects open space and/or sport and recreation facilities, including playing fields, from loss unless it meets specific exceptions, in conjunction with space standards and/or needs identified in the Playing Pitch and Outdoor Sport Strategy.

Ref.	Who	Summary of comment	Our response
		particular, future demand requirements. Sport England will object to any allocation made which will result in the loss of any playing field land.	
Transport Strategy			
576-4	Intermodal Logistics Park North Ltd	The Wigan Borough Transport Strategy does not provide an evidence base to support criterion 3 of Policy J6.	We are no longer proceeding with the Land west of Winwick Lane and no Green Belt land is proposed to be released in the Publication version of the Local Plan, however the site is included in the proposals for Intermodal Logistics Park North. The proposals for this development are being progressed through a Development Consent Order (DCO) application with a detailed Transport Assessment – which includes microsimulation modelling – being prepared to support this application. As part of this work any mitigation required to support the development will be identified. The evidence base for the contributions required will be discussed during the DCO process.

Ref.	Who	Summary of comment	Our response
11023-69	National Highways	The Wigan Borough Transport Strategy, while referenced in the Local Plan, is not explicitly listed as part of the formal evidence base. Recommend this is formally included in the evidence base in future iterations of the Plan. Welcome the Transport Strategy's alignment with the GM Transport Strategy 2040 and its commitment to achieving the right mix target. The range of issues identified are particularly relevant to National Highways and we support its six objectives. Support the flexible approach applied and encourage Wigan Council to continue monitoring trends and updating the Strategy accordingly. Request continued collaboration on the delivery of the five-year plan and any future updates to the Strategy, particularly where interventions may influence traffic flows on or near the SRN.	The Transport Strategy has been added to the key evidence chapter.
1121-7	Private Individual	The Council's transport assessment processes are flawed as they look at developments in isolation and not in aggregate and now the Astley/Mosley Common area is gridlocked for extensive periods of the day. The A580 corridor is at saturation and the Local Plan's proposals are completely inadequate in their response to traffic congestion.	As part of the transport assessment process applications for new developments are required to complete a traffic impact assessment. There is a requirement to include development proposals near the site which have secured planning permission in these assessments. The impacts of the

Ref.	Who	Summary of comment	Our response
			approved schemes are tested alongside the proposals for new development. Any adverse impacts of the proposals are required to be suitably mitigated. Policy T2 outlines the assessments required for new developments. These are based on national practice and are considered appropriate.
Flood Risk Assessment			
11023-69	National Highways	Flood Risk Assessment: National Highways will work with Wigan Council and developers to assess and manage flood risk impacts from any proposals that may affect the SRN. It is noted that several employment and housing allocations intersect with areas of flood risk or sewer flooding. National Highways requests to be informed of detailed drainage strategies and Flood Risk Assessments for these sites once available.	Noted.
1121-7	Private Individual	Greater Manchester Strategic Flood Risk Assessment: There has been a substantial increase in flooding incidents in and around Astley-Boothstown as the weight of extensive new housing developments and the concreting of fields/farmland has increased the water-table substantially and blocked 'run-off'. The	This is covered by Policy EN10 Flood Risk Assessments in support of planning applications will need to be based on the most up-to-date flood data from the Environment Agency which will take into account recent flooding incidents.

Ref.	Who	Summary of comment	Our response
		Bridgewater West area identified for development already suffers badly from flooding and development will exacerbate the issue further.	The site promoter has undertaken a flood risk assessment for the site which concludes that it predominantly falls within Flood Zone 1, making it suitable for development for employment and residential use. Areas of higher flood risk (Zones 2 and 3) are associated with Stirrup Brook and Whitehead Brook, but no built development is proposed within these zones. The site is located within a Critical Drainage Area (CDA). This designation reflects historical surface water flooding issues in the area. The FRA addresses this by proposing a robust drainage strategy that incorporates Sustainable Drainage Systems (SuDS) to manage surface water runoff and mitigate flood risk. In summary, the FRA concludes that the site is suitable for development from a flood risk and drainage perspective.
Infrastructure Delivery Plan (IDP)			
576-4	Intermodal Logistics Park North Ltd	The Infrastructure Delivery Plan reveals that there is no underpinning evidence base to distinguish whether a bypass is needed to serve the development at Winwick Lane (as	The IDP is not the mechanism to justify the delivery of the bypass. It identifies from policy and studies such as Transport Assessments what infrastructure is

Ref.	Who	Summary of comment	Our response
		stipulated under Policy J6), and/or whether other alternative forms of traffic mitigation would be more appropriate on the local road network; when (if proven to be needed) it is to be delivered; who will deliver it; and how much it will cost or be funded.	expected to be delivered to support proposed developments. The funding and delivery maybe then through a number of mechanisms such as section 278, section 106, grant funding or delivery by a developer.
576-4	Intermodal Logistics Park North Ltd	The status of "not started" - with respect the absence of any technical evidence - underpins the submission that the policy cannot make lawful a requirement for a substantial contribution. Furthermore, in the absence of any information on cost, it is not possible to determine the effect on the viability of the Plan as a whole - as required by Planning Practice Guidance.	See above. The policy is the process whereby necessary infrastructure is required. Viability of the site tests whether the site can come forward and whether infrastructure needs can be met as required. If not, the site may not be part of the plan.
576-4	Intermodal Logistics Park North Ltd	Welcome continuing participation with Wigan Council to fully understand the potential transport implications of ILPN on the local highway network through traffic modelling; following which the precise requirement for any mitigation (if needed) may be derived.	Comments noted.
899-0	City of Trees	Would like to see walking, wheeling and cycling routes made more green to improve all round amenity.	This is guidance covered by policy JP-C6 of the PfE plan and the Streets for All guidance.

Ref.	Who	Summary of comment	Our response
899-0	City of Trees	Green and Blue Infrastructure - it would be helpful to know of natural open space is tree covered and what the standards are.	The policy and evidence map provide details of green and blue infrastructure. It is not the role of the IDP.
1022-1	NHS Property Services	To be sound, the draft Infrastructure Delivery Plan should identify adequate health infrastructure. To do this the Council should engage with the NHS particularly the Integrated Care Board. At present there are no health care projects listed in the schedules and Chapter 5 does not address growth in demand on health care from proposed development.	The Council is working collaboratively with the NHS Integrated Care Board to assess health infrastructure capacity at a sub-borough level to identify where and how developer contributions accrued through Policy PE5, now PE6 can be used to address identified capacity gaps in health infrastructure.
1023-69	National Highways	Support the balanced approach set out in the IDP and encourage early engagement to ensure that mitigation measures are identified and delivered in a timely and effective manner.	Support welcomed and comments noted.
1023-69	National Highways	Recommend that the Council adopts a proactive, vision-led approach to infrastructure planning, rather than responding reactively to development pressures. This includes the use of Travel Demand Management strategies and the establishment of a clear mobility vision for the borough.	This is not for the IDP. Proposed policy T2 refers.
1023-69	National Highways	Recommend the IDP explicitly acknowledges the role of digital infrastructure in reducing the need to travel-thereby supporting	Text amended in the IDP to acknowledge this point.

Ref.	Who	Summary of comment	Our response
		decarbonisation and reducing pressure on the SRN.	
1023-69	National Highways	Request clarity on when Infrastructure Delivery Schedules will be available, as they are essential for assessing the cumulative impact of development on the SRN and for aligning investment priorities.	The Delivery Schedules will be updated regularly as and when information becomes available.
1088-0	Canal & River Trust	Raised issue of the canals being both green and blue infrastructure, also concerns that some improvements may cause anti-social behaviour that need to be addressed at the planning stage.	The green and blue infrastructure nature of canals has been acknowledged in the IDP. Design guidance in policy will support safety aspects of improvements, this is covered in PL1 and PL6.
1108-0	St Helens Council	The IDP should link infrastructure to site allocations. Contributions to the Bee Network should also be sought. Cross boundary transport opportunities should be sought by the IDP. This should include active travel links with note given to St Helens and Liverpool region policies and plans.	It is the role of the development plan to link infrastructure to site allocations. The IDP will be updated when details of funded schemes come forward.
1109-0	Warrington Borough Council	Note that the Lane Head bypass has been identified as a requirement in the IDP which appears at odds with the supporting text for Policy J6, which requires the necessary infrastructure to be delivered at an early stage	Text in the IDP has been amended.

Ref.	Who	Summary of comment	Our response
		and therefore raises questions about the deliverability of the bypass and the allocation.	
1110-0	Winstanley College	Population expansion will cause more demand further down the line for colleges places, including at Winstanley College.	Where possible the IDP has identified needs. Colleges have been contacted as part of the preparation of the IDP to seek information with regard to their plans, needs and expectations to inform its content.
1110-0	Winstanley College	Clarity is needed on post 16 needs.	As above.
1110-0	Winstanley College	If Golborne station is upgraded additional bus services to Winstanley college would be beneficial	A review into the provision of bus services to and from the station has been considered as part of the proposals for the new station. These services will be timed to coincide with train frequencies and serve key destinations within Golborne and Lowton. As TfGM manage the bus services in the borough, ongoing consultation is required to ensure services are introduced which serve the local community.
1443-0	Environment Agency	Green infrastructure role should be strengthened.	A paragraph has been added to reflect this point.

Ref.	Who	Summary of comment	Our response
1443-0	Environment Agency	The findings of the Greater Manchester Integrated Water Study should be incorporated into the IDP.	A reference to this study has been made in the text, however it is not considered suitable for the detail of the study to be referenced in the IDP.
1443-0	Environment Agency	There should be inclusion of how blue and green infrastructure will be delivered.	Where there is information on projects these are detailed in the schedules. As further projects come forward the IDP will be updated. The Environment policies also detail the Council's commitment to blue and green infrastructure over the borough.
1443-0	Environment Agency	Reference should be made to the biodiversity metric and integration with the Greater Manchester Nature Recovery Strategy.	This is covered sufficiently in the Environment policies in the Local Plan.
1443-0	Environment Agency	There should be inclusion of how green and blue infrastructure will be delivered.	Where there is information on projects these are detailed in the schedules. As further projects come forward the IDP will be updated. The environment policies also detail the Council's commitment to blue and green infrastructure over the borough.
1443-0	Environment Agency	Flood storage proposals are unclear and SuDS should be added.	The section in the IDP has been revised to make them clearer and SuDS has been added.

Ref.	Who	Summary of comment	Our response
1443-0	Environment Agency	The IDP should be strengthened through delivery mechanisms for Combined Sewer Overflow.	The IDP sets out how the infrastructure is to be delivered through partners and the Local Plan it is not the delivery mechanism itself.
1443-0	Environment Agency	Wigan Council should be added in as the Lead Local Flood Authority.	Additional paragraph has been added to the IDP.
1443-0	Environment Agency	Contaminated land should be considered with reference to the Environment Agency's Contamination Risk Management guidance.	Contaminated land is dealt with in policy ENV7 which references potential contamination for water resources. It is not a matter for the IDP.
1443-0	Environment Agency	Mention should be made to Strategic Flood Risk and Long Term resilience.	Text has been made to reference this, this is however a policy issue.
1443-0	Environment Agency	Reference to flood resilience in greenfield development should be made, no run off should result and there should be positive impacts in the reduction of flood risk.	The text references the policies that deal with is issue it is not an issue for the IDP itself.
1443-0	Environment Agency	The United Utilities works referenced at 3.10 are not directly linked to the flood storage basin at Lilford Park.	The text has been clarified.
1443-0	Environment Agency	Platt Bridge flooding should reference the Manchester Integrated Water Management Plan (MIWMP).	The GMIWMP is too strategic and not suitable for integration into the IDP. Reference to partnership working has been strengthened in the text.

Ref.	Who	Summary of comment	Our response
1443-0	Environment Agency	Bedford Brook pumping station -we recommend that this section be revised to reflect the correct relationship between infrastructure projects and flood storage interventions.	The relevant sections have been revised.
1443-0	Environment Agency	The document should articulate the role of s106 in delivering sustainable transport and biodiversity corridors.	This is for the environment policies not the IDP.
1444-0	Electricity North West	Updated information provided by Electricity North West on upgrades required as a result of housing development.	The IDP has been amended accordingly.
Integrated Assessment			
923-20	A&A Broster Partnership	While the report acknowledges that the site at Drummers Lane, Bryn is proximate to existing communities and has potential for housing, it concludes there is no current housing need. However, due to increased housing demand following SM3, the Council should consider allocating more residential sites, including this one. The site is currently designated as Green Belt and rated as medium-high sensitivity, with long-range views. However, it is of low sensitivity due to surrounding infrastructure (M6 and Ashton-in-Makerfield) and future	The council's position is that we don't need any more Green Belt land to meet our housing requirement through to 2039 based on the position set out in the Places for Everyone Plan. We have sufficient land to meet requirements over the plan period, including identifying a 5-year supply of housing land, as set out in our latest Strategic Housing Land Availability Assessment. Though, Policy UP1 commits to an early update of the plan, at least in relation to

Ref.	Who	Summary of comment	Our response
		developments (e.g., Symmetry Park) will obstruct these views. The landscape impact should be rated neutral, not moderately negative. Agricultural Land: The site is Grade 3b (moderate quality), not Best and Most Versatile (BMV), so its development would have negligible agricultural impact. Ecology: Plans include retaining woodland, enhancing landscaping, and delivering on-site biodiversity net gain (BNG). Accessibility: The report underestimates public transport access, omitting nearby bus stops and Bryn train station (within 1.5 km). The IA claims the site would significantly harm the Green Belt by narrowing the gap between Wigan and Ashton. However, this gap has already been largely eroded by other allocations (e.g., M6 Junction 25), and clustering complementary uses here would enhance economic efficiency and regional connectivity.	meeting identified housing and employment needs, at least, to 2045.
994-1	Private Individual	There are discrepancies between our original site submission (from Wigan's Call for Sites) and how it has been represented in the AECOM	The site in question has received two different site promotions, involving similar but different site boundaries, over the course of the plan's development.

Ref.	Who	Summary of comment	Our response
		Integrated Appraisal (March 2025, page 38). Specifically: The site name has changed from "Wigan Road and Drummers Lane" to just "Drummers Lane". The 90-metre Wigan Road frontage and access have been removed. The AECOM plan includes land not in our control or submission, which alters the green belt buffer between Ashton and Wigan. This change disadvantages our promoted site, especially as it removes the previously included previously developed land (PDL) and access near the M6. There is also a mapping error: theM6 slip road is incorrectly labelled as the A49, raising concerns about the overall accuracy and fact-checking of the report. Request clarification on why these changes were made and express concern about the integrity of the appraisal process.	Unfortunately, the map as shown in the Interim IA didn't include an area north of the Park Lane Chapel, off Wigan Road, as it should have. However, both the IA and the Site Selection Assessment – Employment did take the larger area into account as part of their assessments.
1023-69	National Highways	Integrated Appraisal: Support the IA conclusion and encourages Wigan Council to continue using the IA as a tool for refining policies and guiding implementation. Recommend that future iterations of the IA include more detailed	Support welcomed.

Ref.	Who	Summary of comment	Our response
		analysis of cumulative transport impacts and the effectiveness of proposed mitigation strategies, particularly in relation to the SRN.	
Duty to Cooperate			
1023-69	National Highways	Support the draft SoCG which provides a clear timeline of engagement activities from 2022 to 2025. This structured and transparent engagement process demonstrates Wigan Council's commitment to continuous dialogue and joint working. National Highways is explicitly recognised as a key statutory consultee and has been actively involved throughout this process. The SoCG identifies a comprehensive list of strategic cross-boundary matters, many of which are directly relevant to National Highways. National Highways' engagement is acknowledged, which confirms it is fulfilling its Duty to Cooperate and its commitment to continued collaboration.	Support noted.
Green Belt Assessment			
576-4	Intermodal Logistics Park North Ltd	The absence of a Green Belt Assessment pursuant to the approach set in PPG would seriously weaken the 'fully evidenced' requirement to demonstrate exceptional circumstances.	We are no longer proceeding with the proposed site allocation at land west of Winwick Lane and no Green Belt land is proposed to be released in the Publication version of the Local Plan

Ref.	Who	Summary of comment	Our response
Site Selection Assessment			
576-4	Intermodal Logistics Park North Ltd	Site Selection Assessment: Concerned by the approach taken as it does not meet the needs of a Green Belt Assessment as required by Planning Practice Guidance, which requires an assessment of Green Belt across the relevant "local or strategic area", not just the eight sites identified.	We are no longer proceeding with the proposed site allocation at Bridgewater West and no Green Belt land is proposed to be released in the Publication version of the Local Plan
Other			
100-40	Private Individual	The evidence should be town-specific, not at borough or Greater Manchester level, as this can mask inequalities, particularly in Atherton which has a shortage of open space, modern recreational facilities, poor connectivity, a lack of investment in employment areas, a need for affordable and specialist housing, and an over concentration of HMOs.	The evidence base, including the Open Space Report, Playing Pitch and Outdoor Sports Strategy, and the Housing Needs Assessment, assesses the borough at a sub-borough level.
276-9	Private Individual	The map on display at the consultation event incorrectly showed Astley as lacking a neighbourhood park. However, there are a few pieces of play apparatus in Astley Green, with a beautiful green field. Do not infer that there is no park as a means of providing one if your plans go ahead.	The Open Space Report identifies all open spaces in the borough, including the neighbourhood park in Astley. The park is located outside of the former proposed allocation at Bridgewater West which we are no longer proceeding with, and no Green Belt land is proposed to be

Ref.	Who	Summary of comment	Our response
			released in the Publication version of the Local Plan
571-2	Peel Land	Key evidence of employment and housing needs should be updated in the light of recent changes in national policy, and the supply and availability of deliverable land to meet those should be updated at least annually. If the Council is to maintain a deliverable five year housing land supply through the transition to significantly higher housing needs, it is appropriate for it to plan positively to identify additional land. It should provide for needs to at least 2043, not 2039. The Local Plan should give greater prominence to the planned east-west link road given its key role in the success of the Wigan-Bolton Growth Corridor and several key allocations. This should be a key part of a Local Plan Spatial Strategy.	To reflect an anticipated higher housing requirement post 2029, a new policy has been added committing to an early update of the Local Plan. Agree regarding the prominence to the planned east-west link road and its role in the success of the Wigan-Bolton Growth Corridor and several key allocations. As such, a key diagram has been added.
1021-1	Private Individual	None of the points made feel needed.	Noted.
1023-69	National Highways	There are a limited number of policies around carbon reduction and freight delivery. Recommend that national and local carbon reduction targets and policies are incorporated into the policy review for this evidence base, as	The transport policies set out within the Local Plan aim to complement the transport policies set out within the PfE Plan and the ambitions of TfGM in relation to carbon reduction as set out in

Ref.	Who	Summary of comment	Our response
		well as policies which focus on sustainability with the freight and logistics sector, such as Future of Freight, as the evidence base does not include policies regarding sustainable freight delivery within the borough.	the GMTS2040. Wigan's adopted Transport Strategy also outlines the Councils commitment to decarbonising transport and reducing the adverse environmental impacts of transport. As such it is not considered necessary to include policies related to carbon reduction within the Local Plan. Freight and Logistics is addressed in Policy JP-C7 of the PfE Plan. There is also a significant level of detail included in the GMTS2040 which considers the movement of freight within the GM. Wigan's adopted Transport Strategy also considers freight and logistics. As such it is not considered necessary to include policies related to carbon reduction within the Local Plan.
228-1	Private Individual	There are empty units on Chaddock Lane and many brown spaces where you could invest and not have to destroy green belt land.	Noted. We are no longer proceeding with the proposed employment site allocations and no Green Belt land is proposed to be released in the Publication version of the Local Plan,
1106-2	Private Individual	Object.	Noted.

Ref.	Who	Summary of comment	Our response
498-10	Natural England	The following types of plans relating to the natural environment should be considered where applicable to the plan area: Green and Blue infrastructure strategies; Local Nature Recovery Strategies; Biodiversity plans and strategies; Rights of Way Improvement Plans; River basin management plans; National Landscape and National Park management plans; relevant landscape plans and strategies.	This chapter only provides key examples of key evidence documents and is not an exhaustive list. The documents identified by Natural England have been considered as necessary as set out in the Topic Papers supporting the plan.
1121-7	Private Individual	Strategic Housing Land Availability Assessment: Land for business development in Astley was identified and approved back in 2013 as part of the justification for building over 1,000 new homes in Astley-Mosley Common. Not developed to this day, but now the Council have approved planning to use for more houses instead.	All planning applications are determined against policies in the development plan, national planning policy and other material considerations.
1130-3	The Lancashire Wildlife Trust	No key evidence is presented for Wigan's biodiversity resource. Reference should be made to the Greater Manchester State of Nature report and the emerging Greater Manchester Local Nature Recovery Plan, which identifies the decline, and in some cases recovery, of GM's species and habitats.	Noted. Reference has been made to the GM LNRS in the Key Evidence chapter which directly incorporates and responds to the findings of the GM State of Nature Report.

Ref.	Who	Summary of comment	Our response
1318-1	Private Individual	The key evidence documents do not cover the statements / infographics relating to town centres in the spatial portrait. The evidence for these should be clarified and published.	A retail and town centres review has been added to the Key Evidence section and is published on our website.

Ref.	Who	Summary of comment	Our response
Vision and Strategic Objectives			
Vision			
779-22	Sport England	The vision could include a direct reference to the promotion of healthy lifestyles, particularly in view of the data under the people heading in the spatial portrait.	Objective 8, now Objective 4 has been amended and now makes specific reference to healthier lifestyles.
923-23	The Lancashire Wildlife Trust	Agree and fully support the vision for the environment, especially the reference to nature recovery.	Support welcomed, though the reference has now been moved to Objective 6, now Objective 7.
924-1	The Woodland Trust	Supportive of the general vision of the local plan and pleased to see a recognition that the natural environment should be protected, enhanced and restored.	Support welcomed, though the reference has now been moved to Objective 6, now Objective 7.
1023-70	National Highways	Support the adoption of a vision-led approach, which is advocated in DfT Circular 01/2022, and a plan-led approach. The Vision references Wigan's town and local centres will be enhanced through regeneration led development. To meet these ambitions may require infrastructure improvements and National Highways are involved in working groups with the Council and key stakeholders to understand these.	Support welcomed.

Ref.	Who	Summary of comment	Our response
1106-3	Harworth Group	Support the overall vision, particularly the vision for jobs.	Support welcomed, though this is now covered between the revised Vision and Objective 2.
1116-1	Anwyl Homes	Support the vision for homes.	Support welcomed.
1129-2	Historic England	Support the inclusion of 'Places' in the vision.	Support welcomed, though this is now covered between the revised Vision and Objective 5.
1137-2	United Utilities	Support the vision but recommend that high-quality design and place-making are also incorporated into the vision as key principles.	Support welcomed. Design and place making are now covered by revised Objective 5.
1138-1	Tarleton Estates	Support the vision.	Support welcomed.
1381-2	TfGM	Fully support the vision for 2039, particularly the transport vision. Also support the Strategic Objectives which will contribute in some way to aiding the delivery of an overall reduction in the need to travel by car through the creation of sustainable communities with locally accessible services, jobs and facilities.	Support welcomed, though this is now covered between the revised Vision and Objective 4, now Objective 3.
Objective 1			
924-1	The Woodland Trust	In Objective 1, there should be a recognition that homes should be built with an access to nature - this could be achieved by linking new developments to existing, or new, green spaces,	This is covered sufficiently in the Environment policies.

Ref.	Who	Summary of comment	Our response
		or by ensuring new streets are lined with existing and newly-planted trees.	
1021-3	Home Builders Federation	Generally agree with the homes element of the vision and objective 1.	Support welcomed.
1079-1	Jo Platt MP	Objective 1: Disappointed with the lack of an affordable housing target figure. This should be a high percentage of the overall home requirement and available at an affordable social rent.	The affordable housing requirement is set in Policy H2.
1099-2	Morris and Persimmon Homes	Objective 1a should be amended to cover the period until 2042. It is also inappropriate to refer to an exact number of 16,527, as the PfE housing requirement is a minimum figure and it is inconsistent with the Government's objective of significantly boosting the supply of homes. It should be modified to: "Working with developers, registered providers, landowners and other partners to support the delivery of at least 19,443 new homes in the right locations by 2042."	This is covered in Policy UP1.
1103-2	Story Homes	Support the inclusion of a housing specific element of the vision, but this should be explicit that the council will deliver sufficient homes to meet the housing needs in full. It should specifically address quantitative housing needs. The housing objective relates primarily to the	This is covered in policy UP 1.

Ref.	Who	Summary of comment	Our response
		quality of housing to be delivered rather than addressing the key point around increasing delivery to meet established housing needs over the plan period. Objective 1a should be modified to read: "Working with developers, registered providers, landowners and other partners to support the delivery of 19,443 new homes in the right locations by 2042" to accord with NPPF which requires plans to cover a period of at least 15 years from adoption.	
1106-3	Harworth Group	Support.	Support welcomed.
1116-1	Anwyl Homes	Support Objective 1.	Support welcomed.
1121-8	Peel Land	Support Objective 1, but request it is amended to refer to 2043, not 2039, and to read: "Delivering sufficient homes of the right type, size and tenure to meet the needs of our communities and to support sustainable economic growth by:.."	Support welcomed, but the plan period is covered in Policy UP 1.
1126-2	The Baldwin Estate	Support the vision and strategic objectives subject to the vision and objective 1a being amended to state 2042, not 2039. Landgate will be key in delivering the vision and objectives 1	Support welcomed, but the plan period is covered in Policy UP 1.

Ref.	Who	Summary of comment	Our response
		(delivering homes) and 8 (through the retention / reconfiguration of Bryn Recreation Ground).	
1131-1	Barratt Homes Manchester	Objective 1a should be amended to reflect the additional requirement of meeting needs for a minimum of 15 years from adoption of the plan.	This is covered in Policy UP 1.
Objective 2			
994-5	Private Individual	Support Objective 2 in principle, particularly criterion B. Therefore part of employment site J2.72 (Warrington Road, Hawkley) should be deallocated as it is inconsistent with this objective.	The site at Warrington Road is appropriately within an Employment Area. Proposals for development within it will be subject to Policy J2.
1090-2	CPRE	Objective 2 should include a brownfield first policy, which would reduce the plan's reliance on allocating greenfield sites.	Unfortunately, there is an insufficient supply of brownfield sites to meet identified housing needs without reliance on greenfield land.
1106-3	Harworth Group	Support objective 2 (particularly 2a, 2b, 2c and 2f). However, we suggest objective 2b also expresses support to proposals that not only protect existing employment areas, but also those that encourage further investment within them.	We think this is covered sufficiently in the revised objective.
1121-8	Peel Land	Support reference to A580 in Objective 2a.	Support welcomed though the reference to the A580 has been removed as part of a revision of the objectives. The A580 is

Ref.	Who	Summary of comment	Our response
		Suggest paragraph 4.2 is supplemented to make clear that the Strategic Objectives are inter-related and will be pursued collectively. There should be a strategic objective of optimising the tourism and visitor economy in the borough, including retaining and enhancing existing visitor and tourist facilities and being proactive in supporting the establishment of new facilities. This could be as an additional sub clause to Objective 2 or an amended 2d. The reference in objective 2d is specific and in the context of existing assets. Reference should be made to the potential of built heritage and waterways (alongside culture, arts and sport) to contribute to a diversified and larger visitor economy. This would be consistent with PfE Policy JP-G5 and specifically paragraph 8.28 and provide strategic context for Policy J8.	specifically shown on the new Key Diagram and referenced in an amended spatial portrait.
1138-1	Tarleton Estates	Support the principle of Objective 2 but as reflected in the PfE Plan, consider that housing is also important in delivering the ambitions for the Wigan-Bolton Growth Corridor. As such, Objective 2 should note the importance of the role of housing development in boosting northern competitiveness and particularly in	Reference to the Wigan Bolton Growth Corridor has been removed from the objectives, though it is specifically shown on the Key Diagram and referred to in an amended spatial portrait.

Ref.	Who	Summary of comment	Our response
		delivering the Growth Corridor. The selection of sites for allocation then flow from this and this should be made clear in the objectives. The Wigan Bolton Growth Corridor should be given a clearer spatial definition through the development of a 'Key Plan' or equivalent.	
1398-1	Cllr Debra Wailes	Objective 2: Given the number of houses proposed in the Wigan Bolton Growth Corridor there are no plans to establish a new high school or community facilities in this area. Without additional high school places, the current provision cannot meet the needs of this development.	This is covered by Policy PE5, now PE6 with specific references to this policy within the site allocation policies for North Leigh Park, South Hindley and Westwood Park.
Objective 3 (now Objective 6 in the Publication Plan)			
899-1	City of Trees	In Objective 3, no reference is made to improving climate resilience and enhancing image through increasing GI.	Green infrastructure is a key part of meeting revised Objectives 6 and 7, now Objectives 7 and 8, and doesn't need specific mention. We have a specific policy EN2.
924-1	The Woodland Trust	In Objective 3, there should be a recognition that greener town centres can contribute to the regeneration and improvement of them. This could be achieved by including or creating green spaces and planting street-lined trees.	This is considered too specific for the strategic objectives and is covered sufficiently in town centre policies as necessary.

Ref.	Who	Summary of comment	Our response
1079-1	Jo Platt MP	Objective 3: References to community cohesion and community safety are noticeably absent. Objective 3b: An Article 4 Direction is needed for the Leigh and Atherton constituency to curb the concentration of HMOs, particularly in the town centres. Objective 3d: Admirable, but the expansion of cycle lanes in the Leigh and Atherton constituency have been poorly managed to date and pursuing cycle lanes on our already overly congested roads, particularly in the centres of Leigh, Atherton, Tyldesley, Lowton, Golborne and Astley would be a huge misstep.	Iti s considered that community cohesion and community safety is covered sufficiently across the vision, which align with the Progress with Unity, and the strategic objectives. A boroughwide Article 4 Direction has recently been imposed. Specific reference to cycling provision has been removed from Objective 4, now Objective 3, though walking, wheeling and cycling is promoted through the Local Plan.
1129-2	Historic England	Welcome the addition of objective 3d.	Support welcomed, although our objectives have been rationalised.
Objective 4 (now Objective 3 in the Publication Plan)			
576-13	Private Individual	Objective 4 cannot be achieved in south Astley, Blackmoor and Higher Green without existing traffic congestion on the A572 being addressed. The plan offers no solutions and will make matters worse. With no public transport options available and little or no options to travel by bike; car travel is the only option available.	Proposals for major development will need to be supported by proportionate transport assessment in accordance with policy T2.

Ref.	Who	Summary of comment	Our response
982-1	Private Individual	Objective 4: There are ample walking sites around Standish. We do not want these changing into tarmac networks. The flatter a route, the easier it is for people to use e-bikes etc threatening the security of our homes due to easier get-away routes. The Council need to maintain existing routes.	Safeguarding the integrity of the public rights of way network is an objective of the plan.
1079-1	Jo Platt MP	Objective 4: The central objective is a positive one, but more attention needs to be placed on improving traffic flow and management and less on cycle schemes which bring limited benefits to the majority of residents travelling to and from work.	Many households and people don't drive or can't drive. The only reasonable way of improving traffic flow is to enable more people to choose alternatives to using a car.
1090-2	CPRE	Objective 4 should promote land use patterns that promote sustainable transport. This would mean fewer edge of town/out of town developments that promote car and road haulage dependency, and more town centre and sustainable transport hub located employment development.	This is covered sufficiently in policies within the Places for Everyone Plan including JP-C1, JP-C3, JP-C5, JP-C6 and JP-C8.
1106-3	Harworth Group	Support objective 4 but suggest it also includes the need for new investment in road infrastructure that could also contribute to such aims, where considered appropriate. We support the objectives of the transport policies but this is silent on the need for	We think this is covered sufficiently in the revised objective.

Ref.	Who	Summary of comment	Our response
		investment in road infrastructure to facilitate those objectives. We propose additional text encouraging the development of new roads where appropriate e.g. the link road proposed in Policy J3 and the M58 Link Road.	
Objective 5			
1129-2	Historic England	Welcome the addition of objectives 5a and 5c.	Specific reference to the historic environment has been removed from revised Objective 5 but it does include "the attributes that make our towns and neighbourhoods distinctive".
1137-2	United Utilities	Suggest the word 'better' is replaced with 'high' in objective 5a.	Specific reference to 'better quality development' has been removed from Objective 5.
Objective 6 (now Objective 7 in the Publication Plan)			
923-23	The Lancashire Wildlife Trust	Whilst Strategic Objective 6 is welcome and supported, we would like to see specific reference to the reversal of the decline of species populations within Wigan. The GMLNRS refers to species that require specific actions outside of habitat management. The LNRS also identifies that species are continuing to decline and that specific actions will be required to reverse these declines.	Support welcomed. However, the suggested amendments are too detailed for the strategic objectives and are covered sufficiently in the Environment policies.

Ref.	Who	Summary of comment	Our response
982-1	Private Individual	Objective 6 - nature should be protected and enhanced. Wildlife around Standish is suffering.	The protection and enhancement of nature is covered sufficiently in objective 6, now Objective 7.
1079-1	Jo Platt MP	Objective 6b: Would like to see an increase in the amount of land designated for nature protection in the east of the borough. Building on the Green Belt should be a last resort.	Policy EN1 specifically identifies many priority locations within out natural environment in the east of the borough. Building on the Green Belt is a last resort and is needed to address identified employment needs.
1106-3	Harworth Group	The Objective / Vision addressing the Environment references the wider natural environment but fails to mention Green Belt. Suggest the plan explains how development in current Green Belt locations may in fact accord with national policy and the wider review of the role of land currently allocated as such.	This is not necessary in the strategic objectives. This is set out in the Site Allocation Assessment Reports for the proposed employment allocations.
Objective 7 (now Objective 8 in the Publication Plan)			
923-23	The Lancashire Wildlife Trust	Welcome and support Strategic Objective 7.	Support welcomed, although the objectives have been rationalised.
1137-2	United Utilities	Support the strategic objectives, particularly objective 7b and 7c..	Support welcomed, although the objectives have been rationalised.
Objective 8 (now Objective 4 in the Publication Plan)			
779-22	Sport England	Support Objective 8.	Support welcomed, although the objectives have been rationalised.

Ref.	Who	Summary of comment	Our response
859-7	Private Individual	Objective 8: No new social care, education or community facilities have been delivered in light of the 1000's of new homes being built in Atherton.	Contributions towards social infrastructure were considered at the planning application stage for approved developments. Policy PE4, now PE6, will determine appropriate contributions upon adoption of the Local Plan.
982-1	Private Individual	Objective 8 - More regulations should be in place to restrict the level of barbers and takeaways in Standish.	The Standish Neighbourhood Plan already has a policy which manages hot food takeaway provision. Policy PE2 of the Local Plan will replicate this. It is not within planning powers to restrict the number of barbers, as changing the use to a barbers from many other shops and commercial uses is permitted development and does not need planning permission.
1137-2	United Utilities	Objective 8b should apply to all developments not just major development.	Major developments are those of 10 or more homes, 1,000 sqm of commercial / leisure floorspace or housing, employment or commercial / employment uses on sites of over 0.5 hectares. The delivery of healthier environments is a key objective of the plan and the threshold applied in Policy PE1 is considered appropriate and sufficient to achieve this.

Ref.	Who	Summary of comment	Our response
General support			
901-2	Cityheart Ltd	Welcome and support the commitment to creating a diverse range of town centres that meet multiple user needs and support a range of community functions. The Fettlers scheme aligns with each of the objectives, including delivery of homes in sustainable, well connected locations; driving economic growth and diversification through development; and the regeneration and enhancement of town centres. Promoting a diverse mix of uses and attractions within town centres, sustaining their existing residential areas, and encouraging high-quality new residential development to support vitality, are all welcomed components of this objective.	Support welcomed.
General object			
241-15; 472-1	Private Individuals	Object.	Noted.
296-5	Private Individual	Object. Looks nice in pictures and carefully crafted words, but the reality is more concrete, and less room for wildlife, green spaces and people's wellbeing.	Noted.

Ref.	Who	Summary of comment	Our response
761-2	Private Individual	There should be no further development without adequate infrastructure and transport facilities. As a result there should be: No further development on Green Belt, except limited development on existing brownfield sites and existing "grey" pockets. Firm proposals to improve local public transport, not only in the Manchester direction, and to implement long awaited major road improvements i.e. trams, train station, completing the Atherleigh Way at both its North and South ends, the Internal East/West Road within the Borough, upgrading and modifying the East Lancs Road which currently acts as a barrier to movement. A focus on limited brownfield development and suitable affordable housing i.e. smaller properties for first time buyers and retired people. A focus on town centre redevelopment for non-retail purposes, especially housing, leisure and commercial services. No further large homes that no residents can afford, attract inward settlement of two+ car families and exacerbate congestion.	The council does not have control over many of these matters and certainly does not have the funding, but we do need to plan for the future of the borough. In that sense, policy T1 includes 11 future transport priorities that was re working with TfGM on, and developers and DfT where applicable, including the Land Head South Relief Road and the West of Gibfield – Lee Hall Link, the east-west road link in its component parts. All brownfield land that we know about is in our land supply, principally for new homes. We have ambitious policies, TC2-11 for each of our 10 town centres. There is a strong focus on meeting local needs – policy H2 refers. We are not focusing on Manchester for employment and transport links – see our Jobs policies and policy T1.

Ref.	Who	Summary of comment	Our response
		A focus on integrated transport developments with adjoining Local Authorities both within and outside GM, including the extension of Atherleigh Way northwards and southwards. An end to focusing solely on Manchester for employment and transport links. Major opportunities now exist and will develop in Warrington, St Helens and Liverpool.	
1397-1	Private Individual	No more building.	The council has a statutory duty to identify sufficient land to meet identified development needs.
Other			
100-14	Private Individual	To ensure the vision includes all of Wigan Borough, we request that localised delivery metrics for each objective, broken down by town; commitments to reinvest in towns historically underfunded, starting with Atherton; a fair distribution of infrastructure, employment, housing, and community space investment; a requirement to track and publish progress town-by-town, not just borough-wide; and a dedicated town regeneration plan for Atherton, informed by real community consultation.	Monitoring at a sub-borough level is not realistic through the Local Plan but it may be developed as part of Progress with Unity.

Ref.	Who	Summary of comment	Our response
473-1	Private Individual	Concerned about the number of people in Wigan who are not in work. The council should support all people with mental or physical problems or disabilities into work. Greenfield sites should be protected and developers should be made to redevelop brownfield sites even though this is more difficult and expensive to do. Developers should be made to build the type of housing which is needed in each part of the borough instead of expensive large houses which are unaffordable for many residents.	Providing necessary support to borough residents in need is a corporate objective of the council. Unfortunately, there is an insufficient supply of deliverable and suitable brownfield sites within the borough to meet identified housing and employment needs to 2039, so there is also reliance on greenfield sites. Policy H2 requires the delivery of an appropriate mix of house types, sizes and tenures to meet identified housing needs.
850-1	Private Individual	As usual, all the ambition is for Wigan town, with just housing and a few warehouses everywhere else. Nothing for the Leigh constituency which is ranked at the bottom of the Government's Social Mobility Index.	The plan includes lots of ambition for the Leigh area, such as through policies TC3 and T1.
966-1	Private Individual	The world is being slowly suffocated by endless construction, as fields, forests, and natural spaces are replaced with concrete and steel. We're not just building over land; we're building over our peace, our connection to the earth, and our future.	Environmental protection is a key objective of the Local Plan as set out in the strategic objectives and in the proposed policies, particularly in the Environment chapter. Over 55% of our borough is Green Belt.

Ref.	Who	Summary of comment	Our response
1024-3	Golborne and Lowton West Neighbourhood Forum	Insufficient visibility to the adopted Golborne and Lowton West Neighbourhood Plan, which has full statutory weight. Request a clearer statement that the Neighbourhood Plan policies apply and must be considered in planning decisions affecting the designated area. Need to ensure that the site allocations in the GLW Neighbourhood Area comply with the density, green infrastructure, heritage and design policies in the Neighbourhood Plan. Suggest that the GLW Neighbourhood Plan is included as a referenced document.	The Neighbourhood Plan forms a statutory part of the Development Plan within the Neighbourhood Area.
1027-1	Private Individual	Farming gets no mention in the plan and is conspicuous by its absence. Food mentioned 42 times but mostly in the context of hot food takeaways. Only mention of food growing is fifth in a list of other uses of open spaces. Concern over the loss of farmland due to the impact on food production and food resilience. The Winwick Lane allocation will result in the loss of 221 acres of best and most versatile agricultural land.	Noted. The council no longer proposes to release any Green Belt land for development in this Local Plan.
1121-8	Peel Land	In line with NPPF paragraph 20, a concise spatial strategy is needed highlighting the spatial considerations that have informed the	The plan has been amended to include a key diagram and an extended spatial

Ref.	Who	Summary of comment	Our response
		plan's content. This could be text, a diagram or both and make clear how policies are addressing key growth areas such as the Wigan Bolton Growth corridor and the A580 corridor. In line with NPPF the plan needs to make explicit which policies are strategic policies.	portrait. Appendix 1 has also been added to include a list of strategic policies.

Ref.	Who	Summary of comment	Our response
Homes			
General			
296-2	Private Individual	Housebuilding should be kept to a minimum, and should only take place on brownfield sites. Building new homes is not in the best interest of local communities, nature and wildlife, and doesn't help anyone in the long run, especially when Green Belt is being sacrificed.	Whilst the Council is committed to optimising brownfield land to meet housing needs, there is an insufficient supply of deliverable housing sites on previously developed land to fulfil this need without using greenfield sites.
372-15	Private Individual	Object to Local Plan approach.	Noted.
501-1	Private Individual	Object to more houses being built, especially on Green Belt land. This will have a major negative effect on biodiversity, increase congestion, make it harder to get a doctor's appointment, put additional pressure on the NHS Trust, make it harder to get a school place, deny us green spaces to enjoy, have a detrimental effect on health and wellbeing, and result in a poorer quality of life for existing residents.	The 4 proposed site allocations in the Green Belt were for employment-led developments. We are no longer proceeding with the 4 site allocations and the land is not proposed to be released from the Green Belt in the Publication version of the Local Plan. Housing is proposed to meet identified needs. Whilst the Council is committed to optimising brownfield land to meet housing needs, there is an insufficient supply of deliverable housing sites on brownfield land to fulfil this need without using greenfield sites.

Ref.	Who	Summary of comment	Our response
			Policies in the development plan, including Policy PE4, now PE6, require housing developments to be supported by sufficient infrastructure. However, policy EN4 requires a net gain for biodiversity in one with the national duty. Policy PE4, now PE6 requires developer contributions to address infrastructure capacity issues generated from new developments.
Brownfield focus			
571-3	Private Individual	The aim of supporting regeneration and optimising the use of brownfield land should be mandated and not an alternative. The Council needs to incentivise brownfield usage because developers will always prefer the easier option of developing a greenfield site.	As above.
1320-1	Private Individual	Is it proposed to subject derelict, abandoned or severely neglected properties to compulsory purchase orders? Is it intended to have all HMOs subject to registration to ensure their location is known and to enable them to be subject to other controls to prevent misuse?	The Council is not currently using CPO powers to address derelict, abandoned or neglected properties, and is instead focusing on Enforced Sales for the empty homes that warrant formal enforcement action. The council has now established an Article 4 Direction that means that all

Ref.	Who	Summary of comment	Our response
			new HMOs now need planning permission. The submission and monitoring of a management plan is a policy requirement for new HMOs through the planning process under policy H10 in the Local Plan.
Homes not needed			
262-1	Private Individual	How many estate agents in the borough have notices in their windows stating 'sorry sold out'? This would clearly indicate whether there is a need for this over development on our green spaces.	On that indicator the increased cost of housing in estate agent windows over many years would suggest that there is a mismatch between supply and demand.
Affordable housing			
738-1	Private Individual	Support the building of affordable homes but very concerned about impact on traffic congestion in Hawkley and Land Gate and on overwhelmed schools and services. Homes need to be affordable for all.	Major housing developments will need to be supported by proportionate transport assessments to assess the traffic impacts arising from developments and determine appropriate mitigation as applicable – policy T2 refers.

Ref.	Who	Summary of comment	Our response
862-1	Private Individual	Concerned about a lack of affordable housing for first time buyers and private rentals, a lack of social housing, and the amount of private landlords making and retaining profit instead of reinvesting back into the local area.	See policy H2.
128-1	Private Individual	Needs to be a review of people on the housing register living in overcrowded homes who need a bigger home (4 or 5 bedrooms). Need to build more of the larger houses we need rather than providing more smaller homes.	The council is currently reviewing its Housing Allocation Policy in relation to the Housing Register. We try to encourage movement within council housing stock, including the freeing up of larger family homes for reoccupation, by prioritising our existing tenants (including those who are wanting to downsize) for new accommodation through the use of Local Lettings Policies. Policy H2 requires a mix of housing types, sizes and tenures.
1090-3	CPRE	There remains a lack of affordable housing. Policies to deliver genuinely affordable housing, including social rent, ought to be included and the over-supply taken into account. Much affordable housing provided as part of market schemes is only 20% cheaper and is not genuinely affordable.	See policy H2.

Ref.	Who	Summary of comment	Our response
Homes in Multiple Occupation (HMOs)			
738-1	Private Individual	Do not want to see HMOs everywhere, where people are crammed into one house for profit, or used for asylum seekers. HMOs lower the value of the area.	See policy H10.
1320-1	Private Individual	Is it intended to have all HMOs subject to registration to ensure their location is known and to enable them to be subject to other controls to prevent misuse?	The council has now established an Article 4 Direction that means that all new HMOs now need planning permission. The submission and monitoring of a management plan is a policy requirement for new HMOs through the planning process under policy H10 in the Local Plan.
Eco-homes			
1412-1	Private Individual	For the sake of the planet, new build homes should be required to include solar panels, maximum insulation and heat pumps as part of planning permissions.	In line with Greater Manchester's target to be carbon neutral by 2038, policy EN9 commits the council to work with partners and communities to support and facilitate the development of schemes which deliver low carbon heat and energy.
Atherton / Tyldesley			
100-5	Private Individual	To ensure housing policies serve Atherton fairly, we request:	There cannot be town-level housing targets. Responsibility lies at the borough level. However, matters such as

Ref.	Who	Summary of comment	Our response
		• Town-level housing targets and assessments to ensure Atherton's needs are properly understood and planned for, including the provision of affordable starter homes and bungalows and downsizing options for an ageing population • A commitment to retaining and enhancing family housing stock, not fragmenting it into unsupported HMOs • Priority for local people in accessing affordable and supported housing • The delivery of older persons' housing schemes in under-served areas like Atherton. Will developers be required to show how housing layouts meet older person's needs? • Stronger regulation and planning control over the spread of unregulated supported housing and HMOs, with a commitment to dispersal of supported accommodation. Can the Council introduce an article 4 direction for HMOs in Atherton? An equity-led approach to housing allocations, avoiding overburdening specific towns.	affordable homes, bungalows and older people's homes are covered by policy H2. The council has now established an Article 4 Direction that means that all new HMOs now need planning permission. The submission and monitoring of a management plan is a policy requirement for new HMOs through the planning process under policy H10 in the Local Plan.

Ref.	Who	Summary of comment	Our response
227-1	Private Individual	Cannot see any provision for new schools and school places to cater for the thousands of new homes. Most schools in the Atherton / Tyldesley area are oversubscribed. What will be done to improve access to school places?	Policy PE4, now PE6 refers.
859-6	Private Individual	Through agents, the Home Office acquires rented housing stock for asylum seekers, taking away stock for local social housing needs. How is this to be managed on new affordable schemes for social rent in Atherton?	The council has secured agreement from the Government to not acquire further housing stock in the borough.
Astley / Mosley Common			
17-1	Private Individual	We do not need any more new homes in Astley, Tyldesley or Mosley Common. The areas are already overpopulated and traffic congested. Where are the new schools, nurseries, dentists or doctors to go with the new houses? Why are empty properties not being regenerated? Why are landlords still being allowed to buy multiple properties and make a business out of it?	The housing requirement for the borough is set in the adopted Places for Everyone Plan. Policy PE4, now PE6 addresses infrastructure capacity including for schools and healthcare. The council actively pursues the reuse of empty properties and es a number of tools and incentives to bring long-term empty homes back into use. This includes mass mailouts to property owners, targeted outreach and bespoke advice to help owners understand the options available to them, the marketing of

Ref.	Who	Summary of comment	Our response
			empty homes with local developers and landlords (through our Landlord Hub) to help facilitate a sale, financial incentives, and where needed, timely and proportionate enforcement action. Private property purchase is not a matter under the council's control.
276-11	Private Individual	Do not need Green Belt to meet housing requirements. There should be a hiatus on building on the Green Belt until migration issues have been resolved. The homes being planned in Astley are for rich people and not for people in the community, so underprivileged people, care leavers etc. will not be given any consideration.	The proposed site allocations in the Green Belt are for employment-led developments. Policy H2 requires new residential developments to contribute to the provision of a mix of housing to help address identified housing needs and sets specific requirements for the delivery of affordable housing, including for care leavers. Development at Bridgewater West will need to comply with policy H2.
338-7	Private Individual	High end houses are being built in an area where we have hundreds of homes already for sale. This area lacks the infrastructure to accommodate any more people, houses and cars.	The increasing costs of housing over many years would suggest that there is a mismatch between supply and demand.
Leigh			

Ref.	Who	Summary of comment	Our response
1326-1	Private Individual	Object to the Plan as do not consider there is anything in it that will make Leigh, or the wider borough, a better place in 5/10/15 years time. Where is the infrastructure to support in excess of 16,000 homes? How many of these properties will be HMOs? Expect that more than 16,000 homes will be provided for financial reasons. When is Metrolink coming to Leigh? Wigan Council policies have depleted property values.	Policies T1 and PE4, now PE6 refer to infrastructure, amongst others. It is unlikely that any of those new homes will be HMOs, but all new HMOs now need planning permission. Policy TC3 refers to improved rapid transit between Leigh and Manchester. There is no sign that property prices generally are decreasing.
Standish			
369-11	Cllr Debbie Parkinson	As a local councillor and having talked to many residents we need to ensure that there is no more building in Standish. In the last few years we have had over 2,000 houses and the roads, electricity, water and even broadband infrastructure will not cope with any more houses.	Policy H9 seeks to maintain the role of Policy H1 in the Standish Neighbourhood Plan.
1403-1	Private Individual	Standish is full and cannot take more homes, with Lowton in a similar position. Other areas need to be used for housing, with a focus on the rented sector and homes for the elderly.	Other areas are being used for housing.
Other			
899-2	City of Trees	Can reference be made to protecting tree cover on new development sites, or making compensation for their loss? Could planting	Noted. Reference to this has been added to Policy EN2 Development and Green Infrastructure.

Ref.	Who	Summary of comment	Our response
		take place at earliest possible opportunity on development sites to enable tree cover to be established to provide associated benefits at an advanced rate? City of Trees have access to funding for woodland creation / tree planting so may be potential to support schemes on sites, as long as there are no planning conditions already in place for tree planting. Will existing mature woodland cover and hedges be safeguarded on sites?	
1022-2	NHS Property Services	Residential developments often have very significant impacts in terms of the need for additional primary healthcare provision. New development should make a proportionate contribution to funding the healthcare needs arising. Health infrastructure should be considered at the forefront of priorities for infrastructure delivery. The health estate must be supported to develop, modernise, or be protected in line with integrated NHS strategies. Planning policies should enable the delivery of essential healthcare infrastructure and be prepared in consultation with the NHS to ensure they help deliver estate transformation.	Policy PE4, now PE6 refers.

Ref.	Who	Summary of comment	Our response
1090-3	CPRE	Should plan for the homes needed but not an excess. Wigan and Greater Manchester as a whole continue to deliver more houses than required by PfE, with combined completions running at 110% of the PfE requirement, but there is no reduction for the overperformance. Despite excellent overall performance, the cost of homes has not decreased.	We need to maintain a 5-year supply of land for new homes.
1106-4	Harworth Group	Support proposals to increase the number of homes in the borough and the provision of new homes in accessible locations. Consider adding commentary to the introductory homes paragraphs around the need for homes benefitting employment objectives, given the correlation between places of employment and where people live, which would also provide context for the Jobs chapter. Useful if further commentary could be added to Policy H1 to support the provision of other sites than those listed where such provision was part of a place making approach, referring to Objective 1, para 6.13 and Policy PL1, addressing high quality and inclusive design. For example, the plan could say that sites beyond those listed would be supported if they meet criteria and policies elsewhere in the plan.	The plan should be read as a whole alongside the Places for Everyone Plan too. We need more employment development to restore some of the balance of development over the last decade, which has been overwhelmingly housing based.

Ref.	Who	Summary of comment	Our response
		There is scope for some of the employment allocations to be able to deliver housing as part of a mixed-use scheme and as part of wider place-making objectives.	
1110-1	Winstanley College	New homes at Mosley Common are located at the outer edge of Winstanley College's catchment, with students only able to reach the college via private transport. New and reliable public transport solutions are essential. Primary school expansion and population growth is concentrated in the east of the borough, which may further increase demand for post-16 education provision in these areas. The plan references the need to expand infrastructure provision where new housing developments drive increased demand. What does this mean for post-16 education providers, in terms of ensuring adequate access and transport infrastructure to support potential increases in student numbers?	Policy T1 refers to transport infrastructure requirements, including improvements to the Atherton line between the east of the borough and Wigan, and opportunities along the A577 similarly, arising from new east-west road infrastructure, and policy PE5 covers education infrastructure.
1121-1	Peel Land	Welcome the existing and proposed allocations within the Bridgewater West, Mosley Common, West of Gibfield, and South Hindley sites. In the context of the Government priority on increasing housing delivery, and the significant	Further Green Belt release for housing is not needed through this Local Plan. However, we have recognised the need for an early update of the Local Plan on

Ref.	Who	Summary of comment	Our response
		rise in future housing needs in Wigan, Peel's land to the north of the allocation at Mosley Common and at Gin Pit, West of Astley are highly sustainable locations to help meet these needs. The recognition of the findings of the Housing Needs Assessment in relation to broadening the range of homes, need for more affordable homes and the need for more homes for older people is welcomed. To ensure that the plan can be found sound, there must be robust evidence that the amount and types of land identified in the housing supply is capable of fully meeting these needs. As the Strategic Housing Land Availability Assessment is updated, it must consider the range of size, types and tenure of homes which each site is likely to deliver. It must demonstrate an appropriate alignment between needs and supply including enough of the types of homes that PfE acknowledges are of particular importance in boosting northern competitiveness.	housing and employment land – see new policy UP1.
Policy H1: Housing delivery			

Ref.	Who	Summary of comment	Our response
1099-3; 1102-2	Morris and Persimmon Homes	The level of housing growth in Policy H1 should be referred to as a minimum and the figure should be a net figure.	Policy H1 has been amended in this regard.
1099-3	Morris and Persimmon Homes	The Local Plan does not identify a supply of specific deliverable sites for the first 5 years. Simply providing an annual trajectory fails to do this.	This is set out in the SHLAA.
1102-2	Persimmon Homes	The housing trajectory should be extended to 2042. It should distinguish between sites with permission, allocated sites and SHLAA sites.	The council is committed to an early update of the Local Plan housing land – see new policy UP1. Criterion 2d of policy H1 has been amended to distinguish between sites with permission allocated sites and other SHLAA sites.
1102-2	Persimmon Homes	Following adoption of the Local Plan, which will take place in January 2027 at the earliest, Wigan will need to demonstrate a 5-year supply of housing land. This will require a 20% buffer, with a likely requirement of 7,034 at 1/4/27, which is higher than the trajectory figure of 5,876. The position is then likely to deteriorate each year and there is a danger that the plan will immediately be out-of-date on adoption, leading to planning by appeal. The plan would not be effective or consistent with national policy so would not meet soundness tests.	The 5 year supply will require only a 5% buffer on adoption of the Local Plan in accordance with NPPF paragraph 78. When assessing compliance with NPPF paragraph 78c, footnote 42 confirms that the percentage should be applied in aggregate across the joint local plan area.

Ref.	Who	Summary of comment	Our response
Housing requirement too low			
1089-1; 1091-1; 1092-2; 1095-1; 1099-3; 1102-2; 1103-3; 1104-1; 1120-5; 1122-2; 1124-1; 1125-2; 1126-3; 1128-1; 1130-2; 1131-2; 1132-2; 1134-2; 1135-2; 1138-2; 1140-1	Applethwaite; Northern Trust; Wainhomes; Strategic Land Group Ltd; Morris and Persimmon Homes; Persimmon Homes; Story Homes; Harworth Group; Places for People; Miller Homes; Bellway Homes; The Baldwin Estate; Gladman Developments; Barratt Homes; A&A Broster Partnership; Trustees of Legh Estate and Bloor	Once PfE becomes five years old (in March 2029), Wigan will be required to deliver sufficient housing to meet the latest LHN figure of 1,418 dwellings per annum. This is a very significant (46%) increase that will need to be addressed in both plan making and decision taking, including the 5 year housing land supply. The Local Plan is only proposing to achieve 67% of this figure. We acknowledge the transitional arrangements set out in the NPPF but the Local Plan is not bound by the Places for Everyone figure because this is a minimum. Working pro-actively and accounting for Wigan's LHN figure throughout the entirety of the emerging plan period will place WMBC in the strongest position to meet objectives. This will require the allocation of further sites, including in the Green Belt. Basing the Local Plan on the annual requirement of 972 homes set in the PfE Plan is not ambitious enough and will result in a significant under provision once the LHN figure derived from the Government's new standard method is applied from March 2029.	A plan period to 2039 aligns with the plan period of the Places for Everyone Plan. It is premature to plan for housing needs beyond 2039 in the Local Plan. We are committing to an early update - see policy UP1 in new section 12 'Update' of the Local Plan.

Ref.	Who	Summary of comment	Our response
	Homes; MCI Developments; Tarleton Estates; Ainscough Strategic Land		
1121-4	Peel Land	The NPPF and revised method for assessing Local Housing Need establish significantly higher minimum housing needs for most areas. The PfE Plan recognises the role that the type of new homes plays in supporting economic growth and achieving northern competitiveness and the GM Mayor has also made clear the importance of boosting the delivery of housing. Achieving these ambitions will require each GM authority, including Wigan, to step up housing delivery, and the Wigan Local Plan should reflect this. In Wigan, the new minimum local housing need is significantly higher that the PfE requirement and higher than the levels of delivery in recent years. In this changing context, it is clear that the Local Plan must not merely plan for minimum needs. A new Spatial Development Strategy (SDS) for Greater Manchester will be required to be in	See above.

Ref.	Who	Summary of comment	Our response
		place before 2029 when PfE will be 5 years old and is likely to be in preparation from 2026 onwards. In this context, it would be a more effective use of resources to ensure the Local Plan sets the direction of travel for Wigan in line with the expectations in the updated NPPF and new Standard Method for assessing housing needs. It is essential that the plan is justified by being based upon a robust and up-to-date assessment of local housing need, delivery from the identified supply of sites, potential drivers of higher housing need and the latest calculation of need using the standard method. In addition, it should be based on an assessment of economic needs and up-to-date evidence of the availability of housing and employment land supply including progress of delivery. It is essential that this is informed by up-to-date monitoring data.	
1121-4	Peel Land	The annual average of 972 homes is the minimum need identified by the PfE Plan. Current evidence suggests that needs are significantly higher than this. Part 1 of the policy should be amended as follows: "Over the period	Policy H1 has been amended to state: "a minimum of 16,524 net additional homes, or an average of 972 homes per annum,..."

Ref.	Who	Summary of comment	Our response
		2022-2043 an average of at least 972 homes per annum should be provided...." Factors that indicate that the Plan should be planning for higher than minimum needs include that the minimum need has risen from 972 homes per annum to 1,452 homes per annum, and that this higher need will apply by no later than 2029, and potentially sooner. This is just 2 years after the adoption of the Local Plan, which is not enough time to prepare and adopt a new plan which meets the higher housing needs and to maintain a five-year supply against that need. The requirement to demonstrate a five-year supply will apply throughout the transition to much higher housing needs The supply of sites to meet identified needs was not tested as part of the examination of the PfE Plan and is a task for Local Plans to undertake. The PfE viability assessment highlighted significant challenges on identified sites. Viability testing must be undertaken as part of Local Plan preparation and this testing should also inform a justified allowance for the non-delivery of identified sites. The recognition of	Viability assessment has been undertaken for the plan.

Ref.	Who	Summary of comment	Our response
		the need for a flexibility allowance is supported but it is unclear how the proposed approach is justified and therefore whether a higher allowance may be needed.	
1091-1	Northern Trust	If the Local Plan doesn't deliver more housing than the PfE requirement, it will be unable to demonstrate a 5-year housing supply shortly after adoption. If this is the case, both the PfE Plan and Wigan Local Plan will be deemed out-of-date. The NPPF tilted balance will be engaged as will the new Green Belt exception where development ceases to be inappropriate if the land comprises grey belt and meets other criteria.	The Local Plan is working to the PfE housing land requirement but now also includes a commitment to an early housing land-led plan update – see policy UP1.
1099-3; 1102-2	Morris and Persimmon Homes	The Local Plan should pursue a higher housing requirement in principle. Such low provision is incapable of providing the house types, tenures (including affordable housing) and sizes needed. The PfE requirement is lower than actual delivery in recent years. The standard requirement of 1,452 would be realistic and achievable.	The housing requirement is perfectly capable of securing the house types, tenures (including affordable housing) and sizes needed.
1102-2	Persimmon Homes	Policy H1 does not give scope to allocate sufficient additional sites, including Green Belt land to meet housing requirements.	We don't not need additional Green Belt release for housing in this Local Plan.

Ref.	Who	Summary of comment	Our response
1092-2; 1120-5; 1122-2	Wainhomes; Places for People; Miller Homes	By failing to plan for the latest LHN figure (1,418 dpa), Wigan risks failing to deliver a sufficient quantity of affordable and specialist housing. Wigan should seek to uplift the overall housing requirement in order to meet affordable need.	The housing requirement is perfectly capable of securing the affordable and specialist housing needed.
901-3	Cityheart Ltd	While it is appropriate to draw the housing target from the PfE Plan, it should not be viewed as a ceiling, particularly in light of the acknowledged need for new homes across the country. Against this backdrop, it seems inappropriate to stress the phased approach of the PfE Plan without any caveat as this does not reflect the critical need for housing, nor does it reflect actual levels of delivery.	Policy H1 has been amended to state: "a minimum of 16,524 net additional homes, or an average of 972 homes per annum,..."
1133-2	MCI Developments	It is not necessarily the case that higher housing numbers need to be considered at the GM level first and there is no immediate pressure for this to occur. As such, sufficient headroom should be made available within the Local Plan to positively address some of the shortfall. Under almost every other transitional circumstance set out in the NPPF, the proportional extent of this shortfall would require an immediate review of the Local Plan.	The Local Plan now includes a commitment to an early housing and employment land-led plan update – see policy UP1.

Ref.	Who	Summary of comment	Our response
1135-2; 1125-2	MCI Developments; Barratt Homes	Whilst the Local Plan will be examined under the December 2023 NPPF, the December 2024 NPPF and local housing need are material considerations. The implications of not planning to meet local housing needs should be considered through the Sustainability Appraisal.	See above.
1089-1; 1140-1; 1133-2	Applethwaite; Ainscough Strategic Land; MCI Developments	The Council should consider identifying safeguarded or reserve sites, to ensure flexibility both within and beyond plan period.	See above.
Suggested further allocations – non-Green Belt			
1089-1	Applethwaite	Barn Lane, Golborne.	This site is identified in our potential housing land supply.
1113-1	Seddon Homes	Land west of Rowton Rise, Standish. The site is available now, is not in the Green Belt and is identified as safeguarded land in the Local Plan. Seddon Homes have recently submitted an EIA Screening Request and pre-application request for the site.	This site is covered by policy H9 in the Local Plan.
1135-2	MCI Developments	Land at Belle Green Industrial Estate, Ince is a brownfield site in a sustainable urban location that could deliver up to 80 units, providing a mix of market and affordable dwellings, at a	This site is identified in our potential housing land supply.

Ref.	Who	Summary of comment	Our response
		density ensuring that BNG can be delivered. It is previously developed land with limited constraints on site. Vehicular access can be gained off Belle Green Lane, or a new access off Pennington Lane. The site is achievable for development and there is a reasonable prospect that housing could be developed during the early years of the Plan. The proposed site is partially contained within a slightly wider 2024 SHLAA site that is in multiple ownerships. The site is not identified in the 2024 Economic Market and Employment Land Assessment and does not form any part of the employment land supply.	
Suggested further allocations – Green Belt			
1091-1	Northern Trust	Land North of Orrell Road and East of Spencer's Lane, Orrell.	We don't not need additional Green Belt release for housing in this Local Plan.
1091-1	Northern Trust	Land North of Golborne Road and East of Upland Drive, Ashton.	See above.
1092-2	Wainhomes	Land at Mill Farm (400 homes).	See above.
1096-4	Taylor Wimpey	The employment-led development at M6 Junction 26 (Policy J3) could also support a mix of around 250 new homes, in accordance with Wigan's housing needs.	See above.

Ref.	Who	Summary of comment	Our response
1092-2; 1120-4; 1120-5	Places for People	Site at Miles Lane, Appley Bridge.	See above.
1102-2	Persimmon Homes	Site at Bridge Farm, Lily Lane, Bamfurlong (200 homes).	See above.
1103-3	Story Homes	Land West of Old Pepper Lane, Standish.	See above.
1104-2	Harworth Group	Land at New Springs, Wigan (800 homes).	See above.
1114-4	Seddon Homes	Land west of Wigan Road, Standish (280 homes).	See above.
1122-2	Miller Homes	Land at Lee Lane Farm, Abram (400-450 homes).	See above.
1125-2	Barratt Homes	Land at Drummer's Lane, Bryn (335 homes).	See above.
1130-2	A&A Broster Partnership	Land at Wigan Road / Drummers Lane, Bryn.	See above
1131-2	Barratt Homes	Land at North Lane/South Lane, Astley.	See above.
1132-2	Trustees of Legh Estate and Bloor Homes	Land at Sandy Lane, Golborne.	See above.
1133-2	MCI Developments	Land at Arbour Lane, Standish.	See above.
1134-2	MCI Developments	Land at Close House Farm, Hindley (60 homes).	See above.

Ref.	Who	Summary of comment	Our response
1140-1	Ainscough Strategic Land	Land at Pepper Lane, Standish.	See above.
Housing land supply			
1021-4	Home Builders Federation	If the Council intends to include an allowance for windfalls, they should have an appropriate evidence base to support this, in line with NPPF requirements. It is beneficial for the Council to include a level of flexibility in the supply. This buffer should be sufficient to deal with any under-delivery which is likely to occur from some sites and to provide flexibility and choice within the market. It is important that a strategy is put in place which provides a sufficient range of sites to provide enough sales outlets to enable delivery to be maintained at the required levels throughout the plan period. It is important that housing delivery is effectively monitored so that if housing monitoring shows delays to housing delivery across Wigan action is taken to address this as soon as possible. Additional sites should be allocated so they that can be easily and quickly brought forward to address any under-delivery of housing supply.	The council considers that it has an appropriate evidence base to support a windfall allowance, as set out in the SHLAA. The council includes a level of flexibility in the supply, which it considers sufficient to deal with any under delivery and to provide flexibility and choice. The council actively works with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes. The supporting text to Policy H1 has been amended to emphasise that this will take place. Policy H1 highlights that housing delivery will be monitored to ensure that action is taken if delivery fall short of requirements. The SHLAA identifies land to accommodate more than 10% of the

Ref.	Who	Summary of comment	Our response
		The NPPF requires Local Plans to identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare, unless there are strong reasons why this can't be achieved. One of the chief obstacles for small developers is that funding is difficult to secure without a full, detailed, and implementable planning permission. Securing this is difficult if small sites are not allocated. We therefore wish to see the 10% small sites allowance delivered through allocations and not windfall. The inclusion of additional non-strategic allocations would expand the range of choice in the market and be of a scale that can make a contribution to housing numbers earlier in the plan period. The Plan's policies should ensure the availability of a sufficient supply of deliverable and developable land to deliver Wigan's housing requirement. We strongly recommend that the plan allocates more sites than required to meet the housing requirement as a buffer.	housing requirement on sites no larger than one hectare. The Council considers that it has identified a supply of deliverable and developable housing sites from a range of sources, as set out in Policy H1 and the SHLAA.
1024-2	Golborne and Lowton West	Object to the inclusion of land off Barn Lane in Golborne in the SHLAA, due to flood risk. The site should be removed from the SHLAA until a	Barn Lane will only be developed if flood issues can be resolved in line with national policy, PfE policy JP S-4 and local

Ref.	Who	Summary of comment	Our response
	Neighbourhood Forum	suitable solution to protect existing properties can be found and fully implemented.	plan policy EN10 Development and Flood Risk.
1091-1	Northern Trust	Delivery from the sources of housing supply is overstated. Many of the allocated sites, such as North Leigh Park and South Hindley, have known constraints which could affect viability or require significant infrastructure to be brought forward.	Noted.
1095-1	Strategic Land Group Ltd	The Council's housing supply position has not been subject to independent review. The level of detail provided for each of the proposed sites is not sufficient to justify their conclusion or confirm their developability in the context of the NPPF.	Noted.
1095-1	Strategic Land Group Ltd	There is a significant reliance on brownfield land and sites that currently do not have planning permission. Brownfield land can be subject to significant deliverability and viability issues. The evidence put forward on viability in the PfE Plan demonstrated that 70% of the claimed supply across the nine districts was unviable, even on the basis of 100% market housing.	The council is working well with the GMCA and Homes England to support the delivery of brownfield sites.

Ref.	Who	Summary of comment	Our response
1095-1	Strategic Land Group Ltd	For all sites currently without planning permission in the SHLAA, a level of information should be supplied which justifies the site's inclusion. This could include information from developers and landowners as well as other technical information to demonstrate there are no substantive issues precluding delivery and justification for claimed capacity. This level of information has not been provided for the majority of sites included in the supply. As a minimum, information should be provided in a proforma on these matters.	Further site specific information will be provided in the 2025 SHLAA update, not specifically in the Local Plan.
1095-1	Strategic Land Group Ltd	Allocations are anticipated to deliver 6,494 homes over the plan period. If even 1 or 2 of these stalled, this could have sizeable consequences for housing supply in Wigan. The lack of progress on some of the allocations needs to be factored into the Council's strategy and ensure that sufficient flexibility is inbuilt into the Council's supply.	The council is working well with the GMCA and Homes England to support the delivery of brownfield sites, including North Leigh Park, South Hindley and Westwood Park.
1095-1	Strategic Land Group Ltd	The assumptions adopted in the SHLAA in terms of build out rates are considered too optimistic and do not reflect slowing current market build out rates. Updated Lichfield's research shows a dip in build out rates as a result of tougher market conditions. It is	Delivery assumptions in the SHLAA reflect developer information or recent delivery rates achieved in the borough, where possible. These rates often exceed those set out in the Lichfield's research. Otherwise, a general build rate of 25

Ref.	Who	Summary of comment	Our response
		important that the council adopts more conservative figures to reflect the slower construction market.	dwellings per annum per developer has been applied.
1099-3	Morris and Persimmon Homes	It is inappropriate that the majority of future supply should come from large SHLAA sites. If they are deliverable and / or developable they should be allocated by the Local Plan. Site allocation is necessary to set out a coherent spatial distribution, to set out site specific development criteria where appropriate, and to co-ordinate the delivery of infrastructure and housing. It will provide a more realistic number of dwellings which a site can be expected to contribute than a SHLAA assessment. It is also necessary to ensure an adequate Sustainability Appraisal. The allocations should then be subject to scrutiny by interested parties through the plan-making process and assessed by the Inspector.	As set out in Policy H1, the housing supply comes from a variety of sources including sites allocated in the PfE Plan, sites allocated in this plan, sites under construction, sites with planning permission, windfall sites and a small sites windfall allowance. The majority of future supply is not from unpermissioned large SHLAA sites.
1103-3	Story Homes	The SHLAA fails to include essential information on the size, density assumption, availability, suitability and likely economic viability of sites. Site size, developable area and extent of site constraints need to be made available to demonstrate that evidence in the SHLAA meets NPPF requirements.	The 2025 SHLAA update will include more details on sites than previous iterations, including the information suggested. We consider the approach taken reflects NPPF and PPG requirements.

Ref.	Who	Summary of comment	Our response
		In terms of availability, the SHLAA falls short of the level of information that is required to demonstrate that there are no legal or ownership impediments to development. It lacks data regarding the identity or intentions of landowners for almost all sites, except where in council ownership. There is no evidence that the SHLAA 2024 has considered PPG guidance on the suitability of sites and if this is the case it isn't clearly presented. The Council will need to undertake a viability assessment of the housing trajectory to ensure the sites included can be considered developable. There is a lack of clarity around association with a willing developer on council owned sites. Specific concerns are raised about four of the council owned sites. The assessment of council owned land demonstrates the council's willingness to include sites that have been available for a long time, with constraints, no strategy to overcome them, and capacity assumptions that are not justified.	The Local Plan is supported by a viability assessment.

Ref.	Who	Summary of comment	Our response
1103-3	Story Homes	Wigan's supply is dependent on brownfield sites which have been available for several years without development coming forward and where ownership is missing. Many are in alternative uses. There are doubts about the funding which could be provided to help bring these sites forward. The Local Plan should undertake a viability assessment of the land supply, including showing the capacity for affordable housing provision across the sites. The existing strategy has failed to deliver sufficient numbers of affordable housing in the borough and the brownfield preference will mean that an insufficient number of market and affordable dwellings will be delivered. The brownfield first approach is incapable of delivering enough homes to meet identified needs. There is insufficient evidence at this stage to demonstrate the sites identified in the SHLAA are suitable, available or developable.	The council is working well with the GMCA and Homes England to support the delivery of brownfield sites. The Local Plan is supported by a viability assessment which considers a range of housing typologies. The Council stands by the developability of its housing land supply for both the 5 year and the plan period. The 2025 SHLAA update will include more detail on sites than previous iterations. We consider the approach taken reflects NPPF and PPG requirements.
1103-3	Story Homes	There is a risk with relying on unproven markets such as Wigan Town Centre. More conservative delivery estimates are required.	Noted. We are not relying on the full potential of sites in Wigan town centre.

Ref.	Who	Summary of comment	Our response
1103-3	Story Homes	The LHNA evidence of housing need does not align with a land supply including sites suitable for high density apartments. A land supply capable of delivering a diverse range of products is required.	We are not aware of any land more suitable for the delivery of apartments than that that is already in our land supply.
1103-3	Story Homes	Clear evidence will be required to demonstrate that allocations at South Hindley, Remaining land South of Atherton, East of Atherton, Remaining land at Landgate and Westwood Park can be considered developable. Where site capacities differ from those claimed as part of the PfE supply this should be evidenced.	Our Site Allocation Assessment Reports refer.
1107-2	Brookhouse	Land to the west of Westleigh Brook and Parsonage Way in Leigh should be included in the SHLAA. A planning application for residential development of the site was submitted in June 2024 and remains under consideration.	This site has been added to the 2025 SHLAA.
1113-1	Seddon Homes	The 2024 SHLAA is out of date and does not reflect the current 5-year supply position. Wigan's 5-year land supply is very marginal and needs to be properly assessed. The SHLAA is based on PfE targets, which are significantly lower than the new standard method and do not account for the inclusion of the standard method in future years. Windfall	The SHLAA has been updated for 2025 and will be updated again for 2026.

Ref.	Who	Summary of comment	Our response
		homes are likely to tail off during the latter end of the plan period as this element of the supply is exhausted. The SHLAA is heavily reliant on sites without permission from 2029 onwards. There is no certainty that these will come forward.	
1113-1	Seddon Homes	There is significant concern over the delivery of the proposed allocations at North Leigh Park, South Hindley and Westwood Park. The supply from PfE allocations has been overstated. There are significant constraints to the delivery of Pocket Nook and West of Gibfield. Updated viability assessment is required of PfE allocations and sites identified in the SHLAA.	The council is working well with the GMCA and Homes England to support the delivery of brownfield sites. including North Leigh Park, South Hindley and Westwood Park. A viability assessment has been prepared to support the Local Plan.
1128-1	Gladman Developments Ltd	The Local Plan relies heavily on 'large sites' identified in the SHLAA, which are proposed to deliver over 50% of the total housing required. This is an unsound approach, particularly as most of the SHLAA sites are brownfield and may not be suitable for large scale housing. There is no obligation on landowners to release these sites for development during the Plan	The council is working well with the GMCA and Homes England to support the delivery of brownfield sites. including North Leigh Park, South Hindley and Westwood Park. Our Site Allocation Assessment Reports summarise the case for the deliverability of North Leigh, South Hindley, East of Atherton, South of Atherton, Landgate

Ref.	Who	Summary of comment	Our response
		period and there is a lack of evidence around their deliverability. There is also a heavy reliance on the strategic allocations to deliver housing targets. Both North Leigh Park and South Hindley are heavily reliant on the delivery of a strategic link road for their full development capacity to be realised. As there is significant work still to be done to gain the necessary funding and planning consents for the outstanding sections of this infrastructure, it is unlikely that significant levels of development will be delivered (in particular at South Hindley) until at least the second half of the Plan period. There is considerable vulnerability to the Local Plan's housing strategy.	and Westwood Park which form key elements of the borough's housing land supply.
1131-2	Barratt Homes Manchester	51% of Wigan's supply does not have an extant permission (8,222 units) and there are significant doubts around developability of some sites. The PfE Plan sets out a supply of 18,739 units over the plan period, which has reduced to 18,686 in the 2024 SHLAA. Barratt has significant concerns about the robustness of the proposed supply, with regards to developability, viability concerns around delivery on brownfield land, and reliance on	Housing supply figures are updated in Policy H1 and the 2025 SHLAA. The supply is considered robust and includes a flexibility allowance which is sufficient to ensure that we meet our land supply requirements in accordance with the PfE Plan, without needing to allocate additional land for new homes in the Green Belt.

Ref.	Who	Summary of comment	Our response
		large strategic allocations. Coupled with the increased housing requirement that will come into effect, it is critical that more land is identified.	
1132-2	Trustees of Legh Estate and Bloor Homes	The SHLAA supply position was not interrogated by the PfE Inspectors and as such was not endorsed through the PfE Plan. Overreliance on the PfE allocations and large-scale draft allocations is not effective in ensuring there is enough land to meet need as there is precedence for allocated sites being slow to deliver and not coming forward as quickly as expected. Significant infrastructure improvements will be required to facilitate some developments. Almost 10,000 units are identified on brownfield and urban sites and there are considerable viability issues that will affect the speed of their delivery, or deliverability completely. Pragmatic timescales, a degree of supply flexibility and a contingence for significant slippages is needed. The overall supply set out in the SHLAA, assuming it can all come forward, is insufficient to meet housing requirements to 2042 by at least 787 units. Therefore, plan is unsound and cannot meet its housing requirement.	Housing supply figures are updated in Policy H1 and the 2025 SHLAA. The supply is considered robust and includes a flexibility allowance which is sufficient to ensure that we meet our land supply requirements in accordance with the PfE Plan.

Ref.	Who	Summary of comment	Our response
1133-2; 1122-2; 1125-2	MCI Developments; Miller Homes; Barratt Homes	The lead-in times in the 2024 SHLAA appear over optimistic. A large element of the supply is to come from large sites and we consider that the SHLAA underestimates their lead-in times, meaning that it overestimates the number of homes that would be delivered during 2029-2034 and 2034-2039. We consider that the 2024 SHLAA also overestimates build-out rates because it utilises information from the 2020 Lichfield's Start to Finish Report, rather than the 2024 edition, which reduces average annual build-out rates. Given the absence of viability evidence, we consider that the claimed SHLAA housing land supply has been overestimated. This casts serious doubts over the developability of a large part of the housing land supply. It is appropriate to apply a 20% reduction to the claimed supply to account for longer-lead in times, lower build-out rates, and an element of non-delivery, given the heavy reliance on large sites, the known viability issues with sites, the lack of up-to-date viability evidence, and the lack of evidence on the developability of sites.	Housing supply figures are updated in Policy H1 and the 2025 SHLAA. The supply is considered robust and includes a flexibility allowance which is sufficient to ensure that we meet our land supply requirements in accordance with the PfE Plan. Viability assessment has been undertaken for plan.

Ref.	Who	Summary of comment	Our response
1135-2	MCI Developments	MCI support the Belle Green Lane site's inclusion in the SHLAA but object to the exclusion of the previously developed element of the land.	The site boundary in the SHLAA has been amended to include the previously developed part of the land.
1135-2; 1125-2	MCI Developments; Barratt Homes Manchester	Given the absence of viability evidence, we consider that the claimed SHLAA housing land supply has been overestimated. This casts serious doubts over the developability of a large part of the housing land supply. It is appropriate to apply a 20% reduction to the claimed supply to account for longer-lead in times, lower build-out rates, and an element of non-delivery, given the heavy reliance on large sites, the known viability issues with sites, the lack of up-to-date viability evidence, and the lack of evidence on the developability of sites. This would reduce the claimed supply from 15,339 homes to 12,474 homes during the plan period. and reduce the total supply from 18,686 homes to 15,619 homes, which is insufficient and is a shortfall of 908 homes. The claimed supply also assumes that all small sites with planning permission will come forward, which is optimistic. The buffer in the claimed housing supply (2,159 homes) is insufficient and the Council needs to	Viability assessment has been undertaken for plan. Housing supply figures are updated in Policy H1 and the 2025 SHLAA. The supply is considered robust and includes a flexibility allowance which is sufficient to ensure that we meet our land supply requirements in accordance with the PfE Plan.

Ref.	Who	Summary of comment	Our response
		increase the supply of housing land. The shortfall is even more apparent when considered against the local housing need figure of 1,441 dwellings per annum.	
1137-3	United Utilities	We would welcome detailed liaison with the council on your latest SHLAA so that any specific constraints and issues relating to water and wastewater matters can be identified.	We will liaise with United Utilities on the SHLAA going forward.
Other			
1108-1	St Helens Council	St Helens Council released land within the Green Belt to meet its own need and as the authority remains unable to meet any of the development needs of Wigan, Policy H1 is supported. This confirms that Wigan's housing requirement figure will be met over the plan period, with the draft Duty to Cooperate Statement of Common Ground detailing that there is no requirement for adjacent authorities to contribute to meeting needs.	Support welcomed.
1116-2	Anwyl Homes	Support.	Support welcomed.
1356-2	Green Earth Development Group	The policy should recognise that it is essential there is a sufficient and steady supply of minerals to provide for residential development and associated infrastructure over the plan period. It should encourage the indigenous	A Joint Greater Manchester Waste and Minerals Plan is under preparation with adoption scheduled in 2028.

Ref.	Who	Summary of comment	Our response
		sourcing of minerals to deliver the borough's housing needs. The NPPF requires authorities to recognise the importance of a steady supply of minerals to meet development needs, and the importance of mineral development to the local economy. To ensure consistency with national policy, and to provide a strategy to meet housing need, Policy H1 should promote and safeguard Morley's Quarry Southern Extension for future mineral extraction.	
Astley and Tyldesley			
380-1	Cllr Jess Eastoe	Object to the continued allocation of housing developments in the Astley and Tyldesley area, which has already seen significant levels of housebuilding in recent years (1,761 homes built between 2018-25, with over 1,000 on its way, plus the industrial estate being built behind the farmhouse). This is a disproportionate proportion of the borough's overall housing growth and represents a burden on our local infrastructure and environment. The 129 brownfield sites identified across the borough are capable of delivering over 7,000	Housing land supply is spread across the borough. This Local Plan allocates housing sites in Ashton, Atherton, Hindley, Leigh and Wigan. In addition, the Local Plan includes policy provision for sustainable housing growth in Standish and the Places for Everyone Plan allocated land for housing in Atherton and Lowton, as well as at Mosley Common. All developable sites within the borough's Brownfield Land Register are included within the borough's housing land supply. However, there is unfortunately

Ref.	Who	Summary of comment	Our response
		homes and should be the clear priority for meeting housing targets. The continued focus on open land and Green Belt around Astley and Tyldesley is unjustified and goes against national planning guidance, which strongly encourages development on brownfield land first. It is also inconsistent with the council's own stated environmental and regeneration goals. Residents raise serious and ongoing concerns about the impact of past developments on traffic congestion and water infrastructure. Local roads including the A580 and Mosley Common Road are under constant pressure, with gridlock a daily issue. Public transport is inadequate, and services are not keeping pace with rising demand. Additionally, repeated issues with low water pressure and surface flooding highlight the unsuitability of further large-scale development in this area. The economic case for these proposals is flawed. The kinds of employment opportunities being promoted-mainly in warehousing and logistics-do not reflect the skills, aspirations, or needs of many residents. These are not jobs	an insufficient supply of developable and suitable brownfield sites in the borough to address identified development needs without also relying on the development of greenfield sites. We are no longer proceeding with the proposed site allocation at Bridgewater West in the Publication version of the Local Plan. The Local Plan aims to deliver a mix of housing types, sizes and tenures to meet needs. The proposed homes at the higher end of the local housing market will help to attract and retain highly skilled workers within Greater Manchester, including Wigan residents who seek these types of properties.

Ref.	Who	Summary of comment	Our response
		that offer long-term progression or meaningful incomes. The expensive housing proposed will attract buyers from outside the borough rather than improving social mobility or access to affordable homes for Wigan residents. This is not inclusive growth.	
Atherton			
100-2	Private Individual	There is no breakdown of where Local Plan housing allocations are located. Towns like Atherton remain under-supported in terms of family housing, accessible bungalows and affordable homes. There is a risk that speculative developments will target towns with lower land values, widening existing inequalities. Will the Council publish a breakdown of new housing allocations by town and ward, showing how each part of the borough is expected to contribute to the supply? Can this policy commit to a geographically balanced approach, where delivery targets per town reflect both land availability and local need?	The Local Plan housing allocations are identified in the Plan and shown on the Policies Map. The wider housing supply is identified in our Strategic Housing Land Availability Assessment (SHLAA), which identifies the location of housing sites in the borough and sets this out by settlement. It is published on our website and the sites are shown on our Evidence Map. An authority monitoring report is produced annually which sets out progress with local plan preparation and the performance of policies in the development plan. The Local Plan is supported by an Infrastructure Delivery Plan and the

Ref.	Who	Summary of comment	Our response
		Annual monitoring of housing delivery should go beyond counting units. Local people deserve visibility and input into the types of homes being built, whether affordable housing targets are being met and how well infrastructure is keeping pace with housing growth (e.g. GP access, school capacity, public transport). Can the public be invited to co-produce a local housing evaluation framework, particularly in towns like Atherton with long-standing underinvestment? While flexibility is important, in practice, windfall development is often uncoordinated and outside local housing mix needs. It can lead to inappropriate land use, such as replacing community facilities or employment sites. Can the Council commit to community consultation on major windfall sites, especially in areas already facing housing pressures? Will any future windfall approvals be required to demonstrate how they meet identified local housing need and community benefit? The housing trajectory provides no clarity on where growth will take place, whether it aligns with town centre regeneration needs, whether it's backed by local infrastructure investment, or	council produces an Annual Infrastructure Funding Statement that provides information about financial contributions that the council has secured for infrastructure from developers through S106 agreements. Any applications for major windfall development are subject to public consultation through the planning process and will be assessed against policies in the development plan, including on housing mix, and national planning policy, Engagement takes place as part of the Local Plan process but there are no plans to produce housing evaluation frameworks for individual towns. The SHLAA includes mapping showing the location of the borough's housing supply. The Local Plan includes a policy on Atherton Town Centre, which includes a priority to sustain and enhance its residential locations.

Ref.	Who	Summary of comment	Our response
		whether it helps rebalance previous neglect (as seen in Atherton). Will the Council create and publish a spatial housing delivery map, tied to the trajectory and showing how regeneration and infrastructure will follow growth? Can areas like Atherton be given priority for well-planned, locally-led housing development that revitalises the town centre and serves its community?	
Golborne and Lowton			
133-1	Private Individual	Lowton is already suffering from heavily congested roads and more homes will worsen the situation for everyone. The local infrastructure cannot handle the added pressure. More traffic will make air quality in Lowton worse, which is a public health concern. Very little green space remains in Lowton. These spaces are vital for mental and physical well-being, offering opportunities to exercise, relax, and connect with the community. Lack of safe outdoor areas for children to play - the situation will be made worse by more cars on the road and fewer open spaces.	The Local Plan does not allocate any housing sites in Golborne or Lowton. The proposed allocations in this area are for employment development. The impact of proposed development on road capacity is covered by policy T2; air quality is covered by policy EN7; open space provision is covered by policy PE3, now PE4 and infrastructure capacity by policy PE4, now PE6.

Ref.	Who	Summary of comment	Our response
		Impact on public services, which are stretched beyond their limits, including primary schools, GP surgeries and no NHS dentists. The infrastructure cannot support further growth.	
1067-7	Private Individual	Proposed housing developments accessed by the A579 Atherleigh bypass near the A580, Mayfield Drive and Pocket Nook are in areas that have already been subject to extensive recent housebuilding. This has had negative impacts in terms of congestion, school pupil intake, healthcare provision and utilities, such as sewers. Further development will make the situation worse. One of the farmers does not wish to sell their land and this will result in the loss of productive farmland and green space.	The impact of proposed development on road capacity is covered by policy T2; school and health care capacity is covered by policy PE4, now PE6 and open space provision is covered by policy PE5. The capacity of utility infrastructure, including sewers, is the responsibility of utility undertakers who will be key stakeholders at the planning application stage.

Ref.	Who	Summary of comment	Our response
1093-2	Lowton and Golborne Traffic Advisory Committee (LaGTAC)	No developments, beyond those currently approved shall be considered or approved until the Lane Head South bypass is built. Plans to develop any land further must be withdrawn and land currently in the SHLAA removed. LaGTAC have looked at the huge increase in housing and commercial development within Lowton and Golborne wards over the last 50 years. There has been a massive change in land use for building with no significant changes in the road infrastructure over the same period. If the council is aiming to be environmentally friendly why does it not insist that all future buildings are built to Carbon Zero requirements, rather than allow developers to build the slums of the future using traditional construction? Enforcement would be in the arms of the government (not local authorities) through statute. Legislation had been proposed yet abandoned in 2015. Why have the councils not lobbied the Government on this issue. Planning law continues to be a shambles.	The council has a statutory duty to consider all valid planning applications that are submitted. The traffic impact of proposed developments will be considered in accordance with the development plan, including policy T2. Policy EN9 supports and facilitates low carbon developments in the borough.

Ref.	Who	Summary of comment	Our response
Standish			
383-1	Private Individual	As a Standish resident, I support the development of the local area as such that it is in keeping with the local area.	Support welcomed.
Affordable housing			
413-5	Private Individual	The waiting list for Council housing has not reduced over last three years, because despite building more homes, social housing has been given to 'out of towners'. Concern these may become ghettos in the future.	The Council is currently reviewing its housing allocations policy to make allocation rules fairer and simpler to understand, with tighter rules in terms of eligibility.
573-1	Private Individual	How will the Council ensure that proposed affordable homes remain affordable in the long term? Otherwise, as rents rise, there could be an increase in evictions and subsequent homelessness.	Rents for properties let at 'social rent' are set based on a formula set by the government to ensure affordability. Homes under the council's Discounted Homes Scheme are subject to provisions to ensure they remain affordable in perpetuity.
General issues			
267-1; 269-1; 271-2	Private Individuals	Homes are not needed as there are lots already for sale.	Housing requirements are derived from a methodology set by Government, which is based on local housing stock, adjusted upwards to reflect local affordability pressures. The council is required to deliver additional homes to increase the level of

Ref.	Who	Summary of comment	Our response
			housing stock. Most homes for sale are occupied.
374-2	Private Individual	New homes will put further pressure on social infrastructure that are already oversubscribed, including schools, doctors, hospitals, vets, waste management, emergency services etc.	Agree that new homes put additional pressure on social infrastructure. Policy PE4, now PE6 seeks to address this.
269-1	Private Individual	New homes will lead to further congestion on an already congested road network.	This is addressed by PfE Policy JP-C8: Transport requirements of new development.
267-1; 269-1; 365-1	Private Individuals	Loss of valuable open spaces that are vital for recreation, and mental health and wellbeing.	This is covered by policy PE3, now PE4.
374-2	Private Individual	We don't need more executive homes. New homes should be affordable to all.	The Local Plan aims to deliver a mix of housing types, sizes and tenures to meet identified needs which includes a requirement for affordable housing provision.
365-1	Private Individual	Impact on wildlife.	Development is now subject to biodiversity net gain, and policies in the Local Plan reflect that, notably policy EN4.
1320-1	Private Individual	Has account been taken of the Government's intention to move some departments and staff to the North West, with Wigan being an ideal location?	The housing requirements are set in the Places for Everyone Plan, not this Local Plan.

Ref.	Who	Summary of comment	Our response
		International migration puts extra pressure on residential housing figures and could significantly impact on plan requirements.?	
374-2	Private Individual	We need robust opposition to central government arbitrary house building targets.	Consultation on the changes to national planning policy which introduced the government's new standardised methodology to calculating housing needs was undertaken. Regardless, the housing requirement is set in the Places for Everyone Plan, not this Local Plan.
92-1	Private Individual	There are plenty of empty properties that could be adapted and plenty of existing social housing that could be upgraded to accommodate families in need, instead of building new homes.	The council uses a range of tools and incentives to bring long-term empty homes back into use including mass mailouts to property owners, targeted outreach and bespoke advice to help owners, the marketing of empty homes with local developers and landlords to help facilitate a sale, financial incentives and, where needed, timely and proportionate enforcement action.
92-1	Private Individual	Find it difficult to support plans for more new homes at a time where the housing market is under scrutiny. How can the Council justify spend in the current economy when it is too poor to adopt roads or playgrounds? S106 terms need to be stricter and require money rather	The housing requirement is set in the Places for Everyone Plan, not this Local Plan. The vast majority of homes that will be built will be delivered by private housebuilders, not the council. Section

Ref.	Who	Summary of comment	Our response
		than facilities. This adds additional strain to the area unnecessarily and in effect "double taxing" hard working families.	106 will be applied in accordance with national legislation.
500-1	Private Individual	The Council also needs to look at smaller parcels of land for homes of different kinds, including bungalows. This includes land in the Green Belt. This will enable people to stay in the village in which they live and free up larger family properties.	Policy H2 requires the provision of an appropriate mix of house types, sizes and tenures to meet identified housing needs. The supporting text to Policy H2 also specifically identifies a significant need for level-access bungalows.
Other			
1079-10	Jo Platt MP	Whilst effort appears to be given to create opportunities for walking and cycling in and around our town centres, there are numerous instances of our natural open spaces being allocated for housing developments, particularly in the east of the borough. Every opportunity should be taken to embrace existing green open spaces to create walking and cycling routes in our natural surroundings. The allocation of housing development sites needs to be more evenly distributed across the borough and not weighted towards the east of the borough.	The council has a statutory duty to identify sufficient land to meet identified housing needs. Unfortunately, there is an insufficient supply of suitable and developable brownfield sites to meet this need, with a reliance also on greenfield delivery. The proposed site allocation policies for housing include criteria to retain and enhance green infrastructure provision within these sites and to safeguard the public rights of way network. The housing supply comes from a range of sources and is spread across the borough.

Ref.	Who	Summary of comment	Our response
1023-2	National Highways	Would like to see further detail regarding 'grey belt' sites in the Plan, as these are most likely to impact the Strategic Road Network. Recommend these are shown on the Policies Map or on additional supplementary mapping.	As explained in the introduction of the Local Plan, the plan is being examined against the December 2023 version of the National Planning Policy Framework which pre-dates the concept of grey belt.
1401-2	Private Individual	Health Impact Assessments should be a requirement of any housing developments of 25 or more houses.	This is covered by Policy PE1 which requires proposals for major development to be supported by a Health Impact Assessment or a Planning for Health Checklist.
Policy H2: Housing mix			
Affordable housing			
571-3	Private Individual	Agree with the provision of more affordable housing, with homes for social rent prioritised but it should not be caveated with 'where possible' because that gives developers an 'out' from fulfilling the requirement. The need is for social housing, not housing that is 20% below market rate.	The policy requirements are subject to viability, as required by national planning policy.
922-1	Private Individual	Support the Local Plan's emphasis on trying to build more starter homes and smaller homes for empty nesters.	Support welcomed.

Ref.	Who	Summary of comment	Our response
576-14	Private Individual	The percentage of affordable homes in Policy H2 is too low given wage levels in Wigan, which means that Wigan residents will not have access to new better-quality housing. The majority of rented property should be affordable.	The 25% requirement reflects up-to-date evidence in the Wigan Housing Needs Assessment.
1022-3	NHS Property Services	As part of implementing Policy H2, the Council should consider the need for affordable housing for NHS staff and those employed by other health and care providers in the locality. When staff cannot afford to rent or purchase suitable accommodation within reasonable proximity to their workplace, this has an impact on recruitment and staff retention. As the population grows in areas of new housing development, additional health services are required, meaning the NHS must grow its workforce to serve them, which means that ensuring that NHS staff have access to suitable housing at an affordable price within reasonable commuting distance is important. Ensure that the local need for affordable housing for NHS staff is factored into housing needs assessments, and any other relevant evidence base studies that inform the Local Plan.	When implementing Policy H2, the Council will look at identified local housing needs. The Wigan Local Housing Needs Assessment considered affordability of prices and rents for selected key workers, including nurses. This indicated that between 25% and 35% of a nurse's income would be spent on lower quartile rent, depending on earnings.

Ref.	Who	Summary of comment	Our response
		Consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers.	
1062-6	Castle Green Homes Limited	The Council should evidence how the affordable homes figures in criterion 1 have been subject to viability testing to align with national planning policy and guidance. The viability testing should apply to both the overall level of affordable homes delivered and the tenure split. Notwithstanding the comments on viability testing, the following policy amendment is suggested: 'Subject to viability, developments of 10 homes or more will only be permitted where at least 25% of the homes delivered are affordable, comprising a tenure split of 25% affordable home ownership and 75% for rent, with homes for social rent prioritised. Alternative tenure splits will be permitted where justified by local needs and subject to viability.' Criterion 5 relates to meeting the needs of older people and people with disabilities. Whilst this is desirable, greater clarity is needed. It is	The policy requirement for at least 25% of the homes delivered being affordable is subject to viability – policy H2 criterion 1 refers.

Ref.	Who	Summary of comment	Our response
		unclear whether the intention is for all housing development to be navigable by older people and people with disabilities and how this is to be measured or achieved. It is also unclear whether the intention is to signpost towards the Buildings Regulations or to achieve a different standard. Criterion 6: Whilst 4% is identified as the level of need for wheelchair accessible housing in the LHNA, this figure must be justified with evidence, including overall viability testing, to align with the NPPF and NPPG Optional Technical Standards. It is not sufficient to simply include for a site-specific viability test within the policy: the policy itself must be subject to an overall viability test.	
1089-2	Applethwaite	Support Policy H2. However, by failing to plan to deliver housing in line with the latest LHN figure, the Council risk failing to deliver a sufficient quantity of affordable and specialist housing. The Local Housing Needs Assessment shows a need for 283 affordable homes a year. In line with Planning Practice Guidance, the Council should uplift the overall requirement to meet affordable housing need.	In accordance with NPPF paragraph 234c, the Local Plan is required to meet the identified housing requirement set out in the Places for Everyone Plan. It is premature to plan for housing needs beyond 2039 in the Local Plan. We are committing to an early update - see policy UP1 in new section 12 ' Update ' of the Local Plan.

Ref.	Who	Summary of comment	Our response
1116-3	Anwyl Homes	Broadly supportive of 25% affordable housing requirement and approach to tenure split, subject to viability, and accepts that affordable housing should be provided on site unless there is clear justification for it to be provided off-site.	Support welcomed.
1120-4	Places for People	Support Policy H2 and considers Local Plan should ensure that a sufficient mix of housing is provided for all needs including delivery of both accessible and future-proofed housing. As a Registered Provider, we will seek to provide in excess of the policy requirement with an aspiration to provide 50% affordable housing on the suggested site in Appley Bridge, based on its model of affordable housing delivery and long term site management.	Support welcomed.
1121-4	Peel Land	The appropriate mix of housing should be considered on a site-by-site basis responding to factors such as up-to-date market demand, the existing stock context and wider policy objectives. There should be no expectation that the proposed development mix of individual sites will comply with a sub-area need mix in the LHNA. Policy H2 should potentially be disaggregated. It should reference the LHNA but recognise that it should be applied with flexibility. The	This policy sets out an appropriate approach to delivering an appropriate mix of homes in line with robust evidence in the HNA. The council's expectation to deliver a distinct and high value residential neighbourhood at Bridgewater West is covered sufficiently in Policy J5.

Ref.	Who	Summary of comment	Our response
		Council's expectation to deliver more larger higher value housing to support the boosting of northern competitiveness should be specifically referenced.	
1121-30	Peel Land	Flexibility to propose alternative affordable tenure splits, where justified, is welcomed, as is reference to specific provision of affordable private rent within build to rent developments. Affordable housing completions have been close to the level of need but in order to sustain and, as required, increase levels of affordable housing provision to meet needs in full, higher levels of housing than the PfE Plan minimum annual requirement will need to be provided. To be found sound, the Plan must demonstrate that the supply of sites proposed and available for housing is capable of meeting the need for more affordable homes in the borough. It must evidence Wigan's contribution to the GM aim of delivering 50,000 more affordable homes. Recommended that the specific targets relating to affordable housing are included as a separate affordable housing policy.	Support welcomed. The affordable housing requitement of 25% in policy H2 relates to the percentage of homes in private developments. That is only part of how affordable housing is delivered with around 65% delivered directly by Registered Providers and the council. Affordable housing is part of the housing mix and appropriately covered in policy H2.

Ref.	Who	Summary of comment	Our response
1131-3	Barratt Homes Manchester	Supportive of the inclusion of affordable housing in new developments and flexibility surrounding viability on non-Green Belt sites. However, the policy should also include provisions for Green Belt sites, in accordance with para. 157 of the NPPF. In Wigan, the affordable housing requirement is 25% so any future policy on residential development in the Green Belt should require 40% affordable provision, subject to viability. Support the specific breakdown of the affordable tenure split, based on the LHNA and welcome the flexibility to propose alternative tenure splits, where justified by local needs.	The Local Plan is being examined under the NPPF 2023 so the golden rules do not apply.
1132-3	Trustees of Legh Estate and Bloor Homes	Welcome the degree of flexibility regarding affordable tenure splits.	Support welcomed.
1401-1	Private Individual	Affordable housing needs to be reinforced.	The provision of affordable housing will be determined in accordance with this policy.
1021-5	Home Builders Federation	The HBF supports the need to address affordable housing requirements. The NPPF is clear that affordable housing policies must take account of viability and deliverability. The Council should be mindful that it is unrealistic	Criterion 1 of Policy H2 clearly states that 25% affordable housing is required subject to viability, and that alternative tenure splits will be permitted where justified.

Ref.	Who	Summary of comment	Our response
		to negotiate every site on a one-by-one basis because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise future housing delivery.	
Housing for older people and other specialist housing			
100-15	Private Individual	Request that older people's housing is delivered near amenities in underserved towns like Atherton	Development is restricted to what is available, but achieving older people's housing near to amenities is always the aim.
100-15	Private Individual	The 4% target for wheelchair accessible homes is not high enough in areas such as Atherton.	The requirement for a minimum of 4% is based on up-to-date evidence set out in the Wigan Local Housing Needs Assessment (2024).
576-14	Private Individual	Given the ageing population, there should be a policy on encouraging downsizing. However, a two-bedroom bungalow won't suit all. Retirees may still want extra space for an office, craft room or spare bedroom.	The borough's ageing population was a key factor that was considered as part of the Local Housing Needs Assessment.
759-1	Anchor Hanover	Encourage the inclusion of a specific older persons' housing policy which includes a clear target for homes for older people. The current approach does not go far enough and could result in unmet housing needs for older people. The LHNA identifies a significant need for specialist homes for older people, in addition to	Policy H2 specifically states that new residential development should contribute to the provision of a mix of homes to help address identified housing needs reflecting the latest Local Housing Needs Assessment. Criterion 7 also specifically supports the delivery of

Ref.	Who	Summary of comment	Our response
		extra care and care bedspaces. The Local Plan should aim to meet this identified need. Anchor's 2020 report highlights that many residents move into supported housing in anticipation of ageing or after a significant life change like retirement, loss of a partner or the onset of health issues. Older people are attracted to features such as communal areas, a local housing manager, on-site activities, safety pull cords and aids and adaptations. Others seek increased security, peace of mind and independence in declining health. Anchor has six older persons' schemes and a care home in Wigan. 5 of these include homes for rent and have around 200 people on their waiting lists. Our properties are in high demand in Wigan and an increase in older persons' accommodation in the Borough would help to alleviate demand on the housing register and Anchor's waiting lists. We also encourage the Council to make specific allocations for older persons' housing to meet the identified need. Rather than requiring a percentage of homes to be built to M4(2) or M4(3) standards (which are not typically reserved for older people and do not meet	specialist provision for older people where there is a demonstrable need.

Ref.	Who	Summary of comment	Our response
		many of the specific needs of older people), a percentage of homes should be required to be specialist homes for older people that meet one of the definitions set out in national planning policy. When making allocations, consideration should be given to the minimum number of older persons' homes needed on a site to ensure viability, which in Anchor's experience is at least 65.	
922-1	Private Individual	Need to be prepared to house the increasing older population.	Criteria 5-8 of Policy H2 refers.
926-1	Churchill Living and McCarthy Stone	A viability study has not been published and therefore, the emerging policy is currently unsound, and unjustified. It is unknown as to whether housing developments of 10+ units can viably implement 25% affordable housing. This is a particular concern for specialist accommodation including older persons housing where viability tends to be more challenging than mainstream housing. Specialist forms of accommodation, like retirement and extra care housing, should be treated differently to open market development.	A Viability Assessment of the Local Plan has been prepared.

Ref.	Who	Summary of comment	Our response
		The Retirement Housing Consortium has produced a briefing note on viability, which looks at the key variables and assumptions that can affect the viability of specialist housing for older people. Sales periods, empty property costs, marketing costs, professional fees and profit levels can all differ from those for general needs housing. In addition to typology specific costs, a host of other costs must be considered (e.g. biodiversity net gain). Our experience elsewhere is that it is commonly agreed that older persons' housing cannot provide full percentages of affordable housing or indeed often cannot provide any affordable housing. Local planning authorities often acknowledge this position within local plans and exempt specialist housing for older people from providing affordable housing. Until a viability assessment has been undertaken, we recommend a similar exemption for older persons housing to be incorporated into the wording of Policy H2. The 2024 Wigan Local Housing Needs Assessment identifies a significant need for specialist accommodation for older people over	

Ref.	Who	Summary of comment	Our response
		the plan period. These findings should be presented within the wording of Policy H2. We recommend the following addition: The delivery of specialist accommodation for older persons will be supported in line with the findings of the latest Housing Needs Assessment: • Annual requirement of 349 specialist C3 units (total demand for 6,284 units by 2041) • Annual requirement of 85 C2 Extra Care units (total demand for 1,528 units by 2041). Policy H2 sets out the requirement for wheelchair accessible homes. We recommend that this is tested within any forthcoming viability assessment given the cost implications of designing and constructing homes to M4(3) standards. Once a viability assessment is undertaken, we would like to be given the opportunity to comment on this once it has been published.	
990-4	Private Individual	Welcome that the projected rise in the ageing population is recognised but disappointing that the Plan only requires developers of 'market led housing' to show how their site meets the	Policy H2 specifically states that new residential development should contribute to the provision of a mix of homes to help address identified housing

Ref.	Who	Summary of comment	Our response
		needs of older people and people with disabilities'. There is no specific housing delivery target to meet the delivery programme recommended in the LHNA (349 level access properties to be built every year from 2023 to 2041). The Plan should include a specific delivery target for the identified new housing sites which approaches the assessment's recommendations, with suggestions as to how this would be delivered. Developers should be advised at the site planning stage that their site 'target' is a requirement, not an option. The lockdown during Covid highlighted the disadvantages of flats with no balconies and limited outside space. In addition, today's older residents are, generally, more active and healthy, which reduces the need for specialist accommodation for the majority, though those with dementia or life limiting conditions may require assistance. New builds delivered specifically for older people would also address the needs of the borough's younger population by having a 'knock on' beneficial effect. Down-sizing would release family homes in established areas	needs reflecting the latest Local Housing Needs Assessment, which includes the need for housing that is suitable for older people. In order to future-proof homes, the PfE Plan requires all new dwellings to be built to the accessible and adaptable standard in Part M4(2) of the Building Regulations and Local Plan Policy H2 requires a minimum of 4% of new dwellings to be built to the Part M4(3) wheelchair accessible standard of the Building Regulations. Criterion 7 of Policy H2 also specifically supports the delivery of specialist provision for older people where there is a demonstrable need. The Local Housing Needs Assessment identifies a need for smaller properties (2 and 1-bedroom) which would enable older people to downsize.

Ref.	Who	Summary of comment	Our response
		already served by existing infrastructure without the need for new build houses. Older people often wish to remain in their own homes, so 'future proofing' to enable them to continue to live independent lives either in small senior communities, or in adapted family homes with neighbours they have known for many years should be promoted. Older people who live in the community and can draw informal support from friends and neighbours, are likely to be happier and require less support from formal care services. The possible reduction in Council Tax income resulting from the provision of smaller homes must be balanced against the benefits of providing the most appropriate supply of accommodation to meet needs, and the potential reduction in care costs.	
1021-5	Home Builders Federation	The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. We consider that the Council needs to work closely with the providers of older persons housing to identify appropriate sites or to provide appropriate policies.	The requirement to meet the accessible and adaptable standard in Part M4(2) of the Building Regulations is set out in the Places for Everyone Plan. The requirement for a minimum of 4% of new dwellings to be built to the Part M4(3) wheelchair accessible standard of the Building Regulations is based on up-to-

Ref.	Who	Summary of comment	Our response
		If the Council wishes to adopt the optional higher standards for accessible, adaptable and wheelchair homes it should only do so by applying the criteria set out in the Planning Practice Guidance. The Council should provide a local assessment evidencing the specific case for Wigan which justifies the inclusion of higher optional standards. If the Council can provide the appropriate evidence to support the policy, then the HBF recommends that an appropriate transition period is included. The HBF considers that if the Council has the evidence to introduce this policy, it may want to consider the most appropriate way to deliver the homes required. This may not always be in the form of M4(3) homes, and may need further consideration.	date evidence set out in the Wigan Local Housing Needs Assessment (2024).
1094-1	Private Individual	The Greater Manchester Coalition of Disabled People (GMCDP) proposes that all Local Plans in GM should include a requirement to build 10% of new private and social housing developments to Building Regulation M4(3) wheelchair accessible standard. The Liverpool Plan and the London Plan both include a requirement for at least 10% of all new homes to be designed to M4(3) standard. The	The requirement for a minimum of 4% is based on up-to-date evidence set out in the Wigan Housing Needs Assessment (2024).

Ref.	Who	Summary of comment	Our response
		PfE Plan includes no reference to the provision of M4(3) wheelchair accessible housing. GMCA felt that this was a matter for Local Plans. The Big Disability Survey 2022 highlighted that there is a significant shortage of wheelchair accessible homes in Greater Manchester, with negative impacts on the health and wellbeing of wheelchair users. The 10 GM local authority planning committees were asked to ensure that all new homes are built to M4(2) standard and 10% to M4(3) standard. The lack of suitably accessible homes can impact upon job opportunities, result in wheelchair users having to move away from their support networks and prevent young people from living independently. There is an ageing population and increasing age may bring mobility impairments, with long covid also having an impact. A policy that requires 10% of all new housing in each GM district to be built to M4(3) standard would avoid confusion and provide a level playing field for developers. Further evidence to support this requirement includes data in the 2011 Census (ageing population and long-term health problems /	

Ref.	Who	Summary of comment	Our response
		disability) and in the GM Strategic Housing Market Assessment. In addition, there are a high number of people claiming Personal Independence Payment and Disabled Living Allowance, some of whom require wheelchair accessible housing. The lack of suitable accommodation can also lead to delays in discharging people from hospital. A 2023 report by Habinteg/LSE found that the typical additional cost of building a wheelchair user home, instead of an accessible and adaptable home, for a disabled adult of working age is around £22,000, with the potential 10 year saving to the individual and the public purse being around £94,000. Costs and benefits vary depending on the age of the wheelchair user. Habinteg/LSE found that disabled people of working age whose access needs at home are met are four times more likely to be in employment. Other benefits include reduced costs to the NHS, reduced requirements for social care, reduced costs of future adaptations and more inclusive communities with people able to live in their own homes, in their own communities.	

Ref.	Who	Summary of comment	Our response
1131-3	Barratt Homes Manchester	Acknowledge the need to accommodate accessible homes within developments and welcome the flexibility in the wording for this to be considered against site-specific factors.	Support welcomed.
1401-1	Private Individual	Housing should be designed for elderly people or be able to be adapted.	Policy H2 refers.
Care leavers			
100-15	Private Individual	Safeguarding care leaver homes through quality, location, and youth-led design and not concentrating them in areas like Atherton, where they are already overrepresented.	It would be a small part of housing development across the borough and not concentrated in any one place.
1021-5	Home Builders Federation	The Council may also want to give more thought as to how they will work with developers and registered providers to provide homes appropriate for care leavers within this provision.	Noted.
Self-build			
100-15	Private Individual	Request the promotion of self-build/community-led development on underused brownfield sites and a town-level map of available plots.	It is promoted in policy H2. We have a register of interest and we also publish our strategic housing land availability assessment and brownfield register
1021-5	Home Builders Federation	Keen to understand the evidence to support the need for custom and self-build housing in	Contents of our register are not in the public domain for privacy reasons. The policy simply says "we will work with developers to agree a sustainable

Ref.	Who	Summary of comment	Our response
		Wigan, and how it has informed the proposed policy. The HBF considers that policy mechanisms could be used to ensure a reliable and sufficient provision of self & custom build opportunities including allocation of small and medium scale sites specifically for self & custom build housing and permitting self & custom build outside but adjacent to settlement boundaries on sustainable sites, especially if the proposal would round off the developed form.	approach" – if there is no need it wouldn't be sustainable and would be parked.
1132-3	Trustees of Legh Estate and Bloor Homes	Further detail should be provided as to how the Council intend to work with developers regarding self-build, particularly in regard to viability	Noted.
Viability evidence			
1132-3	Trustees of Legh Estate and Bloor Homes	Viability testing of housing mix policy will be required in advance of release of Regulation 19 version of Plan.	A viability assessment of the Local Plan has been prepared.
1138-3	Tarleton Estates	The plan is not supported by a viability assessment which evidences that this requirement (and other policy requirements) can be met. Such an evidence base will be needed as the Local Plan is developed. Reserve	As above.

Ref.	Who	Summary of comment	Our response
		the right to provide further comment on this matter as the Local Plan is progressed.	
General			
100-15	Private Individual	Request a commitment to town-level analysis of housing mix and targeted correction where needed; the prevention of a concentration of one-bed, HMO, or supported accommodation units in already saturated areas; raising or localising accessibility housing targets in high-need areas. Housing that supports local families, dignifies older residents, and helps young people build a future. This policy must be enforced in a way that recognises historical imbalance and works toward fairer outcomes across the borough.	The Housing Needs Assessment assesses housing needs across ten sub-borough areas.
901-10	Cityheart Ltd	Welcome this policy, which sets affordable housing requirements, whilst acknowledging the need for flexibility in tenure split and in assessment of viability.	Support welcomed.
1002-4	Cllr Gena Merrett	Housing objectives fit with our own in this area as they prioritise affordable and rented accommodation, homes for older people, children in care and care leavers.	Support welcomed.

Ref.	Who	Summary of comment	Our response
1021-5	Home Builders Federation	Policy H2 would be better set as several separate policies as it contains numerous elements. Density: The HBF do not consider that the density element of the policy is required, and instead it would be beneficial to signpost to the PfE in relation to density requirements. Housing Mix: At present the proposed policy on housing mix adds little to what is stated in the PfE Plan. Therefore, it is recommended the policy is either deleted or more guidance provided. It could be improved by providing more indication of the needs of the area. However, a flexible approach should be taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site, and which ensures that schemes are viable.	With regard to density, the policy clearly signposts to PfE Policy JP-H4. With regard to housing mix, the policy is consistent with PfE Policy JP-H3 but also provides necessary context to support the remainder of the policy in relation to affordable housing, homes for older people and specialist housing and care leavers.
1023-3	National Highways	Recognises the desired outcomes of policy and acknowledges the approach outlined.	Noted.
1058-5	Cllr Debra Wailes	The population of Atherton is ageing, and more family homes could be released if there were good quality apartments available for older people. These should include community features to provide for a better quality of life and to reduce the need for care services. These	Policy H2 supports the provision of a mix of housing types, sizes and tenures to help address identified housing needs, including homes for older people, specialist housing, and single people.

Ref.	Who	Summary of comment	Our response
		would be higher density, contributing to the overall number of homes provided. High quality apartments and small bungalows are required to meet needs of single people.	
1083-3	Lowton East Network Development Forum	Approve of building houses that local populations need, such as starter homes and homes for older people. Don't approve of more 4 or 5 bedroom aspirational housing that only investors or the wealthy can afford.	The policy requires that new housing developments contribute to meeting identified housing needs.
1097-1	Vistry Group Ltd	Supportive of the Council's intention to deliver an appropriate mix and density of housing but an element of flexibility should be applied to the policy to ensure future development can respond to site specific considerations and market factors which can vary based on location. Reference to viability in relation to affordable housing delivery is supported. We are committed to delivering a mix of affordable and other tenures as part of redevelopment of North Leigh Park, relying on alternative funding streams. A viability clause in this policy is critical to secure funding. The current policy is unclear as it is not certain to what degree a reduced contribution can be	Support welcomed. Reduced contributions to the requirement for affordable housing and/or Part M4(3) compliance does not mean a nil contribution. It is the level to which a robust viability assessment concludes can be delivered viably.

Ref.	Who	Summary of comment	Our response
		negotiated and whether this incorporates a nil contribution. The policy should be amended to make clear that this includes a nil contribution.	
1103-4	Story Homes	The varied type, tenure and size of housing in the LHNA requires a variety of housing sites to be made available to meet these needs, in a variety of locations. Consider that the mix of homes in the LHNA is too heavily weighted towards smaller properties and does not reflect change in circumstances since the pandemic, with an uptake of people seeking homes offices and garden space. Much of the LHNA data is based on a 2019 survey, with amendments made following the 2021 Census. Important for this to be updated to reflect current trends. Consider it important for housing mix to be applied flexibly. Policy must allow for developers to propose an alternative housing mix where there is market intelligence and evidence to support this. Support use of a similar spatial strategy to Core Strategy Policy SP1, promoting Standish as an area that can viably deliver a mix of new homes. The suggested site on land west of Old Pepper Lane is a deliverable site which can provide	The LHNA is a sufficiently up-to-date and robust position on housing needs in the borough. The policy does not deter housing mix to be applied flexibly and where evidence is provided robustly justifying an alternative mix, this will be a material consideration that will inform planning decisions.

Ref.	Who	Summary of comment	Our response
		affordable and market housing, including a range of house types and sizes.	
1121-30	Peel Land	Provisions for achieving a mix of homes are supported. Flexibility in application of policy requirements, in relation to viability and local proven need, are welcomed and will need to be supported by up-to-date evidence.	Support welcomed.
1121-30	Peel Land	In line with objectives of PfE Plan in relation to boosting competitiveness of northern boroughs, a paragraph should be included highlighting the importance of delivering higher value homes.	. . Policy H2 seeks the provision of a mix of housing types, sizes and tenures across the borough to help address identified housing needs. The supporting text identifies that as well as a need for smaller properties, there is a need for 4-bedroom properties, which would typically be of higher value.
1121-30	Peel Land	The need to provide housing to respond to needs of specialist groups is supported. The Plan will need to confirm that the proposed identification and allocation of residential land will respond to the scale of need identified. Recommended that the policy is split to include separate policies relating to specific groups to	The policy sets out a framework for housing mix against which different developments in different locations should consider the evidence base available.

Ref.	Who	Summary of comment	Our response
		improve clarity. For example, older person housing and self-build and custom build.	It is not considered necessary to split the policy into separate policies as they all relate to housing mix.
1126-5	The Baldwin Estate	Supportive of need to provide for a variety of demographic groups. If adopting higher optional standards for accessible and adaptable homes must do so by applying criteria set out in PPG. Whilst policy reference to impracticability and viability is welcomed, the introduction of such standards needs to be supported by an evidence base.	The Housing Needs Assessment provides evidence in support of the requirement for 4% of new homes on schemes of 20 or more homes to be in accordance with Part M4(3).
1132-3	Trustees of Legh Estate and Bloor Homes	Supportive of intention to deliver an appropriate mix and density to meet needs but an element of flexibility should be applied to ensure that future housing development can respond to site specific considerations and market factors.	Flexibility is built into the policy where robust evidence is provided to justify an alternative mix.
1140-5	Ainscough Strategic Land	Support Policy H2 and consider the Local Plan should ensure that a sufficient mix of housing is provided for all needs including delivery of both accessible and future-proofed housing.	Support welcomed.
Policy H3: North Leigh Park			
100-21	Private Individual	Truly affordable housing should be prioritised, including social rent.	Criterion 2 of policy H3 requires an appropriate mix of types, sizes and tenures, including affordable housing, in

Ref.	Who	Summary of comment	Our response
			accordance with Policy H2. Social rent is a priority for the council as set out in the Local Housing Needs Assessment. This priority is reflected in the affordable housing requirement in Policy H2.
100-21	Private Individual	Homes for older people, care leavers, and those with disabilities should be provided.	As above. Policy H2 covers homes for older people, care leavers and those with disabilities.
100-21	Private Individual	Larger family homes should form part of the mix as they are in short supply in the area.	As above. Policy H2 requires a mix of housing types, sizes and tenures to reflect "the latest local housing needs assessment or equivalent requirement".
100-21	Private Individual	Need to avoid an over-reliance on one or two bed units, which can exacerbate transiency and undercut community stability.	As above.
100-21	Private Individual	Will the Council commit to monitoring housing mix targets to ensure they reflect the needs of Westleigh, Leigh, and Hindley Green? Can a local housing panel be established to input into delivery phases?	New section 13 of the Local Plan refers to monitoring and includes content on housing mix delivered. The development will be commercially led but the council will be able to influence allocations to affordable housing.
100-21	Private Individual	The link road must be prioritised. Will the first phase of development be tied to the early construction of the link road?	Criterion 3 of Policy H3 requires the delivery of the link road. The outline planning permission for the site requires

Ref.	Who	Summary of comment	Our response
			implementation of the link road at around 700 units.
100-21	Private Individual	Public transport must be guaranteed. Can TfGM commit to a specific bus service plan connecting the site to Leigh town centre, schools, and health services?	Criterion 5 of Policy H3 requires the development to provide good accessibility for bus services.
100-21	Private Individual	Support the commitment to strategic green infrastructure and biodiversity—but it must be well-designed for public use, including paths, benches, lighting, and natural play features; connected to the wider green network, especially the Flashes of Wigan and Leigh; and designed with flood resilience and climate adaptation in mind.	Support welcomed. Its design will need to accord with a comprehensive masterplan of the site and in accordance with other Local Plan policies including PL1, EN2 and EN10.
100-21	Private Individual	Can a local community design workshop help shape the green space plan? Will the Council ensure long-term maintenance of public green spaces?	The development will be commercially led but there will be engagement on the details of the proposals. The public green spaces are unlikely to be adopted by the council so they will be privately maintained under the details of the planning permission.
100-21	Private Individual	The Local Centre must serve the wider community and fill a long-standing service gap in Westleigh and Pickley Green.	This is the intention as set out in criterion 4 of policy H3 and policy TC13.

Ref.	Who	Summary of comment	Our response
100-21	Private Individual	Will the local centre be designed for mixed use, including healthcare, retail, and community spaces?	The range of uses at the local centre will be considered in accordance with Policy TC12, which identifies healthcare, retail and community provision as appropriate uses within local centres.
100-21	Private Individual	Can the Council ring-fence units for independent/local traders and consider community-led retail initiatives?	This is unlikely to be possible given the commercial-led nature of the scheme.
100-21	Private Individual	Remediation and infrastructure must be transparent and robust given the site's complex history (landfill, mining, geological faults). Will the remediation strategy be publicly published and subject to independent review? Will the location of green space avoid contaminated zones, ensuring safe public access?	The remediation and containment strategy is being worked up by the site promoter with the Environment Agency and will need to be safe for people and the environment.
100-21	Private Individual	Welcome the requirement for developer contributions under PE4, but local schools, GPs, and dentists are already oversubscribed.	Noted.
100-21	Private Individual	Will the Council guarantee that education and health contributions are spent locally? Can the new community be included in future primary care infrastructure plans?	Education and health contributions will need to be spent where they will mitigate the adverse impact of the development on school places and health registrations, so they will have to be reasonably local.

Ref.	Who	Summary of comment	Our response
779-16	Sport England	The playing field in the north east part of the site was last marked in 2013. The policy wording should include the following: 'The existing playing field shall be replaced with provision of equivalent or better in terms of quantity, quality, availability, management and accessibility to accord with paragraph 104 of the NPPF'. Would welcome the inclusion of direct reference to Active Design Guidance within the policy wording, suggested as: "Provide opportunities for physical activity and Active Travel by incorporating the principles of Active Design." Wish to see the inclusion of policy wording for the provision of a financial contribution to new and improved sports facilities based on evidence of demand to accord with paragraph 103 of the NPPF.	Development proposing the loss of the playing field would be determined against Policy PE3, now PE4. The playing field (Melrose Playing Field) is classed as amenity greenspace in the Open Space Report (2025) with a moderate quality score. Leigh West Ward, has a current provision of amenity greenspace of 1.25ha per 1,000 people which is notably higher than the quantity standard of 0.81 hectares set in Policy PE3, now PE4. However, an accessibility gap is identified in the Open Space Report. The concept of active design is covered sufficiently in criterion 5 and 6 of this policy and through the application of policy PL1 in the Local Plan.
874-7	Cllr John Harding	Support. The new road infrastructure will provide better communication links in the East-West corridor and on completion, will provide some vehicular relief/reduction on Atherton Road and Westleigh Lane.	Support welcomed.

Ref.	Who	Summary of comment	Our response
899-3	City of Trees	Could woodland creation be undertaken here in advance of the site being developed?	This will be determined as part of a comprehensive masterplan for the site.
923-29	The Lancashire Wildlife Trust	Welcome the commitment of criterion 7. Appropriate mitigation and/or compensation must be provided to ensure that populations of ground nesting birds such as Lapwing are supported and enhanced. Welcome criterion 8 but feel that water quality is also an issue that needs to be addressed. The development should ensure that the quality of water entering adjacent water courses is not adversely affected by the development and that features to improve water quality should be incorporated into the design of the development. In paragraph 5.35, suggest referencing the GMLNRS for appropriate habitat and species priorities for targeted action.	Support welcomed. The remediation and containment strategy is being worked up by the site promoter with the Environment Agency and will need to be safe for people and the environment.
925-1	The Coal Authority	Support criterion 9.	Support welcomed.
1022-4	NHS Property Services	Amend criterion 10 to read: Make financial contributions for healthcare provision and primary and/or secondary school provision to meet the needs generated by the development,	Criterion 10 of Policy H3 has been amended to reflect changes made to policy PE5, now PE6, which address the issues raised.

Ref.	Who	Summary of comment	Our response
		through Policy PE4 in this Plan in line with policy JP-P5 in the Places for Everyone Plan.	
1023-4	National Highways	We will work with the Council and developers to ensure that the delivery of the housing is brought forward in a managed and appropriate way. There is the potential for this site to impact the SRN at M6 Junction 23, M61 Junctions 4 and 5 (Bolton), and the A580. Any required mitigations to accommodate this site should be appropriately identified and consulted with National Highways at the earliest opportunity.	Noted. This is a replacement allocation for one in our adopted Local Plan Core Strategy (policy SP3).
1079-6	Jo Platt MP	Criterion 3 should require the link road to be delivered first. The reference in criterion 5 to cycling in Leigh town centre is concerning given the severe disruption to residents and businesses caused by the St Helens Road cycle lane works.	The outline planning permission for the site requires implementation of the link road at around 700 units. Providing good alternatives for people to use instead of the car is the only reasonable means of addressing congestion.
1097-3	Vistry Group Ltd	Support the principle of the draft allocation and commit to working with the Council and other stakeholders to deliver the scheme. Consider "around 1,400 homes" to be sufficiently flexible to address potential levels of remediation necessary and is deliverable but would welcome commentary in the supporting	Support welcomed. We understand that "around 1,400 homes" remains an appropriate statement following further work on the remediation proposals.

Ref.	Who	Summary of comment	Our response
		text to make clear that the number of homes is dependent on the remediation solution.	
1097-3	Vistry Group Ltd	Given the viability constraints associated with the site, suggest that criterion 2 specifically references that affordable housing is subject to viability (with added commentary in the supporting text to abnormal costs and the potential need for public subsidy to fund significant infrastructure) rather than just relying on Policy H2.	Affordable housing is not just achieved through the 25% requirement on market housing, and that itself is subject to viability considerations. Policy H2 refers.
1097-3	Vistry Group Ltd	Regarding criterion 4, further evidence is needed to demonstrate that a Local Centre is necessary to make the development acceptable in planning terms. Also unclear what is meant by a 'balanced range'. Sufficient flexibility is required given the end use will be driven by local market demand, and in the event where a local centre is not commercially viable.	Evidence identifying the need for a local centre is summarised in our Topic Paper on Town and local centres. An appropriate range of uses is set out in policy TC12.
1097-3	Vistry Group Ltd	Regarding criterion 5, the site is already well served by bus stops. Whilst the link road has been designed to accommodate buses (as required by criterion 3), there is no requirement in the outline permission to provide new bus stops within the site or a requirement for the spine road from Nel Pan Lane to accommodate buses. The ability to provide a full north south	Criterion 5 of Policy H3 does not refer to bus stops. Much has changed since 2013 including bringing back local bus services into public control. There are good commercial reasons for the site to be developed to standards for the 2020's and 2030's rather 2013, particularly on

Ref.	Who	Summary of comment	Our response
		route through the site may be impacted by the presence of landfills on the northern boundary of Phase 1. Given the outline permission did not rely or require such a route or provide an access onto Nel Pan Lane, this should not be required by the policy.	transport in terms of its impact on the wider road network.
1097-3	Vistry Group Ltd	Regarding criterion 6, woodland has already been provided in the southeastern area of the site and no further woodland is proposed as part of the open space strategy for the site. Further flexibility is needed in the criterion regarding flood mitigation to ensure it is not an absolute requirement, given the drainage strategy is currently being reconsidered in context of the new site-wide remediation strategy.	Criterion 6 of Policy H3 has been amended to read "Provide a strategic green infrastructure network, including, as necessary, provision for open space, trees or woodland, flood mitigation and wildlife habitat.
1097-3	Vistry Group Ltd	Criterion 7 should either remove direct reference to PfE Plan Policy JP-G8 or provide further clarification in the supporting text that there is no expectation for future reserved matter applications pursuant to the extant outline planning permission to demonstrate 10% BNG. The outline planning permission predates PfE Plan and the statutory regime for 10% BNG.	This policy would be material to any new planning applications.

Ref.	Who	Summary of comment	Our response
1097-3	Vistry Group Ltd	Criterion 8 should be changed to make sure that "restrict surface water run-off from the site into watercourses including Westleigh Brook to no more than the rates prior to development" is not interpreted to mean that any one discharge location is not higher than before. It is considered that the strategy to focus surface water attenuation and discharge in one location could be perceived to be in breach of that requirement. Instead, this should be updated to refer to greenfield rates or a detailed surface water management strategy to be agreed with the Local Planning Authority (particularly as the surface water management strategy may need to be reconsidered, having regard to potential issues around land remediation).	It is clear to us that the criterion refers to the site overall. It should be noted that the greenfield standard has been applied rather than the standards for previously developed land, which are tighter. Policy EN10 refers.
1097-3	Vistry Group Ltd	Consider criterion 9 to be overly prescriptive. Consider that the criterion and paragraph 5.36 should follow the language proposed in draft Policy EN7 (Protecting amenity and the environment) which requires the land to be made suitable for the proposed use.	Criterion 9 of Policy H3 has been amended to read: "Ensure the safe remediation, mitigation or containment, as appropriate, of landfill, landfill gas, colliery spoil, mine shafts, coal seams and the geological fault within the site, in line with policy EN7 in this plan."

Ref.	Who	Summary of comment	Our response
1097-3	Vistry Group Ltd	Regarding criterion 10, Section 106 contributions have already been secured through the extant outline planning permission, therefore the supporting text should clarify that there is no expectation for future reserved matter applications pursuant to the extant outline planning permission to deliver additional contributions under this policy over and above what has already been agreed.	This policy would be material to any new planning applications.
1113-2; 1114-1	Seddon Homes	Despite outline approval for 1,800 homes in 2013 only 200 have been delivered, suggesting significant constraints to delivery and raising concerns over future delivery on the site. Assume the 250 homes granted full permission in April 2021 have expired, demonstrating that sites with permission cannot be guaranteed to be deliverable. North Leigh requires significant brownfield funding for remediation and infrastructure delivery. This will limit its ability to deliver policy compliant affordable homes, which means additional viable sites that can deliver affordable homes need to be allocated. The residual capacity of the site of 800 homes included in the plan is below the 982 homes	The council is working well with the site promoter, the GMCA and Homes England to support the delivery of North Leigh Park in line with schedule set out in our SHLAA.

Ref.	Who	Summary of comment	Our response
		estimated in the 2023 SHLAA, demonstrating that figures within the SHLAA cannot be relied upon and are overstated.	
1137-4	United Utilities	Request the following additional criteria at the end of the policy: • Have full regard to the water and wastewater infrastructure that passes through the site, ensuring that access is maintained, and the assets are protected. • There is a risk of sewer flooding which must be assessed and considered in the detailed design, masterplanning and drainage details. This flood risk could affect the developable area. • Incorporate multi-functional sustainable drainage which is integrated with the landscaped environment. • Be developed in accordance with a holistic allocation-wide strategy for foul and surface water drainage infrastructure including a management and maintenance regime for drainage infrastructure and on-site watercourses.' Request the following additional supporting text:	The proposed additional criteria are not necessary. Policy EN10 has been amended to include the requirement for holistic drainage plans that also consider existing water and foul sewage infrastructure. Sustainable drainage is also appropriately covered in policy EN10 and has been updated to include reference to the National SuDS Standards 2025. Likewise with regards to the proposed additional supporting text this is not required as much of it is already covered by policy EN10 and PfE Plan Policy JP-D1 already requires us to encourage early dialogue between developers and infrastructure providers and requires applicants to prepare an infrastructure phasing and delivery strategy for proposals. In this case much of this has already taken place through numerous previously approved planning

Ref.	Who	Summary of comment	Our response
		'There is significant water and wastewater infrastructure on the site. Applicants will need to engage with United Utilities to agree access and protection requirements. A risk of sewer flooding has been identified at this site. There are also flood incidents from the public sewer in the wider vicinity. The applicant must engage with United Utilities prior to any masterplanning to assess the flood risk and ensure development is not located in an area at risk of flooding from the public sewer. Applicants should consider site topography and any exceedance flow paths. Resultant layouts and levels should take account of such existing circumstances. Applicants must demonstrate that the proposed development would be safe and not lead to increased flood risk. Applicants should not assume that changes in levels or changes to the public sewer, including diversion, will be acceptable as such proposals could increase / displace flood risk. It may be necessary to apply the sequential approach and incorporate mitigating measures subject to the detail of the development proposal. Careful consideration will need to be given to the approach to drainage including the management of surface water; the point of	applications for the proposed allocation site.

Ref.	Who	Summary of comment	Our response
		connection; whether the proposal will be gravity or pumped; the proposed finished floor and ground levels; the management of exceedance paths from existing and proposed drainage systems and any appropriate mitigating measures to manage any risk of sewer surcharge. Holistic site-wide drainage strategies will be required in accordance with wider policy requirements (relevant policy number to be inserted). Sustainable drainage must be integrated with the landscaped environment and designed in accordance with the four pillars of sustainable drainage (water quantity, water quality, amenity and biodiversity). It should identify SuDS opportunities, such as permeable surfacing; soakaways; filter drainage; swales; bioretention tree pits; rain gardens; basins; ponds; reedbeds and wetlands. Any drainage should be designed in accordance with 'Ciria C753 The SuDS Manual', sewerage sector guidance, or any subsequent replacement guidance.'	
1381-7	TfGM	Criterion 3 could also make reference to a cycle route alongside the link road.	This is covered sufficiently in criterion 5 of Policy H3 which requires good accessibility for walking, wheeling and cycling.

Ref.	Who	Summary of comment	Our response
Policy H4: South Hindley			
	Residents	Responses received from residents and individuals for this site allocation policy have been summarised and are set out in Appendix A below.	
498-13	Natural England	South Hindley is situated within Site of Special Scientific Interest Impact Risk Zones for Abram Flashes SSSI and Bryn Marsh and Ince Moss SSSI. These designated sites are vulnerable to changes in water quality and their hydrology should not be severed as part of the development. Surface run-off, septic tank and package sewage treatment plant discharges can contribute to elevated nutrients and changes in water quality at designated sites in the absence of poor location, unsuitable capacity of design and/or mitigation.	Criterion 8 of Policy H4 has been amended to include reference to surface water run-off not being increased as a result of development. Proposed policies within the local plan, notably EN3 Blue Infrastructure Network, EN7 Protecting Amenity and the Environment and EN10 Development and Flood Risk are designed to reduce or eliminate risks to protected sites by embedding environmental safeguards directly into the Local Plan.
779-8	Sport England	The policy should specifically refer to the protection of the sports pitches and facilities at Leyland Park and Hindley Juniors FC to provide clarity for the masterplan. Would welcome the inclusion of direct reference to Active Design Guidance within the policy wording, suggested as: "Provide	Criterion 6 of Policy H4 specifically relates to the enhancement of Leyland Park and the provision / enhancement of sports, open space and recreational provision. The concept of active design is covered sufficiently in criteria 5 and 6 of this

Ref.	Who	Summary of comment	Our response
		opportunities for physical activity and Active Travel by incorporating the principles of Active Design." Suggest the inclusion of policy wording for the provision of a financial contribution to new and improved sports facilities based on evidence of demand to accord with paragraph 103 of the NPPF.	policy and through the application of policy PL1 in the Local Plan. Revised criterion 10 addresses financial contributions towards sport and recreation provision.
899-4	City of Trees	Could the strategic green infrastructure network required in criterion 6 be planted in advance? Is there a Strategic Green Infrastructure Plan we could look at?	This will be determined through a comprehensive masterplan for the site.
923-7	The Lancashire Wildlife Trust	Welcome the requirements of criteria 6, 7 and 8, but criterion 7 should be strengthened to read: 'protect and enhance the sites of biological importance, the adjacent Low Hall Local Nature Reserve, water courses and wildlife corridors.' Support that the masterplan will be landscape-led and the requirement to retain/create an east-west linear landscape feature, connecting existing landscape features on site. The connectivity of the SBIs with each other and the wider environment will need to be assured.	Support welcomed. It is considered that 'take appropriate account of' is sufficiently strong wording to protect the assets identified, which are also protected by policies in the Environment chapter.

Ref.	Who	Summary of comment	Our response
		The area is likely to support priority ground nesting bird species, such as Lapwing and Skylark, which rely on larger open and undisturbed grasslands. Appropriate mitigation and compensation must be provided to support and enhance these bird populations. Development must ensure that the quality of water entering adjacent water courses is not adversely affected and that features to improve water quality should be incorporated into the design of the development.	
1022-5	NHS Property Services	Failure to adequately address the healthcare needs of new residents residing at these strategic developments would create unsustainable pressures on the healthcare system. Therefore, propose amendments to criterion 10 as follows: "Make financial contributions for healthcare provision and primary and/or secondary school provision to meet the needs generated by the development, through Policy PE4 in this Plan in line with policy JP-P5 in the Places for Everyone Plan."	Criterion 10 of Policy H4 has been amended to reflect changes made to policy PE4, now PE6, which address the issues raised.

Ref.	Who	Summary of comment	Our response
1023-5	National Highways	We will work with the Council and developers to ensure that the delivery of the housing is brought forward in a managed and appropriate way. There is potential for this site to impact the SRN at M6 Junction 23 and 24, M61 Junction 4 and 5 (Bolton), and the local road network of the A580 East Lancashire Road. Any required mitigations to accommodate this site should be appropriately identified and consulted with National Highways at the earliest opportunity.	Noted. This area is a broad location in our adopted Local Plan Core Strategy (policy SP4).
1062-7	Castle Green Homes Limited	Criterion 1 should specifically reference the need to involve developers, as well as landowners, in the production of the masterplan and recognise the need for the development to come forward in phases. The wording landscape-led should be removed. The word 'comprehensive' is open to interpretation and should be replaced with wording stating that the masterplan should cover the entire site. Proposed amendment: "1. Be in accordance with a masterplan covering the entire site, which is prepared in liaison with landowners, developers, the local community, developers and other key stakeholders as applicable, and approved by the council."	The requirement is directed at developers / site promoters. It is important that the masterplan is both comprehensive, i.e. covering all material matters, and landscape-led given its urban fringe location. The words "covering the entire site" have been added. Criterion 2 of Policy H4 is sufficient as it cross references to policy H2 which refers to the latest local housing needs assessment or equivalent requirements and to viability. Criterion 3 has been amended accordingly.

Ref.	Who	Summary of comment	Our response
		Criterion 2: The word 'appropriate' should be defined with reference to the type, tenure and size to be delivered within the allocation as reflected in NPPF 61 and 66. There is also a need to ensure the mix is viable in line with Policy H2. the reference to density should reflect guidance at NPPF 129 (a)-(e). Proposed amendment: "2. Deliver up to 2,000 homes with an appropriate mix of types, sizes and tenures, including affordable housing, to meet identified needs in accordance with Policy H2 in this plan and subject to viability constraints, with higher densities in the most accessible locations and close to the new local centre." To clarify the level of provision that is expected and to describe the rationale behind the local centre's location, the following amendment to criterion 3 is proposed: "3. Deliver a new local centre, comprising a range of commercial uses and community facilities to meet local needs, in a location accessible by active travel focal location to serve new residents and existing residents to the north."	

Ref.	Who	Summary of comment	Our response
1113-3; 1114-2	Seddon Homes	There are significant delivery challenges, including land assembly due to numerous landowners and the delivery of the link road. As the site has not progressed since 2018 evidence is required to demonstrate why the site will now come forward to demonstrate it is deliverable.	Noted.
1116-6	Anwyl Homes	The representation relates to a 21 hectare parcel at the western end of the South Hindley proposed allocation with access from Liverpool Road which is in the control of Anwyl Homes. The site is not subject to any major technical constraints which would preclude development. Anwyl seek to ensure that their site forms an early phase of the wider development given the site's strategic location at the entrance to the allocation. Broadly in agreement with criterion 2 but feel higher densities would also be appropriate along the northern sections of the allocation given it borders existing development. it is considered that larger areas of open space are appropriate close to the local centre and particularly any new primary school.	Support welcomed. Higher densities on the northern boundary may be appropriate if it would be highly accessible by public transport, walking, wheeling and cycling. There is a limited case to remove the land on Liverpool Road from the Green Belt given that flood risks limit its developability and that there is a sufficient supply of sites outside the Green Belt to meet identified housing needs.

Ref.	Who	Summary of comment	Our response
		Supportive of the need to deliver a link road, and as the site forms the link to the A58 Anwyl would need to be involved in all discussions relating to this provision. Supportive of the provision of a strategic green infrastructure network within the wider allocation, and suggested that the most appropriate location for any east-west landscape feature would be along the southern edge of the allocation where it meets the open countryside. Consider that the matters covered in criterion 9 would be the responsibility of individual landowners/developers and should be dealt with prior to development of the various phases. The Anwyl site is not subject to a Mineral Safeguarding Area designation, but would not want criterion 11 to delay the development of the allocation, and also question the acceptability of such extraction given the proximity of existing development. Consider that the land within the allocation adjacent to Liverpool Road should be removed from the Green Belt as part of the plan process,	

Ref.	Who	Summary of comment	Our response
		which does not make a strong contribution to the purposes of Green Belt.	
1121-29	Peel Land	Support the inclusion of an allocation policy in the Local Plan. Criterion 1 does not state how a masterplan will be approved. It is requested that the supporting text makes clear that a masterplan can be approved as part of the grant of planning permission (rather than being subject to a separate process). Criterion 4 would have more clarity and assist delivery of the link road if a programme of phasing for comprehensive delivery was required. The Local Plan should include measures to ensure that other developments, which would either benefit from the new infrastructure or capacity created by it elsewhere on the network, make fair and proportionate contributions to the delivery of the link road. Such an approach would apply to other parts of the east west infrastructure where similar viability challenges may arise.	The approval process for the masterplan will depend on the position with the site. The issue is that a site-wide masterplan is produced and approved and that planning applications are approved in line with that masterplan. Delivery of the link road is of strategic importance to the NorthFold Growth Corridor. It will be influenced by progress on the Wigan-Hindley Link Road and the North Leigh Park Link Road.
1134-1	MCI Developments	The Close House Farm site is available, suitable and can be delivered immediately and	Noted – support welcomed.

Ref.	Who	Summary of comment	Our response
		completed within the first five years of the Plan period with access from Maple Avenue. The site could deliver approximately 60 homes, providing a mix of market and affordable dwellings. Criterion 1 - The site is a logical and contained residential development parcel which can be accessed via Maple Avenue. It is not dependent on the delivery of wider infrastructure on the wider allocation. The early delivery of the site would not undermine a masterplan approach to the delivery of the wider allocation. MCI wish to be consulted on any future Masterplanning proposals for the site, as a key stakeholder in the allocation. Criterion 2 – Support Criterion 5 - Development of the Close Lane Farm site can safeguard the integrity of the existing public footpaths on site, which will be retained. Criterion 7 - The site will deliver 10% biodiversity net gain.	
1137-5	United Utilities	Request the following additional criteria at the end of the policy:	The proposed additional criteria are not necessary. Policy EN10 has been amended to include the requirement for

Ref.	Who	Summary of comment	Our response
		• Have full regard to the water and wastewater infrastructure that passes through the site, ensuring that access is maintained, and the assets are protected. • Ensure that the occupiers of new developments will enjoy an appropriate standard of amenity and will not be adversely affected by nearby wastewater infrastructure including a wastewater pumping station and overflows. • There is a risk of sewer flooding which must be assessed and considered in the detailed design, masterplanning and drainage details. This flood risk could affect the developable area. • Incorporate multi-functional sustainable drainage which is integrated with the landscaped environment. • Be developed in accordance with a holistic allocation-wide strategy for foul and surface water drainage infrastructure including a management and maintenance regime for drainage infrastructure and on-site watercourses.' Plus the following explanatory text:	holistic drainage plans that also consider existing water and foul sewage infrastructure. Sustainable drainage is also covered in policy EN10 and has been updated to include reference to the National SuDS Standards 2025. Likewise with regards to the proposed additional supporting text, this is not required as much of it is already covered by policy EN10 and Policy JP-D1 in the PfE Plan already requires us to encourage early dialogue between developers and infrastructure providers and requires applicants to prepare an infrastructure phasing and delivery strategy for proposals. In this case much of this has already taken place through a previously submitted outline planning application for the site and a revised outline planning application is due to be submitted imminently, which includes a new environmental statement for the proposed allocation site.

Ref.	Who	Summary of comment	Our response
		'There is water and wastewater infrastructure on the site. Applicants will need to engage with United Utilities to agree access and protection requirements. A risk of sewer flooding has been identified at this site. There are also flood incidents from the public sewer in the wider vicinity. The applicant must engage with United Utilities prior to any masterplanning to assess the flood risk and ensure development is not located in an area at risk of flooding from the public sewer. Applicants should consider site topography and any exceedance flow paths. Resultant layouts and levels should take account of such existing circumstances. Applicants must demonstrate that the proposed development would be safe and not lead to increased flood risk. Applicants should not assume that changes in levels or changes to the public sewer, including diversion, will be acceptable as such proposals could increase / displace flood risk. It may be necessary to apply the sequential approach and incorporate mitigating measures subject to the detail of the development proposal. Careful consideration will need to be given to the approach to drainage including the management of surface water; the point of connection; whether the	

Ref.	Who	Summary of comment	Our response
		proposal will be gravity or pumped; the proposed finished floor and ground levels; the management of exceedance paths from existing and proposed drainage systems and any appropriate mitigating measures to manage any risk of sewer surcharge. Holistic site-wide drainage strategies will be required in accordance with wider policy requirements (relevant policy number to be inserted). Sustainable drainage must be integrated with the landscaped environment and designed in accordance with the four pillars of sustainable drainage (water quantity, water quality, amenity and biodiversity). It should identify SuDS opportunities, such as permeable surfacing; soakaways; filter drainage; swales; bioretention tree pits; rain gardens; basins; ponds; reedbeds and wetlands. Any drainage should be designed in accordance with 'Ciria C753 The SuDS Manual', sewerage sector guidance, or any subsequent replacement guidance.'	
1381-8	TfGM	Criterion 4 could also make reference to a cycle route alongside the link road. The development of sections of the east-west strategic link provide the opportunity for a strategic cycle route.	This is covered sufficiently in criterion 5 of Policy H4 which requires good accessibility for walking, wheeling and cycling.

Ref.	Who	Summary of comment	Our response
		Unlike Policy H3 (North Leigh Park), the policy does not include reference to accessibility for (or to) bus services.	Bus accessibility is covered in criterion 4 on the link road.
Policy H5: Remaining land South of Atherton			
	Residents	Responses received from residents and individuals for this site allocation policy have been summarised and are set out in Appendix A below.	
779-14	Sport England	Would welcome the inclusion of direct reference to Active Design Guidance within the policy wording, suggested as: Provide opportunities for physical activity and Active Travel by incorporating the principles of Active Design.	The concept of active design is covered sufficiently in criterion 4 and 5 of this policy and through the application of policy PL1 in the Local Plan.
779-14	Sport England	We would wish to see the inclusion of policy wording for the provision of a financial contribution to new and improved sports facilities based on evidence of demand to accord with paragraph 103 of the NPPF.	Amended criterion 10 of Policy H5 and amended policy PE3, now PE4 refer.
899-5	City of Trees	Will existing tree cover be protected and enhanced. Could this be planted in advance?	Policy EN2 refers.
923-14	The Lancashire Wildlife Trust	Welcome policy sections 4) and 5) but wording 'taking account of water courses' should be amended to read 'protect and enhance water courses.'	Criteria 4 and 5 have been merged but the wording from previous criterion 5 (now criterion 6) remains: "Protect and enhance the environs of Chanters Brook.

Ref.	Who	Summary of comment	Our response
		Paragraph 5.51: The creation of wetland habitats would be appropriate here. Reference should be made to the GMLNRS that identifies the site for priority action for wetland and grassland creation and enhancement of the watercourse. Where BNG is proposed then the priority must be for on-site provision to contribute to the identified nature network within the area. Development must seek to strengthen the network, not weaken the functionality for the movement of species.	Policy EN4 is cross referenced. It requires that biodiversity net gain is achieved on-site as first preference.
1022-6	NHS Property Services	Failure to adequately address the healthcare needs of new residents residing at the strategic developments would create unsustainable pressures on the healthcare system. We request that the allocation policies are modified to include a clause stating that they should make financial contributions for healthcare provision and primary and/or secondary school provision to meet the needs generated by the development through Policy PE4 in this Plan in line with policy JP-P5 in the Places for Everyone Plan.	Noted. The policy has been amended to signpost to policy PE4, now PE6 which seeks developer contributions towards various forms of infrastructure including health and education.
1023-6	National Highways	As a statutory consultee, we will work with the Council and developers to ensure that the delivery of the housing is brought forward in a	Noted.

Ref.	Who	Summary of comment	Our response
		managed and appropriate way. There is the potential for this site to impact the SRN at M6 Junction 23, M61 Junction 4 and 5 (Bolton), and the local road network of the A580 East Lancashire Road. Any required mitigation to accommodate this site should be appropriately identified and consulted with National Highways at the earliest opportunity.	
1079-3	Jo Platt MP	It is noted in 5.50 that some of the land to the south of Lodge Lane is within Flood Zones 2 and 3, restricting its developability. On those grounds I believe this site should not be used for a development of this size. Given the considerations required for flooding mitigations to take place to support areas downstream, as suggested in documentation provided to the local authority by the Environment Agency, I propose that the allocation of this site be reconsidered.	If it wasn't allocated this site would still come forward for development. By proposing it for allocation there is a specific policy relating to it that enables us to influence how the site comes forward. The risk of flooding associated with the development of this site will be managed through the implementation of policy EN10: Development and flood risk.
1129-8	Historic England	Support criterion 7.	Support welcomed.
1137-6	United Utilities	Request the following additional criteria: • '8. Have full regard to the water and wastewater infrastructure that passes	The proposed additional criteria are not considered necessary. Policy EN10 has been amended to include the requirement for holistic drainage plans that also consider existing water and foul

Ref.	Who	Summary of comment	Our response
		through the site, ensuring that access is maintained, and the assets are protected. • 9. Incorporate multi-functional sustainable drainage which is integrated with the landscaped environment. • 10. Be developed in accordance with a holistic allocation-wide strategy for foul and surface water drainage infrastructure including a management and maintenance regime for drainage infrastructure and on-site watercourses. Request the following additional explanatory text: 'There is water and wastewater infrastructure on the site. Applicants will need to engage with United Utilities to agree access and protection requirements. Holistic site-wide drainage strategies will be required in accordance with wider policy requirements (relevant policy number to be inserted). Sustainable drainage must be integrated with the landscaped environment and designed in accordance with the four pillars of sustainable drainage (water quantity, water quality, amenity and biodiversity). It should identify SuDS opportunities, such as permeable surfacing;	sewage infrastructure. Sustainable drainage is also appropriately covered in policy EN10 and has been updated to include reference to the National SuDS Standards 2025. Likewise with regards to the proposed additional supporting text this is not required as much of it is already covered by policy EN10 and PfE Plan Policy JP-D1 already requires us to encourage early dialogue between developers and infrastructure providers and requires applicants to prepare an infrastructure phasing and delivery strategy for proposals.

Ref.	Who	Summary of comment	Our response
		soakaways; filter drainage; swales; bioretention tree pits; rain gardens; basins; ponds; reedbeds and wetlands. Any drainage should be designed in accordance with 'Ciria C753 The SuDS Manual', sewerage sector guidance, or any subsequent replacement guidance.'	
1138-4	Tarleton Estates	Strongly support allocation. The Estate owns majority of Site H5 and is working in partnership with other owners to bring forward in a comprehensive manner. Via the submission of an updated Development Framework it has been demonstrated how site can come forward, delivering a range of housing and supporting infrastructure, with access taken of existing road network where appropriate. The Development Framework demonstrates that site is not affected by any insurmountable technical or environmental constraints and is fully deliverable in form proposed. A further technical evidence base is being developed, which will provide foundation for a planning application which is expected to be submitted shortly.	Support welcomed.
1138-4	Tarleton Estates	Whilst noting the aspiration to complete east-west link through the wider area, the allocation should include a greater degree of flexibility to	In order to deliver the full quantum of development at the site a new junction from Tyldesley Road is required.

Ref.	Who	Summary of comment	Our response
		enable site to come forward as early as possible, reflecting reality of how site will be developed.	Any new junction from Tyldesley Road must be designed to a suitable standard and complete the Link Road from the adjacent development.
1138-4	Tarleton Estates	The development should make provision for future delivery of east-west link but it may be that some development can be provided via access off existing road network, such as off MIllers Lane or Bracken Road for example, rather than Tyldesley Road, noting that some may need to be served off the main east-west connection through the site and that to the west of Millers Lane. This will be resolved through the masterplan and ultimately the planning application process.	Noted, however, only a small quantum of development can potentially be accessed off existing residential access roads such as Bracken Road or Millers Lane. Any new junction from Tyldesley Road must be designed to a suitable standard and complete the Link Road from the adjacent development.
1138-4	Tarleton Estates	Clause 2 should be amended to read: Ensure land is protected from development to enable the completion of the road connection from..... Any requirement for infrastructure should be informed by infrastructure baseline and extent to which additional demands as a result of development cannot be met without improvements or expansion to its capacity, in accordance with CIL Regulations 122 & 123.	As above, any new junction from Tyldesley Road must be designed to a suitable standard and complete the Link Road from the adjacent development.

Ref.	Who	Summary of comment	Our response
1138-4	Tarleton Estates	Clause 6 should be amended to read: Where proven to be needed, make financial contributions for.....	Noted. This is addressed in Policy PE4, now PE6 which is now cross referenced in the criterion, now renumbered 8.
1138-4	Tarleton Estates	The boundary of the allocation should be extended to include the allotments to the rear of properties along Tyldesley Road to enable a more effective masterplan for the site to be developed. As existing allotments, this part of site is protected from development unless specific criteria are met. Whether the allotments remain in situ or re-provided elsewhere within the allocation should be determined through the allocation process.	The boundary has been amended to include this land.
1381-9	TfGM	Should this policy include a criterion to "Ensure good walking, wheeling and cycling provision within the site and to..."?	Agree. This has been added to the policy.
Policy H6: East of Atherton			
	Residents	Responses received from residents and individuals for this site allocation policy have been summarised and are set out in Appendix A below.	
779-9	Sport England	Sport England would like to see the inclusion of the principles of Active Design and policy wording to provide for specific funding towards new and improved sports provision.	The concept of active design is covered sufficiently in criteria 5 and 7 of this policy and through the application of policy PL1 in the Local Plan.

Ref.	Who	Summary of comment	Our response
899-6	City of Trees	The existing woodland along and to the west of Hindsford should be retained and enhanced with further planting.	The appropriate protection of trees and woodland is covered sufficiently in Policy EN2.
923-24	The Lancashire Wildlife Trust	Would like to see the policy wording strengthened at point 8) to read ' protect and enhance the SBI that lies to the east of the site.' Welcome the provision of a green infrastructure corridor incorporating Hindsford Brook. It should be noted that the GMLNRS identifies the site for priority action for wetland and grassland provision, BNG should strengthen the existing provision. Ground nesting birds in the area should also be protected and habitats enhanced.	It is considered that 'take appropriate account of' is sufficiently strong wording to protect the assets identified, which are also protected by policies in the Environment chapter. Policy EN2 requires that development should contribute to GI in line with priorities and actions set out in the Greater Manchester Local Nature Recovery Strategy.
1022-7	NHS Property Services	Policy H6 does not make contribution for healthcare provision. The policy should be modified to 'Make financial contributions for healthcare provision and primary and/or secondary school provision to meet the needs generated by the development' in line with policy JP-P5 in the Places for Everyone Plan.	This has been added as part of a revised criterion 10.

Ref.	Who	Summary of comment	Our response
1023-7	National Highways	As a statutory consultee, we will work with the Council and developers to ensure that the delivery of the housing is brought forward in a managed and appropriate way. There is the potential for this site to impact the SRN at M6 Junction 23, M61 Junction 4 and 5 (Bolton), and the local road network of the A580 East Lancashire Road. Any required mitigation to accommodate this site should be appropriately identified and consulted with National Highways at the earliest opportunity.	Noted. This area is a broad location in our adopted Local Plan Core Strategy (policy SP4).
1079-2	Jo Platt MP	The Mayor's Challenge Fund walking and cycling schemes for Tyldesley and Atherton should lead on how the financial contributions are spent. Some of the contribution should go to improving parking at Atherton Station. With 600 homes from the allocation and another 1,600 in neighbouring Bolton serious consideration needs to be given to traffic management and how on road cycling provision is delivered. There is no reference in the Local Plan as to how secondary schools will be funded	Financial contributions from the site will be determined and spent in accordance with Policy PE4, now PE6.

Ref.	Who	Summary of comment	Our response
1124-2	Bellway Homes	Strong support for the allocation which includes Bellway's land interests at Douglas Road, Atherton, which forms the south-western extent of the allocation. Bellway are looking to bring forward development on site as soon as possible, within the first five years of the plan period, with a live application pending determination. Policy Criterion 1: Bellway and the current landowner have not been approached to date in respect of the preparation of a masterplan but wish to express their desire to be involved with any such process in the future. The Douglas Road proposals have been designed to not prejudice the delivery of the wider allocation and are not dependent on the delivery of infrastructure on the wider allocation. The proposals will facilitate access to the wider allocation through the existing public right of way, which will be re-routed slightly to accommodate the development. Policy Criterion 2: Support allowing for the delivery of 'around 600 homes'. This allows sufficient flexibility as the allocation is likely to deliver around 630 homes on the Lilford Estate land and Douglas Road land.	Support welcomed. In relation to criterion 4, financial contributions will be determined in accordance with Policy PE4, now PE6, as set out in revised criterion 10, previously 9.

Ref.	Who	Summary of comment	Our response
		Policy Criterion 3: Not applicable to the Douglas Road phase Policy Criterion 4: No comments as this relates to the northern areas of the allocation and not applicable to the Douglas Road phase. These financial contributions would not meet the planning obligation tests as set out in paragraph 57 of the 2023 NPPF. Policy Criterion 5: Supportive of this criterion. The Douglas Road proposals will safeguard the integrity of the public footpath on site, which will be slightly re-routed. The site is already well served by suitable connection routes into Atherton and in respect of Chanters Industrial Estate there are existing footways along Arley Way that can easily be accessed. Policy Criterion 6: It is logical to locate any additional employment development on the land parcel to the east of Douglas Road. The noise assessment supporting the live planning application confirms that residential development can be sited adjacent to the existing employment area. It is important that any employment land use in the southern phase of the Masterplan appropriately mitigates to protect the amenity	

Ref.	Who	Summary of comment	Our response
		of existing and future residents. We suggest the following amendment to the criterion: 'Maximise the opportunity to extend the existing industrial activity at Chanters Industrial Estate northwards. Appropriate mitigation measures will be required, to ensure any employment land-use protects the residential amenity of existing residents in the area and future residents of the allocation.' Policy Criterion 7: No comments as it appears to relate to the wider allocation. Policy Criterion 8: An ecology report has been submitted with the planning application which states that due to the distance of the Site of Biological Importance (SBI) from the proposed development, it is anticipated that there would be limited detrimental impacts on the SBI. The Douglas Road proposals have appropriately accounted for and considered the SBI in line with this criterion. The proposals will deliver 10% BNG in line with national requirements. Policy Criterion 9: Educational contributions will be discussed in further detail as part of the live planning application. Supporting Text: No particular comments, other to note that paragraph 5.52 is supported.	

Ref.	Who	Summary of comment	Our response
1137-7	United Utilities	Request the following additional criteria to this policy: • 10. Have full regard to the wastewater infrastructure that passes through the site, ensuring that access is maintained, and the assets are protected. • 11. Incorporate multi-functional sustainable drainage which is integrated with the landscaped environment. • 12. Be developed in accordance with a holistic allocation-wide strategy for foul and surface water drainage infrastructure including a management and maintenance regime for drainage infrastructure and on-site watercourses. Request the following additional explanatory text: There is wastewater infrastructure on the site and applicants will need to engage with United Utilities to agree access and protection requirements. Holistic site-wide drainage strategies will be required in accordance with wider policy requirements (relevant policy number to be inserted). Sustainable drainage must be integrated with the landscaped	The proposed additional criteria are not necessary. Policy EN10 has been amended to include the requirement for holistic drainage plans that also consider existing water and foul sewage infrastructure. Sustainable drainage is also appropriately covered in policy EN10 and has been updated to include reference to the National SuDS Standards 2025. Likewise with regards to the proposed additional supporting text this is not required as much of it is already covered by policy EN10 and PfE Plan Policy JP-D1 already requires us to encourage early dialogue between developers and infrastructure providers and requires applicants to prepare an infrastructure phasing and delivery strategy for proposals. An outline planning application for the site has already been submitted with an Environmental Statement covering flood risk and drainage which UU will already have been consulted on.

Ref.	Who	Summary of comment	Our response
		environment and designed in accordance with the four pillars of sustainable drainage (water quantity, water quality, amenity and biodiversity). It should identify SuDS opportunities, such as permeable surfacing; soakaways; filter drainage; swales; bioretention tree pits; rain gardens; basins; ponds; reedbeds and wetlands. Any drainage should be designed in accordance with 'Ciria C753 The SuDS Manual', sewerage sector guidance, or any subsequent replacement guidance.	
1138-5	Tarleton Estates	Strongly support the allocation. The site is in a sustainable location in Wigan-Bolton Growth Corridor. The updated Development Framework demonstrates how the site can come forward with access off existing road network. It demonstrates that the site is not affected by any insurmountable technical or environmental constraints and is fully deliverable in form proposed. An outline application has been submitted supported by technical evidence on matters such as ecology, highways/transport, flood risk/drainage, air quality, noise, ground conditions and landscape and visual effects. Cumulatively this	Support welcomed.

Ref.	Who	Summary of comment	Our response
		demonstrates that site is deliverable in form proposed.	
1138-5	Tarleton Estates	The site is held in several ownerships, although bulk of ownership, covering the northern part, is with the Estate. This has impacts for delivery of site. The Estate's land is disconnected from land to the south and little benefit in tying these parts of the site together. Bellway have submitted an application for the southern part of site. Policy H6 should allow for the masterplan to be advanced through the planning application process. As such, suggest amendment to Clause 1 as follows: …and approved by the Council via either one or more planning applications or via a separate approval process	The word site has been added to criterion 1 in recognition of the fact that need to be site related rather than across Land east of Atherton as a whole, in recognition that some of the site parcels are quite separate. However, they will need to be taken into account in site planning.
1138-5	Tarleton Estates	Clause 2 should make reference to viability as follows: ..including affordable housing, where viable, and with higher densities…	Viability is covered in Policy H2.
1138-5	Tarleton Estates	Improvements to the local footpath network may be directly delivered by the development, rather than via financial contributions. Clause 4 should be amended as follows: Deliver or	Criterion 4 of Policy H6 has been amended accordingly.

Ref.	Who	Summary of comment	Our response
		provide financial contributions towards the delivery of improved pedestrian routes....	
1138-5	Tarleton Estates	In line with CIL Regulations, any contribution towards infrastructure should be informed by the baseline position and the extent to which additional demand for infrastructure generated by the development cannot be met without improvements or expansion to its capacity. Clause 9 should be updated to read: Where proven to be needed, make financial contributions for off-site additional.....	The proposed amendments to criterion 9, now 10, address this.
1312-1	Private Individual	These comments relate principally to our client's land within the East of Atherton site allocation, which lies off Shakerley Lane and has been subject to an application, and pending appeal for 31 dwellings. We continue to support the inclusion of this site allocation with the Local Plan. It was agreed during the course of the application that this site could be progressed in advance of a masterplan for the whole site. We note also that the majority landowner's current proposals, consulted upon at pre app earlier this year, do not include our client's land.	Following the resolution of the appeal, our position is that this site can only be accessed off the western side of the brook.

Ref.	Who	Summary of comment	Our response
		Therefore, bullet point 1 needs amendment to reflect this, so that the restriction of a site wide masterplan doesn't hold up development, as this site is already late in delivering development proposed in the last plan. Bullet point 3 references an access into the site from the A579 Bolton Road, with supporting paragraph 5.52 noting the site would be 'served primarily off the A579 Bolton Road to the north'. We would suggest that bullet point 3 is amended to give reference to this being the primary access, so as not to restrict the potential for additional accesses to be provided.	
Policy H7: Remaining Land at Landgate, Ashton-in-Makerfield			
	Residents	Responses received from residents and individuals for this site allocation policy have been summarised and are set out in Appendix A below.	
498-14	Natural England	Policy H7 Remaining land at Landgate, Ashton-in-Makerfield is situated within Site of Special Scientific Interest Impact Risk Zones for Abram Flashes SSSI and Bryn Marsh and Ince Moss SSSI. These designated sites are vulnerable to changes in water quality and their hydrology	Proposed policies within the local plan, notably EN3 Blue Infrastructure Network, EN7 Protecting Amenity and the Environment and EN10 Development and Flood Risk are designed to reduce or eliminate risks to protected sites by

Ref.	Who	Summary of comment	Our response
		should not be severed as part of the development. Surface run-off, septic tank and package sewage treatment plant discharges can contribute to elevated nutrients and changes in water quality at designated sites in the absence of poor location, unsuitable capacity of design and/or mitigation.	embedding environmental safeguards directly into the Local Plan.
779-11	Sport England	Support the aim of clause on playing pitches but advise that the retention/provision of parking should be included as this will influence the sustainability of the playing field site. Would welcome inclusion of direct reference to Active Design Guidance within policy wording, such as: Provide opportunities for physical activity and Active Travel by incorporating the principles of Active Design. Wish to see the inclusion of policy wording for the provision of a financial contribution to new and improved sports facilities based on evidence of demand to accord with paragraph 103 of the NPPF.	Criterion 5, now 7, has been amended to require associated car parking. The concept of active design is covered sufficiently in criteria 5 and 7 of this policy and through the application of policy PL1 in the Local Plan. Revised criterion 6, now 9, addresses financial contributions towards sport and recreation provision.
899-7	City of Trees	Retain and enhance existing tree cover.	This is covered in Policy EN2.
923-22	The Lancashire Wildlife Trust	Welcome the requirement to safeguard and enhance the settings of the fishing ponds and	Support welcomed. Policy EN2 requires that development should contribute to GI in line with

Ref.	Who	Summary of comment	Our response
		improving the connections from this area into the countryside to the east. Reference should be made to the GMLNRS that identifies the northern part of the site for riverine restoration and enhancement. Mitigation and any ecological compensation should be aimed at maintaining this corridor.	priorities and actions set out in the Greater Manchester Local Nature Recovery Strategy. Policy EN3 will also apply to these areas
1022-8	NHS Property Services	The strategic housing allocations are likely to significantly increase pressures on the existing healthcare system. We therefore request that the allocation policies are modified to include a clause stating that they should make financial contributions for healthcare provision and primary and/or secondary school provision to meet the needs generated by the development through Policy PE4 in this Plan in line with policy JP-P5 in the Places for Everyone Plan.	Revised criterion 6, now 9, addresses financial contributions towards healthcare provision.
1023-8	National Highways	As a statutory consultee, we will work with the Council and developers to ensure that the delivery of the housing is brought forward in a managed and appropriate way. There is the potential for this site to impact the SRN at M6 Junction 23, 24 and 25, and the local road network of the A580 East Lancashire Road. Any required mitigation to accommodate this site should be appropriately identified and	Noted. This area is a broad location in our adopted Local Plan Core Strategy (policy SP4).

Ref.	Who	Summary of comment	Our response
		consulted with National Highways at the earliest opportunity.	
1126-4	The Baldwin Estate	The Baldwin Estate wish to express their strong support for the draft H7 allocation and can confirm their intention to start delivering housing on site as soon as possible, working alongside Wigan Council. The Baldwin Estate is the majority landowner, but some land is owned by other private landowners and Wigan Council. It is vital that the Council works alongside the majority landowner to ensure the delivery of the site. Discussions have been held with the Council on the development of this site and a hybrid planning application for 250 homes has been prepared but not yet submitted.	Support welcomed.
1126-4	The Baldwin Estate	Criterion 1: A vision document has been prepared which shows how the H7 allocation could deliver around 700 homes. 400 homes is very low density development for a site of this size. It is envisaged that the site would come forward in phases. Significant technical work has been undertaken to confirm that the site is suitable and deliverable. Our client's land is able to accommodate a significant proportion of the 700 homes and	Criterion 1, now 2, has been amended to 'around 500 homes', which provides flexibility. Viability is covered in Policy H2.

Ref.	Who	Summary of comment	Our response
		can deliver the early phases of the development. An initial review of land parcels out of the Estate's control indicates that they are deliverable. The Estate is willing to explore options to work with Wigan Council to bring the entire allocation forward. There are viability considerations on this site due to works associated with the playing pitch improvements as well as costs associated with the link road. Suggest the following amendments to criterion 1. 1. 'Deliver around 700 homes with an appropriate mix of house types, sizes and tenures, including affordable housing - subject to viability considerations, in accordance with Policy H2'	
1126-4	The Baldwin Estate	Policy Criterion 2: Baldwin Estate own the employment premises adjacent to Landgate School. No definitive plans are in place but the landowner is exploring an option to relocate from the site and move elsewhere in the Borough. This would aid delivery of additional housing on site, and would comprise the last phase of development. Suggest the following amendment to criterion 2: 'Retain, or replace	Criterion 2, now 3, has been amended accordingly.

Ref.	Who	Summary of comment	Our response
		elsewhere on site, Landgate School. The adjacent employment premises will be retained or replaced elsewhere either on or off-site elsewhere within the Borough.'	
1126-4	The Baldwin Estate	Policy Criterion 3: This is a longstanding requirement for the site that is subject to ownership constraints. The Baldwin Estate is not able to resolve this position alone and will require input and cooperation from the Council. The previous agreed strategy was to allow a further phase of development to come forward prior to the delivery of the entirety of the road. This option could still be advanced and considerable work has gone into this. However, our client is keen to work with the Council to explore alternative and more comprehensive options for delivery of this infrastructure. Suggest replacing the existing criterion 'Extend the new road from the A49 Wigan Road through the site to the B5207 Bryn Road' with: 'Ensure relevant phases of development safeguard sufficient land and incorporate sufficient infrastructure for a link from the A49 Wigan Road to the B5207 Bryn Road to be secured and delivered in line with an agreed Infrastructure Delivery Scheme'	This can be explored fully through the masterplanning process.

Ref.	Who	Summary of comment	Our response
1126-4	The Baldwin Estate	Policy Criterion 4: Support this criterion and can confirm that development can deliver its requirements.	Support welcomed.
1126-4	The Baldwin Estate	Policy Criterion 5: Significant work has already been undertaken on this matter in respect of the draft planning application that has been prepared. Initial feasibility work confirms that the playing fields can be suitably re-configured / re-orientated. Support the criterion subject to the following amendment, noting delivery / viability considerations: 'Ensure the retention or re-configuration, and enhancement of the playing pitches in the south of the site, including the provision of changing facilities, in line with an agreed Infrastructure Delivery Scheme'.	This can be explored fully through the masterplanning process.
1126-4	The Baldwin Estate	Wholly supportive of paragraph 5.60, but suggest that Policy criterion 2 is updated in line with suggested comments. Supportive of paragraph 5.61 but highlight the need for a phased approach to development, noting the costs and landownership considerations associated with the link road.	Support welcomed.
1126-4	The Baldwin Estate	Supporting Evidence Base: The April 2025 draft Flood Risk Assessment confirms that the entire site is located within Flood Zone 1. The vast	Noted and welcomed.

Ref.	Who	Summary of comment	Our response
		majority of the site is of low surface water flood risk. The fishing ponds, which will remain undeveloped, are of medium-high surface water flood risk. There is a pocket of medium-high surface water flood risk in the central-eastern area. However, the site satisfies the sequential test and these issues can be readily addressed as part of the detailed design process. A detailed drainage strategy will be prepared as part of any planning application, working with United Utilities, and will confirm that the proposals are entirely acceptable from a drainage and flood risk perspective. The Interim IA Report fully supports the draft allocation	
1137-8	United Utilities	Request the following additional criteria: • Have full regard to the water and wastewater infrastructure that passes through the site, ensuring that access is maintained, and the assets are protected. • There is a risk of sewer flooding which must be assessed and considered in the detailed design, masterplanning and drainage details.	The proposed additional criteria are not necessary. Policy EN10 has been amended to include the requirement for holistic drainage plans that also consider existing water and foul sewage infrastructure. Sustainable drainage is also appropriately covered in policy EN10 and has been updated to include reference to the National SuDS Standards 2025.

Ref.	Who	Summary of comment	Our response
		• Ensure that the occupiers of new developments will enjoy an appropriate standard of amenity and will not be adversely affected by nearby wastewater infrastructure including wastewater pumping stations and overflows. • Incorporate multi-functional sustainable drainage which is integrated with the landscaped environment. • Be developed in accordance with a holistic allocation-wide strategy for foul and surface water drainage infrastructure including a management and maintenance regime for drainage infrastructure and on-site watercourses. Request the following additional supporting text: 'There is significant water and wastewater infrastructure on the site. Applicants will need to engage with United Utilities to agree access and protection requirements. Holistic site-wide drainage strategies will be required in accordance with wider policy requirements (relevant policy number to be inserted).	Likewise with regards to the proposed additional supporting text this is not required as much of it is already covered by policy EN10 and PfE Plan Policy JP-D1 already requires us to encourage early dialogue between developers and infrastructure providers and requires applicants to prepare an infrastructure phasing and delivery strategy for proposals.

Ref.	Who	Summary of comment	Our response
		Sustainable drainage must be integrated with the landscaped environment and designed in accordance with the four pillars of sustainable drainage (water quantity, water quality, amenity and biodiversity). It should identify SuDS opportunities, such as permeable surfacing; soakaways; filter drainage; swales; bioretention tree pits; rain gardens; basins; ponds; reedbeds and wetlands. Any drainage should be designed in accordance with 'Ciria C753 The SuDS Manual', sewerage sector guidance, or any subsequent replacement guidance. There are flooding incidents from the public sewer in the wider vicinity. The applicant must engage with United Utilities prior to any masterplanning to assess the flood risk and ensure development is not located in an area at risk of flooding from the public sewer. Applicants should consider site topography and any exceedance flow paths. Resultant layouts and levels should take account of such existing circumstances. Applicants must demonstrate that the proposed development would be safe and not lead to increased flood risk. Applicants should not assume that changes in levels or changes to the public sewer, including	

Ref.	Who	Summary of comment	Our response
		diversion, will be acceptable as such proposals could increase / displace flood risk. It may be necessary to apply the sequential approach and incorporate mitigating measures subject to the detail of the development proposal. Careful consideration will need to be given to the approach to drainage including the management of surface water; the point of connection; whether the proposal will be gravity or pumped; the proposed finished floor and ground levels; the management of exceedance paths from existing and proposed drainage systems and any appropriate mitigating measures to manage any risk of sewer surcharge.'	
1381-10	TfGM	Should this policy include a criterion to ensure good walking, wheeling and cycling provision within the site and to….?	Agree. New criterion 5 has been added, with consequential amendments to criterion 6.
Policy H8: Westwood Park, Wigan			
383-5	Private Individual	Support, as such as it is in keeping with the area.	Support welcomed
779-6	Sport England	The policy should take account of the BMX facility within the site and provide for its protection or its replacement to accord with paragraph 104 of the NPPF.	It is outside of the site boundary. Furthermore, it is not a BMX facility, it is informal with earth humps made damaging trees and protected wildlife

Ref.	Who	Summary of comment	Our response
		Would welcome the inclusion of direct reference to Active Design Guidance within the policy wording, suggested as: Provide opportunities for physical activity and Active Travel by incorporating the principles of Active Design. Would wish to see the inclusion of policy wording for the provision of a financial contribution to new and improved sports facilities based on evidence of demand to accord with paragraph 103 of the NPPF.	habitat. It is an anti-social behaviour issue that might suggest a need some alternative formal provision but that is a wider matter, perhaps one for Sport England to engage with, not one for this development. The concept of active design is covered sufficiently in criteria 4 and 7 of this policy and through the application of policy PL1 in the Local Plan. Revised criterion 10 addresses financial contributions towards sport and recreation provision.
899-8	City of Trees	Will the significant areas of woodland within the site be safeguarded? Paragraph 5.65 should be more specific and be clear what it means when it says that 'it is vital that development of the site takes appropriate account of the biodiversity assets on and adjacent to the site.'	The appropriate protection of trees and woodland is covered in Policy EN2. Biodiversity net gain is a statutory duty.
923-15	The Lancashire Wildlife Trust	Welcome criterion 4 but the wording could be strengthened by replacing 'taking appropriate account' with 'protecting and enhancing'.	It is considered that 'take appropriate account of' is sufficiently strong wording to adequately protect the assets identified which are also adequately

Ref.	Who	Summary of comment	Our response
		Welcome paragraph 5.64 but reference should be made to the GMLNRS that identifies priority actions within the site. Paragraph 5.65 should be strengthened to read 'It is vital that development of the site protects and enhances the biodiversity assets on and adjacent to the site'.	protected by other policies in the Environment chapter. Biodiversity net gain is covered sufficiently in Policy EN4.
1022-9	NHS Property Services	Failure to adequately address the healthcare needs of new residents residing at the strategic developments would create unsustainable pressures on the healthcare system. Request that the allocation policies are modified to include a clause stating that they should make financial contributions for healthcare provision and primary and/or secondary school provision to meet the needs generated by the development through Policy PE4 in this Plan in line with policy JP-P5 in the Places for Everyone Plan.	Revised criterion 10 addresses financial contributions towards healthcare provision.
1023-9	National Highways	As a statutory consultee, we will work with the Council and developers to ensure that the delivery of the housing is brought forward in a managed and appropriate way. Noted that there is the potential for this site to impact the SRN at M6 Junction 25 and 26. Any	Noted. This site allocation would replace a site allocation for employment development under policy EM1A in our adopted Replacement Unitary Development Plan (saved policies).

Ref.	Who	Summary of comment	Our response
		required mitigation to accommodate this site should be appropriately identified and consulted with National Highways at the earliest opportunity.	
1088-2	Canal & River Trust	Welcome criterion 3. Criteria 6 could go further in terms of the policy wording promoting access/connectivity to the canal towpath. An amended criterion could read: "Maximise the opportunities provided by the canal and integrate the canal and promote access to the towpath into the overall design in accordance with Policy PL5".	Support welcomed. Criterion 6, now 7 has been amended accordingly.
1113-4; 1114-3	Seddon Homes	Failure to implement the previous planning permission (approved in 2015 and since expired) raises doubts over the deliverability of the site, especially given the complexities of a brownfield site and uncertainties surrounding public sector funding. There is no guarantee that even if an application is approved, the development will be implemented. Given the site's history of unimplemented permissions, the Council needs to publish evidence to demonstrate the site is deliverable.	The site is being marketed for disposal by the Council and has attracted significant interest from a number of developers.

Ref.	Who	Summary of comment	Our response
1129-9	Historic England	Before allocating this site for development: 1. An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the Listed Building in its vicinity, and what impact the loss of this undeveloped site and its subsequent development might have upon their significance. 2. If it is considered that the development of this site would harm elements which contribute to the significance of the Listed Building, then the measures by which that harm might be removed or reduced need to be effectively tied into the Plan. (3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of any of these Listed Building, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 214 or 215).	This site allocation is supported by an Historic Environment Assessment concluding that the development is achievable without causing harm to the Listed Buildings on-site and their settings.
1137-9	United Utilities	Suggest amendment to criterion 8 as follows: "Ensure that the occupiers of new developments will enjoy an appropriate standard of amenity and will not be adversely affected by nearby wastewater infrastructure	This criterion is not as it is covered by Policy EN7 Protecting Amenity and the Environment which has been strengthened through amendment.

Ref.	Who	Summary of comment	Our response
		including wastewater pumping stations. Ince Wastewater Pumping Station is to the south and potential impacts such as noise, vibration, files and odour must be considered, in accordance with Policy PL7." Also request the following additional criteria: • Have full regard to the water and wastewater infrastructure that passes through the site, ensuring that access is maintained, and the assets are protected. • Be developed in accordance with a holistic allocation-wide strategy for foul and surface water drainage infrastructure including a management and maintenance regime for drainage infrastructure and on-site watercourses.' Also request the following supporting text: 'Holistic site-wide drainage strategies will be required in accordance with wider policy requirements (relevant policy number to be inserted). Sustainable drainage must be integrated with the landscaped environment and designed in accordance with the four pillars of sustainable drainage (water quantity, water quality, amenity	The proposed additional criteria are not necessary. Policy EN10 has been amended to include the requirement for holistic drainage plans that also consider existing water and foul sewage infrastructure. Sustainable drainage is also appropriately covered in policy EN10 and has been updated to include reference to the National SuDS Standards 2025. Likewise with regards to the proposed additional supporting text this is not required as much of it is already covered by policy EN10 and PfE Plan Policy JP-D1 already requires us to encourage early dialogue between developers and infrastructure providers and requires applicants to prepare an infrastructure phasing and delivery strategy for proposals.

Ref.	Who	Summary of comment	Our response
		and biodiversity). It should identify SuDS opportunities, such as permeable surfacing; soakaways; filter drainage; swales; bioretention tree pits; rain gardens; basins; ponds; reedbeds and wetlands. Any drainage should be designed in accordance with 'Ciria C753 The SuDS Manual', sewerage sector guidance, or any subsequent replacement guidance. There is significant water and wastewater infrastructure on site and in proximity to the site. Applicants will need to engage with United Utilities to agree access and protection requirements. The infrastructure includes Ince Wastewater Pumping Station to the south. Applicants will need to engage with United Utilities to understand whether any impact assessments are required to inform layout and any necessary mitigation measures to ensure an appropriate standard of amenity.'	
Policy H9: Sustainable housing growth in Standish			
	Residents	Responses received from residents and individuals for this policy have been summarised and are set out in Appendix A below.	

Ref.	Who	Summary of comment	Our response
159-5	Standish Voice	All the housing sites for Standish identified in the Plan are greenfield land, running contrary to the general 'brownfield first' ethos of the plan. Both the borough's Housing Needs Assessment and the assessment commissioned for the Neighbourhood Plan identify a need for smaller homes and homes for older people. This is especially needed in Standish where the majority of new homes are designed for families. As these people age, they will need homes specifically designed, or able to be adapted, for older people. We believe the housing allocation sites in Standish should be specifically designed for older people. There is a need for affordable housing, and levels of affordable housing provision need to be robustly enforced on the housing sites in Standish. Standish has seen large-scale development over a short period of time with mitigating infrastructure being inadequate to prevent a detrimental impact, especially in health provision and highways. Any future development of housing sites needs to be mindful of this and so those sites should only be	There can only be a brownfield ethos to the extent that there is brownfield land to be developed. Policy H2 requires new development to contribute to the provision of a mix of housing types, sizes and tenures across the borough to help address identified housing needs, reflecting the latest local housing needs assessment or equivalent requirement. It also supports the delivery of housing for older people. Policies in the development plan, including Policy PE4, now PE6, require housing developments to be supported by sufficient infrastructure. Effectively applying a moratorium until 2035 is neither appropriate nor supported by evidence.

Ref.	Who	Summary of comment	Our response
		brought forward towards the end of the life of the Plan, specifically in the years 2035-2039. Suggest that Policy H9 should also include: "Developments on these sites should: • Come forward for development only from 2035 • Deliver homes for older people, or which can be adapted for older people."	
369-33	Cllr Debbie Parkinson	No more houses should be built in area. Houses are over £200,000 which is not affordable. The neighbourhood plan should be adhered to. H9.1 East of Robin Hill Lane, Pepper Lane and Almond Brook Road could not take any more traffic and these are the main routes from the motorway. H9.2 - this area has also been subjected to a few hundred new houses taking green space of the old golf course etc. The road on Chorley Road since the houses were built has been flooded when it rains as the culvert cannot take any more water with the new houses. House builders have reneged on promises within planning permissions to build allotments, park	Applying a moratorium in Standish is neither appropriate nor supported by evidence. Affordable housing provision is covered by Policy H2. Policy H9 enables policy H1 in the Standish Neighbourhood Plan to remain relevant to future planning applications following the de-designation of the safeguarded land that it refers to when the Local Plan is adopted. There are no known overriding constraints as to why these sites cannot be developed at some point in the future, but the matters raised will need to be fully considered before any planning permissions can be granted.

Ref.	Who	Summary of comment	Our response
		area etc and the amenities in the area are nil. Also, a footpath to school from the leisure centre was promised by the builders and never materialised. Local schools are currently full. H9.3 This land is the only green space between 2 very large housing areas in and around Standish. This space should not be allowed to be built on. An area near Worthington has recently had 152 new houses built, the road leads to a single track railway bridge and a narrow country road - the water culvert floods near the Crown at Worthington and a narrow bridge and road on Rectory Lane. The roads around this area are narrow and will not take further traffic. H9.4 This area is already heavily populated, new houses surround it and Standish cannot take more building. It should not be built on. H9.5 This area has been highly developed. The road is used by HGVs etc to cut from M6 to M61 and several accidents have happened on this road, some fatal. There is a narrow railway bridge from this area and Lurdin Lane is used by walkers, ramblers, hikers and should remain undeveloped.	Commitments from developers need to be tied down through the details of the planning permissions, such as being shown on the approved drawings or set out in the conditions of approval or in a planning agreement, then they can be enforced.

Ref.	Who	Summary of comment	Our response
1099-4	Morris and Persimmon Homes	This policy approach is flawed because it perpetuates a Neighbourhood Plan policy approach adopted in July 2019 without any evidence or justification that it is appropriate in present circumstances. Whilst the Neighbourhood Plan runs to 2030, it has not been updated. It was never intended to address the role Standish will play in meeting housing needs after the end of the Core Strategy period in 2026, or what infrastructure might be necessary to serve new housing provision. It contained no objective evidence on the infrastructure position at the time of adoption. Criterion ii) requires that "All of the necessary infrastructure works required through legal agreements for the level of housing have been completed and implemented". This is concerned with developments which were approved around 8 years or more ago, and it has no place as a consideration in a new Local Plan. The relationship between borough-wide policy and the unique approach taken to Standish under Policy H9 are unexplained.	The neighbourhood plan was adopted on the basis that it met the basic conditions.

Ref.	Who	Summary of comment	Our response
		The draft Local Plan designates remaining safeguarded land in Standish for sustainable housing growth, and this is included in the housing land supply. The draft Local Plan is accompanied by a draft Infrastructure Delivery Plan (IDP), which covers a range of matters. There is no up-to-date evidence of any current infrastructure issues unique to Standish which justify a different approach than at any other location within the Borough. The IDP does not identify any specific infrastructure requirements for Standish, other than a common place need for primary school places which can be dealt with through developer contributions. The Local Plan should determine the housing distribution for Wigan, allocate sites in Standish, identify the current infrastructure position, and specify how any deficiencies will be addressed. This will then supersede the historic Neighbourhood Plan approach. This applies specifically to H9.1, H9.2 and H9.3. H9.2 and H9.3 form part of residual land at Rectory Lane, which has been developed by Morris Homes and Persimmon Homes. A Development Framework has been previously	

Ref.	Who	Summary of comment	Our response
		submitted, which includes a masterplan that assesses constraints and opportunities at the site. The sub-division between 9.2 and 9.3 in the Local Plan appears logical. It is positive that Policy H9 explicitly recognises that safeguarded land in Standish should be identified as a location for sustainable housing growth and that the draft Infrastructure Delivery Plan does not identify any constraints to development unique to Standish, which is consistent with health and education assessments commissioned by Persimmon. It is welcomed that the Council appears to have taken account of the Development Framework in designating areas for housing growth but these sites must logically be identified as housing allocations.	
1100-1	Persimmon Homes	This representation concerns land owned by Persimmon Homes at Pepper Lane, Standish. The site forms 2.46 ha of site H9.1 in the Local Plan. An accompanying representation submitted on behalf of Persimmon Homes and Morris Homes argues that the basis of this policy is flawed. It is the role of the Local Plan to determine the housing distribution for Wigan, allocate sites in	Noted.

Ref.	Who	Summary of comment	Our response
		Standish, identify infrastructure provision, and specify how any deficiencies will be addressed. The Plan should be subject to sustainability appraisal and the Infrastructure Delivery Plan fully used as a tool for plan making. The majority of site H9.1 was subject to a planning application for 57 dwellings (A23/96541/MAJOR), which was refused on 11//10/24 contrary to officer advice and is subject to appeal. The Local Plan can only be found 'sound' if it makes residential allocations in Standish. In the absence of any site-specific reason for refusal of the planning application, there is substantial and up-to-date evidence that the site promoted by Persimmon Homes is deliverable and should form an allocation, with delivery within the first five-years of the plan period.	
1103-5	Story Homes	The Local Plan fails to establish a settlement hierarchy for the purposes of future growth and the individual settlement policies within the Housing chapter provide little to no clarity about why certain sites have been allocated and what housing need they are addressing.	The sites that have been allocated have been chosen given their strategic nature, their role in meeting identified housing needs and that they will benefit from a detailed site policy to facilitate their comprehensive development and the delivery of associated infrastructure.

Ref.	Who	Summary of comment	Our response
		The HNA assesses need at a sub-borough level but this has not been used to inform a spatial strategy for the allocation of land for development. The HNA identifies that in the Shevington and Standish sub-area there are 974 households in need of housing and an annual shortfall of 152 affordable dwellings. Additional greenfield sites in the Green Belt, such as land west of Old Pepper Lane, are needed to meet the borough's qualitative housing needs as adopting a brownfield first focus risks these not being met. This site can meet the golden rules set in NPPF including the delivery of 50% affordable housing. The proposed housing allocations in H9 appear to be based on the availability of land alone, without consideration to how the land supply will contribute to meeting the qualitative housing needs of the Borough.	It is considered that the proposed site allocations, alongside the wider housing supply set out in the SHLAA and summarised in Policy H1, is sufficient to meet identified housing needs in the borough without releasing further land from the Green Belt.
1113-5	Seddon Homes	Current consultation on the re-designation of the Standish Neighbourhood Plan provides an opportunity to review the Neighbourhood Plan safeguarded land policy. Re-designation of the Standish safeguarded land sites within the Local Plan and Standish Neighbourhood Plan undermines draft Local	There hasn't been a consultation on the redesignation of the Standish Neighbourhood Plan. There has been a consultation on the redesignation of the Forum.

Ref.	Who	Summary of comment	Our response
		Plan Policy H1 and the Council's obligation to deliver 16,527 homes over the plan period and contradicts Core Strategy Policy SP4. The designation in the Standish Neighbourhood Plan is limited as the Neighbourhood Plan is more than 5 years old, the Council's land supply is marginal and the site satisfies relevant criteria. A recent decision (A/23/96541/MAJOR) demonstrates Council support for the short term delivery of safeguarded land sites in Standish. The Council's approach to safeguarded land is inconsistent. The policy lacks justification as to why the Standish Neighbourhood Plan allocations have been retained, when the Neighbourhood Plan is more than 5 years old and why other safeguarded sites have been allocated. A large proportion of the sites allocated are constrained and unviable. Therefore, there is a need to allocate safeguarded sites such as Rowton Rise in Standish, which is an available, suitable and achievable site that is not located in the Green Belt. There are no physical constraints and the site can be readily served by	

Ref.	Who	Summary of comment	Our response
		utilities. It is in the ownership of a housebuilder who wishes to develop it in the short term. Designation of safeguarded sites indicates support for development in this location. Given the Council's marginal position, failure to allocate safeguarded sites will make it vulnerable to speculative less sustainable applications, potentially requiring the release of Green Belt land.	
1137-10	United Utilities	Request opportunity to liaise with the council more closely on the sites. Site H9.1 is in proximity to hydraulic flooding incidents from the public sewer. Site H9.2 contains a water main and associated formal easement within this site. Site 9.3 includes wastewater infrastructure where modelling data indicates a risk of flooding from the public sewer; Sites H9.3 and H9.4 include significant water and wastewater infrastructure. Sites H9.3, H9.4 and H9.5 are in proximity to flooding incidents from the public sewer.	Noted. Liaison with United Utilities is welcomed at, or prior to, any planning application stage.

Ref.	Who	Summary of comment	Our response
1140-4	Ainscough Strategic Land	The fact that these five sites remain undeveloped suggests there are significant issues with their deliverability and viability. Therefore, further locations which are deliverable in the short term are needed to safeguard against continued deliverability issues in Standish.	Representations from the site promoters of these sites to this consultation suggests otherwise.
Policy H10: Houses in Multiple Occupation			
874-9	Cllr John Harding	Recognise the need for a certain number of HMOs, but an Article 4 direction should be applied to all HMOs across the borough, regardless of location. Having an Article 4 direction only in specific areas may lead to developers purchasing properties in more peripheral areas, thereby spreading out any potential problems.	The borough has recently imposed a boroughwide Article 4 Direction for HMOs and the policy has been amended accordingly.
369-30	Cllr Debbie Parkinson	There are several HMOs in Standish, which in the main do not cause problems. However, where landlords take lounge areas and turn them into bedrooms, residents have nowhere to relax or socialise, so may end up socialising on the street causing noise issues. Noise late at night can also be a problem. HMOs may be needed but should be registered so that the Council knows where they are.	The borough has recently imposed a boroughwide Article 4 Direction for HMOs, meaning that all proposals for HMOs will require planning permission, and the policy has been amended accordingly.

Ref.	Who	Summary of comment	Our response
1002-3	Cllr Gena Merrett	Do not support more HMOs unless they are heavily regulated and licenced as they can lead to areas of high turnover and anti-social behaviour.	The borough has recently imposed a boroughwide Article 4 Direction for HMOs. Policy H10 requires a robust management plan to be submitted, which would cover anti-social behaviour. All HMOs with 5 or above bedrooms require a licence.
100-28; 413-2; 573-6	Private Individual	The Article 4 Direction requiring all proposals for new HMOs, regardless of size, to require planning permission should be extended more widely across the borough, particularly where HMO numbers are rising, including at: South Atherton; Tyldesley Road; parts of Leigh; Springfield / Gidlow; Swinley; Ince; Scholes; Whelley; Beech Hill.	The borough has recently imposed a boroughwide Article 4 Direction for HMOs and the policy has been amended accordingly.
1325-1	Private Individual	Strongly object to the amount of HMOs being planned in the borough, particularly in Beech Hill, where the latest proposal is for ex-offenders. The area already has anti-social behaviour issues and HMOs raise safety concerns, particularly for pensioners when it is dark and for children playing outside without supervision.	The role of policy H10 is to help enable the effective management of HMO provision in the borough.

Ref.	Who	Summary of comment	Our response
860-1; 864-1	Private Individual	The Council should stop allowing more HMOs, which only add to local deprivation.	Most HMOs do not need planning permission unless permitted development rights have been withdrawn successfully through what is called an Article 4 Direction, so the council has not allowed them. However, we have now been able to introduce a boroughwide Article 4 Direction for HMOs, so they do not all need planning permission. The role of Policy H10 is to help manage HMO provision to help minimise any negative impact they may have in communities.
1321-1	Private Individual	Disagree with all HMO developments in Wigan as there is no consideration given to maintaining garden spaces, which is essential for health and wellbeing, the local environment and our protected wildlife.	See above.
413-2	Private Individual	A major concern is 2 and 3 bedroom housing being used for shared housing, which doesn't need permission. These properties should be used as family homes.	A HMO has to have at least 3 bedrooms. The borough has recently imposed a boroughwide Article 4 Direction for HMOs which means that all HMOs regardless of their size now need planning permission.

Ref.	Who	Summary of comment	Our response
413-2	Private Individual	HMO problems include anti-social behaviour, parking issues and poor property upkeep.	Policy H10 and the associated SPD seek to address these issues as far as we are able to.
413-2; 502-1	Private Individual	The landlords for these properties often live outside of the borough, with profit the main motivation. Many landlords see HMOs as a money making opportunity without any regard for people living in the area.	Policy H10 requires landlords to prepare and submit a robust management plan prior to the occupation of new HMOs which will be enforceable.
502-1	Private Individual	There should be protection regarding who is placed in these properties and also against a high concentration of properties in one area. A system of consultation should be in place for people living within a certain radius regarding who is residing in their locality e.g. ex-offenders.	Policy H10 imposes a limit on the concentration of HMOs. Management of who occupies HMOs is outside the remit of the Local Plan.
860-1; 862-2; 864-1; 934-1; 983-1; 1323-1; 1324-1	Private Individuals	Understand that HMOs can serve a legitimate purpose in providing affordable housing but unchecked expansion without appropriate planning controls has negative impacts including: • community disruption due to tenant turnover, resulting in a loss of neighbourly relationships and more social disconnection • anti-social behaviour and safety concerns • pressure on local service, such as waste collection, healthcare and schools	Policy H10 seeks to ensure that HMOs are effectively managed in order to address such negative impacts.

Ref.	Who	Summary of comment	Our response
		• parking problems and traffic congestion • degradation of housing stock through poor conversions and poor management, impacting on character of areas • substandard living conditions for tenants • loss of family housing • noise issues • impact on the saleability and value of neighbouring properties.	
862-2	Private Individual	Investors are buying housing which are suitable for first time buyers. This makes it harder for people to get on the property ladder.	The Council cannot influence who buys properties on the open market, however, having now introduced a borough-wide Article 4 Direction meaning that all HMOs now need planning permission, it is highly likely that fewer new HMOs will come forward.
100-28	Private Individual	Support the proposed thresholds in relation to concentrations, sandwiching and blocks of adjacent HMOs. An online concentration map should be published for transparency. The proposed requirement for a management plan is welcome, but these must not become a box-ticking exercise. They should include a named local contact and a 24/7 number for	Support welcomed. It is not intended to be a box ticking exercise but a clear commitment against which landlords can be held to account.

Ref.	Who	Summary of comment	Our response
		reporting issues. A clear escalation route should be provided for unresolved nuisance or waste issues. HMO landlords should be required to display their licensing and contact details on the property exterior. HMOs often bring disproportionate pressure on bins, parking, and local amenities. All applications should be required to show dedicated, screened waste and recycling areas. Where parking is limited, a parking stress survey should be mandatory for all applications. Local communities often express frustration at the lack of proactive enforcement around noise, anti-social behaviour and waste management. Wigan Council should appoint or resource a dedicated HMO compliance officer or team, who undertake annual spot-checks and audits. Support Policy H10's intent but urge the Council to strengthen monitoring, enforcement and community engagement. If managed poorly, HMOs undermine neighbourhood cohesion and quality of life. If managed well-with strict rules, transparency, and proactive enforcement-they can be a positive part of the housing mix.	

Ref.	Who	Summary of comment	Our response
576-27	Private Individual	How many people in HMOs come from outside of the Borough? Wigan does not have a big student population. The development of HMOs should not deprive local residents of first homes.	We do not know the origin of residents of HMOs but all places have them. By definition, there are generally temporary accommodation for people, including students and people working temporarily in the area.
859-8	Private Individual	The number of HMOs has risen significantly, changing the character of areas, from once stable neighbourhoods into transient streets where long-term residents no longer feel at home, heard, or safe. Please review Bolton Council's HMO Action Plan, which considers these matters.	The borough has recently imposed a boroughwide Article 4 Direction for HMOs which means that all HMOs regardless of their size now need planning permission.
933-2	Private Individual	Converting housing stock to HMOs in central areas does not reflect the need for different types of property as set out in the LHNA. Houses that have larger rooms in areas such as Springfield, Gidlow, Swinley, Scholes, Whelley and Ince are being bought up by investors and converted to HMOs. Where there is no article 4 direction, smaller HMOs are being converted without the local authority's awareness and longstanding residents are being sandwiched between HMOs.	See above.

Ref.	Who	Summary of comment	Our response
		This increases the need for 2/3/4-bedroom properties as the current housing stock is no longer available, Linked to Policy H10, the Council should implement article 4 directions in all of the named areas, if not across the entire borough, as well as ask HMO landlords to register an HMO of any size. This will help the local authority understand the impact HMOs are having, what services need to be planned for, and to look at the impact of outside investment in 'cheap northern housing stock' on the provision of housing in Wigan, particularly for first time buyers and families. If single person accommodation is needed then the focus should be on proposed developments needing to include flats with adequate parking as part of their building programmes.	
1023-11	National Highways	Supportive of this policy.	Support welcomed.
1033-4	Private Individual	10% is too high a figure in terms of HMOs.	The policy has been amended to remove the reference to 10%.
1322-1	Private Individual	There is no mention of the number of HMOs in Wigan in the plan graphics. Many terraced homes in Gidlow and Swinley have been	Sufficient affordable housing delivery is a key objective of the Council. As set out in the Council's Authority Monitoring

Ref.	Who	Summary of comment	Our response
		converted to HMOs. This is reducing the supply of family homes to purchase. It is a disgrace that the number of households renting privately has increased by 275% since 2001. Why have the council not provided more social housing instead of allowing developers to convert a valuable asset of low cost terraced houses to HMOs?	Report, over 3,300 affordable homes have been delivered in the borough since 2011, with the annual target being exceeded most years since 2017. In 2023/24, 441 affordable homes were delivered, including 317 through grant funding, 107 secured though Section 106 agreements and 17 secured through other arrangements with the private sector.
Policy H11: Homes for looked after children			
369-26	Cllr Debbie Parkinson	All children deserve a safe, warm home. However, siting them in areas where elderly people live, where noise can be an issue, has not been ideal in Standish. Larger houses are often targeted, which is very contentious. Specific specialised housing should be created and suitable areas/streets should be researched first.	Content within policy H11 will ensure that such matters are taken into account.
874-1	Cllr John Harding	Welcome the proposed tightening in regard to the management of planning applications pertaining to homes for looked after children. The occupation of properties by children placed by Wigan Council and inclusion of the Council's Children's services in the process is also welcomed. This will provide greater overall control.	Support welcomed.

Ref.	Who	Summary of comment	Our response
100-16	Private Individual	Support the reference to avoiding "undue concentration" in criterion 3, which is essential. In Atherton, multiple properties have been converted into children's homes, often without consultation or regard for their cumulative impact. Recommend that the policy should include a quantitative threshold, similar to the 10% HMO rule, to protect residential character, ensure access to support services, and prevent over-reliance on any single neighbourhood.	Support welcomed. Criterion 3 with the policy refers to "undue concentration of such uses".
100-16	Private Individual	Support the requirement for robust management plans but important that these are not too generic and are properly enforced. Recommend that they include a named manager contact for neighbours, a complaints and incident response procedure, details of staff training and supervision and confirmation of Ofsted status (if required). They must be reviewed regularly and linked to planning enforcement conditions where relevant.	The specific details set within the management plans will be in line with statutory requirements and are outside the remit of this Local Plan.
100-16	Private Individual	Outdoor space is vital for therapeutic and recreational purposes. Recommend that this should be made non-negotiable unless it is a conversion of an existing property where suitable external space already exists.	This is required in criterion 5 of the policy.

Ref.	Who	Summary of comment	Our response
100-16	Private Individual	Monitoring provision against needs is vital, as is transparency. Recommend that the Council publish an annual public report detailing the number and location of children's homes in the borough, capacity vs. local demand, outcomes of monitoring efforts and any enforcement taken.	The issue is that private companies have been importing looked after children into the borough because of chapter property prices not child welfare reasons. The policy sets out to ensure that proposals are based upon "clearly demonstrated local need" and show "clear alignment with the council's adopted children's social care strategies".
1023-12	National Highways	Supportive of this policy	Support welcomed.
Policy H12: Accommodation for gypsies and travellers			
100-26	Private Individual	Support the safeguarding of existing sites unless a high-quality alternative is provided, or there is clear evidence of no demand over a 15 year period. Raises concern about the Little Lane extension. Important to ensure that early and meaningful engagement is undertaken with neighbouring residents and the site masterplan is made public and includes green buffers, acoustic screening, lighting plans and designated amenity areas. Visual impact assessments should be provided to mitigate any negative effects.	The need for additional pitches in the borough is set out in the 2024 Greater Manchester Gypsy and Traveller Accommodation Assessment. Amended criteria 4, 5 and 8 refer.

Ref.	Who	Summary of comment	Our response
		Request criteria to be expanded to include requirements for SuDS, confirmation of sufficient utility capacity (electricity, refuse collection routes, etc.) based on service provider data and a clause that delivery of pitches is phased alongside utility upgrades and access improvements. This concentration of pitches in a single locality could overburden local infrastructure and services. Future allocations or windfall proposals should seek geographical balance across the borough. Policy should confirm that access roads will be widened or upgraded where necessary for emergency and waste vehicles. Pedestrian safety assessments should be conducted around the site entrance and bus stops and pedestrian crossings near the site should be assessed for capacity and safety.	
396-2	Private Individual	Why is there such a high proportion of traveller pitches in Pemberton? Pitches should be spread around the borough.	The council did not determine the location of the existing sites, they have been secured through planning applications. The Little Lane site is well managed however, and appropriate site for expansion to meet needs.

Ref.	Who	Summary of comment	Our response
498-11	Natural England	Policies H12.1 Bickershaw Caravan Site and H12.3 Aspull Common are situated within Site of Special Scientific Interest Impact Risk Zones for Abram Flashes SSSI and Woolston Eyes SSSI. These designated sites are vulnerable to changes in water quality and their hydrology should not be severed as part of the development. Surface run-off, septic tank and package sewage treatment plant discharges can contribute to elevated nutrients and changes in water quality at designated sites in the absence of poor location, unsuitable capacity of design and/or mitigation.	These two sites already exist.
1023-13	National Highways	The criteria which will be used to determine whether a site has safe and suitable vehicular and pedestrian access to the highway network are not clear. Without clarity on this, there is a risk that sites will not be able to be challenged in terms of their potential impacts on both the local and strategic highway network. There is no statement around highway capacity, demand or impact. This will need to be understood and used as part of the criteria to determine if a site is sustainable or could have a potential impact on the strategic road network.	The ability to access and egress a site safely and conveniently will be determined by the design of that access and its location on the highways network, including the speed limit on the road concerned and the proximity to corners and junctions, as with any other access.

Ref.	Who	Summary of comment	Our response
1332-3	Private Individual	Do not agree with the provision of additional homes for gypsies and travellers	The Council has a statutory duty to meet the housing needs of gypsies, travellers and travelling showpeople.
Policy H13: Accommodation for travelling showpeople			
498-12	Natural England	Policy H13.3 Seaman Way, Ince is situated within Site of Special Scientific Interest Impact Risk Zones for Abram Flashes SSSI and Woolston Eyes SSSI.	It is an existing site.
1023-14	National Highways	Accessibility and egress from the highway network is identified but there is no identification of how safety impacts may be mitigated if required. This will need to be identified if the sites are located in the vicinity of, or accessed from, the strategic road network.	The ability to access and egress a site safely and conveniently will be determined by the design of that access and its location on the highways network, including the speed limit on the road concerned and the proximity to corners and junctions, as with any other access.

Ref.	Who	Summary of comment	Our response
Jobs			
100-18	Private Individual	The Jobs chapter offers a promising and forward-looking economic framework. There are persistent investment and employment inequalities between towns in the borough. Atherton has not received proportional investment in employment land, business support, or high-quality transport connectivity compared to Wigan or Leigh. A specific action plan for under-served towns like Atherton and Tyldesley is needed with clear targets for employment growth and business support in these areas. Frontier Sector Growth - Atherton is strategically located near the A577 and the M61 corridor and has former industrial sites and brownfield land with real potential for clean manufacturing, logistics, and even digital co-working space development. The plan should: • Identify and promote small-scale innovation and tech hubs outside of the borough's largest towns.	Support welcomed. Employment areas and employment sites are identified in Atherton – see policy J2 in this plan and policy JP- Allocation 34: West of Gibfield in the Places for Everyone Plan. The Missions in Progress with Unity apply across the borough and the plan's objectives have been amended in line with those.

Ref.	Who	Summary of comment	Our response
		• Consider repurposing unused town centre or mill buildings (like Victoria Mill or Ena Mill) as start-up space or education/training hubs in frontier sectors. • Ensure local access to skills and apprenticeship opportunities - travel distances to Wigan or Leigh can be a barrier for some residents in outlying areas such as Atherton, Hag Fold, and Howe Bridge. To address this bring satellite education and training provision to local centres like Atherton Library or Community Hubs. Support remote and hybrid apprenticeship pathways in partnership with local employers. • Include a public-facing economic performance dashboard broken down by township/locality, to improve accountability and allow residents to see the direct impact of the plan on their area, showing: o Jobs created Employment land uptake o Business start-up rates o Apprenticeship placements	
159-7	Standish Voice	The retention and creation of jobs in Standish should be a priority. Enhancing the village centre will enable Standish to capitalise on its popularity	Policy TC10 seeks the further improvement of Standish centre as a key centre serving the north west of the borough and

Ref.	Who	Summary of comment	Our response
		as a retail and hospitality centre, which increases jobs in these sectors, and encourage more office space to bring in more employment.	recognises its key role for a variety of uses, including retail, food and drink outlets, and financial and professional services. Policy TC1 also supports offices, as a main town centre use, within Standish centre in principle.
271-3	Private Individual	Details of local unemployed figures were not available at a recent consultation event.	Local unemployment figures are only a small part of the picture, which also needs to include matters such as average incomes, skills and qualifications and deprivation.
369-12	Cllr Debbie Parkinson	Not many new employment sites promoted to the north of Wigan, including Standish which has lost most of its industrial sites to new housing.	Bradley Lane and Mayflower are safeguarded as employment areas under policy J2. Green Belt land would be needed for any new employment sites.
372-8	Private Individual	New jobs generated will be low paid and attract people from outside of the borough.	There is no evidence to support this.
576-9	Private Individual	This policy is flawed because the assumption that people in the southeastern part of the borough i.e. Astley, Tyldesley and Mosley Common have good access to other boroughs, other than central Manchester, is false due to existing chronic congestion on the roads. The plan does nothing to address these issues by tackling existing problems and makes matters worse by loading already overcrowded roads	Policy T1 prioritises improvements to services on the Atherton rail line and policy TC3 seeks to secure significantly improved rapid transit services between Leigh and Manchester. Bus franchising has also brought local bus services under public control with improvements to services locally pending. Walking, wheeling and cycling also needs to be prioritised as good

Ref.	Who	Summary of comment	Our response
		with new house building with no option for new, well-paid jobs in volume within the borough. Residents cannot access motorway networks easily and public transport connectivity is practically non-existent apart from journeys into central Manchester.	alternatives to car use are needed if congestion is to be addressed.
761-1	Private Individual	Confirmed that there is no proposal to designate Land South of Pennington for business use.	The Local Plan does not propose land south of Pennington for development. It is proposed to remain in the Green Belt.
859-3	Private Individual	Job creation, investment, training programmes and apprenticeship placements need to be fairly distributed across the borough, including towns like Atherton, to enable residents to access opportunities. Any meaningful employment strategy must be backed by adequate transport and digital infrastructure - Atherton continues to suffer from poor connectivity. Satellite outreach, pop-up events, or facilities are needed in Atherton Para 6.29 presents a distorted picture of Leigh - with it having good connectivity!	Noted. The proposed employment policies support appropriate employment development across the borough, including in Atherton. Policy T1 safeguards future transport priorities. Leigh town centre is a focal point for bus services in the east of the borough including guided busway services.
990-3	Private Individual	Support for the ambition to provide better quality local jobs within the borough but concerned about the re-classification of 345,000	Support welcomed. The Lowton area has direct access to both the A580 and the M6, at Junctions 22 and 23, which are key

Ref.	Who	Summary of comment	Our response
		sqm of Green Belt in Lowton, to deliver two large industrial / employment sites, out of the total borough requirement of 647,000 sqm.	attributes sought by modern businesses. . However, we are no longer proceeding with the employment site allocations and no land is proposed to be released from the Green Belt in the Publication version of the Local Plan.
1023-71	National Highways	National Highways will work closely with the Council to ensure the proposed allocations can be delivered whilst reducing the overall impact on the SRN, particularly on the M6 from J22 to J26. The allocation on the A580 and the potential for a Lane Head bypass might have implications for M6 J22 and J23 that would need to be considered. The proposed employment allocations are typically road-reliant uses and close to the SRN. These will require a vision-led approach with supporting infrastructure and potential mitigation measures delivered in a timely and appropriate manner.	Noted. We are no longer proceeding with the employment site allocations in the Publication version of the Local Plan.
1058-3	Cllr Debra Wailes	Additional high school provision is needed in the Wigan Bolton Growth corridor, to the north of Atherton. Access to more highly paid jobs needed.	Policy PE4, now PE6 will ensure that development contributes to education provisions as needed.
1106-5	Harworth Group	Supports the general emphasis at para 6.1 - 6.19 that set out the case for economic growth and	Support welcomed.

Ref.	Who	Summary of comment	Our response
		the need to allocate sites that are well placed to meet identified demand. Support the comment at para 6.7 that the council considers that it is crucial to build on the strong foundational economy that includes logistics and manufacturing. Support the comment at para 6.12 that makes explicit reference to those sectors, and the need to provide support to them by identifying much needed additional and better quality sites to attract the best businesses.	
1121-3	Peel Land	Strongly support the Council's ambitions to grow and diversify the local economy. Securing both growth and diversification are key to addressing some of the challenges the borough faces. It is consistent with key objectives of GM and national planning policy, and with Policy JP-J1 of PfE which seeks a "thriving, inclusive and productive economy in all boroughs" with an emphasis on: "maintaining a very high level of economic diversity across our boroughs" and "facilitating the development of high value clusters in key economic sectors..." Recognises that supporting the foundational sectors in which Wigan is strong and seeking to take advantage of growth in high value frontier	Support welcomed. Paragraph 6.10, now 7.10, has been amended to reflect comments and for consistency.

Ref.	Who	Summary of comment	Our response
		sectors (paragraphs 6.7-6.10), in economic corridors such as the A580 East Lancashire Road corridor, is strongly supported. As the EMELA recognises, one of the weaknesses of the local economy is an underrepresentation in, and absence of suitable land for, more productive jobs in sectors such as professional, scientific and technical, ICT, creative and related manufacturing businesses (paragraph 6.72). The proposals within the WBLP are part of an appropriate strategy to address this. It is requested that the list of frontier sectors within paragraph 6.10 includes "professional, scientific and technical, ICT and creative" activities. These are already referenced at paragraph 6.30 and 6.72 of the plan and including a reference at paragraph 6.10 would ensure consistency. Making available additional and better-quality sites, that have the required location, quality profile and environment to support growth and business investment (paragraph 6.12 and 6.23-6.24) is an essential part of ensuring a sound plan and is supported. it is an appropriate strategy to plan for more employment space than the minimum	

Ref.	Who	Summary of comment	Our response
		requirement (as set out in paragraph 6.33) in recognition that some of the current supply may either be more suitable for alternative uses or may not deliver the economic growth that the WBLP seeks to achieve. This approach is clearly justified by the findings of the plan's evidence base	
1326-4	Private Individual	There seems to be a disconnect between the good quality of education and employment opportunities in the borough as Wigan has a high level of NEETS. Warehouse and delivery jobs and social care are not sufficient for the well educated aspire to. The educational offer in Wigan is limited, with the lack of choice putting some parents off living in the Borough.	It is a key objective of the council, and partners, to better equip local residents with the skills and qualifications needed to take advantage of the local job opportunities that our economic ambitions will create. This is covered in Policy J1 as amended, and in PfE Plan Policy JP-J1.
1403-2	Private Individual	Encourage higher quality jobs through grants etc to move to the borough	There have been few if any grant opportunities available to offer but the council will continue to actively seek opportunities to support economic growth in the borough.
Policy J1: Supporting economic growth			
100-32	Private Individual	The plan should elevate the role of Atherton in the economic growth strategy and explore further employment allocations or safeguarded	The PfE Plan allocates land at West of Gibfield for mixed use development, including employment, and Atherton is

Ref.	Who	Summary of comment	Our response
		land in East Atherton and Hindsford to maximise its rail links and road network access. Support the regeneration of historic employment spaces in secondary towns like Atherton, that could support start-up units for manufacturing or creative industries and co-working spaces or clean-tech incubators. Commit to piloting frontier sector enterprise hubs in underserved towns like Atherton using UKSPF or Shared Prosperity funding. Include explicit reference to transport investment priorities that connect towns like Atherton to the borough's key economic corridors, particularly if these areas are not getting equivalent employment site allocation. Prioritise local delivery of training, apprenticeships, and adult re-skilling programmes in proportion to the lack of direct employment site allocations.	already well located to access jobs at existing sites, including at Logistics North in Bolton district. Policy J2 designates a number of employment areas in Atherton. These are protected by both Policy J1 and J2 from redevelopment for alternative uses and are recognised as areas for economic regeneration, intensification and jobs growth.
369-28	Cllr Debbie Parkinson	Standish lost its main employment area to new housing.	Most of the Bradley Lane site remains as an employment site.
576-12	Private Individual	Para 6.26 does not stand up to scrutiny. There is standing traffic on local roads in the rush hours every day during school term time and bus travel takes over an hour.	Policy T1 prioritises improvements to services on the Atherton rail line and policy TC3 seeks to secure significantly improved rapid transit services between Leigh and

Ref.	Who	Summary of comment	Our response
		The implication that the whole of the east of the borough has good connections to the M60 is false. You can access the M60 going northwards via A580 at Junction 14 but you cannot go directly south from the A580. The M60 southbound, M602 eastbound to Eccles and Salford and M62 westbound is accessed via Junction 13 at Worsley. Manchester airport is also only accessible by road since there are no public transport options available. For residents in the east of the borough this is unacceptable with no plan to improve it.	Manchester. Bus franchising has also brought local bus services under public control with improvements to services locally pending. Walking, wheeling and cycling also needs to be prioritised as good alternatives to car use are needed if congestion is it to be addressed.
739-1	Private Individual	Object to the use of green belt land for industrial use, this will damage the wildlife and the environment. There are numerous industrial estates in Wigan not being fully utilised that could provide a better option than these plans.	We are no longer proceeding with the employment site allocations and no land is proposed to be released from the Green Belt in the Publication version of the Local Plan.
86-2	Private Individual	How does redesignating a large area of green belt land as commercial development land contribution towards a greener sustainable economy in an area already heavily congested.	We are no longer proceeding with the employment site allocations and no land is proposed to be released from the Green Belt in the Publication version of the Local Plan.

Ref.	Who	Summary of comment	Our response
899-9	City of Trees	Many of the site allocations appear to include mature wooded areas and hedgerows - will these be safeguarded? South Lancashire Industrial Estate Extension - will the established woodland in the eastern corner be safeguarded? Chaddock Lane - will existing scrub / emerging woodland areas be retained?	All new development is subject to a statutory duty to deliver a 10% net gain for wildlife. As woodland is a highly valuable habitat, there is strong financial incentive to retain it.
901-4	Cityheart Ltd	Support for the strong commitment to supporting economic growth and diversification, including within town centres.	Support welcomed.
1023-15	National Highways	Proposals for employment sites will need to be appropriately scoped with National Highways where there is a view of detrimental impact on the SRN. National Highways will work with the Council and other key stakeholders to ensure that development is brought forward in a safe and sustainable manner.	Noted. However, we are no longer proceeding with the employment site allocations in the Publication version of the Local Plan.
1096-6	Taylor Wimpey	Taylor Wimpey supports the aims of Draft Policy J1) and welcomes the allocation of Land North of M6 Junction 26 for employment purposes. It supports the delivery of new employment allocations in the Local Plan, in addition to those allocated in PfE. PfE Table 6.2 indicates that	Noted. However, we are no longer proceeding with the employment site allocation at land North of M6 Junction 26 in the Publication version of the Local Plan.

Ref.	Who	Summary of comment	Our response
		Wigan's industrial and warehousing land supply 2022-2039 is 480,321 sqm. Whilst Taylor Wimpey welcomes the proposed identification of sufficient land to deliver a net requirement of around 647,000 sqm of new high-quality employment floorspace as set out in Draft Policy J1, there are concerns that the Council has not sought to deliver an associated uplift of housing delivery to support this. It is considered crucial that Wigan manages its economic ambitions and job creation whilst ensuring that there is sufficient high quality housing stock in the Borough.	Economic ambitions alongside future revised housing requirements will be considered in an early update of the Local Plan as set out in policy UP1 of the Publication version of the Local Plan.
1103-6	Story Homes	Whilst this modification to Green Belt boundaries is supported by Story Homes, it is important for Wigan to undertake a comprehensive Green Belt Assessment as part of the Local Plan preparation - i.e. assess Green Belt parcels of land for their suitability for development, rather than assess land as being suitable, or otherwise, solely for employment use; or an assessment of the sites suitability as a Grey Belt site for employment use. A piecemeal Green Belt Review that only assesses land for employment uses is not effective or a suitable method of plan making. In	We are no longer proceeding with the employment site allocations and no land is proposed to be released from the Green Belt in the Publication version of the Local Plan.

Ref.	Who	Summary of comment	Our response
		this instance, there is an identified need for both employment and residential allocations, therefore a comprehensive Green Belt Review is required.	
1106-6	Harworth Group	Policy J1 includes a reference to the NorthFold growth corridor which we support. However, this should be given greater prominence given the publicity surrounding the initiative, and how it would help deliver meeting region wide needs by working in collaboration with Bolton Council. Such reference could act as a prelude to additional commentary at policy J3.	A key diagram is now included in the Local Plan alongside the vision and objectives, which shows the NorthFold growth corridor. A paragraph has also been added to the supporting text for policy J1.
1106-6	Harworth Group	Support the overall figure for new employment floorspace of around 647,000sqm.	Noted, however the employment land supply position has been updated to reflect the removal of the 4 employment site allocations from the publication version of the Local Plan. The total floorspace in Table 6.1 has been revised to 486,978 sqm. Quantitatively, the borough's land supply, is sufficient to address the borough's expected contribution of 482,326 sqm towards the employment requirement set out in the Places for Everyone Plan.

Ref.	Who	Summary of comment	Our response
1106-6	Harworth Group	Support part (2)(c) but suggest that additional support would be given to proposals that would have beneficial impacts on existing employment areas being likely to encourage further investment in them.	Support welcomed. We will be looking to support our employment areas through various measures, including transport improvements.
1106-6	Harworth Group	Para 6.32 refers to mixed use allocations that may contribute to employment objectives on sites under policies H6 and H8. Given the approach here is to blend elements of employment and housing allocations, it might be useful to add a wider reference that allocated employment sites might contain some limited housing provision where there are demonstrable benefits to place making. This approach could be added by making reference to policy PL1.	This is not necessary. An element of employment development is very firmly part of the mix at these two housing-led sites. However, we are not proceeding with the employment-led site allocations in this Local Plan.
1106-6	Harworth Group	Paras 6.33 and 6.34 comment on how the total of 997,100 sqm exceeds the identified need for 647,211 sqm. This analysis that explains the reason for allocating a larger area of land [than] might otherwise be required should emphasise the need to provide for high quality development, and in economically desirable locations. EMELA emphasises that new employment generating development of scale requires the allocations as envisaged at Figure 6.1. These paras would benefit from a re-writing	The employment land supply position has been updated to reflect the removal of the 4 employment site allocations from the publication version of the Local Plan. The total floorspace in Table 6.1 has been revised to 486,978 sqm. Quantitatively, the borough's land supply, is sufficient to address the borough's expected contribution of 482,326 sqm towards the employment requirement set out in the Places for Everyone Plan.

Ref.	Who	Summary of comment	Our response
		to reflect the acknowledged need. It could be redrafted to better represent the Council's strong growth agenda and ambition. It could also refer back to the evidence base, where there is clear justification for the allocations being made. This is set out at para 3.1 of the plan, at the 4th bullet point there that summarises the findings of the EMELA.	Policy UP1 now commits to an early update of the Local Plan, at least in relation to meeting identified housing and employment needs, at least, to 2045.
1106-6	Harworth Group	Para 6.37 - clarify whether the figures set out at Figure 6.2 are included in the global figure for employment areas referenced at Figure 6.1. We note that Martland Park is identified as the largest park by site area, measured at 92.92ha, with the next largest being South Lancashire Industrial Estate (SLIE) measured at 90.62ha. However, SLIE is referenced at Figure 6.1 (alongside Chaddock Lane) and as such it is given status as a major employment area. We consider that it would be consistent if Figure 6.1 included Martland Park, particularly given that a benefit of the allocation under policy J3 is that it would also enhance the attraction of inward investment at Martland Park. An amendment to the plan to this effect would be consistent with policy J3, and its supporting para 6.49.	Martland Park has a total of 3.73 hectares of land available across 2 plots, whereas others including South Lancs has 35.6 ha available and Chaddock Lane has 13.87 ha, which is why they are identified as significant separate assets in Table 7.1, not because of the overall size of the employment area.

Ref.	Who	Summary of comment	Our response
1121-28	Peel Land	Peel strongly supports the Council's ambitions to grow and diversify the local economy. Recognition that supporting the foundational sectors in which Wigan is strong and seeking to take advantage of growth in high value frontier sectors (paragraphs 6.7-6.10), in economic corridors such as the A580 East Lancashire Road corridor, is strongly supported. Making available additional and better-quality sites, that have the required location, quality profile and environment to support growth and business investment (paragraph 6.12 and 6.23-6.24) is an essential part of ensuring a sound plan and is supported. It is an appropriate strategy and is clearly justified (by supporting evidence) to plan for more employment space than the minimum requirement (as set out in paragraph 6.33) in recognition that some of the current supply may either be more suitable for alternative uses or may not deliver the economic growth that the WBLP seeks to achieve. Policy J1 is considered to be an appropriate response to the evidence base of the plan and the Council's economic strategy for the borough. It reflects the need to target development that	Support noted, however we are no longer proceeding with the employment site allocations and no land is proposed to be released from the Green Belt in the Publication version of the Local Plan.

Ref.	Who	Summary of comment	Our response
		facilitates growth and diversification of the economy in key spatial locations, including the A580 corridor. The A580 is a key economic and transport corridor within Wigan. It is already home to a number of important employment sites and small businesses. Data suggests higher levels of business start-ups and entrepreneurship than in other parts of the borough. It is right that the role and potential of the corridor is recognised in the plan. The allocation of additional land to help meet this need, and in particular the proposed allocation at Bridgewater West, Astley (Policy J5) which is within the A580 corridor and the most proximate part of the borough to the regional centre, is strongly supported.	
1130-1	A&A Broster Partnership	Support the aims of Policy J1 which seeks to target new development that facilitates the growth and diversification of the economy, particularly in key spatial locations including the M6 corridor and the Wigan-Bolton Growth Corridor. The Council are heavily reliant on the four proposed employment allocations (alongside the adopted PfE allocations) coming forward in the	We are no longer proceeding with the 4 employment site allocations and no land is proposed to be released from the Green Belt in the Publication version of the Local Plan. The land at Drummers Lane (owned by A&A Broster) was assessed in the Site Selection Assessment – Employment, which concluded that the proposed site

Ref.	Who	Summary of comment	Our response
		emerging plan period to meet identified needs. We understand that land ownership issues may be a constraint to the delivery of (some of this) employment land, and that specific landowners have expressed aspirations and intentions for their land that do not fully align with their proposed allocations for development. To meet this additional need, the Council will be required to allocate further employment sites that have no technical, physical or land ownership constraints to prevent them being delivered in the emerging plan period. The Site - Drummers Lane and Wigan Road in Bryn, is solely owned by A&A Broster Partnership. It is sustainably located adjacent to the M6 to maximise potential of the M6 corridor. To best take advantage of the M6 corridor running through the authority area, A&A Broster Partnership consider that additional, deliverable sites should be allocated adjacent to the motorway. The Site is extremely well placed to support an employment allocation.	allocations was not suitable to address identified needs.

Ref.	Who	Summary of comment	Our response
1135-1	MCI Developments	Note that Belle Green Industrial Estate does not form part of the EMELA assessment and is not identified in Policy J2 and so does not form any part of the total supply of employment land. As it is not needed for employment purposes moving forward, the site should be allocated for residential uses in its entirety. As Policy J1 seeks to support economic growth, part of which seeks to protect sites from redevelopment for alternative uses, the Council need to be mindful of the EMELA assessment and the existing supply of employment sites in this Policy. This is essential as the Plan progresses to ensure that sites, such as Belle Green Industrial Estate, are not constrained for future re-development, as it is not needed to contribute to the supply of employment land.	The land at Belle Green Industrial Estate is identified as a suitable and developable site for residential development in the Council's Strategic Housing Land Availability Assessment (SHLAA).
1356-3	Green Earth Development Group	Policy J1 should recognise the contribution of mineral extraction to the local economy and give greater weight to the benefits of mineral development in the decision making process. It should recognise that local mineral development reduces the need to import certain minerals and generates income from indigenous material, further improving the local economy.	This is not considered sufficiently important for inclusion in Policy J1. A Joint Greater Manchester Waste and Minerals Plan is under preparation with adoption scheduled in 2028.

Ref.	Who	Summary of comment	Our response
1439-1	Private Individual	Why in the Integrated Appraisal by AECOM (page 38) does the site boundary differ to that submitted by the promoter. Also, the name has changed from Wigan Road and Drummers Lane to that of Drummers Lane and a 90m road frontage and access point has not been included. The additional land not submitted by this site promoter removes the Green Belt buffer separating Ashton from Wigan. The removed road frontage on Wigan Road which includes PDL also provides access to the site. Also to note: the M6 slip road is incorrectly labelled as A49.	The land in question has been subject two different interests promoting the site or parts thereof, over the course of developing the Local Plan. The wider area, covering both interests has been subject to Site Selection Assessment (as published) and the Integrated Appraisal, with the exception that the area of land fronting Wigan Road was excluded in error from the IA map. Noted.
Policy J2: Employment Areas			
100-38	Private Individual	The plan should identify Chanters and Ena Mill/Collier Brook as strategic regeneration priorities, particularly for creative industries, light manufacturing, and community-based enterprise, supported by targeted infrastructure and environmental investment. Allow for greater flexibility in policy J2 for mixed-use or community/creative redevelopment of historic buildings within Employment Areas eg Ena Mill (J2.14), where such uses retain an economic function and respond to local need, even if technically outside B or E(g) use classes.	Chanters and Ena Mill/Collier Brook are identified as employment areas under policy J2. Creative industries, light manufacturing, and community-based enterprise would be appropriate uses. Paragraph 6.46, now 7.36 refers to de-risking and unblocking sites. Policy J7, now J3 'The green economy' promotes low-carbon, sustainable employment uses.

Ref.	Who	Summary of comment	Our response
		The economic development fund referenced in paragraph 6.46 should explicitly prioritise reinvestment into employment sites in towns like Atherton that are underserved by new employment land allocations but have viable regeneration sites. Include an action plan or monitoring framework within the Local Plan to proactively assess and intervene in stalled or deteriorating employment sites eg J2.15 Gibfield, including options for environmental improvement or interim creative/business uses. Ensure Policy J2 explicitly promotes low-carbon, sustainable employment uses in Employment Areas adjacent to urban communities like Atherton, supporting both economic and environmental goals. We urge the Council to commit to supporting Atherton's employment areas not only through land-use protection but through targeted investment, flexible use policies, and a place-based economic strategy.	
159-9	Standish Voice	We welcome the Mayflower area of Bradley Lane being designated as an employment area in line with a policy in Standish Neighbourhood Plan.	Support welcomed. Proposals for non-employment uses within the designated

Ref.	Who	Summary of comment	Our response
		Standish's two employment areas (Bradley Lane and Mayflower) should be retained exclusively for this use and protected from speculative developers. We would like to see provision in the LP to ensure that residential planning applications would not be approved in these locations.	Employment Areas would need to satisfy criterion 2 of Policy J2.
234-2	AB World Foods and Associated British Foods	Request that the policy for designated employment areas should robustly protect the existing industrial operations so that industrial operations on a 24-hour basis (including distributions by HGVs, plant and other activities) are not prejudiced by the introduction of noise sensitive uses in close proximity.	This is covered sufficiently by Policy EN7 which has been strengthened and applies the 'agent of change' principle.
234-2	AB World Foods and Associated British Foods	Request that the boundary of the Employment Area (J2.42) is extended to include land to the north (circa 4.89ha) in ABWF's ownership, as there is a limited potential growth within the Employment Area and there is no other site viable for ABWF in the Borough.	We acknowledge that land for expansion is limited in this area but note that the land to the north has constraints that would need addressing, including flood risk concerns (the land is partly in Flood Risk Zones 2 and 3) and comprises of a former cricket pitch. We are happy to discuss this matters further with you, including the merits in bringing forward a planning application to address your concern, as the council is

Ref.	Who	Summary of comment	Our response
			keen retain major employers in the borough.
234-2	AB World Foods and Associated British Foods	Request that the Jury Street and Briggs Street area is not identified as a potential housing site, it is in close proximity to ABWF's food manufacturing operations and further residential development has the potential to curtail the operation and prevent the future growth of the business. The boundary of the existing Kiribati Way and Kirkhall Lane Employment Area has been amended to remove the undeveloped greenfield area to the west of Westleigh Brook. Therefore, the safeguarding provision under Policy J2 is inadequate and ineffective to protect the employment use of the remaining sites or premises in the area, as the stringent policy criteria do not apply to the development of this area. At worse, this approach has the potential to curtail the existing operations and prevent investment in the economic regeneration, intensification and growth of the existing and future businesses.	It is the SHLAA, not the Local Plan, that identifies the Jury Street and Briggs Street area within the borough's developable housing land supply. Policy EN7 applies the agent of change principle which protects ABWF in this regard. The relationship between potential future housing at Jury Street / Briggs Street and the potential expansion of the ABWF operation would need to be considered as part of the development management process, but the council would not want to undermine AB World Foods position in the borough.
369-15	Cllr Debbie Parkinson	Very few opportunities for employment areas in Standish.	Bradley Lane and Mayflower are safeguarded as employment areas under

Ref.	Who	Summary of comment	Our response
			policy J2. Green Belt land would be needed for any new employment sites.
899-10	City of Trees	Does criterion 1 mean that existing tree cover will be safeguarded? Will the existing tree cover / wooded areas be safeguarded at J2.21 (Stone Cross Park), J2.28 (West of Leigh Road), J2.30 (Dobson Park Industrial Estate), J2.31 (Makerfield Way), J2.33 (Richard Street) ,J2.41 (Hope Carr Leigh Commerce Park), J2.42 (Kiribati Way and Kirkhall Lane)?	All new development is subject to a statutory duty to deliver a 10% net gain for biodiversity. As woodland is a highly valuable habitat, there is strong financial incentive to retain it. Policy EN2 Development and Green Infrastructure also applies and has been amended based on City of Trees comments on existing trees, woodlands and hedgerows.
923-21	The Lancashire Wildlife Trust	Appropriate bird surveys will need to be undertaken to assess the potential for supporting s41 ground nesting birds at South Lancashire Industrial Estate (J2.07). Development at West of Leigh Road (J2.28) needs to incorporate an appropriate buffer to protect the SBI. The Woodland habitat also needs to be protected or fully compensated for. Chaddock Lane (J2.55) extends into an area of semi-natural habitat. Appropriate ecological surveys should be undertaken to inform the level of compensation required. Development at Mort Lane (J2.56) would need an appropriate buffer to protect the adjacent	Noted. This will be considered as part of the planning application process should development proposals come forward within those sites, in accordance with the environment policies in this plan.

Ref.	Who	Summary of comment	Our response
		Lancashire Wildlife Trust reserve at Cutacre. Development represents an opportunity to rationalise the drainage in the area. The drainage from the development should be directed into the foul sewers or mitigation / compensation provided through the creation of appropriate wetland habitat, such as reedbeds that will filter any water entering the reserve from the development site.	
994-2	Private Individual	Employment land which is identified under Policy J2 (cross-referenced within J1) should be deliverable. Allocations should not be maintained that are not evidence-based and have to rely upon a DM framework to justify retention or loss.	The employment areas designated in Policy J2 are considered developable within the plan period, though policy J2 provides a policy framework to enable their loss to non-employment uses where it can be justified.
994-3	Private Individual	The residual 0.59 hectare element within parcel J2.72 should be de-allocated. The site is highly constrained and has failed to come forward despite prior employment consents and marketing aligned to current policy ambitions. Its designation would be unjustified and unsound. The plan-making process should only protect employment sites where they are suitable and can be put into active employment-type use.	Criterion 2 in Policy J2 allows non-employment uses within Employment Areas subject to meeting certain conditions, including evidence demonstrating that there is no demand.

Ref.	Who	Summary of comment	Our response
1023-16	National Highways	National Highways should be consulted on any new or redeveloped sites that may impact the SRN due to increased vehicle movements. The policy should include a forecast of transport impact to inform sustainable development decisions. Support the inclusion of active travel and low emission vehicle infrastructure, and highlights the need for adequate lorry parking, especially for B8 developments.	These sites are either existing employment locations or are identified as employment areas under policy EM1A in our Replacement Unitary Development Plan.
1067-2	Private Individual	Land at Pocket Nook is farmland and has an unwilling landowner. Farmland should be retained for farming and growing food. Increased traffic resulting from further development at Pocket Nook will affect the safety of children who attend the 4 schools nearby.	Pocket Nook is allocated for mixed used development including around 15,000 sqm of employment floorspace in the adopted PfE Plan.
1137-11	United Utilities	We note the list of sites in this policy which identifies remaining land with/without planning permission and would welcome the details of these sites as GIS compatible shp files so that we can review the sites for any constraints / considerations that must be considered when bringing forward development proposals at these locations. Highlight that elements of the new modern economy, such as data centres, can be major users of water resources, with associated	Noted. The relevant GIS shp files have been shared with United Utilities. Development proposals will need to be compliant with applicable policies in the environment chapter, notably EN7 Protecting the Environment and Amenity EN3 Blue Infrastructure Network, EN10 Development and Flood Risk and EN13 Water Efficiency. We do not consider

Ref.	Who	Summary of comment	Our response
		consequential requirements for wastewater discharge. We request the following additional wording is added to either Policy J2 or as a new policy. 'Applications must be supported by a strategy for foul and surface water management and clean water supply. Proposals must be designed to minimise the impact on water resources and wastewater infrastructure.' We also suggest the following explanatory text: 'Elements of the new modern economy can be major users of water resources, with associated consequential requirements for wastewater discharge. Applicants must demonstrate how the impact on water resources, wastewater infrastructure and the environment has been mitigated and managed. Reducing impact on water resources and wastewater infrastructure is essential to ensure that critical water and wastewater infrastructure is available for wider growth opportunities and to ensure that the impact on the environment of the emerging modern economy is minimised. Proposals for new Data Storage facilities will be required to undertake early engagement with the relevant electricity provider to ensure that	therefore the additional clause or additional explanatory text necessary.

Ref.	Who	Summary of comment	Our response
		their power requirements can be met and with United Utilities in relation to water and wastewater requirements.'	
1139-2	Lidl GB	All Class E uses should be explicitly supported within Strategic Employment Areas and on employment sites, as they are widely acknowledged to be employment-generating.	Our Employment Areas are safeguarded for Class E(g), B2, B8 and other sui generis employment uses to ensure there is a sufficient supply for such uses to meet identified needs. Retail uses are subject to policy TC1.
1139-2	Lidl GB	The minimum requirement for a 24 months active marketing period is excessive in comparison to the other Councils across England. The policy should be amended to allow for a minimum marketing exercise of 6 months. This would ensure the policy is proportionate whilst also protecting the function and viability of employment land, ensuring that sites do not sit stagnant and economically inactive for substantial periods of time. Any requirement for marketing evidence should be removed where the proposed use contributes positively to economic development.	24 months is not excessive, especially as circumstances can change over time.
1139-2	Lidl GB	The financial contribution is considered to fiscally impede the delivery of sites within a Use Class which can generate significant employment value. The removal of this contribution would	A small financial contribution for the loss of employment land and premises for a higher value use such as retail is not

Ref.	Who	Summary of comment	Our response
		increase the deliverability of sites which bring economic benefits.	unreasonable and should be taken into account in the value of the land.
Policy J3: Land north of M6 Junction 26, Wigan			
	Residents	Responses received from residents and individuals for this site allocation policy have been summarised and are set out in Appendix A below.	We are no longer proceeding with the proposed employment site allocation at land north of M6 Junction 26, Wigan and no land is proposed to be removed from the Green Belt in the Publication version of the Local Plan.
572-1	Cllr Eileen Rigby	Object. This land has not yet been designated as grey belt land and definitely does not meet the criteria. It is subject to flooding and with the destruction of trees will make this problem worse. It will lead to further traffic congestion from Orrell to Wigan, through Pemberton and from Wigan to Orrell, through Pemberton. The traffic will be severely increased causing chaos on local roads with much more standing traffic. This in turn will impact on emissions and pollution affecting local residents, schools and nurseries. There will be a huge, detrimental impact on local wildlife and their habitat, affecting many species some of whom are protected.	As above

Ref.	Who	Summary of comment	Our response
		It will result in the loss of a local, family farm which is an integral part of the local community. The family do not want to sell their land and wish to remain as a working farm. The projected job opportunities are grossly exaggerated as most of these schemes are now automated, however the extra workforce will create further traffic issues. It is basically encouraging urban sprawl as Orrell and Pemberton become more entwined. There are local alternatives available for development at J25 of the M6 which would make far more sense and not require the destruction of one of the few green spaces remaining in this area. This development will also require the demolition of local homes and a massive reduction in value many, many local homes. It is not the correct development for this area.	
1441-1	Cllr Jeanette Prescott	Traffic congestion on Spring Road is an issue with HGVs trying to pass each other on the narrow section of road. This will only get worse if not dealt with, so for that reason I object to the redevelopment of the Bell.	We are aware of issues at Spring Road / Walthew House Lane and discussions are ongoing to determine how these can be addressed

Ref.	Who	Summary of comment	Our response
779-3	Sport England	The allocation is adjacent to playing fields containing sports pitches to the south of the site. Existing community facilities (such as sports clubs) should not have unreasonable restrictions placed on them as a result of development permitted after they were established. In line with the 'agent of change' principle set out in NPPF paragraph 200, the policy should include reference to the potential requirement for mitigation in relation to ball strike if found necessary. The inclusion of direct reference to Active Design Guidance within the policy wording would be welcomed, suggested as: Provide opportunities for physical activity and Active Travel by incorporating the principles of Active Design.	We are no longer proceeding with the proposed employment site allocation at land north of M6 Junction 26, Wigan and no land is proposed to be removed from the Green Belt in the Publication version of the Local Plan.
899-11	City of Trees	Potential loss of hedgerows and established trees	As above
923-25	The Lancashire Wildlife Trust	The agricultural fields have the potential to support important and declining species such as ground section 41 nesting birds, such as Lapwing and Skylark. Appropriate bird surveys should be undertaken and mitigation/compensation undertaken as appropriate so that existing populations and maintained and enhanced.	As above

Ref.	Who	Summary of comment	Our response
		The development would need to be accompanied by appropriate ecological surveys that would identify important habitats and species requiring mitigation/compensation. We welcome requirement 13) to incorporate measures to slow the flow of surface water run-off from the site. We would also highlight the importance of maintaining/increasing water quality as part of these measures.	
1023-17	National Highways	National Highways will work with the Council and developers to manage and mitigate impacts on M6 Junction 26. The site's B2 and B8 uses are road-reliant, and any adverse impacts on the SRN must be mitigated.	As above
1096-5	Taylor Wimpey	Support the allocation as a substantial, high quality employment development in the M6 Corridor. TW has been promoting this site as an employment-led, mixed use allocation in collaboration with Harworth Group, with an element of residential development on a proportion of the site to complement the overall masterplan. The site was included as an allocation (or specifically 'strategic area') in the initial Draft GMSF published in October 2016 and was identified as an opportunity to deliver around	As above

Ref.	Who	Summary of comment	Our response
		150,500 sqm of employment floorspace (B1, B2 and B8) and around 170 homes as an extension to Kitt Green, Wigan. Whilst the allocation was subsequently removed from the following GMSF iterations and the subsequent PfE, it is recognised that the site has been previously identified at plan level to support an element of residential development. Consider the site should comprise an employment-led, mixed use allocation as it is suitable to accommodate around 250 homes alongside the quantum of employment development. This would increase the sustainability credentials of the site and facilitate a more planned and harmonious transition from residential to employment which protects the residential amenity of the existing residential properties to the east of the site. Inclusion of a residential element in the draft Policy J3 wording would enable improved integration of the site allocation with the existing residents through the delivery of a residential buffer through careful placemaking.	
1106-7	Harworth Group	We support the identification of Policy J3 and the opportunity that Land north of M6 Junction 26, Wigan can provide to deliver a substantial, high	As above

Ref.	Who	Summary of comment	Our response
		quality employment development in this location.	
1106-7	Harworth Group	Criterion 1, 2, 7, 11-15 are supported.	As above
1106-7	Harworth Group	Criterion 3 - a new link road through to Martland Park will serve to remove HGV traffic from neighbouring residential communities. In bringing forward a new link road regard will be had to the presence of Public Right of Ways (PROWs). It would be useful if the plan addressed the need to divert or retain and enhance the existing alignments.	As above
1106-7	Harworth Group	Criterion 4 - unclear as to what measures in the Pemberton area are being referred to.	As above
1106-7	Harworth Group	Criterion 5 - we do not object to the principle of providing contributions to enable accessibility by bus but consider that this does not need to form part of policy. It might be better to delete this requirement and added in at criterion 1 that the master planning stage with stakeholders would include providers of public transport and infrastructure will be provided as necessary/subject to viability.	As above
1106-7	Harworth Group	Criterion 6 - the need to enhance the subway connection could be dovetailed into the	As above

Ref.	Who	Summary of comment	Our response
		masterplan element under criterion 1, rather than as a specific objective.	
1106-7	Harworth Group	Criteria 8, 9, 10 - Support but suggest that these criteria could be replaced by a new criterion saying that design needs to accord with the objectives of policy TP1 and that the masterplan under criterion 1 would have regard to such matters.	As above
1106-7	Harworth Group	Paras 6.48 - 6.57 are generally supported. We endorse the reference at para 6.48 that a masterplan should incorporate the outcomes of an environmental risk assessment and site investigation in accordance with policy EN7.	As above
1106-7	Harworth Group	Paras 6.33 and 6.34 could make reference to para 6.49 here to justify the need for the allocation.	As above
1106-7	Harworth Group	Para 6.51 needs clarification. We support the general point and consider that designing the masterplan with regard to the site's proximity to residential areas creates an opportunity for place making, that may include an element of new housing. It would be useful to make such reference here, as part of the need to re-word in any event. With regard to our representations in respect to the section headed 'Homes" of the draft local plan, we have suggested that Policy H1 could be amended to include alternative sites	As above

Ref.	Who	Summary of comment	Our response
		that may have allocations for employment and other uses, where incorporating housing would be beneficial as part of a wider place making initiative. In this case we consider that the site allocation under Policy J3 could include a cross reference to housing up to approximately 250 units.	
1106-7	Harworth Group	Para 6.56 makes reference to the Green Belt. We have commented already on why we consider a section addressing wider Green Belt issues would benefit the plan. We do not consider that the site should continue to be referred to as Green Belt and we would welcome the opportunity to work with the council to add further clarification in this point Developing the site would not offend Green Belt purposes A, B and C of NPPF para 143. The site has well defined boundaries, largely because of the M6, so its development would not encroach into the countryside and as such, the site meets the criteria as grey belt and therefore its development to meet identified needs is appropriate, as set out in the NPPF.	As above
1106-8	Harworth Group	The M6 Junction 26 allocation is situated in a sustainable location and offers potential for high-quality employment development on the M6	As above

Ref.	Who	Summary of comment	Our response
		corridor. It is well-integrated into the urban environment and has vehicular access via a new Link Road from Spring Road to the A577. The Link Road will connect the site to the M6, benefiting the local area by allowing HGVs to use it instead of existing residential roads. Harworth supports the draft allocation, demonstrating minimal impact on the local and strategic road network. The site is also aimed at enhancing opportunities for walking, cycling, and public transport use, with strong connections for residents and staff to travel off-site on foot and by bike. The site is also close to many amenities, accessible on foot, by cycle, and by e-bike. Existing and proposed infrastructure ensures the site is accessible to existing or new bus infrastructure. Harworth supports the Transport requirements of Policy J3, ensuring the site can be accessed safely and suitably. The proposals will provide a more direct HGV route, improve accessibility on foot and by cycle, and not have a severe impact on the local or strategic road network.	
1119-3	West Lancashire	Wish to continue to engage with Wigan colleagues to understand what transport modelling has been undertaken in relation to the emerging Wigan Local Plan, the geographical	The land supply generally was modelled through the Places for Everyone Plan strategic transport model. The council will continue to maintain effective co-

Ref.	Who	Summary of comment	Our response
	Borough Council	extent of the modelled area and the mitigations proposed for the highway network in proximity to West Lancashire to address the forecast increased traffic from planned developments, including land north of M6 Junction 26 and those in connection with the NorthFold growth corridor.	operation with West Lancashire Borough Council on cross boundary strategic issues.
1129-10	Historic England	Welcome the inclusion of criterion 12. However, it would be prudent to undertake a Heritage Impact Assessment (HIA) for the site given proximity to designated heritage assets and the scale and nature of the proposed development. In assessing the site, consideration should be given to whether any of the buildings associated with the former Orrell Hall Farm, or any other buildings and structures, should be classified as non-designated heritage assets and treated accordingly in the HIA.	We are no longer proceeding with the proposed employment site allocation at land north of M6 Junction 26, Wigan and no land is proposed to be removed from the Green Belt in the Publication version of the Local Plan.
1137-12	United Utilities	UU requests the following additional criteria to this policy: • 'Have full regard to the water and wastewater infrastructure that passes through the site, ensuring that access is maintained, and the assets are protected. • There is a risk of sewer flooding which must be assessed and considered in the	As above

Ref.	Who	Summary of comment	Our response
		detailed design, masterplanning and drainage details. • Incorporate multi-functional sustainable drainage which is integrated with the landscaped environment. • Be developed in accordance with a holistic allocation-wide strategy for foul and surface water drainage infrastructure including a management and maintenance regime for drainage infrastructure and on-site watercourses.' Also request the following explanatory text: 'There is water and wastewater infrastructure on the site. Applicants will need to engage with United Utilities to agree access and protection requirements. Holistic site-wide drainage strategies will be required in accordance with wider policy requirements (relevant policy number to be inserted). Sustainable drainage must be integrated with the landscaped environment and designed in accordance with the four pillars of sustainable drainage (water quantity, water quality, amenity and biodiversity). It should identify SuDS	

Ref.	Who	Summary of comment	Our response
		opportunities, such as permeable surfacing; soakaways; filter drainage; swales; bioretention tree pits; rain gardens; basins; ponds; reedbeds and wetlands. Any drainage should be designed in accordance with 'Ciria C753 The SuDS Manual', sewerage sector guidance, or any subsequent replacement guidance. There are flooding incidents from the public sewer in the wider vicinity. The applicant must engage with United Utilities prior to any masterplanning to assess the flood risk and ensure development is not located in an area at risk of flooding from the public sewer. Applicants should consider site topography and any exceedance flow paths. Resultant layouts and levels should take account of such existing circumstances. Applicants must demonstrate that the proposed development would be safe and not lead to increased flood risk. Applicants should not assume that changes in levels or changes to the public sewer, including diversion, will be acceptable as such proposals could increase / displace flood risk. It may be necessary to apply the sequential approach and incorporate mitigating measures subject to the detail of the development proposal. Careful consideration will need to be given to the	

Ref.	Who	Summary of comment	Our response
		approach to drainage including the management of surface water; the point of connection; whether the proposal will be gravity or pumped; the proposed finished floor and ground levels; the management of exceedance paths from existing and proposed drainage systems and any appropriate mitigating measures to manage any risk of sewer surcharge.'	
Policy J4: Moss Industrial Estate Extension, Aspull Common, Leigh			
	Residents	Responses received from residents and individuals for this site allocation policy have been summarised and are set out in Appendix A below.	We are no longer proceeding with the proposed site allocation at Moss Industrial Estate Extension, Aspull Common, Leigh and no land is proposed to be removed from the Green Belt in the Publication version of the Local Plan.
498-6	Natural England	The site is situated in a SSSI IRZ for Woolston Eyes which will require consideration of hydrological impacts. This designated site is vulnerable to changes in water quality and their hydrology should not be severed as part of the development. Surface run-off, septic tank and package sewage treatment plant discharges can contribute to elevated nutrients and changes in water quality at designated sites in the absence	As above

Ref.	Who	Summary of comment	Our response
		of poor location, unsuitable capacity of design and/or mitigation.	
778-1	Avison Young obo National Gas	Given the Bretherton to Warrington high pressure gas pipeline crosses the site, the policy needs to be amended to include the following criterion: "11. Include a clear strategy for responding to the National Gas Transmission high-pressure gas pipelines present within the site which demonstrates how the National Gas Transmission Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design."	As above
779-10	Sport England	Would welcome the inclusion of direct reference to Active Design Guidance within the policy wording, suggested as: Provide opportunities for physical activity and Active Travel by incorporating the principles of Active Design.	As above
899-12	City of Trees	Potential loss of hedgerows and established hedge trees.	As above
923-28	The Lancashire Wildlife Trust	Welcome criteria 8 and 9, however section 41 ground nesting birds will need to be considered and compensated for.	As above

Ref.	Who	Summary of comment	Our response
		Provision and enhancement of species rich grassland should be a priority when delivering BNG. Welcome the requirement to manage the collection of rainwater and the flow of surface water run-off which will be required to ensure that it does not exceed run-off from the undeveloped site. However, we would also highlight the importance of maintaining/increasing water quality as part of these measures.	
1023-18	National Highways	National Highways will work with the Council and developers to assess and mitigate impacts on M6 Junction 23 and the A580 East Lancashire Road. The road-reliant nature of B2 and B8 uses requires demonstration that SRN impacts can be mitigated.	As above
1108-2	St Helens Council	The development of the site could potentially impact Junction 23 of the M6, which is situated within St Helens Borough. There are a number of allocations in St Helens that impact this junction so Wigan Council should liaise with St Helens Council, Liverpool City Region Combined Authority and National Highways, to ensure cumulative (cross boundary) impacts are	As above

Ref.	Who	Summary of comment	Our response
		appropriately considered for Junction 23 of the M6.	
1137-13	United Utilities	Request the following additional criteria to this policy: • Have full regard to the significant water infrastructure that passes through the site, ensuring that access is maintained, and the assets are protected. • There is a risk of sewer flooding which must be assessed and considered in the detailed design, masterplanning and drainage details. • Incorporate multi-functional sustainable drainage which is integrated with the landscaped environment. • Be developed in accordance with a holistic allocation-wide strategy for foul and surface water drainage infrastructure including a management and maintenance regime for drainage infrastructure and on-site watercourses. Also request the following explanatory text: 'There is significant water infrastructure on the site. Applicants will need to engage with United Utilities to agree access and protection	As above

Ref.	Who	Summary of comment	Our response
		requirements. Holistic site-wide drainage strategies will be required in accordance with wider policy requirements (relevant policy number to be inserted). Sustainable drainage must be integrated with the landscaped environment and designed in accordance with the four pillars of sustainable drainage (water quantity, water quality, amenity and biodiversity). It should identify SuDS opportunities, such as permeable surfacing; soakaways; filter drainage; swales; bioretention tree pits; rain gardens; basins; ponds; reedbeds and wetlands. Any drainage should be designed in accordance with 'Ciria C753 The SuDS Manual', sewerage sector guidance, or any subsequent replacement guidance. There are flooding incidents from the public sewer in the wider vicinity. The applicant must engage with United Utilities prior to any masterplanning to assess the flood risk and ensure development is not located in an area at risk of flooding from the public sewer. Applicants should consider site topography and any exceedance flow paths. Resultant layouts and levels should take account of such existing circumstances. Applicants must demonstrate that the proposed development would be safe and not lead to increased flood	

Ref.	Who	Summary of comment	Our response
		risk. Applicants should not assume that changes in levels or changes to the public sewer, including diversion, will be acceptable as such proposals could increase / displace flood risk. It may be necessary to apply the sequential approach and incorporate mitigating measures subject to the detail of the development proposal. Careful consideration will need to be given to the approach to drainage including the management of surface water; the point of connection; whether the proposal will be gravity or pumped; the proposed finished floor and ground levels; the management of exceedance paths from existing and proposed drainage systems and any appropriate mitigating measures to manage any risk of sewer surcharge.'	
Policy J5: Bridgewater West, Astley			
	Residents	Responses received from residents and individuals for this site allocation policy have been summarised and are set out in Appendix A below.	We are no longer proceeding with the proposed site allocation at Bridgewater West, Astley and no land is proposed to be removed from the Green Belt in the Publication of the Local Plan.

Ref.	Who	Summary of comment	Our response
483-1	Cllr Barry Taylor	Object to the proposed allocation as I am concerned about the removal from Green Belt and the amount of development that has occurred in recent years. The PfE plan assured our residents that the Green Belt would be safe and now the Local Plan has overridden it resulting in a complete lack of confidence in local councillors and Wigan as a whole.	As above
484-1	Cllr Jess Eastoe	Object to this development. Tyldesley & Mosley Common and Astley wards have had their fair share of developments, which is congesting our roads. I will not be in support of any housing development until other wards have had their fair share too. We should promote affordable housing and council housing not "executive houses". It does not support our younger people trying to buy a house nor the 13,000 applicants on the council house waiting list.	As above
779-18	Sport England	The site contains playing field land which has been marked out over years as a youth 11v11 football pitch. The latest PPOSS identifies this as disused and therefore we expect the policy to	As above

Ref.	Who	Summary of comment	Our response
		specifically refer to mitigation for the loss of this pitch.	
899-13	City of Trees	Potential loss of hedgerows and established hedge trees.	As above
923-34	The Lancashire Wildlife Trust	The development would result in a significant loss of habitat within the site. Appropriate bird surveys need to be undertaken to assess the sites value for section 41 priority ground nesting birds. It is unlikely that BNG requirements will provide for mitigation for these species and suitable compensation should be put in place, where appropriate. Welcome measures to manage the collection of rainwater and the flow of surface water run-off, to ensure that it does not exceed run-off from the undeveloped site, but we would also highlight the importance of maintaining/increasing water quality as part of these measures. Welcome that measures necessary to avoid any potential negative impacts from air quality on the Manchester Mosses Special Area of Conservation will be incorporated but would call attention to the Holcroft Moss SPD that will	As above

Ref.	Who	Summary of comment	Our response
		require mitigation for the impact on traffic flows on the M62.	
1023-19	National Highways	Due to its location near Salford and other developments, National Highways will work with both Wigan and Salford Councils to assess cumulative impacts on M60 Junctions 13 and 14. B2 uses must demonstrate that SRN impacts can be mitigated.	As above
1109-2	Warrington Borough Council	Warrington BC should be specifically referenced as a key stakeholder in the preparation of the comprehensive masterplan and phasing plan.	As above
1109-2	Warrington Borough Council	Noted that there is no transport modelling information or assessments available as part of this Local Plan consultation. The impact of the allocation on WBC's highways (including through Glazebury) should be considered and appropriate mitigation referenced in the allocation policy and Infrastructure Delivery Plan, if required.	As above
1109-2	Warrington Borough Council	Criterion 8 should consider bus access to Warrington and not just to locations in Wigan.	As above
1109-2	Warrington Borough Council	A requirement to make a contribution to mitigation works at Holcroft Moss, in accordance	As above

Ref.	Who	Summary of comment	Our response
		with the Holcroft Moss SPD should be specified in the policy.	
1121-2	Peel Land	Strongly support the allocation which occupies a strategic location within the A580 economic and transport corridor and is the closest part of the borough to the regional centre. It is the most appropriate and sustainable location within Wigan to attract investment in high value frontier sectors of the economy; help to grow the visitor economy; and deliver the types of homes that can complement this. Its location and scale mean that it has the potential to attract sectors of the economy which are currently under-represented, and which show strong growth potential. These include high value and high growth science, technology, professional services and advanced manufacturing businesses which are prioritised in national, GM and local economic policy. High quality family and affordable homes as part of this mixed new neighbourhood can optimise the sustainability of the development by creating a housing offer that will help to retain and attract highly skilled workers and entrepreneurs in this part of the borough. This includes provision for higher value homes, which can be	As above

Ref.	Who	Summary of comment	Our response
		accommodated in this location given the strength of the surrounding housing market, and which will attract occupiers who support and drive economic growth. Provision of this particular type of housing at the site will help to support economic growth and investment, whilst cross-funding other components of the project to ensure that the whole is readily deliverable Assessments undertaken separately, by the Council and commissioned by Peel, demonstrate that the site meets the definition of "grey belt" as set out in national planning policy and guidance. There are clear and compelling exceptional circumstances which justify the removal of the site from the Green Belt and its allocation for employment-led mixed-use development. These include the benefits associated with each of the following: • Meeting unmet need for high quality employment space aimed at growing foundational and frontier sectors of the economy within a key economic and transport corridor in the closest part of the borough to the city centre;	

Ref.	Who	Summary of comment	Our response
		• Creating a new visitor and tourism destination which builds on the unique characteristics of the site; location next to an important cultural and visitor attraction; and ability to improve connections with other visitor facilities in the area Creating a highly sustainable place which includes a mix of housing for which there are identified needs including higher value homes that complement economic ambitions alongside affordable housing and accommodation for older people. The new homes will importantly generate development value which helps to cross-fund the quality of place and environmental enhancement proposed at Bridgewater West; • Including recreation and water resources - new water bodies, a lake and a marina will help to manage drainage and create spaces for people to enjoy and be active. It will create a high-quality environment that frames and integrates with new development to support well-being and environmental enhancement; • Potential to deliver an improved bus connectivity for the site and adjoining communities and potential for a new Park	

Ref.	Who	Summary of comment	Our response
		and Ride site that would help to reduce car travel and support wider transport objectives on the A580; • A new local centre which would serve the needs of local communities and help meet an identified gap in current provision;* Improved environmental quality; biodiversity; and public access within and around the site; and* Extensive socio-economic benefits including creating of over 1,000 new jobs on site and in supply chain activities; add over Â£76 million GVA to the local economy; and generate significant additional Business Rates and Council Tax Revenue to support local public services.	
1121-2	Peel Land	Criterion 1 - Peel will bring the site forward in a comprehensive way in collaboration with relevant stakeholders. It would welcome confirmation that the approval of a masterplan and phasing plan could be achieved through a planning application (rather than necessarily being a separate exercise	As above
1121-2	Peel Land	Criterion 3 - High quality housing is an important part of this mixed-use proposal. Peel considers that the appropriate number of homes for this site should be determined through the	As above

Ref.	Who	Summary of comment	Our response
		masterplanning and assessment process. In this context the cap of 300 homes is considered to be unjustified, and somewhat counter-intuitive given the position with housing needs in the Borough (see Section 2). We request that this matter be kept under review as the masterplanning and WBLP processes proceed.	
1121-2	Peel Land	Criterion 7 - The incorporation of existing public rights of way within and on the boundaries of the site will be reflected in the masterplan for the site. The masterplan will also seek to optimise connectivity with existing bus routes and, where feasible bring bus services into the site. This is addressed by criterion 8 of Policy J5. However, it is not possible at this stage in the masterplanning process to confirm the most appropriate locations for bus stops (existing or proposed). It is requested that "and bus stops within and close to the site" is removed from criterion 7 of the policy.	As above
1129-11	Historic England	Welcome criteria 3 and 14. It would be prudent to undertake a Heritage Impact Assessment (HIA) for the site given the close proximity of designated heritage assets to it and the scale and nature of the development proposed. The HIA should include a proportionate	As above

Ref.	Who	Summary of comment	Our response
		archaeological assessment. If necessary, the policy should be amended to reflect the conclusions of the HIA in terms of removing or reducing harm to heritage assets.	
1136-1	Salford City Council	The conclusion that the site is 'grey belt' is noted. As grey belt is a very new policy concept we wish to reserve the right to review our position if the proper interpretation of the NPPF and NPPG (for example through planning appeals / court decisions) indicate that a different conclusion should be reached on the proposed allocation.	As above
1136-1	Salford City Council	Flooding from the public sewer has occurred on a number of occasions within the last five years with flooding to properties on Sterndale Road and Linkfield Drive. During frequent sewer flooding events, foul water leaving the public sewer system also runs overland and enters the main river network within the proposed site (contrary to paragraph 198 of the NPPF. Given the development could exacerbate the existing situation it should be demonstrated that a strategic intervention to mitigate sewer flooding is possible and also deliverable (including financially viable). Any such intervention should be explicitly referenced within the allocation	As above

Ref.	Who	Summary of comment	Our response
		policy. Without appropriate intervention Salford City Council cannot support the allocation.	
1136-1	Salford City Council	Key issues for Salford in relation to the highway network as a direct result of the proposed allocation are the potential impact on the East Lancashire Road and its existing junctions, as well as the likelihood of increased traffic travelling through Boothstown and along Leigh Road to access junction 13 of the M60. Wigan Council should assess the impact development is likely to have on key transport corridors and junctions in Salford, particularly those which are already constrained in capacity terms during peak times, principally the A580 East Lancs, Chaddock Lane, A572 Leigh Road and junction 13 of the M60.	As above
1136-1	Salford City Council	Details relating to the scale / floorspace associated within the proposed local centre, and its location within the site, have not been provided. There is potential for the new local centre to draw trade way from Boothstown local centre, and other designated centres with Salford, which could have an impact on their vitality and viability. Although it is noted that an agreed masterplan is a requirement of the allocation policy (criterion 1), Wigan should	As above

Ref.	Who	Summary of comment	Our response
		provide indicative details of the scale (floorspace) of the proposed local centre and its location within the allocation boundary. This will enable us to better consider the potential impact on our designated centres (particularly Boothstown local centre).	
1137-14	United Utilities	Request the following additional policy criteria: • Have full regard to the water and wastewater infrastructure that passes through the site, ensure that access is maintained, and the assets are protected. • Ensure that the occupiers of new developments will enjoy an appropriate standard of amenity and will not be adversely affected by nearby wastewater infrastructure including a wastewater pumping station. There is a risk of sewer flooding which must be assessed and considered in the detailed design, masterplanning and drainage details. This flood risk could affect the developable area. • Incorporate multi-functional sustainable drainage which is integrated with the landscaped environment.	As above

Ref.	Who	Summary of comment	Our response
		• Be developed in accordance with a holistic allocation-wide strategy for foul and surface water drainage infrastructure including a management and maintenance regime for drainage infrastructure and on-site watercourses.' We also request the following explanatory text: 'There is water and wastewater infrastructure on the site. Applicants will need to engage with United Utilities to agree access and protection requirements. A risk of sewer flooding has been identified at this site. There are also flood incidents from the public sewer in the wider vicinity. The applicant must engage with United Utilities prior to any masterplanning to assess the flood risk and ensure development is not located in an area at risk of flooding from the public sewer. Applicants should consider site topography and any exceedance flow paths. Resultant layouts and levels should take account of such existing circumstances. Applicants must demonstrate that the proposed development would be safe and not lead to increased flood risk. Applicants should not assume that changes in levels or changes to the public sewer, including diversion, will be acceptable as such	

Ref.	Who	Summary of comment	Our response
		proposals could increase / displace flood risk. It may be necessary to apply the sequential approach and incorporate mitigating measures subject to the detail of the development proposal. Careful consideration will need to be given to the approach to drainage including the management of surface water; the point of connection; whether the proposal will be gravity or pumped; the proposed finished floor and ground levels; the management of exceedance paths from existing and proposed drainage systems and any appropriate mitigating measures to manage any risk of sewer surcharge. Holistic site-wide drainage strategies will be required in accordance with wider policy requirements (relevant policy number to be inserted). Sustainable drainage must be integrated with the landscaped environment and designed in accordance with the four pillars of sustainable drainage (water quantity, water quality, amenity and biodiversity). It should identify SuDS opportunities, such as permeable surfacing; soakaways; filter drainage; swales; bioretention tree pits; rain gardens; basins; ponds; reedbeds	

Ref.	Who	Summary of comment	Our response
		and wetlands. Any drainage should be designed in accordance with 'Ciria C753 The SuDS Manual', sewerage sector guidance, or any subsequent replacement guidance.'	
1262-1	Michael Wheeler MP	This land is currently classified as Green Belt and has been protected from development in previous plans. It forms one of the last remaining buffers between the Wigan Borough and the City of Salford, and the distinct communities of Astley and Boothstown. The plans as set out do not justify removing this land from the Green Belt. This site is wholly unsuitable for a number of reasons: • Unaffordable Housing Point 3 of Policy J5 on Page 57, says that the site would 'Deliver up to 300 new homes to establish a distinct and high value residential neighbourhood.' Although I agree that housing is needed, I do not believe that a 'high value residential neighbourhood' would benefit residents and address the shortage of affordable and social housing • Poor Access The site lies alongside the A580 in between the existing junctions at Higher	As above

Ref.	Who	Summary of comment	Our response
		Green Lane and Chaddock Lane. This section of the road network is already highly congested at peak times, as referenced in point 11.418 of the Places for Everyone plan, which comments on the impact of the Mosley Common development on the local road network, which it describes as 'regularly congested at peak times.' • The site is not well served by public transport, with no current direct bus services to or from local population centres, and no access to the rail or tram network. Although Point 8 of Policy J5 states that developers would be required to 'Provide public transport improvements and services to connect the site to Boothstown, Astley and Tyldesley,' this is not guaranteed and it is likely that a business park, new local centre, visitor centre and 300 high value homes would add a significant amount of traffic onto the existing and already congested road network. • Infill and Urbanisation Astley and Boothstown are both historic and distinct population centres with their own identities. A development of the scale that is proposed in the location which represents the last green	

Ref.	Who	Summary of comment	Our response
		space in between the two communities represents infill, and risks eroding the character of the two neighbourhoods • Risk to wildlife and the nearby Chat Moss One of the main objections raised by residents who have contacted me about the proposals as their MP, relate to the loss of valued green space and the environmental impact which this will have. Residents point out how the land is populated by wild deer, lapwings and Yellowhammers, and is active farming land. The site is also in close proximity to Chat Moss, which forms part of the Manchester Mosses Special Area of Conservation. In point 15, the Plan acknowledges the 'potential negative impacts from air quality' on this internationally renowned and protected land. This proximity to Chat Moss and the presence of protected bird species is a further reason why this development is not a suitable use for this land. • Site Assessment The only criterion met is Criterion 3 which relates to a contribution to the competitiveness of the Borough. The inclusion of this site, even though it only meets one of the seven criteria, and is	

Ref.	Who	Summary of comment	Our response
		acknowledged to cause 'moderate harm' to the local area, is concerning. • Strength of local feeling and opposition to the proposed development If Wigan is to Progress with Unity its council must take residents with it, listen to their concerns and make decisions in their best interests. Failure to do so would only leave to residents feeling that change is something that is done 'to' them, not 'with' them. I am calling for Policy J5 Bridgewater West to be removed from the Local Plan document. Please can you consider this document as my official response to the consultation as the elected Member of Parliament for the area in question.	
1304-1	Whitehead Hall Meadow Millenium Green Trust	Concern re impact that the proposals will have on Whitehead Hall Meadow which is close to the southern boundary of the proposal. The site although small at 5.58 hectares, is of high ecological value and importance. The Meadow is botanically rich and has good habitat diversity. The good work will be put in jeopardy, if human pressure on the Meadow increases due to any development on 'Bridgewater West'. The presence of the Green Belt to the north has helped to protect it from overuse, removing the	As above

Ref.	Who	Summary of comment	Our response
		Green Belt will be detrimental to the Meadows present flora and fauna. It is unrealistic to think that you can manage the flooding and drainage of the area, without impacting or destroying the habitats for the present wildlife, which is there because of the wet conditions. There is the very real threat that using Green Belt for building will result in brownfield sites being overlooked for development or deliberately being ignored by developers. Developers find that it is more expensive to redevelop brownfield sites and they will, often, not touch them as there is not as much profit to be gained from them We do not believe that any green areas incorporated into the development will compensate either the human or wildlife population for what will be lost.	
Policy J6: Land west of Winwick Lane, Lowton			
	Residents	Responses received from residents and individuals for this site allocation policy have been summarised and are set out in Appendix A below.	We are no longer proceeding with the proposed site allocation at land west of Winwick Lane, Lowton and no land is proposed to be removed from the Green Belt in the Publication version of the Local Plan.

Ref.	Who	Summary of comment	Our response
498-7	Natural England	Development will likely have significant hydrological impacts to Highfield Moss SSSI and risks the loss/degradation of notified peat habitats. The allocation has the potential to modify or lose a large proportion of the ground water catchment. There are potential impacts to the geochemistry of the groundwater. This water must remain acidic and nutrient poor to support the notified wet heath and mire habitat within the designated site. The allocation is situated in a SSSI IRZ for Woolston Eyes SSSI which requires consideration of hydrological impacts. This designated site is vulnerable to changes in water quality and their hydrology should not be severed as part of the development. Surface run-off, septic tank and package sewage treatment plant discharges can contribute to elevated nutrients and changes in water quality at designated sites in the absence of poor location, unsuitable capacity of design and/or mitigation.	As above
899-14	City of Trees	Will the wooded area be safeguarded?	As above
923-1	Lancashire Wildlife Trust	There must be a significant buffer zone between the development and the SSSI. This needs to be managed to create appropriate wetland habitat that can complement the mossland habitat	As above

Ref.	Who	Summary of comment	Our response
		within the SSSI and protect the site from adverse impacts on its water table. Advice and input from Natural England, who have expressed concerns, needs to be carefully considered. The protection and enhancement of the SSSI must be ensured at all costs and that development should be refused if it cannot assure the protection of the hydrology of the SSSI, in accordance with paragraph 193 (b) of the NPPF. Mossland is also an irreplaceable habitat and the NPPF states that 'development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists'. Concern that the area might support populations of declining farm birds such as lapwing and Skylark. The landscape is one of flat agricultural fields. Whilst the fields might botanically limited, if they support S41 ground nesting birds then they could be described as a being a valuable ecological resource. Appropriate bird surveys must be carried out, and if section 41 priority species are found to be	

Ref.	Who	Summary of comment	Our response
		reliant on the fields within the application site, then mitigation/compensation must be provided. Off-site compensation will therefore be required that offers the appropriate habitat requirements, otherwise these important species will continue to decline.	
1023-20	National Highways	National Highways is working with stakeholders on the Parkside masterplan to avoid SRN impacts. Continued collaboration with Wigan and St Helens is needed to manage impacts on M6 Junctions 22 and 23 and the A580. Early scoping discussions are encouraged.	As above
1024-4	Golborne and Lowton West Neighbourhood Forum	The Forum holds strong reservations about the potential development of the Rail Freight Interchange, in the absence of firm policy commitments and infrastructure sequencing. Object to any proposals that would allow the SRFI to proceed before the delivery of key supporting infrastructure. Strongly recommend the inclusion of a policy requirement that the Atherleigh Bypass extension is delivered prior to the commencement of any construction of the SRFI in order to relieve pressure on already congested routes (A580, A572, Stone Cross Lane North); ensure safe, efficient freight access to the site;	As above

Ref.	Who	Summary of comment	Our response
		mitigate impacts on local communities, air quality, and safety; uphold the NPPF's principles of sustainable transport and net zero development. Recommend that the following amendment (or equivalent) be included in the Local Plan's Infrastructure or Employment sections: "Strategic employment developments in the south-east of the borough, including the proposed Rail Freight Interchange, and the proposed extension of Moss Industrial Estate shall only proceed where supporting infrastructure-specifically the extension of the Atherleigh Bypass-is delivered in advance of development."	
1079-7	Jo Platt MP	For this development to be successful it is essential that the bypass for Lane Head South goes ahead and that associated traffic reduction measures take to improve the situation on Winwick Lane.	As above
1090-5	CPRE	Result in an unnecessary increase in levels of road traffic. The site would effectively be used only as an extension to the adjacent Strategic Rail Freight Interchange (SRFI) site allocated in St Helens Local Plan. St Helens Local Plan allocated the SRFI site based on evidence	As above

Ref.	Who	Summary of comment	Our response
		provided as to what was necessary to make the SRFI work. Pre-application consultation undertaken by Tritax for this SRFI site included the land at Winwick Lane to make a much bigger site thereby providing more employment land at the SRFI than is needed to make the SRFI viable and meet the economic goals it was allocated for. The loss of Green Belt here is therefore not justified and would be harmful to the adjacent SSSI as noise, light and air pollution associated with whatever employment uses would go there. The likely logistics generated vehicle movements would be severely detrimental to wildlife and biodiversity in the SSSI. The gap between the original proposal and the Lowton would be very narrow. Developing the land at Winwick Lane would severely reduce it further and as such its allocation would represent an unacceptable loss of Green Belt.	
1108-3	St Helens Council	This policy is broadly welcomed by St Helens Council . The acknowledgement of 'a comprehensive masterplan and phasing plan for Parkside East prepared in cooperation with neighbouring	As above

Ref.	Who	Summary of comment	Our response
		councils and other key stakeholders as applicable' is also welcomed.	
1108-3	St Helens Council	The policy should be clear that the allocation of land at Winwick Lane should be rail served / linked (i.e. requiring on-site access to a railway) or be of a layout and scale that would not prejudice the ability to develop an effectively laid out SRFI or other rail served / linked employment development (including any necessary rail and road infrastructure, buildings, and landscaping) on the adjacent St Helens 7EA allocation (St Helens Local Plan Policy LPA09).	As above
1108-3	St Helens Council	The requirement to engage with the three affected Local Highway Authorities (LHA) is welcomed but it is requested that clarification is added that St Helens Council is one of these LHAs and would recommend also including a requirement to engage with National Highways.	As above
1108-3	St Helens Council	Reference to 'the remaining permissions at Parkside' being expected to contribute to the provision of a bypass for Lane Head South should be removed from the supporting text. There is no provision for such within the Parkside East allocation (or the Parkside West allocation, which in part has planning permission), and the determination of these applications will be made	As above

Ref.	Who	Summary of comment	Our response
		by St. Helens Council / Government and the Wigan Local Plan would not be the Development Plan when determining these applications.	
1108-3	St Helens Council	The prospective Lane Head bypass would only be required if the Land West of Winwick Lane site comes forward. It is agreed, as set out in the Draft Duty to Cooperate Statement of Common Ground, that Wigan Borough Council will need to liaise with St Helens Council , the Liverpool City Region Combined Authority, National Highways, and Warrington Borough Council and the Greater Manchester Combined Authority / Transport for Greater Manchester, to consider any cross boundary infrastructure requirements or other issues relating to the development of the wider proposed cross-boundary Parkside East SRFI and logistics site adjacent in St Helens that is being promoted as ILP North, including mitigating any impacts on the road network and neighbouring communities. This collaborative working should also be extended to the LCRCA and Network Rail. There will also be a requirement for Wigan Council to continue to engage with the Transport Working Group to ensure any cross-boundary infrastructure requirements or other issues relating to the development of the sites at West of Winwick	As above

Ref.	Who	Summary of comment	Our response
		Lane and ILP North for employment uses are mitigated.	
1108-3	St Helens Council	This policy should link to a wider Wigan Local Plan Masterplan policy, which allocations requiring of a masterplan can then reference against.	As above
1108-3	St Helens Council	This policy should seek to establish and implement a Travel Plan that incorporates measures to encourage travel to / from the development using sustainable transport modes, including access by public transport, cycle and foot.	As above
1108-3	St Helens Council	This policy should seek to derive mitigation for any adverse impacts on the surrounding strategic and local road networks	As above
1108-3	St Helens Council	The policy should make reference to St Helens Local Plan policy LPA09 and how it is in accordance with it.	As above
1108-3	St Helens Council	The policy should consider bespoke parking standards that align with those adopted by St Helens Council in 2024.	As above
1108-3	St Helens Council	The policy should be relatable to the Transport for the North Freight and Logistics targets and	As above

Ref.	Who	Summary of comment	Our response
		expectations as well as those of the Liverpool City Region Combined Authority.	
1109-1	Warrington Borough Council	While identified as 'grey belt', need to demonstrate exceptional circumstances for the revision of Green Belt boundaries through the Local Plan process.	As above
1109-1	Warrington Borough Council	The Council recognises that the eastern extension of the Parkside Strategic Rail Freight Interchange (SRFI), which the allocation would facilitate, could provide the basis for exceptional circumstances, but only if the extension is required for the SRFI's operation and delivery. Concern if the allocation was providing development for meeting general employment needs not directly associated with the SRFI, as this have greater impacts on the strategic and local road network, with corresponding impacts on air quality. WBC is committed to working with Wigan and St Helens Council through the Local Plan and DCO processes to ensure the SRFI can be delivered, together with the timely delivery of the wide-ranging mitigation that will be required. WBC will expect to see further evidence to justify the requirement for the inclusion of the	As above

Ref.	Who	Summary of comment	Our response
		allocation as part of the SRFI and additional controls in the allocation policy.	
1109-1	Warrington Borough Council	There is no Transport modelling information or assessments of any type available. WBC needs to understand the impact of the proposed allocation on the surrounding highway network - both local highway network, including around villages and settlements in North Warrington and more strategically on the motorway network and M6 J22. This will help to understand the need for further improvements or mitigations on the highway network WBC considers that strategic traffic modelling would be preferable in terms of progressing the Wigan Local Plan as this can better assess cumulative impacts from the Plan as a whole and better identify any route reassignment which may occur as a result of the additional traffic from allocation J6 and other key development sites in Wigan and the wider sub-area.	As above
1109-1	Warrington Borough Council	WBC is supportive of the principle of a Lane Head bypass and welcomes the inclusion of supporting text to confirm that the alignment is expected to be entirely within Wigan Borough and be subject to public consultation.	As above

Ref.	Who	Summary of comment	Our response
1109-1	Warrington Borough Council	WBC notes that the Lane Head bypass has been identified as a requirement in the supporting Draft Local Plan Infrastructure Delivery Plan April 2025 (IDP) which appears at odds with the supporting text for Policy J6, which requires the necessary infrastructure to be delivered at an early stage and therefore raises questions about the deliverability of the bypass and the allocation. There appears to be no available evidence of work undertaken to assess the viability of any of the Local Plan site allocations and policy requirements, including allocation J6.	
1109-1	Warrington Borough Council	WBC wishes to be a key stakeholder in the discussions around the alignment, need for and delivery of the Lane Head bypass and will look for any scheme to minimise the impact on Warrington residents. As previously stated, WBC would be very concerned about the by-pass extending into Warrington due to the harm on the Green Belt and potential impacts on Warrington residents. Further, any alignment extending into Warrington is likely to raise issues of affordability.	As above
1109-1	Warrington Borough Council	WBC welcomes inclusion of the requirement for necessary improvements to Winwick Lane in Part 3 of the Policy. If an access point into the	As above

Ref.	Who	Summary of comment	Our response
		site is provided from A574 Winwick Lane, WBC would need to be involved in discussions about the junction given it is WBC's highway. Any junction in this location would create delay on WBC's highway network and the Council would want to understand the impact of this.	
1109-1	Warrington Borough Council	WBC welcomes the commitment in Parts 4 and 5 to provide bus services that would connect the site and Parkside to surrounding communities in Wigan, St Helens and Warrington and is committed to working with Wigan and St Helens to develop these services	As above
1109-1	Warrington Borough Council	WBC considers that Part 6 of the policy should also ensure that safe and convenient walking, wheeling and cycling routes provide connections for Warrington residents. In particular, WBC is investing in a high-quality active route between Warrington and Winwick and the Council would welcome discussions about how this site could support (in collaboration with St Helens Council and the wider Parkside development) an extension to connect to this site.	As above
1109-1	Warrington Borough Council	A contribution to mitigation works at Holcroft Moss will be required in accordance with the Holcroft Moss SPD.	As above

Ref.	Who	Summary of comment	Our response
1127-2	Intermodal Logistics Park North Ltd	The land proposed to be allocated under Policy J6 provides an unrivalled opportunity in terms of the quality of access to the road and rail networks for the delivery of both rail connected and rail served logistics buildings in conjunction with the allocated land for a SRFI in St Helens Borough to meet the identified market requirements.	
1127-2	Intermodal Logistics Park North Ltd	ILPN Ltd concurs with the Council's conclusion that necessarily the form and scale of development will have an impact of some significance on the purpose of safeguarding the countryside from encroachment. Such an effect necessarily arises where the Green Belt has been drawn tightly around the edge of existing urban areas and land is now required to meet development needs, both locally and nationally.	As above
1127-2	Intermodal Logistics Park North Ltd	It is concluded that the land at Winwick Lane has the characterisations of grey belt. The characterisation of the site as grey belt does not overcome the requirement through the plan-making process, to demonstrate that the release of the land from the Green Belt is necessary to meet development needs.	As above

Ref.	Who	Summary of comment	Our response
1127-2	Intermodal Logistics Park North Ltd	The exceptional circumstances for releasing the area of land allocated under Policy J6 from the Green Belt are hence considered to be: (a) The compelling need in the national interest to establish an expanded network of SRFIs, recognising that SRFIs are crucial to rail freight growth. (b) Given the locational requirements for both rail and road access, the number of locations suitable for SRFIs across the country is considered to be limited. The land to be allocated under Policy J6, together with the land allocated within St Helens Borough for a SRFI (Parkside East) provides an unrivalled opportunity in the region and wider north of England to develop a viable SRFI, including the operational requirement for the railport to effectively and efficiently handle trains of 775m in length. The NPS states SRFIs should have the ability to handle trains of 775m in length; the allocation in the St Helens Local Plan alone cannot effectively and efficiently deliver a SRFI that can handle trains of 775m in length. (c) The need for an SRFI to meet rail related logistics requirements within a subregional	As above

Ref.	Who	Summary of comment	Our response
		market area i.e. the market that would be served by the SRFI, is generally formed from a 20-mile HGV journey movement for the delivery of goods from the SRFI into the PMA. (d) The substantial socio-economic benefits that will be delivered to the subregion from this form of development. (e) The lack of suitable land both within and outside the Green Belt, including brownfield land, to meet the market demand for rail related logistics floor space and the operational requirements of an intermodal freight port.	
1127-2	Intermodal Logistics Park North Ltd	The focus of Policy J6 on the provisions of land for an SRFI would then be consistent with the consideration set out in the Site Selection Appraisal of Sites Promoted for Employment Uses in the Green Belt. Criterion 3 states:' The parcel would form an extension of the proposed Parkside East strategic rail freight interchange (SRFI) and logistics site adjacent in St Helens' Criterion 2 should be re-worded as follows: Deliver rail-related logistics development of around 230,000 sqm (Class B8) designed as an integral part of an SRFI that encompasses land	As above

Ref.	Who	Summary of comment	Our response
		so allocated within St Helens Local Plan (Policy LPA09 Parkside East).	
1127-2	Intermodal Logistics Park North Ltd	Criterion 3 - policy criterion is not supported by an evidence base within the published Draft Infrastructure Delivery Plan April 2025 or elsewhere. The supporting text to Policy J6 at paragraph 6.93 (which refers to contributions towards the provision of a bypass from both ILPN and "remaining sites at Parkside") is presently not evidenced within the plan-making process. A policy in a development plan cannot make lawful a demand upon development which would be unlawful, when assessed against the provisions of Regulation 122 of CIL Regulations 2010. This emerging development plan for Wigan Borough cannot lawfully introduce a new policy criterion which is related to development that is allocated in St Helens Borough Local Plan. Criterion 3 does not satisfy national planning policy and fails two of the tests of soundness. Criterion 3 should be re-worded to read: Address the impacts of traffic generated by the development on the local highway network consistent with the provisions of national	As above

Ref.	Who	Summary of comment	Our response
		planning policy set out in the Framework for promoting sustainable transport.	
1127-2	Intermodal Logistics Park North Ltd	Criterion 5 is effectively addressed through Criterion 4 and may hence be omitted.	As above
1127-2	Intermodal Logistics Park North Ltd	Criterion 8 appears to be imposing a higher policy test upon development than is contained within the NPS, in not recognising the need to consider the operational requirements for an SRFI. This is not reasonable or appropriate. The following words should be added to the end of Criterion 8: '...while maintaining the operational requirements of the scheme'	As above
1127-2	Intermodal Logistics Park North Ltd	Criterion 10 - the following words should be added after 'suitable use': '...within the scheme's landscaping and green infrastructure as far as practicable'	As above
1127-2	Intermodal Logistics Park North Ltd	Criterion 13 - It is not appropriate for a policy to imply the development must provide community benefits to compensate for the presence of an SRFI. Such a policy provision is considered to be unlawful in not being reasonably related in scale and kind to the development (Regulation 122 CIL 2010).	As above

Ref.	Who	Summary of comment	Our response
		This Criterion should be re-worded (emboldened) as follows: 'Ensure that the development does not give rise to unacceptable impacts upon the amenity of the area by reason of noise, air quality, light pollution and visual amenity'. It may be appropriate for an additional criterion to be added to Policy J6 such as: 'Opportunities for the development to provide enhancements and/or features that would benefit the local community will be encouraged where reasonably related to the development and where practically achievable'	
1127-2	Intermodal Logistics Park North Ltd	Criterion 14 - site investigations have taken place across the DCO Site as part of the survey work for the DCO application. These confirm that the extent of sand and gravel resources are both of limited thickness and extent present. The investigations also highlight the significant processing that would be required to obtain a suitable aggregate from those same resources. A Minerals Resource Assessment is being prepared as part of the ILPN DCO application and will demonstrate that at least one of the criteria of Policy 8 of the Greater Manchester Joint Minerals Development Plan can be satisfied. As such the inclusion of Criterion 14 is	As above

Ref.	Who	Summary of comment	Our response
		not necessary as it duplicates existing policy already in place. Paragraph 6.105 should also be omitted.	
1127-2	Intermodal Logistics Park North Ltd	The supporting text to Policy J6 should set out the exceptional circumstances which justify the release of this land from the Green Belt.	As above
1127-2	Intermodal Logistics Park North Ltd	Paragraph 6.90 - in supporting an SRFI reference to Class B2 development should be omitted.	As above
1127-2	Intermodal Logistics Park North Ltd	Paragraph 6.91 - the text states: "it will be important to envisage that the necessary infrastructure delivered at an early stage, including the internal connecting link with the adjacent site" Two considerations arise from this statement. Firstly, it is acknowledged that the delivery of infrastructure across the DCO Site should be phased so as to be available when needed, as identified through evidence. The words 'at an early stage' might suggest that infrastructure is to be installed earlier than is justified. ILPN Ltd recommend that this text is amended to read. "it will be important to ensure a phased delivery of infrastructure so that it is available as necessary to serve the development". Secondly the words 'internal connectivity link with the adjacent site' are potentially capable of	As above

Ref.	Who	Summary of comment	Our response
		being misunderstood. It is recommended that the text reads (emboldened) after as 'necessary to serve the development' 'including suitable access to the intermodal railport'.	
1127-2	Intermodal Logistics Park North Ltd	Paragraph 6.93 - text is not supportable by an evidence base for the draft Local Plan and is regarded as an unlawful approach to plan-making. The text should be omitted.	As above
1127-2	Intermodal Logistics Park North Ltd	Paragraph 6.104 - reveals an ambition of the Council to extract extraneous benefits from the development, with particular reference to the "borough community health and wealth building ambition". Policy cannot change the law, which in the context of the obligations that may be imposed upon new development is regulated by the provision of Regulation 122 of the CIL Regulations 2010. The text at paragraph 6.104 should be omitted.	As above
1129-12	Historic England	Support criterion 12.	As above
1137-15	United Utilities	Request the following additional criteria: • Incorporate multi-functional sustainable drainage which is integrated with the landscaped environment.	As above

Ref.	Who	Summary of comment	Our response
		• Be developed in accordance with a holistic allocation-wide strategy for public water supply and foul and surface water drainage infrastructure, including a management and maintenance regime for drainage infrastructure and on-site watercourses. It may be necessary to co-ordinate the delivery of development with the delivery of infrastructure improvements. • Ensure that there is no adverse impact on the groundwater environment and public water supply given the location of the site in groundwater source protection zone 3.' Request the following explanatory text: 'Holistic site-wide drainage strategies will be required in accordance with wider policy requirements (relevant policy number to be inserted). Sustainable drainage must be integrated with the landscaped environment and designed in accordance with the four pillars of sustainable drainage (water quantity, water quality, amenity and biodiversity). It should identify SuDS opportunities, such as permeable surfacing; soakaways; filter drainage; swales; bioretention tree pits; rain gardens; basins;	

Ref.	Who	Summary of comment	Our response
		ponds; reedbeds and wetlands. Any drainage should be designed in accordance with 'Ciria C753 The SuDS Manual', sewerage sector guidance, or any subsequent replacement guidance. The site is located in groundwater source protection zone 3. The principal aquifer underlying the site is associated with the catchment for several groundwater source protection zones. The location of the site in a groundwater source protection zone must be considered in future risk assessments and their protection ensured throughout the construction process and throughout the operational lifetime of the development. There is potential for construction to create a direct pathway for contaminants into the underlying aquifer, and there is a lack of confining superficial deposits providing protection to surface contaminants. United Utilities has advised of the need for early dialogue regarding potential water supply requirements and any connection to the public sewer. The site is located in a rural location where infrastructure is proportionate to the rural location. If infrastructure improvements are required, this could be a significant project and	

Ref.	Who	Summary of comment	Our response
		the design and construction period should be accounted for. This will be particularly important to consider in respect of the nature of the future use of the proposed employment units. Different uses and proposals can have differing water / wastewater demands and therefore early dialogue with the water and wastewater undertaker is critical. It may be necessary to co-ordinate the delivery of development with the delivery of infrastructure improvements.'	
1381-11	TfGM	Suggest amendment to criterion 3 as follows given a transport assessment may indicate other mitigations on / improvements to Wigan highways: 3. Contribute substantially to a bypass for Lane Head South, associated traffic reduction measures in Lane Head South where practicable, necessary improvements to Winwick Lane, and other highways improvements necessary to mitigate traffic impacts arising from the development.	As above
1414-1	Cllr Gary Lloyd	The proposed site is currently designated as Green Belt and comprises productive agricultural land. These are not exceptional circumstances to justify release of this land from the Green Belt.	As above

Ref.	Who	Summary of comment	Our response
1414-1	Cllr Gary Lloyd	National food security should be kept very much in focus and any proposal to decrease farmland, would not be in our nations long term interest.	As above
1414-1	Cllr Gary Lloyd	The Draft Plan has not identified or discussed the existing Green Belt status or the site's role as prime agricultural land.	As above
1414-1	Cllr Gary Lloyd	It fails national and local policy priority for developing brownfield land first.	As above
1414-1	Cllr Gary Lloyd	The proposed SRFI is in very close proximity to a designated Site of Special Scientific Interest (S.S.S.I), risking detrimental impact on the biodiversity, especially the ecologically valuable corridors relying on the S.S.S.I.	As above
1414-1	Cllr Gary Lloyd	The Plan makes a commitment to nature recovery, biodiversity net gain and environmental stewardship yet it is not clear how the proposed development aligns with these objectives.	As above
1414-1	Cllr Gary Lloyd	Wigan Council must have a duty of care to ensure all steps are taken to protect communities from exposure to pollutants.	As above
1414-1	Cllr Gary Lloyd	Lane Head area has suffered unacceptable levels of air pollution. Despite this, Warrington Borough Council continues to refuse implementing a weight limit on traffic travelling along Winwick	As above

Ref.	Who	Summary of comment	Our response
		Lane, towards Lane Head, but have weight limited all of their roads. Similarly, Warrington Borough Council are actively preventing the extension of Atherleigh Way within their borough, therefore, Wigan Council have stated the bypass would be routed solely through land within the borough of Wigan. This would require creating an extra junction on the A580 between the end of the Atherleigh Way and Lane Head.	
1414-1	Cllr Gary Lloyd	As is suggested the Freightliner terminal in Trafford Park, is being considered for relocation. This relocation will enable the redevelopment of the area for a new football stadium. The proposed new location for the Freightliner Terminal is Parkside East in St. Helens. Therefore, the economic growth and job creation claim is very weak, as the likely net economic growth and job creation will be zero; attracting existing workers from Trafford Park to commute to Parkside.	As above
Policy J7: The green economy (now policy J3 in the Publication Plan)			
369-21	Cllr Debbie Parkinson	More homes on open space and farmland would not help the green economy in Standish.	Policy J7, now J3 applies to employment development.

Ref.	Who	Summary of comment	Our response
		Creating a large car park on Preston Road would encourage people to park and use the bus/train into Manchester, Wigan and beyond.	
576-1	Private Individual	This should be actively lobbying for electric charging points in every part of the borough and encouraging businesses to manufacture and install them. The Council should lobby to be a trial area to find solutions for Providing EV chargers to terraced homes. Similarly with solar panels and home insulation. Have sites been identified for solar and/or wind farms? Are schemes being devised for shared energy schemes?	As set out in paragraph 6.110, now 7.43, the green economy could include the establishment and growth of green and renewable energy including supporting opportunities for new solar, wind, low carbon, / EV charging infrastructure.
899-15	City of Trees	What does (f) include? It should be encouraging / pushing for greater levels of green infrastructure to manage to manage surface water runoff and moderate temperature.	Clause f would include actions related to resilience to high temperatures, low temperatures, high winds, high rainfall or drought.
901-8	Cityheart Ltd	Acknowledge ambition to promote a green economy by requiring all new and existing business developments to achieve an EPC rating of B or better, subject to viability. However, need to consider further the practicality of this requirement.	'and feasibility' has been duly added to criterion 2.

Ref.	Who	Summary of comment	Our response
923-2	Lancashire Wildlife Trust	Support the inclusion of eco-tourism and farm diversification. As part of this would be the move towards wetter farming and foodstuffs that are grown in a more sustainable way.	Support welcomed.
1023-21	National Highways	Support measures to decarbonise transport and development. We will work with Wigan Council to integrate green and circular economy principles into local operations.	Support welcomed.
1121-27	Peel Land	Policy JP-S2 of PfE establishes a clear expectation that development will achieve net zero carbon. It is unclear what much of Policy J7 adds to this requirement and therefore whether it is justified and necessary. The ambition, within Part 2 of Policy J7, that existing and new businesses premises should, in addition to the requirements of PfE Policy JP-S2, achieve EPC ratings of B or better is noted. Peel supports that this requirement will be subject to viability testing. This will be essential in seeking to stimulate investment in sectors that are not currently well-represented in Wigan.	Noted. Criterion 2 cross references to PfE Policy JP-S2.
1356-4	Green Earth Development Group	Policy J7 should also encourage the use of local materials ahead of importing from beyond the borough. Policy PL1 and Policy J7 could better recognise the benefits of the strategic synergistic co-location of developments, particularly mineral	This would be included in "Using more sustainable materials" in criterion 1c and potentially other elements. It would also

Ref.	Who	Summary of comment	Our response
		and waste development, in securing high quality design and promoting a green economy.	come under Resources: efficient and resilient in criterion 1 of policy PL1.
Policy J8: The visitor economy (now policy J4 in the Publication Plan)			
100-11	Private Individual	Atherton offers a unique blend of community heritage, emerging cultural activity and local hospitality, which aligns directly with the goals of Policy J8. This includes grassroots music and nightlife, cocktail bars and restaurants, Howe Bridge Village and Pretoria Pit disaster site, Atherton Leisure Centre, Atherton Town Hall, Historic walking routes and green corridors. Policy J8 should be amended to: explicitly include Atherton as part of the borough's visitor economy framework, particularly in reference to its: grassroots music and nightlife offer independent food and drink scene Historic and heritage assets. Need to develop better connections (physical and strategic) between Atherton and key visitor hubs, including Pennington Flash, Leigh town centre, and Hindsford Brook, with improved signage, cycling routes and active travel links and support investment in grassroots culture	Whilst Atherton's contribution to the borough's visitor economy is recognised and valued, the features described are covered by clauses a, b, c and e at the very least. No changes are proposed.

Ref.	Who	Summary of comment	Our response
		and hospitality venues in smaller towns, not just large-scale flagship attractions.	
369-19	Cllr Debbie Parkinson	Standish has a thriving night time economy but needs more public transport to enable people to visit and more car parking.	Car parking is covered in policy TC10. Standish is relatively well served by bus, including by frequent services between Wigan and Chorley (632).
576-7	Private Individual	The policy focuses too much on Wigan and not enough on Leigh, disadvantaging many residents to the benefits that investment brings. The plan should ensure that all residents of the borough should have equal access to its facilities and benefits from investment.	The policy references a number of assets in Leigh and elsewhere in the east of the borough, including Leigh Sports Village, the Turnpike Gallery, the Lancashire Mining Museum, Chat Moss and Tyldesley Little Theatre.
901-9	Cityheart Ltd	Policy welcomed, particularly the focus on facilities to enhance the visitor experience, especially in town centres. Inclusion of creative studios and workspaces within town centres is commended.	Support welcomed.
923-33	The Lancashire Wildlife Trust	Support.	Support welcomed.
1023-22	National Highways	Support access to tourism and cultural sites via active and public transport. It is open to scoping holistic interventions and physical mitigation where needed for SRN-adjacent sites.	Support welcomed.

Ref.	Who	Summary of comment	Our response
1058-1	Cllr Debra Wailes	RHS Bridgewater should be added to tourism destinations.	RHS Bridgewater is not in Wigan Borough.
1088-3	Canal & River Trust	Support.	Support welcomed.
1121-26	Peel Land	Support the inclusion of an explicit policy for the visitor economy and the objective of growing the visitor economy in Wigan. Welcome the commitment (Part 1 of Policy J8) to protecting and enhancing visitor assets such as the Lancashire Mining Museum, the Bridgewater Canal and Chat Moss. Welcome Parts 2 and 3 of the policy. The approach is considered to complement the approach being taken within the part of Salford immediately to the east of the Bridgewater West allocation: "SS4D Part A): Neighbourhood vision The vision for the Worsley and Westwood Park, Boothstown and Ellenbrook neighbourhood area up to 2042.	Support welcomed.
1129-13	Historic England	Support.	Support welcomed.
Policy J9: Digital and telecommunications infrastructure (now policy J5 in the Publication Plan)			
100-19	Private Individual	Support commitment to full fibre broadband and 5G rollout across Wigan Borough.	The policy supports the rollout and improvement of digital infrastructure

Ref.	Who	Summary of comment	Our response
		Concerned that Policy J9 lacks a clear framework to address inequalities in digital infrastructure, particularly in areas like Atherton. Policy J9 would be strengthened by: • Committing to targeted rollout in areas with low full fibre availability, including parts of Atherton, Hindley, and Leigh, where commercial fibre providers have not prioritised deployment • Explicitly prioritising digital inclusion in deprived areas, ensuring that new housing and employment sites are connected to high-speed networks from the outset • Requiring digital infrastructure assessments as part of major development proposals, particularly in regeneration areas, to guarantee residents and businesses are not left behind in the shift to digital services • Working with community partners to explore community broadband and cooperative models where commercial rollout is unlikely due to perceived lack of profitability	across the whole borough. The revised supporting text recognises that there are areas underserved / with poor connectivity.

Ref.	Who	Summary of comment	Our response
		• Using developer contributions (e.g. Section 106) to fund local digital improvements, such as Wi-Fi hubs, digital literacy programmes or public-use digital infrastructure in town centres and local centres like Atherton. Atherton is not referenced in the plan's digital strategy, while it experiences patchy fibre coverage and connectivity challenges for businesses and households, particularly in older housing stock and along the town centre's periphery. This limits access to digital services, online education, and remote work opportunities - further entrenching social and economic disadvantage.	
369-2	Cllr Debbie Parkinson	Phone signal and digital connectivity needs addressing in Standish before any more homes are considered.	Noted. This policy sets out to support improvements to phone signal and digital connectivity issues across the borough.
1023-23	National Highways	National Highways should be consulted on telecoms infrastructure that may impact the SRN. This includes the need for sites to be in compliance with DMRB in terms of both structure and safety, with Road Safety Audits or GG104-compliant assessments being necessary in some circumstances.	Noted.

Ref.	Who	Summary of comment	Our response
1079-13	Jo Platt MP	Support. Phone signal and digital connectivity is poor in certain areas, including Howe Bridge.	Support welcomed.
1129-14	Historic England	Support criteria 2 and 3.	Support welcomed.
1137-16	United Utilities	Request the following criterion which reflects concerns relating potential adverse impacts on water and wastewater from the emerging modern economy: 'In accordance with Policy J2, applications must be supported by a strategy for foul and surface water management and clean water supply. Proposals must be designed to minimise the impact on water resources and wastewater infrastructure.'	Foul and surface water management is sufficiently covered in Policy EN10. Policy EN13 sets requirements for water efficiency.

Ref.	Who	Summary of comment	Our response
Town and local centres			
100-8	Private Individual	Atherton will not receive funding support for proposals to improve it. Request a delivery plan with funding identified and timescales for action for all towns. This should also include the local delivery mechanisms. Atherton's assets are underrepresented in the policy including the re-use of Atherton town hall as a community hub for cultural activity for all including youth provision. The plan should reference how capital should be distributed across the towns with priority given to those in the top 10% of deprived areas.	The draft Local Plan supports *the* regeneration and improvement to all town centres across the borough. Progress with Unity also has the objective to 'Make all our towns and neighbourhoods flourish for those who live and work in them.' The council through its capital programme and funding bids will support project development and action where it can. This includes where consultation takes place on the role, function and improvement of its buildings and assets.
276-8	Private Individual	There are a number of issues affecting town centres including drug addicts, business rates and costs. The Government and council are causing empty shops.	The council works in partnership with the police and voluntary agencies to deal with issues including drug use in town centres. However, funding has been, and remains, very tight for such work. The council does not determine business rates (this is central government) or rents for privately owned property which form a high proportion of town centre stock. It will wherever it can support businesses.

Ref.	Who	Summary of comment	Our response
			Empty shops are caused by several factors including the impact of internet shopping, unsuitable properties and lack of custom.
338-5	Private Individual	Object.	Noted.
576-16	Private Individual	The facilities in Wigan are not accessible to residents in the east of the borough. Leigh is suffering from de-regeneration. The plan for Leigh is incomprehensible. Questions whether the Parsonage Retail centre is in the town centre. The framework for Leigh was drawn up in 2000 and 5 years later nothing has been done. Both Leigh and Wigan are suffering from anti-social behaviour and crime.	The framework for Leigh was drawn up in 2020. Funding has subsequently received to support implementation of a range of initiatives. This approach is referenced on the Leigh regeneration page in the council's website and projects and works are now being brought forward. Paragraph 7.40, now paragraph 10.44, refers. The council works in partnership with the police and voluntary agencies to deal with issues around crime and anti-social behaviour in town centres.
899-18	City of Trees	Greening references should be included in all town centre policies.	Policy PL1 applies, including criterion 1e "Nature: enhanced and optimised, integrating with green and blue infrastructure and nature recovery networks". The biodiversity net gain duty also applies. Leigh has been identified as a particular priority for greening.

Ref.	Who	Summary of comment	Our response
922-2	Private Individual	Business property and market stall rents are too high in town centres.	The council does not determine rents for privately owned property which form a high proportion of town centre stock. Market rents are modest, and the council will support businesses that seek to rent from them wherever it can.
990-1	Private Individual	Leigh suffers from litter and anti-social behaviour, due to alcohol and drug abuse. Shop front improvements and cafe culture won't help to attract people into Leigh unless these issues are dealt with. Lowering rents along with improving the street scene and introducing more diverse shop will help to attract people in and boost the economy.	The council works in partnership with the police and voluntary agencies to deal with issues around crime and anti-social behaviour, drugs and alcohol misuse in its town centres. However, funding has been, and remains, very tight for such work. The council does not control rents of the many private shop properties in town centres; these are commercially set and negotiated. Where it owns properties, it will look to support fair and manageable rents for occupiers. Along with plans to improve shop frontages which will improve the street scene there are plans to also improve the public realm in which properties are set.
1129-3	Historic England	Support policies TC3 to TC11.	Support welcomed.
1137-17	United Utilities	Support but wish to see the addition of wording to ensure that sustainable	This is covered by policies in the Environment chapter.

Ref.	Who	Summary of comment	Our response
		management principles are incorporated into all the policies.	
1326-2	Private Individual	Towns are no longer about retail. They should be regenerated through housing and leisure. There should be a moratorium on HMOs, Eastern European shops, Turkish Barbers and Nail Bars.	The plans for all the town centres in the borough reflect support for residential and wider food and drink and leisure uses. All shops are defined within the use class order as the same. It is not in the power of the local planning authority to restrict lawful uses. A borough-wide Article 4 Direction has been established recently to require all HMOs to need planning permission. Policy H10 refers.
1332-1	Private Individual	This is all about Wigan. Funding should be equally distributed to all 22 towns and villages. Wigan is not a principal town centre.	PfE Policy JP-P4 identifies Wigan as one of 8 main town centres across Greater Manchester. Funding has been received by other centres including Leigh, Ashton and Tyldesley. The Local Plan does not determine the capital programme of the local authority though it does reflect its corporate priorities. Wherever possible the Council will fund projects and support funding bids to improve its town centres.

Ref.	Who	Summary of comment	Our response
Policy TC1: Hierarchy of town and local centres			
100-1	Private Individual	A policy should be introduced to ensure that existing town centre uses are prioritised against residential development in town centres. This should require that sound proofing and mitigation measure lie with the residential development. The policy should align with the Culture Strategy and Night-time economy strategy to prevent displacement of uses. Suggest the 'Agent of Change' principle applies.	National planning policy recognises residential development as an important element in town centres to help increase viability and vitality. The agent of change principle also applies, however, and this is included in policy EN7.
994-4	Private Individual	The 900 sq. m threshold for an impact test in edge or out of centre locations is not justified. Impact assessments are only identified for retail and leisure by the NPPF, with thresholds below the 2,500 sq. m figure set in NPPF needing to be justified and evidenced.	The policy has been amended following a study undertaken by Nexus. The impact assessment threshold is now 500 sqm, or 300 sqm or 200 sqm if within 800m of a town centre or local centre respectively.
1023-24	National Highways	No comment.	Noted.
1089-3	Applethwaite	Supports the town centre policies and the identification of Golborne in the hierarchy.	Support welcomed.
1120-3	Places for People	Development of our site supports Shevington Local Centre and Standish Centre	Noted.
1139-1	Lidl GB	Support the general principles of the policy but object to the 900 sq. m threshold for	The policy has been amended following a study undertaken by Nexus. The impact

Ref.	Who	Summary of comment	Our response
		impact tests. The Wigan retail study is 10 years out of date, therefore there is insufficient evidence for the threshold which makes the plan potentially unsound. A new retail study should be prepared.	assessment threshold is now 500 sqm, or 300 sqm or 200 sqm if within 800m of a town centre or local centre respectively.
1140-3	Ainscough Strategic Land	Support the policy and Standish's allocation in the hierarchy.	Support welcomed.
Policy TC2: Wigan town centre			
369-25	Cllr Debbie Parkinson	Disruption should be kept to a minimum when works are underway in Wigan town centre. Wigan suffers from poor parking, fewer shops and transport problems.	Criterion 1 of policy EN7 requires developments to not result in unacceptable levels of pollution both operationally and during the construction phase.
413-3	Private Individual	Redevelopment of the Galleries has been a disaster, the Galleries should have been re-purposed. In times when we are told money is tight, the demolition of the Galleries and market hall is a waste of money. The redevelopment of the Galleries is not for Wiganers. The Council has an opportunity to keep the area open and create outside space for markets and events as has been done in Chorley and Bury.	There was a reason that the value of the Galleries declined from around £200m, to £10m in less than 20 years. Re-purposing the Galleries would not be cost-effective since the age of the build and the type of units would mean extensive repair; remodelling and ground works to make the units and space suitable for 21st Century uses. The proposed market hall that is now under construction will keep elements of the old-style food market offer but will also introduce food and drink plus leisure uses and should be a considerable asset to the town.

Ref.	Who	Summary of comment	Our response
454-1	Private Individual	Open up Standishgate from a pedestrian area to an area where you can park for 2 hours would mean shops are quickly accessible. Split larger shops up on Standishgate into smaller shops.	Traffic can access Standishgate from 4.30pm, and it doesn't improve matters. People should be able to walk around without fear of being hit by a car.
469-1	Private Individual	The Council has not undertaken meaningful engagement, with minimal residents actively involved in the decisions at Haigh Hall and the Galleries. The Conservation Appraisals are out of out of date and talk of commitment to them when there are issues such as unsympathetic extensions, HMOs, poor repairs and bin storage and collection. For those who live in the town centre of Wigan the building works over the past five years have been a living hell. Other authorities are regenerating their High Streets. However, Wigan helped to destroy the Galleries by developing the Grand Arcade and forcing out viable businesses. It would be good if the tag line progress with Unity was not just a tag line.	Wigan Council did not develop the Grand Arcade. It has, however, managed to keep retailers in there for the most part, even in challenging times. The council has limited resources and cannot do everything at once. As noted in the policy, improvement will be achieved through working in genuine partnership with businesses, residents, visitors, the Voluntary, Community, Faith and Social Enterprise sector and our strategic partner organisations. Mesnes Park is included in the policy.

Ref.	Who	Summary of comment	Our response
		Mesnes Park needs more investment including restoring the tennis courts, bowling greens and crazy golf.	
779-20	Sport England	Support the policy but would like to see the principle of Active Design incorporated into the policy.	The concept of active design is covered through the application of policy PL1 in the Local Plan.
859-1	Private Individual	The policy focuses only on the Learning Zone and Deanery, and ignores other establishments providing post 16 education and community resources in the borough.	The policy specifically relates to Wigan town centre. It is acknowledged that other education establishments in the borough are a valuable resource in their localities and to the communities they support.
899-17	City of Trees	The policy should mention greening the town centre for climate resistance.	Policy PL1 applies, including criterion 1e "Nature: enhanced and optimised, integrating with green and blue infrastructure and nature recovery networks". The biodiversity net gain duty also applies.
901-1	Cityheart Ltd	Support.	Support welcomed.
933-1	Private Individual	Support more residential provision in Wigan Town Centre.	Support welcomed.
1023-25	National Highways	Any detailed designs that have traffic impacts on the SRN particularly the motorway network should be advised on.	Noted.
1117-2	Network Rail	Support.	Support welcomed.

Ref.	Who	Summary of comment	Our response
1129-21	Historic England	Support.	Support welcomed.
1381-13	TfGM	Change traffic to 'motor traffic' in the policy where applicable to differentiate from pedestrian and cycling traffic.	Criteria 7, 9 and 21 have been amended accordingly.
1412-4	Private Individual	Support the proposals for residential in Wigan town centre, and the provision of car parking at Wigan North Western station. Concerned that some of the older properties such as Pagefield Mill will not be saved and converted for housing.	Support welcomed. Criterion 12 specifically identifies securing the comprehensive conservation-led and housing-led regeneration of Pagefield Mill as a key priority.
Policy TC3: Leigh town centre			
100-23	Private Individual	The investment in Leigh Town Centre is unfair, more should be given over to Atherton and other towns. Atherton is a more deserving case as it is regenerating from the bottom up. The investment in Leigh is creating unfair competition especially around the night-time economy. The strategy for Leigh should focus on education, health, employment, diversified daytime uses, the arts and high-quality public realm.	Leigh is the second largest town centre in the borough, and it is considered important that intervention takes place to secure regeneration of the town centre when funding allows. The funding received has been from central Government who have been convinced of the case. The funding will focus on 3 priorities set by Government: thriving places, stronger communities and taking back control The strategy for Leigh is therefore focused on expanding uses in the town centre including the arts and improving the public realm as

Ref.	Who	Summary of comment	Our response
		The policy is not in line with progress with unity.	well as projects around safety, community initiatives and employment opportunities. In line with Progress with Unity the policy reflects the commitment to work in genuine partnership with businesses, residents, visitors, the Voluntary, Community, Faith and Social Enterprise sector and our strategic partner organisations. The Leigh Neighbourhood Board consists of a variety of public, private ad voluntary representatives and is being expanded to make it more representative. The Council is committed to supporting all its town centres and proposals are focused on a town's strengths to ensure that each maximises it selling points to increase footfall and trade.
967-3	Private Individual	Support the policy but HMOs should be discouraged. Bradshawgate and Railway Road should be prioritised for improvement. A better town centre offer is needed.	Support welcomed. A borough-wide Article 4 Direction has been established recently to require all HMOs to need planning permission. Policy H10 refers. Criteria 3 and 8 respectively prioritise Bradshawgate and Railway Road for improvement.
540-1	Private Individual	The number of traffic lights in Leigh town centre should be reduced, the lights at the	The circulation of traffic and associated walking, wheeling and cycling access is

Ref.	Who	Summary of comment	Our response
		junction of Lord Street and Market Street are dangerous and should be looked at. The two Pelican crossings on Market Street should be replaced with an integrated crossings at The Avenue traffic lights. The bus lane outside the Parish Church causes delays.	identified for action in criterion 7 of the policy. Work has been commissioned to look at transport movements across the town which will look at all motor traffic and improvements to access by walking, wheeling and cycling.
563-1	Private Individual	Leigh town centre is rife with criminals, drug addicts and alcoholics, making it unsafe to live or shop in the town centre. The residents that are being housed there by Wigan Council are unpleasant and do not care about the houses or neighbours.	The council works in partnership with the police and voluntary agencies to deal with issues around crime and anti-social behaviour, drug and alcohol misuse in its town centres. However, funding has been, and remains, very tight for such work. The only residents being housed by Wigan Council in Leigh town centre are in the new apartments at Brown Street South which houses people off the council's waiting list. Anti-social behaviour from can be reported to the Police and/or Wigan Council.
576-21	Private Individual	Leigh needs improved and faster access into Manchester, the guided bus is too slow. A site for higher education needs to be identified. Co-working space needs to be identified. Bradshawgate needs to be repurposed with new better-quality shops and a food and	The draft policy at criterion 1 supports significantly improved rapid transit services between Leigh and Manchester. A higher education presence and co-working spaces are covered in criterion 2. Bradshawgate is covered by criterion 3.

Ref.	Who	Summary of comment	Our response
		drink offer with outside space. CPO should be used. The terraced housing should be analysed as to the occupants and ASB dealt with. Leigh is used as a through route for residents of Blackmoor and this should be dealt with alternative and better public transport options. Leigh needs a better vision to attract residents in the south of the borough away from other centres such as Warrington, Manchester and the Trafford Centre. There is no provision for youth activities in Leigh.	CPO is only used as a last resort; the Council will work with businesses and owners to improve property wherever possible. Anti-social behaviour can be reported to the Police and/or Wigan Council who have Housing Support and ASB teams. Criterion 17 supports reducing the adverse impacts of traffic in the town centre.
779-5	Sport England	Support but would like to see the principles of Active Design incorporated into the policy.	The concept of active design is covered through the application of policy PL1 in the Local Plan.
874-5	Cllr John Harding	Supports the work to improve the town centre street scene and shop frontages. Works though would be welcome to improve the road infrastructure especially from Chapel Street to Lidl which would help with traffic management.	Support welcomed. A scheme to improve traffic at the Chapel Street junction is being worked up for early implementation.

Ref.	Who	Summary of comment	Our response
923-4	The Lancashire Wildlife Trust	Greening the town centre through street trees, green walls and roofs, landscape planting and SUDs is supported. This should be in all other town centre policies.	The town centres are designed to be spatial specific. Leigh has been identified as needing greening. Policy PL1 otherwise refers.
1023-26	National Highways	Support reference to the provision of a rapid transit between Leigh and Manchester.	Support welcomed.
1079-14	Jo Platt MP	Supports the general approach of the policy, but: Road traffic improvements should be prioritised before cycling. Reductions in motor vehicles both moving and parked should not reduce access for shoppers to the town centre and businesses taking deliveries. There should be an Article 4 directive against HMOs. Improvements to walking, wheeling and cycling linkages should be subject to community consultation.	Support welcomed. The only reasonable way to tackle congestion is to provide people with good alternatives to using the car. It also helps create a safer, quieter and healthier environment. A borough-wide Article 4 Direction has been established recently to require all HMOs to need planning permission. Policy H10 refers. Lessons are being learnt from the St Helens Road scheme, including how we can consult better.
1381-14	TfGM	The policy should include reference to a new / redeveloped bus interchange for the town centre.	New criterion 6 added accordingly.

Ref.	Who	Summary of comment	Our response
Policy TC4: Ashton-in-Makerfield town centre			
03-1	Private Individual	Would like to see more celebration of the town's heritage including recognition of Roger Lowe.	This has been shared with colleagues working on the town centre public art project. Roger Lowe had already been mentioned during previous consultations on the scheme and will be considered along with other figures and suggestions of local and historical interest, as proposals are brought forward, and kept in mind for wider opportunities to promote heritage in relation to Ashton town centre.
779-4	Sport England	Support criterion 9 but would like a reference to NPPF paragraph 104 to give additional support to the playing field. Request reference to Active Design Guidance in the policy.	The concept of active design is covered through the application of policy PL1 in the Local Plan.
1023-27	National Highways	Support the enhancement of the active and multi modal interchange options and will work to manage diversions to and from M6 Junction 25.	Support welcomed.
1381-16	TfGM	Suggest criterion 2 is amended from 'preventative traffic management measures in the town centre' to 'introduce traffic management measures in the town centre to improve safety'.	Criterion 2 has been amended accordingly. There is provision for north facing slips at Junction 25 in the design of the proposals at the Junction 25 site.

Ref.	Who	Summary of comment	Our response
		Para. 7.53 refers to improving access to both M6 J25 and J26, with J25 having south facing slips only. As potential north facing slips could encroach on the PfE site allocation, and approved development, at M6 Junction 25, is the reference rather to J26 and the A49 link road?	
Policy TC5: Atherton town centre			
100-7	Private Individual	The policy should reflect a funding and regeneration strategy prioritised for Atherton in the policy with a delivery timetable and commitment to fund improvements. The sequential policy has not been applied to the outskirts of Atherton with investment drawn away.	There is no substantive funding that can be prioritised and, in that regard, the Local Plan does not allocate funding. It does though set out the council's ambitions for the town centre and, by doing so, it sets out a commitment to identify resources when opportunities arise. As noted, however, the policy will only be secured by "working in genuine partnership with businesses, residents, visitors, the Voluntary, Community, Faith and Social Enterprise sector and our strategic partner organisations – it cannot be just the council on its own.
100-20	Private Individual	The policy does not go far enough in encouraging the regeneration of Atherton. Too much attention is given to Leigh. Specific recommendations are needed to support the town's improvement including a planting	Policy TC5 is for Atherton town centre, not Leigh. The policy covers most of the matters raised: planting and improved streetscene (criterion

Ref.	Who	Summary of comment	Our response
		scheme and improved street scene, time limited parking, revamped toilets and a mural, and replacement of the metal bus stop in the market square. A lack of banking services should also be addressed. Lack of investment has undermined the town and this should be addressed by the Council. Support vacant shop conversions.	1), parking (criterion 7) and the public toilets (criterion 8). Banking services are provided commercially. Wherever possible the council will lobby banks to keep a branch presence in a town centre.
460-1	Private Individual	Market Street needs opening up and the camera removed. A new secondary school is required. The East of Atherton plan for 450 houses needs to be put on hold until we see the implications of all of the other developments in the area. More Community Police officers required. Youth provision is urgently needed in Atherton. An overflow car park for V buses such as a Park and Ride is needed. TfGM needs to offer a more affordable, reliable and consistent transport option. Local infrastructure is beyond capacity. Social housing is urgently needed - not private developments. Support funding from Wigan Council to implement the local plan for Atherton.	The policy supports the improvement of Market Street by making it a more people friendly place that will benefit trade. School places are covered by policy PE4, now PE6, as are other infrastructure requirements arising from development. Community Police Officers is a policing matter, not something the Local plan can cover. Policy PE6, now PE7 covers community facilities, including youth provision. Criterion 5 supports maximising the busway service and park and ride facilities. TfGM are offering a more affordable, reliable and consistent bus service network now that they are back in public control, including maximum fares and seasons tickets.

Ref.	Who	Summary of comment	Our response
			Social housing is a priority for the council but again it is substantively limited by the funding that is available. Private development is one of the main ways through which affordable housing is provided, as a percentage of the overall housing – policy H2 refers.
675-1	Private Individual	The pedestrian area on Market Street should be reviewed as it is preventing passing trade, perhaps with a six-month trial period. Car parking is limited because of the V2 bus service. Some new businesses have moved into Atherton but some of the properties that have been improved remain empty.	The policy supports the improvement of Market Street by making it a more people friendly place that will benefit trade. A car parking survey has been carried out recently that shows that there is space available.
779-15	Sport England	Support the aims of criterion 6 in particular and would welcome the inclusion of direct reference to Active Design Guidance within the policy wording, suggested as: Provide opportunities for physical activity and Active Travel by incorporating the principles of Active Design.	Support welcomed. The concept of active design is covered through the application of policy PL1 in the Local Plan.
874-4	Cllr John Harding	Current level of pedestrianisation of Market Street is sufficient. There should be a dedicated park and ride in Atherton for the V2 service.	Criterion 5 of the proposed policy supports maximising the busway service and the provision of park and ride facilities.

Ref.	Who	Summary of comment	Our response
1023-28	National Highways	Support the park and ride for Leigh Guided Busway.	Support welcomed.
1079-8	Jo Platt MP	Oppose the full pedestrianisation of Market Street as this is not supported by residents, businesses and councillors. It would also take shoppers arriving by bus away from the town centre, which could lead to more car journeys. Improving cycling should not disadvantage those on public transport. Additional car parking is needed for the V2 service and town centre.	The policy supports the improvement of Market Street by making it a more people friendly place that will benefit trade. Specific mention is made of the need make walking distances from bus services as short as possible. Criterion 5 of the proposed policy supports maximising the busway service and the provision of park and ride facilities.
1082-3	Private Individual	Disagree with the full pedestrianisation of Market Street. The promotion of cycling should not mean relocation of bus services. There is a need for more car parking for the V2 services and shoppers.	The policy supports the improvement of Market Street by making it a more people friendly place that will benefit trade. Bus services in Atherton town centre are not going to be relocated for the promotion of cycling. Criterion 5 of the proposed policy supports maximising the busway service and the provision of park and ride facilities.
1381-15	TfGM	The V2 could be faster if there was bus priority where it runs on highway. Is dedicated park and ride envisaged in Atherton for the busway?	Criterion 5 of the proposed policy supports maximising the busway service and the provision of park and ride facilities.

Ref.	Who	Summary of comment	Our response
Policy TC6: Golborne town centre			
539-1	Private Individual	Would like to see more doctors, dentists and school places to support additional housing. There should be more litter operatives. Traffic is a concern. There should be more shuttle buses into shopping areas from Estates.	Policy PE4, now PE5 covers delivering infrastructure in relation to development, but it can only deal with physical aspects such as surgery extensions. Commissioning of personnel and services is a matter for other bodies. We are focusing on our town centres including Golborne as our most accessible locations by a range of means of transport.
779-17	Sport England	Support but would like to see reference to Active Design Guidance.	The concept of active design is covered through the application of policy PL1 in the Local Plan.
984-12	Private Individual	Disagree with the proposal to create a rail station in Golborne. Object to release of any Green Belt.	The proposed rail station at Golborne is firmly evidenced in transport terms and well advanced. It should be a significant benefit to the town. There is no Green Belt involved in the station proposals or town centre more widely. There is no release of Green Belt proposed in this Local Plan.
1002-6	Cllr Gena Merrett	Support the town centre policy and the proposals for Golborne station. There should be safe walking and wheeling and cycling links and an appropriate car parking strategy.	Support welcomed. Safe walking, wheeling and cycling connectivity is covered in amended criterion 4 and new criterion 5, as well as criterion 3. A new criterion 6 has been

Ref.	Who	Summary of comment	Our response
			added on exploring options to increase car parking.
1061-1	Private Individual	Support the town centre policy and the proposals for Golborne station, and would like to see 2 hours parking at the station.	Support welcomed New criterion 6 has been added on exploring options to increase car parking, including some shorter stay parking.
1089-4	Applethwaite	Strongly support the policy. They consider their proposals for residential development off Barn Lane will support the policy.	Support welcomed.
Policy TC7: Hindley town centre			
779-7	Sport England	Support the policy but would like to see reference to Active Design Guidance.	The concept of active design is covered through the application of policy PL1 in the Local Plan.
923-5	The Lancashire Wildlife Trust	Support for improving the flood management of Borsdane Brook and creating nature and recreational benefits.	Support welcomed.
1023-30	National Highways	National Highways will work with the Council on the proposed east-west bypass.	Support welcomed.
1119-1	West Lancashire Borough Council	Paragraph 7.81 should read M6 Junction 26 at Orrell and not Junction 6.	The text has been amended accordingly.
Policy TC8: Pemberton town centre			

Ref.	Who	Summary of comment	Our response
779-19	Sport England	Support the policy but would like to see the policy include reference to Active Design Guidance.	The concept of active design is covered through the application of policy PL1 in the Local Plan.
1023-31	National Highways	National Highways will work with the Council to ensure the M58 link road does not impact on the SRN.	Noted with thanks.
1119-2	West Lancashire Borough Council	Paragraph 7.84 should read M6 Junction 26 at Orrell and not Junction 6.	The text has been amended accordingly.
396-3	Private Individual	There is a lack of investment in Pemberton. There are too many barbers and vape shops. Cafes, restaurants and bars should built on Divinos and the old Bank. The link road will have a negative impact on the town centre. Fly tipping is not being addressed. Funding should be focused on Pemberton.	The plans for all the town centres in the borough reflect support for residential and wider food and drink and leisure uses. The Council where funding is available internally or externally will support investment in its town centres. The link Road will reduce the amount of through traffic which will improve the overall environment for those using the town centre. This includes an improvement in air quality and general access in and across centre for those walking, wheeling and cycling. All shop uses are defined within the use class order as the same. It is not in the power the Council authority to restrict lawful uses.

Ref.	Who	Summary of comment	Our response
			Fly tipping should be reported to Council. Where it can identify fly tippers the Council will prosecute.
Policy TC9: Platt Bridge town centre			
779-12	Sport England	Support the policy but would like to see the policy include reference to Active Design Guidance.	The concept of active design is covered through the application of policy PL1 in the Local Plan.
923-6	The Lancashire Wildlife Trust	Support the introduction of SuDS in the town centre but would like to see the creation of wetland habitats too.	Improving flood risk management for the town centre from Hey Brook is a key priority for the council and partners.
1023-32	National Highways	No comments.	Noted.
Policy TC10: Standish centre			
159-2	Standish Voice	Would like more in Policy TC10 on improvements to the public realm to support the vitality of Standish centre; to add the priority of enhancing Standish' conservation area.; and to increase car parking provision. The site on Preston Road should be designated for new retail and hospitality and redevelopment of the site for housing should be resisted.	The policy supports improvements to the quality of the street scene in criterion 2. The detail will be brought out through development of the project. The priority of improvements to the historic value of the centre is covered by criterion 6. The management of car parking in the centre is covered by criterion 5. New criterion 3 on the site at Preston Road has been added to the policy.

Ref.	Who	Summary of comment	Our response
369-5	Cllr Debbie Parkinson	Generally supportive of the policy. Parking is a problem for retailers. Traffic is an issue in the centre of Standish as drivers ignore the rules on no right/left turns. Cameras have not been provided as promised. The main junction is narrow, not fit for purpose and accidents frequently occur.	Support welcomed. Criterion 5 supports a locally developed strategy for car parking. The latest position on cameras is that the council is currently liaising with Yunex, the camera provider to get a date when traffic management can be installed to enable the camera to be erected. We will keep you updated.
369-20	Cllr Debbie Parkinson	Standish centre needs a revamp - types of shops should be supported monitored – there is an overconcentration of barbers.	The improvement of the centre is supported in criteria 2 and 3. The council has no powers to influence the type of shop uses. As things stand, barbers are part of the same use class as shops.
779-23	Sport England	Support the policy but would like to see reference to 'Active Design Guidance' in the wording.	The concept of active design is covered through the application of policy PL1 in the Local Plan.
732-3	Cllr Ray Whittingham	There has been no improvement in amenities or improvements in Standish despite the increase in population. This includes no new car parking which needs addressing including use of the site on Preston Road, and poor signage quality. There is a need to improve the triangle from Pole Street to the cenotaph, via Church	There have been improvements to the old mineral line and the connections into Standish for walking, wheeling and cycling. Criterion 5 supports a locally developed strategy for car parking. The site on Preston Road is in private ownership and has permission for retail

Ref.	Who	Summary of comment	Our response
		Street, Market Place/Street, and a need for motor bike and cycle parking.	development. It is not available for car parking. Criterion 2 covers improving the quality of the street scene, particularly along High Street, Preston Road, Pole Street, Market Street and Cross Street. The details would be worked up for the project with local stakeholders. New criterion 3 on the site at Preston Road has been added to the policy.
1023-33	National Highways	No comments.	Noted.
1099-5	Morris and Persimmon Homes	Standish should be labelled as a town centre.	It is a village centre in the neighbourhood plan.
Parking			
229-4; 531-3; 982-6; 1401-3	Private Individuals	There is insufficient car parking in Standish.	Criterion 5 supports a locally developed strategy for car parking. There is only so much land available, however.
1405-2	Private Individual	A low-cost car park is needed in Standish.	As above.
229-4; 531-3	Private Individuals	The derelict land at Preston Road should be allocated for parking.	This land is in private ownership and has a retail permission and is therefore not available for allocation as car parking,

Ref.	Who	Summary of comment	Our response
229-4;	Private Individual	There is a need for more dedicated cycle parking.	As part of improving access for walking, wheeling and cycling additional cycle parking will be encouraged.
730-2	Private Individual	Illegal parking takes place that cause problems for traffic and pedestrians. There needs to be enforcement.	Our Network Management parking enforcement team visit Standish most days. If people are not happy with the level of enforcement, they can fill in the parking diary sheet at 'How to report a parking issue' on our website.
Shops and services			
396-3	Private Individual	Standish has too many barbers and vape shops.	All shop uses are defined within the use class order as the same. It is not in the power of the local planning authority to restrict lawful uses.
Traffic			
1064-1; 1071-1	Private Individuals	To improve Standish town centre, traffic needs reducing by improving public transport and providing a bypass.	There is no realistic funding available for a bypass. Bus services in Standish are being improved through developer funding.
229-4	Private Individual	Traffic from Almond Brook/Pepper Lane to Standish is constantly backed up.	More use of walking, wheeling, cycling and public transport is the only realistic way of addressing congestion.
730-2	Private Individual	The crossroads need to be addressed as there is a lot of congestion.	As above.
982-6	Private Individual	There are traffic violations that are not enforced which are dangerous to pedestrians.	Traffic violations should be reported to the police or the council.

Ref.	Who	Summary of comment	Our response
1412-3	Private Individual	The pedestrian environment cannot be improved without re-routing traffic.	Comment noted. Traffic certainly constrains what can be done.
Public transport			
229-4	Private Individual	Transport links are poor on the outskirts of Standish. There are insufficient bus services for people living close to the M6/Almond Brook/Rectory Lane areas.	This is a challenge but the council is working closely with TfGM to achieve the maximum benefits we can for residents from bus franchising.
Other			
982-6	Private Individual	Pavements are unkempt and scruffy and the works to the Quakers Place has made things worse	The Quakers Place works have not been completed as yet.
454-1	Private Individual	Continue the protection of green spaces.	Policies PE3 (now PE4), EN1 and EN2 refer.
274-1	Private Individual	Support the comments of Standish Voice.	Noted.
531-3	Private Individual	Improvements to Standish public realm should have greater emphasis including at Market Street, Pole Street, Market Place and Cross Street. Priority should also be given to the conservation area in Standish centre.	Criteria 2 and 6 refer.
531-3	Private Individual	Enhancing Standish as a place to visit is in line with policy J8 The Visitor Economy.	Noted.

Ref.	Who	Summary of comment	Our response
730-2	Private Individual	How much funding from residential development has been spent in Standish?	The Council's Infrastructure Funding Statement for s106 details what has been spent through s106 across the borough.
985-1	Private Individual	Standish infrastructure cannot cope with further population increases from new housing development.	Provision of new Infrastructure associated with development is covered by policy PE4, now PE6 Delivering Infrastructure.
Policy TC11: Tyldesley town centre			
100-39	Private Individual	TC11 rightly highlights the progress made in Tyldesley town centre through the Heritage Action Zone (HAZ). The focus should now be on other areas of Tyldesley and towns such as Atherton. This should be reflected in the policy for Tyldesley. The policy should recognise that regeneration is not just about rewarding past success but addressing disparities in funding.	The policies for all the designated town centres support their regeneration and improvement. This is an on-going process and the council wherever possible will support capital funding for improvements from a variety of sources.
275-1	Private Individual	The proposals in Tyldesley are not workable if traffic congestion is not sorted.	Criterion 1 references the softening of the impact of through traffic calming measures.
779-1	Sport England	Support the policy but would like to see Active Design guidance incorporated into the policy.	The concept of active design is covered through the application of policy PL1 in the Local Plan.
1023-34	National Highways	No comments.	Noted.
Policy TC12: Local centres supporting thriving communities			

Ref.	Who	Summary of comment	Our response
100-41	Private Individual	The policy rightly recognises the role local centres play for communities but should go further by prioritising funding for underinvested centres including Hag Fold, Atherton and Hindsford. This should include public realm improvements and investment in the most deprived centres. Suggests additional wording: "Where land is underused or vacant, the council will work with local voluntary, community and faith organisations to establish community-led uses, including flower beds, pocket parks, public art, and local food production. Opportunities to lease land on a low-cost or peppercorn basis should be actively explored." Suggest time limited 'park and shop' for Atherton and other centres. A public delivery plan should be put together for the lowest performing centres which looks at co-location of public services and community hubs.	There is no substantive funding that can be prioritised and, in that regard, the Local Plan does not allocate funding. It does though set out the council's ambitions for the town and local centres and, by doing so, it sets out a commitment to identify resources when opportunities arise. The last paragraph of the policy states: Underperforming local centres will be targeted for these improvements as resources allow. The policy applies to 47 local centres – most haven't got underused or vacant land that could be so used. The policy doesn't include Atherton town centre. Which has its own policy.
779-21	Sport England	Support the policy but would like to see Active Design Guidance incorporated into the policies.	The concept of active design is covered through the application of policy PL1 in the Local Plan.

Ref.	Who	Summary of comment	Our response
859-5	Private Individual	The proposals to reinstate facilities that have been lost is insulting.	Not sure what we have done wrong – the word reinstatement doesn't appear in the policy or supporting text.
1023-35	National Highways	Support the proposed modal shift from cars to public transport.	Support welcomed.
1079-15	Jo Platt MP	Public consultation is needed before any local centres are remodelled.	Noted.
1120-2	Places for People	Our proposed housing site supports the sustainability of Shevington local centre.	Noted.
1381-12	TfGM	Add 'and shelters' to the policy wording	Criterion 4 has been amended accordingly.
Policy TC13: Gaps in the provision of local centres			
100-4	Private Individual	The policy does not go far enough. It should prioritise the gap in west Atherton for delivery during the plan period with suggested additions that the council will work with landowners to identify sites. Suggest that criteria of the policy including at Gibfield are strengthened by detailing the mix of uses with reference to cash points and post offices. Community led centres or pop-up models should be enabled through social enterprise.	The draft plan identifies the opportunity for a centre, however it is not the delivery mechanism. If there is opportunity through a council led development this will be explored through potential lettings and if private sector led, the council will challenge the developer to deliver a local centre against the policy. The opportunity at West Atherton is through the West of Gibfield development. We cannot detail the mix of uses years out from development and they are usually commercial decisions. Community centres

Ref.	Who	Summary of comment	Our response
		Suggests wording for local centres is strengthened to help target delivery and funding.	will be sought where there is a clear gap in such provision and a clear need.
369-7	Cllr Debbie Parkinson	There are gaps in the provision of convenience shops at Robin Hill Estate and in the Almond Brook area.	A gap is identified within the policy at Shevington Moor and North West Standish.
779-13	Sport England	Would welcome the inclusion of direct reference to Active Design Guidance within the policy wording. Wish to see the inclusion of policy wording for the provision of a financial contribution to new and improved sports facilities based on evidence of demand to accord with paragraph 103 of the NPPF.	The concept of active design is covered through the application of policy PL1 in the Local Plan.
994-6	Private Individual	The policy fails to identify other gaps in local centre provision as it does not identify the site at Marus Bridge near total fitness.	The site concerned may be in a gap in local centre provision but its potential walk in catchment to the north is almost all wholly within the 600 metres catchments of nearby local centres at Hawkey and Goose Green, who almost all also have the choice of two existing large supermarkets.
1023-36	National Highways	Support the creation of new local centres to reduce short car journeys.	Support welcomed.

Ref.	Who	Summary of comment	Our response
1121-25	Peel Land	The cap on floorspace should be 2,000 sq. m and single units can be considered as provision for a local centre.	A local centre as per the Glossary of the NPPF are primarily occupied by main town centre uses (plural), this would exclude a single shopping unit of whatever size.
Policy TC14: Convenience shops outside of designated centres			
100-6	Private Individual	There should be a cross reference to Policy TC13 to prioritise gap areas for small shops with support given to shops under 600 sqm. in gap areas. There should be restrictions on mid-size stores from national retailers with impact statements to assess there is no harm on a centre or the independent traders within them. Furthers sites in areas of deprivation should be identified as suitable for new shops.	Policy TC14 follows on from all of the other policies in the chapter and covers the circumstances where smaller scale convenience shops are appropriate, as sought.
369-27	Cllr Debbie Parkinson	Convenience stores are welcome in the Standish area as long as they don't turn into barbers.	New convenience stores are in the same use class as barbers so a change of use does not need planning permission as things stand.
1023-37	National Highways	No comments.	Noted.

Ref.	Who	Summary of comment	Our response
Transport			
100-22	Private Individual	Support the council's ambition to improve connectivity, air quality, and transport accessibility across the borough. However, despite being named in the plan and transport strategy documents, Atherton is still marginalised in the execution of these strategies, with no direct benefit from major borough-wide transport projects. The plan promotes active travel and modal shift away from car use, but Atherton's town centre parking is overwhelmed by commuters due to the absence of a park and ride facility. The plan fails to support the town's emissions-reduction and walkability goals. The plan lacks clarity on active travel and infrastructure funding, and pavement conditions in Atherton are dangerous. The plan should include Atherton in the next phase of strategic infrastructure investment, with a defined timeline and budget allocation for active travel, public transport, and traffic-calming projects.	Policy T1 sets out 11, formerly 10, transport priorities. These include: 3. Improved infrastructure and services on the Atherton rail line (Wigan-Manchester); 9. West of Gibfield – Lee Hall Link; 6, 7 and 8 – the east-west link road (in sections) from Westwood Park Wigan to Atherleigh Way; and 10. A577 and A58 Active Travel and Public Transport Improvements. Together these will provide significant transport benefits for Atherton, for general traffic, bus services and walking, wheeling and cycling connections. Policy TC5 sets out transport priorities for Atherton town centre. The pre-2022 timetable did include direct rail connections to Manchester Airport and did have a service that would have called at Golborne.

Ref.	Who	Summary of comment	Our response
		There is also a significant focus on how rail investment does not directly benefit Atherton, considering it focuses on moving people through Atherton as opposed to into it. The reinstatement of pre-2022 services in Atherton fails to address key service gaps, such as no direct rail link to Manchester Airport or a stop for Golborne. The town has no EV charging network for its retail core, and inadequate evening transport, or EV charging. The council should include Atherton in the next round of Bee Network and TfGM investment planning, deliver a Park and Ride feasibility study, extend V2 operating hours, and deliver public EV charging and cycle storage. The proposed plan aims to redirect and ring-fence funding currently assigned for connectivity between Atherton Station and Tyldesley. However, instead, it should focus on improving Atherton's direct access to its own station, prepare Atherton for future inclusion in the Bee Network, and make the case for Metrolink integration. The plan includes	

Ref.	Who	Summary of comment	Our response
		reallocating current station-to-Tyldesley linkage funding to create a targeted local programme focused on active travel improvements, access enhancements, and public realm upgrades. The Atherton Station Bee Network needs to be made ready for real-time digital integration with other Bee Network services, including bus, Metrolink, and active travel. Smart ticketing machines, cycle storage, and improved passenger facilities should be introduced. Atherton should be included in future Bee Network planning documents and mapping, and a feasibility study for a Metrolink extension should be co-commissioned. Investing in Atherton's connectivity would maximize rail assets, provide a viable alternative to car travel, and support economic regeneration.	
159-6; 531-4	Standish Voice; Private Individual	The village of Standish is facing congestion due to the M6 and high housebuilding. People also use Standish as a through route to other centres. The current Local Plan lacks policies for improved transport in Standish, as well as the rest of north Wigan, which is a missed opportunity.	Policy TC10 outlines the Councils ambitions for Standish. At present there are no proposals to establish a railway station at Standish. Policy T2 outlines the assessments required for new developments. These are based on

Ref.	Who	Summary of comment	Our response
		The scrapping of HS2 has reduced capacity on the West Coast Main Line. Opportunity to reopen a railway station in Standish should be on the local authority radar as it is a long-term vision and should be mentioned in the LP. The village's crossroads is a major choke point, and developers should address and bear responsibility. The LP should include a policy for Standish requiring developers of residential sites over 25 units to create a local Travel Plan and Transport Assessment. Previous planning conditions which agreed improved bus links on Rectory Lane should be brought forward as a matter of urgency.	national practice and are considered appropriate. We are hopeful that a bus service at Rectory Lane, supported by s106 funding, will be introduced soon.
241-5	Private Individual	Object.	Noted.
369-18	Cllr Debbie Parkinson	Standish needs a rail station. Trains to Bolton and Manchester would be beneficial as it would reduce traffic congestion and allow residents to visit relatives in Manchester Hospitals. No relevance to policy T3.	At present there are no proposals to establish a railway station at Standish. It could potentially be served a by a service to/from Manchester but not Bolton.
372-11	Private Individual	Overall objection.	Noted.
413-8	Private Individual	The council's spending on boroughwide small cycle lane improvements may not be	Many people don't feel safe cycling on the roads, so dedicated provision is needed.

Ref.	Who	Summary of comment	Our response
		economically viable for the low number of cyclists who use them, as it appears they are primarily for food delivery cyclists, while other cyclists use country roads and routes, which may need more attention.	
498-5	Natural England	Concerned about the Wigan-Hindley Link Road, which is on deep peat, and the potential loss of habitat through extraction or sealing. Oppose the development of deep restorable peat, as it could disrupt natural drainage, fragment peat areas, and make future restoration difficult. The sealing of peat with impermeable surfaces could also alter the underlying peat's nature, affecting natural processes such as maintaining a high-water table.	We note the concern around peat; however, we do not believe that any deep, restorable peat is present in the proposed alignment of the Wigan-Hindley Link Road across Amberswood due to the sites history of open cast coal mining and subsequent restoration. An evidence paper has been prepared to support this.
541-1	Private Individual	The plans for the Tyldesley/Atherton area will only increase the existing traffic situation. It is already difficult to travel along the road with the proposed new junction. Added pressure at the Chequerbent roundabout would cause queuing towards the Red Lion Junction. Impossible to turn right off the roundabout without risk of accident. Area behind Shakerley is riddled with shallow mine	A thorough traffic impact assessment will be undertaken to ensure any proposals for the Tyldesley/Atherton area are adequately designed and mitigated to ensure minimal impact.

Ref.	Who	Summary of comment	Our response
		workings, which would be dangerous to build on.	
573-4	Private Individual	A frequent direct train service to Manchester Airport would be helpful. In the long-term, an expansion of the Metro service to include easier links to east Wigan towns like Bury would be helpful.	Rail services within Wigan are operated by Northern and Network Rail with timetables set at regional and national levels. The council continues to advocate for increased services within the borough however has no direct control over the timetabling of these services.
576-22	Private Individual	Existing traffic congestion in Blackmoor is not addressed through any infrastructure solutions, with residents relying on car travel for better paid jobs outside the borough. The Guided Busway to Manchester is the only solution, but it is slow and gets stuck in Salford and Manchester. It also contributes to congestion in Tyldesley. Access to the busway is poor from Blackmoor, and it does not connect to the nearest Metro or rail stations. The proposed development on green belt in Mosley Common should not have been approved, and the proposed development at Bridgewater West should be cancelled due to its adverse effects on local traffic.	The concerns in relation to the Guided Busway service are noted and have been fed back to TfGM through the bus network review process.

Ref.	Who	Summary of comment	Our response
638-2	Private Individual	The elderly are not adequately addressed, with the first suggestion being to walk, cycle, or use public transport. Walking long distances or cycling are not viable for elderly people. Public transport is also not suitable due to the buses in the area not providing direct connections to amenities such as Leigh library and the hospital.	The phrase 'walking, wheeling and cycling' includes mobility aids such as wheelchairs and mobility scooters.
674-1	Private Individual	Over the years, numerous houses have been built around Broadwell Drive and Thames Avenue, with many on green fields. Many drivers disregard safety in these areas and the 20 mph speed limit. Access and egress have been planned poorly during the planning stage, with most users using Beech Walk, Hand Lane, and Jean Avenue. Fully integrating traffic access is important in planning.	Noted.
730-3	Private Individual	M6 junction 27 is helpful, but heavy goods vehicles regularly cut through to local areas, causing accidents due to the size of these vehicles using the access road. A HGV weight restriction from the motorway bridge to Boundary Lane/Pepper Lane should be explored.	The council would not introduce a weight restriction on the Boundary Lane / Pepper Lane route, nor install 'Unsuitable for HGVs' signing because the route is a designated classified road intended for use by all modes of traffic. To do so would be likely to have the effect of increasing HGV flows along the likes of Old Pepper Lane / Shevington Moor etc,

Ref.	Who	Summary of comment	Our response
			which are not classified roads and are less suited to carrying such traffic.
732-2	Cllr Ray Whittingham	The council should consider a by-pass, from Charnock Richard services toward Chorley Road via Coppull and continue through Douglas Valley, following the former Whelley line and joining the A6 at Westhoughton. This would reduce congestion in and around Standish, which has been experiencing congestion due to increased population and housebuilding. Reopening the former railway station on the former site should be a nonstarter, as the main junction in the village is currently at maximum capacity. Highlights the congestion at the crossroads within the centre and on main arteries in and out of Standish.	The route referred to is largely in Lancashire and where it isn't it is likely to be in Bolton. There would be very little case for funding such a road. One of the main constraints on opening a new station in Standish would be traffic generation and parking. And it would be likely to bring people in from a wide area.
858-6	Sport England	Support aims of policy where it aligns with our aims to achieve increased activity levels in England. Would welcome the inclusion of direct reference to Active Design Guidance within the policy wording were appropriate, suggested as: Provide opportunities for physical activity and Active Travel by incorporating the principles of Active Design.	Support noted. The concept of active design is covered through the application of policy PL1 in the Local Plan.

Ref.	Who	Summary of comment	Our response
860-2	Private Individual	Paragraph 8.3 directly contradicts previous assurances from local government. The continued loss of green space, combined with the oversaturation of new housing, is actively contributing to a decline in air quality for Atherton residents. What specific measures do you intend to implement to improve and protect air quality in Atherton amidst this ongoing development?	Improved opportunities to use public transport, walking, wheeling and cycling, specific measures to tackle poor air quality where it arises, such as at Lane Head South (Winwick Lane) and Market Street Atherton, together with changes to the way vehicles are powered (cleaner and zero emission vehicles).
922-4	Private Individual	Agree that there is a need for improvement to public transport, but happy with the Bee Network. Residents living on the edge of the borough have poor connectivity to Newton train station, Warrington, and Manchester. A bus route from Lowton to Leigh retail park and sports village would be beneficial.	A bus network review is currently being undertaken by TfGM who manage the bus network in Wigan. The council is in ongoing discussions with TfGM on this but as a cross-boundary matter in may need bus franchising in St Helens too (hopefully in 2026) before it can be addressed.
930-2	Private Individual	Astley/Tyldesley/Boothstown is experiencing gridlock, traffic, and poor transport connections. Further development will add to this. There is a lack of information discussing infrastructure improvements as part of these developments. Area suffers from poor public transport, with many local bus services lost or infrequent.	All proposals for significant development are required to submit an assessment which considers the impact of the proposals on the local road network. This information can be viewed on the Councils planning portal.
1064-2	Private Individual	The Standish by-pass could connect to various roads, including the A5106, A6 and	There are no proposals for a Standish by-pass at this stage.

Ref.	Who	Summary of comment	Our response
		M61. Additionally, improving the junction of A5209 Crow Orchard Road with B5206 Shevington Lane could create a roundabout.	
1065-1	Private Individual	Action is needed to safeguard land for the Standish By-pass. Cross boundary involvement from Lancashire and Bolton may be needed depending on how far the road goes.	There are currently no proposals for a Standish by-pass therefore land cannot be safeguarded for this purpose.
1079-4	Jo Platt MP	There is a need to increase parking provisions at Atherton and Hag Fold rail stations. More parking is required in Atherton town centre for those wanting to use the V2 bus service. These are barriers for those looking to make multi-modal trips using bus / trains. More bus services should be established in the evenings between Leigh, Lowton, and Golborne, as residents from these areas are discouraged from using due to limited provision. The plan also references cycling, but only 2% of residents cycle to work as their main mode of transport in 2023. The St Helens Road scheme in Leigh have caused chaos for residents and businesses for several months. Issues surrounding traffic have arose in Leigh town centre. They would like to see more work done on improving	Parking for the busway service in Atherton is covered in policy TC5 on Atherton town centre. Improved parking at rail stations is an objective of TfGM's where there is the ability to do so. A bus network review is underway led by TfGM who manage the bus network. Beter evening bus services is an objective of that review. Many people don't feel safe cycling on the roads, so dedicated provision is needed. Improving waterways is covered by policy EN3.

Ref.	Who	Summary of comment	Our response
		waterways, green spaces, and wildlife, particularly addressing Japanese knotweed.	
1093-1	Lowton and Golborne Traffic Advisory Committee	The Lane Head South bypass is a high priority for completion prior to any other aspect of the LP for Lowton and Golborne, including housing and commercial developments and further Parkside expansions. Glad to see it included in the Local Plan as it was previously not. The working group, chaired by TfGM, will examine the feasibility of evidence-led options identified by the community. LaGTAC and local community groups want to be updated on the progress of the bypass. Legal covenants must prevent any additions to the bypass for junctions or additional roads to housing or commercial developments (in the future).	Community consultation will be undertaken as per the usual methods with local community groups kept informed of the progress of the bypass. It should be noted that the Lane Head South bypass will now be referred as "Lane Head South Relief Road".
1093-1	Lowton and Golborne Traffic Advisory Committee	The construction of the Lane Head South Bypass and halting all proposed developments is the only sensible solution to addressing existing traffic congestion issues in Golborne and Lowton. In 2020, LaGTAC conducted an exercise to assess the average velocity of vehicles in the area, finding that it was 3mph. The council estimated that the cost of congestion to individual motorists was	It should be noted that the Lane Head South bypass will now be referred as "Lane Head South Relief Road". The relief road is linked to the proposed development at Parkside Phase 3 which is now referred to as Intermodal Logistics Park North. The bypass is necessary to address the impact of development on the Newton Road/Winwick Lane junction and reduce congestion in an area of the borough

Ref.	Who	Summary of comment	Our response
		around £16 million per annum. This is approximately the same cost estimated for the extension to the bypass.	which has historically suffered from poor air quality.
1093-1	Lowton and Golborne Traffic Advisory Committee	Active travel and cycling are encouraged, but most working people in Golborne and Lowton commute into Manchester, Liverpool or elsewhere, making cycling and walking less suitable. Monitoring from LaGTAC shows that the percentage of cyclists on local roads is well below 0.5% confirming that cycling investment over recent years has been a waste of money and a detriment to motor vehicles. There needs to be a reprioritisation of schemes over the next decade to reflect realistic expectations. Walking and cycling, which are predominantly leisure uses, should be kept away from motor vehicles due to safety and pollution.	The Golborne railway station is proposed to enable people to commute to Manchester without needing to drive. Walking is certainly not primarily a leisure use and neither should cycling be. Either way they should be healthy activities.
1093-1	Lowton and Golborne Traffic Advisory Committee	Road weight limit restrictions for HGVs >7.5 tons have been proposed, but residents have been calling for a reduction in these vehicles on narrow and inappropriate roads and lanes,	Winwick Lane is currently subject to a southbound weight restriction. At present, there are no plans to implement additional weight limits within the surrounding area.

Ref.	Who	Summary of comment	Our response
		similar to how Warrington have done it to protect their local villages.	However, we continue to monitor traffic conditions and will review any future proposals in line with strategic transport objectives and community needs.
1093-1	Lowton and Golborne Traffic Advisory Committee	Concern over highway safety due to the proposed increase in HGV movements. Wigan Council are prepared to allow increase numbers of large HGV on an inadequate road infrastructure. The council needs to consider the impact of large HGVs traveling at 40mph on the road network.	How do you generate jobs without giving rise to HGV movements, and the A572, A579 and A580 are main roads. There is a pinch point on that road network at Lane Head South and a relief road is proposed.
1093-1	Lowton and Golborne Traffic Advisory Committee	Damage to road surfaces is traditionally expressed as D = k(wt)^4, with a 40 ton HGV causing the same damage as 160,000 cars. The council is considering allowing more HGV vehicles on local roads, but questions arise about the degradation rate, extra cost of repairs, and increased frequency of repairs. For example, if traffic on Winwick Lane increases to 15% HGVs, the extra cost and delay to repairs could be significant.	As above.
1093-1	Lowton and Golborne Traffic Advisory Committee	Concern about the lack of on-road and off-road parking facilities (including car parks), especially on local thoroughfare roads and residential streets. Residents have complained about this issue for years, and the	Policy T3 outlines the requirements for parking at new developments. This seeks to strike a balance between providing sufficient parking to support new developments and the needs of other road users. The parking

Ref.	Who	Summary of comment	Our response
		council has failed to accommodate essential parking in their current and forward planning. The number of vehicles wishing to park in residential streets exceeds the capacity of appropriate parking areas, leading to unsafe parking at road junctions, causing increased damage to vehicles and pedestrians. Drivers, cyclists and pedestrians cannot see if these junctions are clear.	requirements for residential properties have also been increased to address concerns related to insufficient residential parking.
1093-1	Lowton and Golborne Traffic Advisory Committee	The council is facing a parking problem, with vehicles not allowed within 10m of a junction yet being forced to due to lack of parking facilities. This issue is not solved by cycling, walking, or more buses. Double yellow lines are also being implemented, making parking chaos worse. Car parking facilities are often too small for most vehicles, and there is no legal requirement to define the minimum size of parking bays. The council should introduce a by-law for a minimum width of space and ensure at least one clearly marked "cash-payment" machine is available on every car park.	As above. Cycling, walking and more buses are part of the solution is it enables households to own fewer cars.
1093-1	Lowton and Golborne	Lowton and Golborne face numerous issues, including excessive speeding on residential	Speeding and dangerous driving offences are enforced by GM Police (GMP) and people are

Ref.	Who	Summary of comment	Our response
	Traffic Advisory Committee	roads, car racing, overtaking on bridges and bends, ignoring traffic signs, rat-running, crossing traffic lights long after they have changed to red, accidents involving cyclists and equine riders, using mobile phones while driving, and other moving traffic violations. Road Traffic Accidents involving serious injury or fatalities, and a road related death can easily cost £2 million to investigate.	encouraged to report incidents directly via their website. The council continues to work in partnership with GMP to support the identification and reporting of traffic-related offences. This includes responding to speed-related complaints and actively promoting public reporting. We encourage residents to act as our eyes and ears, helping to ensure that offences are consistently reported and addressed wherever possible.
1093-1	Lowton and Golborne Traffic Advisory Committee	Traffic restrictions should be implemented to reduce vehicles, especially HGVs, on narrow roads. Interactions with highways and planning departments are needed for strategic alternatives in housing and commercial development. Consultation with the Council's Traffic Department on road infrastructure and maintenance is also necessary. Local residential groups should unite to develop a coherent strategy. Opening up Crankwood Road could provide a more direct route from Leigh to Wigan.	Safe and suitable access to new developments is considered as part of the planning process. Any changes required to the road network are considered at this stage of development. Weight restrictions can be considered where appropriate. The planning portal is a public database, and all applications are available for comment.

Ref.	Who	Summary of comment	Our response
		The recent Section 106 'Major Projects' debacle highlighted the council's disregard for consultation and the lack of evidence-based arguments. Local residents should be part of a planning oversight group at the start of any planning application and not ignored until the last minute.	
1098-1	Manchester Airport	The Plan does not address Aerodrome Safeguarding, a legal requirement regulated by ICAO and the UK CAA. Request that a policy is added with the following policy wording: "Aerodrome Safeguarding - Development that would adversely affect the operational integrity or safety of Manchester Airport or Manchester Radar will not be permitted." This policy would ensure the safety of aircraft manoeuvring on the ground, taking off, landing, or flying in the vicinity of the aerodrome. The airport is a statutory consultee for certain planning applications for developments that require safeguarding to protect the safety of its operation. The safeguarding zones around Manchester Airport are defined on a safeguarding map lodged with relevant local	A policy with that wording has been added to the Local Plan in respect of both Manchester and Liverpool Airports, and their respective safeguarding zones have been added to the evidence map that is supporting the Local Plan.

Ref.	Who	Summary of comment	Our response
		planning authorities by the Airport. The Manchester Airport's safeguarding zones cover Wigan, requiring consultation with the Airport Operator and/or National Air Traffic Services Ltd. The airport is open to discussing the implications of the safeguarding map and drafting an appropriate policy and supporting text.	
1108-4	St Helens Council	Expect all site allocations to be sustainable and not put additional pressure on nearby settlements. Policies for proposed housing allocations include on-site provision or financial contributions for primary and secondary school provision. A general policy should be established for development sites needing infrastructure to mitigate their impacts. Considerations should be made on the impacts of any site allocation near M6 Junctions 22, 23, and 24 on the operation of the junctions and the local road network. The Local Plan should reference 'right mix' targets and aspirations for modal travel share	Policy T2 outlines the requirements for new developments to be supported by a relevant Transport Assessment or Statement depending on the quantum of development. This policy also sets out the requirement for vision-led planning. Policy PE4, now PE6 covers delivering infrastructure with a commitment to bring forward an SPD. It is not considered necessary to include 'right mix' targets as they are adequately addressed in the LTP / GM Transport Strategy. As part of the proposals for Intermodal Logistics Park North a working group - which includes St Helens and Wigan – has been established to consider the impact of Parkside

Ref.	Who	Summary of comment	Our response
		in accordance with the GM Transport Strategy 2040. Vision-led planning should be included in the draft Local Plan, but a 'Preferred Future' statement should be included to clarify the approach to Vision-led planning. The Wigan Borough Transport Strategy highlights the opportunity for cross-boundary provision in Greater Manchester and Liverpool City Region bus franchising. Concerns regarding Parkside and Haydock Point employment site remain, with heavy goods vehicle traffic on the A579 Winwick Lane through Lane Head. The responsibility for addressing these concerns rests with both St Helens and Wigan, not with a single authority. Regarding M6 J23, references should be made to prior study work involving Wigan, St Helens, and National Highways. Closure of J24 should be considered, as local accessibility relies on it. The St Helens A580 Active Travel Route 1 scheme should be afforded greater consideration as an opportunity within this strategy, the IDP and the Local Plan.	on the local road network and address any cross-boundary issues. As a neighbouring authority St Helens will be consulted on all planning applications which are likely to have an impact on the road network within the authorities' boundaries.

Ref.	Who	Summary of comment	Our response
1110-2	Winstanley College	The proposed Golborne train station would provide improved access to Wigan train station for students from Leigh, Golborne, and Lowton. However, this requires improvements in public transport services between Wigan station and the College. The planned 1,100 new homes in Mosley Common, which will fall at the outer edge of the recruitment catchment, already strains current transport links to Winstanley College. To accommodate increased demand, new and reliable public transport solutions are essential. The Wigan-Bolton growth corridor and the proposed M61-M6 link road present opportunities to enhance accessibility to the College for students from the Bolton area. The plan also emphasizes the need to expand infrastructure provision to support increased demand from new housing developments. The Wigan-Bolton Link Road could benefit from improved connectivity, provided public transport infrastructure is enhanced.	The Mosley Common site is an adopted PfE Plan site allocation that has outline planning permission. Bus network improvements are being considered as part of the bus network review being undertaken by TfGM. The council is actively involved in these discussions. Policy T1 sets out various transport priorities related to the Wigan-Bolton growth corridor, including public transport improvements.
1117-3	Network Rail	Network Rail's goal is to protect and enhance the railway infrastructure, so any proposed development in close proximity to the railway or potentially affecting its specific land	Where appropriate consultation is undertaken with Network Rail as part of the planning process.

Ref.	Who	Summary of comment	Our response
		interests must be carefully considered, including access points and rights of way for the railway, drainage works, encroachment of land or air-space, excavation works, siting of structures less than 2m from the railway boundary, lighting impacting train drivers' ability to perceive signals, landscaping that could impact overhead lines or Network Rail boundary treatments, piling works, scaffolding works, public open spaces, use of cranes or plants, fencing works, demolition works, and hard-standing areas. Developers are requested to construct a suitable steel palisade trespass-proof fence of at least 1.8m in height for any proposal adjacent to the railway. Transport Assessments should consider the potential for increased footfall at railway stations and include developer contributions to provide funding for enhancements. Level crossings development should be accompanied by a Transport Impact Assessment, with contributions sought to mitigate the impacts of those developments.	
1326-5	Private Individual	Leigh isn't connected to the rail network, and the council has not addressed this issue.	Leigh has got a very success guided busway. Policy TC3 includes a commitment to securing

Ref.	Who	Summary of comment	Our response
		2% of people cycle to work, and a cycle lane on St Helens Road is wasted money, causing inconvenience and causing distrust in Wigan Council's ability to deliver real transport improvements.	significantly improved rapid transit services between Leigh and Manchester. The reason why only 2% cycle is that many people don't feel safe cycling on the roads, so dedicated provision is needed.
1332-5	Private Individual	Metrolink will never come to Leigh due to poor planning, removing facilities, and businesses due to requirements around alcohol licenses. The St Helens Road Cycle Lane also reduces traffic/customers into the town. The nearest rail station is in Newton Le Willows, with no buses in the evening or Sundays. Golborne Rail Station will only provide one train an hour to Manchester.	Leigh has got a very success guided busway. Policy TC3 includes a commitment to securing significantly improved rapid transit services between Leigh and Manchester. Bus network improvements are being considered as part of the bus network review being undertaken by TfGM. The council is actively involved in these discussions. Our aspiration is for a higher frequency rail service at Golborne station but a service is better than no service.
1381-1	TfGM	A policy on the development of Travel Hubs or Park and Ride facilities, which could cover public transport hubs like rail stations and bus interchanges should be considered. This could include the development of new facilities or the expansion or redevelopment of existing facilities. The emerging LTP Policy Paper Transport Hubs (including Park and Ride) sets out a proposed approach to the	As TfGM own and manage the public transport network in Wigan it is considered that the policy contained within the upcoming LTP will be sufficient to address the need for a specific policy on Travel Hubs and/or Park and Rides. Paragraph 8.4, now paragraph 8.3 addresses three points for a reason - that there are multifaceted benefits. TFGM's ambition will be implemented in the relatively short term.

Ref.	Who	Summary of comment	Our response
		development of Travel Hubs and Park and Ride principles. Suggest paragraph 8.5 is re-drafted due to it addressing three different points in one sentence (social exclusion, obesity and emission reduction targets). Recommend a reference to TfGM's ambitions (now funded) to have a fully electrified bus fleet." Suggest paragraph 8.6 is reworded to "Our plans, in partnership with Transport for Greater Manchester, include significantly increasing walking, wheeling, cycling and the use of public transport that are supported by a programme of major transport improvements.". The use of "walking, wheeling and cycling" sounds wrong. Paragraph 8.21 - There is no confirmed route for the Gibfield Park Way Extension and the Lane Head South Bypass, and they are not included on the policies map. Policy T1 also includes a link for the Gibfield Park extension, showing safeguarding across the Atherton line, up to the boundary with Bolton.	Paragraphs 8.5, now paragraph 8.4 has been amended as suggested. The statement about the Gibfield Link Road Extension – now West of Gibfield – Lee Hall Link – in paragraph 8.21, now paragraph 8.24 was incorrect, it was shown on the Policies Map as noted. The safeguarded area for the Lane Head South Relief Road is also now shown on the Policies Map.

Ref.	Who	Summary of comment	Our response
Policy T1: Safeguarding future transport priorities			
Wigan Station Gateway			
1117-1	Network Rail	Support. The wording is not overly prescriptive, allowing flexibility for evolution as the project progresses, making it a positive reference for the regeneration area.	Support welcomed. There is further reference in policy TC2 Wigan town centre.
Golborne Station			
874-8	Cllr John Harding	Whilst Golborne Station is welcome, a rail link for Leigh would serve a larger number of residents.	Leigh has got a very success guided busway. Policy TC3 includes a commitment to securing significantly improved rapid transit services between Leigh and Manchester. This has now also been added to policy T1.
1067-3	Private Individual	The proposed Golborne Station development could improve public transport for Golborne and Lowton residents, but the limited service to Manchester is a missed opportunity. The limited parking time (2 hours) for users would make the car park redundant. The parking should be realistic for those travelling to Manchester for the day. The station should provide secure bicycle storage, encourage cycling, and provide a good bus service for pedestrians. Additionally, a suitable footbridge should be provided for safe access	The proposals for Golborne Station are detailed within the planning permission which is publicly available on the council's website. These proposals include east-west connections via a bridge and an improved access route to Gloucester Avenue. The car park will be split into short-stay and long-stay parking allowing both commuter parking and parking for short trips to the town centre. Cycle parking is also proposed for the station. Our aspiration is for a higher frequency rail service at Golborne station but a service is better than no service.

Ref.	Who	Summary of comment	Our response
		for pedestrians and disabled people from the east side of the station.	
Atherton rail line			
874-8	Cllr John Harding	Atherton service frequency should be returned to pre-December 2022 levels and there should be better parking provision at Atherton Station and new/additional car parking at, or adjacent to, Hag Fold station.	We agree about the service frequency as it states under the policy. Improved parking at rail stations is an objective where there is the ability to do so.
1079-9	Jo Platt MP	Support.	Support welcomed.
1121-24	Peel Land	Support.	Support welcomed.
M58 Link Road			
171-1	Private Individual	Worries over M58 link road causing traffic issues in the area.	The impact of the M58 link road on surrounding roads has been assessed as part of the planning permission for the scheme.
South Hindley Link Road			
1121-24	Peel Land	Support.	Support welcomed.
Gibfield Park Way Extension – now renamed West of Gibfield – Lee Hall Link			
874-8	Cllr John Harding	Disappointing that there is no confirmed route for the Gibfield Park Way Extension as this is fundamental to improving connectivity to the M61 and across the borough in an East/West direction.	The policies map includes a section of land which will be safeguarded for the delivery of this link. Policy reference T1.9.

Ref.	Who	Summary of comment	Our response
1079-9	Jo Platt MP	The route for Gibfield Park Way extension should be documented so that future developments in the area do not hinder its delivery. The West of Gibfield site should not go ahead without essential elements of infrastructure being confirmed prior due to being greenbelt land.	As above.
1121-24	Peel Land	Support.	Support welcomed.
A577 and A58 active travel and public transport improvements			
1068-1	Lancashire County Council	Support this policy, however, suggest connecting with an alternative route to Up Holland High School, which is more suitable for meeting LTN120 standards due to the constraints around the A577. The alternative route (shown on P95 of LCC's LCWIP) enters Wigan south of the M58 and railway line, near Orrell station. LCC's LCWIP (P27) also suggests considering active travel connections north to Coppull, using a bridleway and an aspirational route south of Adlington to Red Rock, which would provide connectivity with sites J2.53 and H9.3.	Support welcomed. The council is open to discussions with LCC on how we can integrate with their LCWIP proposals to ensure cross-boundary solutions for active travel are progressed.

Ref.	Who	Summary of comment	Our response
1119-4	West Lancashire Borough Council	Would like to explore cross-boundary working with Lancashire County Council in relation to the West Lancashire Local Cycling and Walking Infrastructure Plan (LCWIP), which identifies a priority cycle corridor between Skelmersdale and the Wigan border. This could link to the above safeguarded route in the draft Wigan Local Plan. This would provide a cross-boundary active travel route from West Lancashire to the Land north of M6 Junction 26, Wigan site allocation (Policy J3) and beyond.	We would welcome discussions on this.
Lane Head South bypass			
962-1	Private Individual	The bypass will lead to more agricultural land disappearance, reducing food production. Mention of 4ft water pipe which hasn't been accounted for. The proposed route to Junction 11 of the M62 is not considered. Warrington's objections may be overruled by the Secretary of State for Transport. The proposed extension would also create another junction along the A580, causing accidents (one fatal) due to drivers jumping red lights. More lights would equal more	A longer bypass would impact more agricultural land. There is no need to use land in Warrington. The route and designs of the bypass will need to be supported by robust transport assessments and modelling.

Ref.	Who	Summary of comment	Our response
		opportunities for light jumping and frustrated drivers due to traffic slowing down. Emphasis on avoiding adding more traffic lights. A bridge to cross Kenyon Lane would be safer and more efficient, allowing traffic to move smoothly along Kenyon Lane and other local roads.	
990-2	Private Individual	The Lane Head South Bypass to be included on the policies map once the LP is finalised.	A safeguarded area for the bypass, including the land needed for its construction, now referred to as a relief road, is now shown on the Policies Map.
1002-5	Cllr Gena Merrett	Overall support the Atherleigh Bypass and agree it is needed in the area to divert traffic from Lane Head and Lowton and Golborne centres.	Support welcomed.
1079-9	Jo Platt MP	Support.	Support welcomed.
Other			
470-1	Private Individual	Need to safeguard land east of Hag Fold Station for a future Park & Ride. This was the subject of a petition supported by the MP and had cross party support which was handed into Andy Burnham in 2017. It is an ideal site for the P&R and would attract commuters and has support from Jo Platt MP.	We are not safeguarding the land in this plan. It doesn't mean it can't happen if it is supported and secures funding.

Ref.	Who	Summary of comment	Our response
576-19	Private Individual	The map is unclear and congestion on the A572 should be prioritized due to significant developments in Tyldesley, Mosley Common, and Higher Green areas.	The only reasonably way to tackle congestion is to provide good alternatives to using the car.
858-2	Sport England	Should any of the 10 allocations affect playing fields, the policy should take this into account, in accordance with NPPF paragraph 104.	Work has been undertaken at the M58 Link Road to address the issue. There are other known issues. Policy PE3, now PE4 would apply to any planning applications.
1098-1	Manchester Airport	Support. Emphasise the reinstatement of services to Manchester Airport as the infrastructure is put in place to increase service frequency on the Atherton rail line.	Support welcomed.
1108-5	St Helens Council	The Mott Macdonald Technical Note emphasizes the need to consider cross-boundary implications of traffic reassignment in the design and delivery of infrastructure proposals, particularly highway schemes, to safeguard future transport priorities.	Noted. Ongoing discussions needed in accordance with the duty to cooperate.
1121-24	Peel Land	The Council's ambitions for growth and regeneration of the borough require timely delivery of these infrastructure projects. Strategic infrastructure should be included in the overall spatial strategy for the plan.	Noted and agreed. Strategic infrastructure has been identified on the Key Diagram.
1137-18	United Utilities	Request early engagement in the design of transport schemes to address asset	Noted.

Ref.	Who	Summary of comment	Our response
		protection issues, infrastructure improvements, and sustainable water management principles. This will ensure that future transport proposals are considered alongside future transport proposals, ensuring that these schemes are safeguarded and prioritized.	
1381-3	TfGM	Policy T1 outlines proposed improvements to the transport network identified through the Greater Manchester Local Transport Plan or Wigan Borough Transport Strategy, including improvements to the Atherton rail line. Hindley station's Access for All (AfA) Rail Station Accessibility Improvements are included, but Bryn station's proposals are not. Wigan already has a Transport Strategy, but it is requested to strengthen the connection between the Local Plan and Transport Strategy, supporting TfGM's transport analysis work for faster, more frequent, and higher-capacity journeys.	A new paragraph is included in the supporting text as follows: These are our 10 key transport priorities for safeguarding in the Local Plan and on the Policies Map but they are not all of our transport priorities. Our Transport Strategy includes further details on schemes as does the Greater Manchester Local Transport Plan. Access to Bryn station is covered in criteria 11 and 12 of policy TC4 and access to Hindley station is covered in criterion 4 of policy TC7.
Policy T2: Transport Assessments, Travel Plans and Transport Statements			
348-2	Private Individual	More regular bus services are needed that link towns and train stations, e.g. Newton Road in Lowton has only 1 bus every 40	Bus network improvements are being considered as part of the bus network review being undertaken by TfGM. The council is actively involved in these discussions.

Ref.	Who	Summary of comment	Our response
		minutes which stops at 6.30pm, and no service on a Sunday.	
990-2	Private Individual	The ambition for walking, wheeling, cycling, and public transport to be the first choice for short journeys is admirable, but may not be practical for many parents or those with other caring responsibilities. Employers in the private sector also tend to be less flexible and understanding than in the public sector. Travel Plans have been included in planning consent conditions for years but have not been implemented or monitored.	The only reasonably way to tackle congestion is to provide good alternatives to using the car. A new Travel Plan SPD has been adopted which is more readily implemented.
1023-39	National Highways	Support T2 and the emphasis on modal shift and the requirement for vision-led Transport Assessments.	Support welcomed.
1079-16	Jo Platt MP	Would welcome a requirement that all approved developments have roads that can accommodate future bus routes.	All developments of an appropriate size and location should have roads that can accommodate future bus routes. Many of our site allocation policies refer.
1108-6	St Helens Council	The delivery of B2/B8 development necessitates consideration of freight management and its impact on local communities. The Council should include a Freight Management plan, a Travel Plan checklist, and a monitoring and enforcement	Objective 6 of the Transport Strategy focuses on the need to minimise the negative impacts of freight on local communities and the environment. These impacts will be considered through the submission of

Ref.	Who	Summary of comment	Our response
		regime in the Local Plan or Supplementary Planning Document. This includes measures for HGV management on and off-site, as well as non-infrastructure measures.	Transport Assessment for B2/B8 developments. It is not considered necessary to have a separate Freight Management Plan.
1121-23	Peel Land	Policy T2 aims to mitigate residual traffic impacts, but this may not be realistic in all situations. To align with national planning policy for sustainable transport, the second paragraph should be amended to read "and any residual impacts are mitigated to an acceptable degree through a vision-led approach". Part 5 requires infrastructure and services to be in place before development is occupied or at an appropriate stage of development as agreed with the Council. The policy should provide for infrastructure requirements to be agreed as part of phasing larger developments.	The second paragraph of the policy has been amended accordingly albeit alongside a further change suggested by TfGM. Part 5 outlines that infrastructure can be delivered at an appropriate stage of development as agreed, this includes developing a phased approach to infrastructure delivery for larger developments.
1381-4	TfGM	The revised National Planning Policy Framework requires that sustainable transport modes be prioritized considering the site's vision, type of development, and location. For developments that will generate significant amounts of movement, a vision-led transport statement or transport	Amended accordingly.

Ref.	Who	Summary of comment	Our response
		assessment should be supported to assess the likely impacts of the proposal.	
1381-4	TfGM	Suggest amendments to the second paragraph to be more people focussed about the purpose of the TA and mitigation, as follows: "Applicants will need to take a vision-led approach, prioritizing sustainable transport modes, taking into account the type of development and its location, and mitigating any residual impacts."	Amended, with further change to refer to walking, wheeling and cycling.
1381-4	TfGM	Suggest amendments to criterion 1: In accordance with NPPF, suggest replacing "will support access" with "will prioritise access". Suggest amendment to criterion 2: Suggest replacing "and/or" with "and".	As above.
1381-4	TfGM	Suggest amendment to the third paragraph under the criteria: Suggest replacing with: "When developing a vision-led strategy, proposals should seek to achieve a step change in the uptake of sustainable transport modes (link into GM right mix 2040 strategy). The approach to development should be measured from a baseline position and	Amended largely in line with the suggested text but without mention of the GM right mix strategy as not needed in this policy.

Ref.	Who	Summary of comment	Our response
		considered viable and deliverable within the development's lifetime."	
1381-4	TfGM	Suggest extending paragraph 8.30 to include: "By focussing on a vision-led approach and prioritising sustainable transport, the aim is to ensure that sites consider the transport needs of all users and to prioritise funding towards sustainable transport where there are wider environmental, health, safety and wellbeing benefits and sustainable design is built into the development from the outset. This is opposed to the traditional Predict and Provide approach which started with a traffic forecast and designed highway mitigation to accommodate it and did not fully consider the needs of all potential site users and considered the road network as only one part of the transport and movement network."	Amended accordingly with a further clarification at the end.
Policy T3: Parking provision at new developments			
369-22	Cllr Debbie Parkinson	New developments in Standish are causing parking issues, requiring owners to have a drive and garage is crucial.	The changes made to the parking standards increase the requirements for parking at new homes and are aimed at providing sufficient parking for residents.

Ref.	Who	Summary of comment	Our response
858-1	Sport England	Would welcome the inclusion of direct reference to Active Design Guidance within the policy wording with reference to cycle parking, suggested as: "Provide opportunities for cycling and Active Travel by incorporating the principles of Active Design."	Noted. The concept of active design is covered through the application of policy PL1 in the Local Plan.
1021-6	Home Builders Federation	Requiring spaces for EV charging in this policy is unnecessary as Part S of the Building Regulations already provides charging requirements for residential developments. The Council should avoid setting its own development standards which may differ from the approaches set out in other consenting regimes.	While Building Regulations provide a blanket requirement for EV charging infrastructure, they do not provide specific requirements for all land uses. Therefore, to ensure new developments are supported by an adequate supply of EV charging spaces we feel the requirements in Policy T3 are proportionate.
1023-40	National Highways	Support and are willing to collaborate on EV infrastructure. Recommend that quantitative demand assessments and parking standards align with modal shift goals.	Support welcomed.
1108-7	St Helens Council	The policy should consider overlap with neighbouring standards especially for cross-boundary or near-boundary developments. Benchmarking against other GM authorities, St Helens and Warrington would ensure the veracity of the standards. Wigan Council should consider setting accessibility standards for parking and development	Cross-boundary issues can be addressed as part of the planning process. The parking standards are broadly in line with other GM authorities. Minimum cycle parking standards are provided.

Ref.	Who	Summary of comment	Our response
		allocations in advance to avoid inconsistent provision. Cycle parking standards should be included as a minimum level, with encouragement to provide more. The standard for cycle parking should be detailed in terms of safety, security, convenience, and accessibility.	
1121-22	Peel Land	Support the approach to determining appropriate parking provision within new development.	Support welcomed.
1126-6	The Baldwin Estate	Support the flexible policy for parking provision in new developments. The parking standards in Appendix 2 are the starting point, with scope for parking provision to be considered on factors like site accessibility and local car ownership. Regarding EV parking standards, the Council should not set its own standards for development, as they may differ from approaches in other consenting regimes.	Support welcomed. While Building Regulations provide a blanket requirement for EV charging infrastructure, they do not provide specific requirements for all land uses. Therefore, to ensure new developments are supported by an adequate supply of EV charging spaces we feel the requirements in Policy T3 are proportionate.
1381-4	TfGM	Suggest adding the following to the end of criterion a: "…including making reference to GMAL (Greater Manchester Accessibility Level) for the proposed site." Suggest adding an additional criterion:	This suggested change is not supported. The GMAL scores do provide a good indication of accessibility to a site, however, following updates to the GM mapping website the levels

Ref.	Who	Summary of comment	Our response
		"(f). The proposed vision-led transport strategy for the site (specifically in relation to ensuring that proposed car parking levels support the overall multi-modal access strategy for the site)".	aren't readily available, and other matrices can provide more readily available information. Policy T3 is related specifically to parking provision at new developments while T2 focuses on ensuring a vision led approach is adopted when developing masterplans for sites. Therefore, the focus on parking is not required in Policy T2.
1381-5	TfGM	GMAL can be used to assess accessibility by public transport, considering local access to services and facilities and the quality of the active travel network in a particular location. The most accessible locations may support development with very low levels of car parking provision, but this may also be dependent on adequate on-street parking controls. Wigan Council may consider a more bespoke, site-specific approach to car parking provision for larger developments or strategic development sites to enable the provision of car parking to act as a degree of demand management alongside a multi-modal access strategy. This could involve using existing car parking standards, testing against site-based	The GMAL scores do provide a good indication of accessibility to a site, however, following updates to the GM mapping website the levels aren't readily available, and other matrices can provide more readily available information. Policy T3 is related specifically to parking provision at new developments while T2 focuses on ensuring a vision led approach is adopted when developing masterplans for sites. Each large development in the borough also benefits from a specific policy. Therefore, the focus on vision-led planning is not required in Policy T3 as it will factor into the considerations regarding the design of the site.

Ref.	Who	Summary of comment	Our response
		elements such as development location, proposed vision for the site, mix and density of development, sustainable transport measures, and the need for car parking to act as demand management where appropriate. Reduced car parking provision may form part of a demand management strategy needed to encourage stakeholders like National Highways to accept site-based vision-led strategies. In vision-led transport assessments, evidence could be used to illustrate how car parking levels to be provided, reinforce the transport vision for the site, support the need for overall car parking levels as part of the multi-modal access strategy, and use the standards as a reference point to define an appropriate level of car parking linked to available site-specific evidence.	
901-5	Cityheart Ltd	General acceptance of Policy T3 regarding sustainability and flexibility it offers based on site-specific accessibility.	Support welcomed.
Policy T4: Design and layout of parking			
275-6	Private Individual	More parking needed at new developments such as Astley Point. Lack of parking forces	The parking policy cannot relate to existing development.

Ref.	Who	Summary of comment	Our response
		people to congest Higher Green or even park on Ann Lane where they could get fined.	
858-3	Sport England	Suggest incorporating Active Design references into policy wording for cycle parking, aiming to promote cycling and active travel, as follows: "Provide opportunities for cycling and Active Travel by incorporating the principles of Active Design."	The concept of active design is covered through the application of policy PL1 in the Local Plan.
1023-41	National Highways	Support. Parking standards need to reflect the Council's modal shift objectives.	Support welcomed.
1108-8	St Helens Council	Wigan Council should benchmark their car parking design parameters against various standards, including Car Park Design IstructE 2023, BS 8300-1:2018, PAS 1899:2022, LTN1/20 Cycle Infrastructure Design, National Design Guide, and DfT Inclusive Mobility, to ensure an accessible and inclusive built environment.	Noted.
1137-19	United Utilities	Car parking design should incorporate sustainable water management principles, apply surface water hierarchy, and integrate multi-functional SuDS.	Not required as part of this policy.
901-5	Cityheart Ltd	Parking space dimensions should be incorporated into a guidance document.	Noted.

Ref.	Who	Summary of comment	Our response
Places			
100-36	Private Individual	Welcome the Local Plan's emphasis on high-quality, inclusive design and the conservation of Wigan Borough's heritage. However, the application of these principles is not being delivered equally across the borough, e.g. in Atherton.	Support welcomed. The policies in the plan, including PL1-PL6 which relate to design and conservation, apply across the borough, including within Atherton.
100-36	Private Individual	Dereliction is replacing character – Paragraph 9.3 speaks of partnership and proactive conservation, yet Atherton's reality is one of passive erosion of built character. When will the Council begin proactive enforcement and engagement with landlords of historic buildings in Atherton? Can a local heritage action zone or emergency repair fund be established for key sites at risk?	Policy PL3 commits the council to using enforcement powers where necessary and reasonable to facilitate the effective conservation, restoration and/or sensitive regeneration of heritage assets at risk.
100-36	Private Individual	Public realm improvements in Atherton have not used high-quality, inclusive or locally distinctive design and not involved local consultation. Will the Council commit to a design code for town centre improvements in Atherton that reflects local character and accessibility needs? Can a public consultation on inclusive	Substantive public realm improvements in Atherton were undertaken 20 years ago. Budgets available to the council are generally extremely tight, which can impact on quality. The merits of preparing design codes to inform the application of policy PL1 at both at borough and sub-borough level will be considered, but this will be separate to the preparation of this Local Plan.

Ref.	Who	Summary of comment	Our response
		town centre design be initiated before further works are commissioned?	
100-36	Private Individual	While the Plan rightly protects Green Belt land, it fails to account for the absence of green public spaces within town centres like Atherton. Will the Council identify and prioritise new town centre greenspace projects in Atherton? Can S106 or UKSPF funds be ringfenced for greening and placemaking within the town centre boundary?	Opportunities for landscaping and street tree planting feature in criterion 1 in policy TC5 on Atherton town centre. Policies PE3, now PE4 and PE4, now PE6 will contribute to protecting, managing, enhancing and, where appropriate, expanding open space, sport and recreation provision in the borough. Policies PE3, now PE4 and PE4, now PE6 seek developer contributions towards new and/or enhanced provision.
338-6	Private Individual	Object.	Noted.
1129-4	Historic England	The plan lacks sufficient policy coverage on how the local planning authority intends to approach development proposals affecting designated and non-designated archaeology, including scheduled monuments and non-designated archaeology that is demonstrably of equivalent significance to scheduled monuments.	Policies PL2 and PL5 have been amended accordingly with input from the Greater Manchester Archaeological Advisory Service.

Ref.	Who	Summary of comment	Our response
Policy PL1: Securing high quality and inclusive design			
100-12	Private Individual	To align with Policy PL1 we request the following in Atherton: • A place-specific Design Code or Guide that respects and enhances Atherton's identity • A full public realm audit to evaluate accessibility, safety, and movement • Green infrastructure investment in line with biodiversity and climate goals • Durable materials and clear maintenance plans for all future works • A community-led masterplanning process for all future strategic regeneration in Atherton	Design Codes and/or guides will follow the adoption of the Local Plan. The merits of a design code / guide specifically for Atherton, and the other identified requests, will be considered in due course.
369-34	Cllr Debbie Parkinson	Only in accordance with the neighbourhood plan in Standish.	The Standish Neighbourhood Plan forms part of the statutory development plan for Standish.
498-4	Natural England	The Plan may also wish to consider a policy to reduce light pollution. Lighting can be harmful to wildlife and undermine enjoyment of the countryside or night sky, especially in intrinsically dark landscapes, such as protected landscapes and nature reserves.	Light pollution is covered by criteria 1 and 2 in policy EN7.

Ref.	Who	Summary of comment	Our response
858-4	Sport England	Suggest direct reference to Active Design Guidance within the policy wording as follows: Provide opportunities for physical activity and active travel by incorporating the principles of Active Design.	The concept of active design is covered through the application of policy PL1 in the Local Plan.
923-11	The Lancashire Wildlife Trust	Fully support and welcome that nature will be enhanced and optimised by integrating with green and blue infrastructure and nature recovery networks.	Support welcomed.
967-2	Private Individual	The Council should insist on solar panels and heat pumps on all new developments.	This is covered in policy EN9.
1023-42	National Highways	Support the policy's emphasis on public transport and active travel integration in new developments.	Support welcomed.
1088-4	Canal & River Trust	The policy seems very high level and we ask that the Council satisfies itself that this will deliver its design aspirations for the borough. Given that the draft Local Plan includes a standalone canal policy (PL6) we have no further comments to make on this policy.	Noted.
1090-7	CPRE	The Local Plan should support the local authority to deliver beauty and protect and enhance the important heritage assets around Wigan. It should protect and enhance historic strengths in the place-making of the	Alongside national planning policy and legislation, Local Plan policies PL2-PL5 provide a policy framework to protect and, where appropriate, enhance the borough's historic environment.

Ref.	Who	Summary of comment	Our response
		future and this includes the area's social history, particularly rural.	
1096-2	Taylor Wimpey	Support.	Support welcomed.
1106-9	Harworth Group	Support.	Support welcomed.
1121-21	Peel Land	Support clauses (a) to (j).	Support welcomed.
1129-15	Historic England	Support the policy and welcome the reference to Historic England's Good Practice Advice (GPA) and Historic England Advice Notes (HEAN) in paragraph 9.9.	Support welcomed.
1131-4	Barratt Homes Manchester	For clarity, the term 'strategic development' in criterion 2 should be defined within the policy wording, as well as further detail on when it would be appropriate to require a site-specific design code.	This is adequately covered in the supporting text to the policy.
1137-20	United Utilities	Suggest the following additional criterion: '3. Development must embed sustainable water management principles at the outset of the design process. Development must robustly apply the surface water hierarchy and make space for multi-functional SuDS.'	This is covered sufficiently in policy EN10.
1356-5	Green Earth Development Group	Policy PL1 and Policy J7 could better recognise the benefits of the strategic synergistic co-location of developments,	Noted.

Ref.	Who	Summary of comment	Our response
		particularly mineral and waste development, in securing high quality design and promoting a green economy.	
Policy PL2: Our historic environment			
100-29	Private Individual	Atherton should be identified as a historic town given its rich and varied history with key heritage features including the historic Market Street and Mealhouse Lane with Edwardian and Victorian commercial buildings, and Howe Bridge Colliery, St John the Baptist Church (Grade II*), the former Carnegie Library and town hall buildings, and the Roman road corridor running along the A577. Will the Council formally recognise Atherton's architectural and historic assets in the Local Plan's evidence base and Historic Environment Strategy?	There are a number of historic town centres across the borough in addition to those mentioned in criterion 6, which have medieval cores. The Conservation Area in Atherton is small however compared to other town centre conservation areas, being around the church and extending no further west along market Street than Crab Tree Lane. The Roman road broadly following the route of the A577 is featured in criterion 1. Ena Mill is identified as one of the former textile mills in criterion 3. Atherton's architectural and historic assets are part of the evidence base for the Local Plan, the Historic Environment Strategy and planning more widely.
100-29	Private Individual	The neglect of historic buildings is undermining the identity of Atherton, including a derelict, roofless building next to the Plaza Bar, the abandoned old town hall	Such instances are unfortunate but we are dealing with a substantial legacy of Victorian buildings built when mines and mills were prospering and now we are in a post-industrial economy and regeneration area (as is much of

Ref.	Who	Summary of comment	Our response
		site, and numerous decaying shopfronts along Market Street. Will the Council use Section 215 notices or other legal mechanisms to require owners of derelict historic properties in Atherton to act?	the urban north of England), many of which are now in decline. Most are in private ownership and the council can rarely afford to take on liabilities. Resources are spread thinly. Momentum does not have to be started by the council. Tyldesley town centre and Leigh Spinners Mill are two good examples of where momentum has been established by other parties.
100-29	Private Individual	Will the Council support a Heritage Action Zone or launch a Local Heritage Partnership focused on Atherton?	There is not a funding opportunity to seek funding from at present, and resources are spread thinly.
100-29	Private Individual	The policy commits to enhancing the historic environment, yet there is no guidance, grants or technical assistance available for small businesses or community groups trying to repair historic buildings in Atherton. Will the Council create or facilitate a heritage regeneration fund or grant scheme specifically accessible to Atherton-based projects?	With what funding can we create a heritage regeneration fund? Resources are spread thinly. If, however, there is a specific proposition or enquiry, the council can advise.
100-29	Private Individual	Will the Council commit to producing a heritage-led regeneration strategy for Atherton as part of its town centre revival plan?	When resources allow.

Ref.	Who	Summary of comment	Our response
369-16	Cllr Debbie Parkinson	Houses all look the same, no character. Our heritage is getting lost here.	A key objective of the policy is to preserve the identity, character and distinctiveness of the borough's historic environment.
1023-43	National Highways	National Highways will work with Wigan Council to ensure that any SRN-related changes do not adversely affect listed or scheduled buildings or monuments. Where impacts are identified, mitigation should be explored.	Noted.
1058-2	Cllr Debra Wailes	Howe Bridge should be identified as a superb example of a 'model village'. It merits additional support.	Howe Bridge has been added to criterion 5 as an historic mining village.
1088-5	Canal & River Trust	One matter that is not really covered is the potential impact of climate change (water feast or famine) and its potential impact on the historic environment.	Noted, but feel that policies PL2-PL6 provide sufficient coverage to ensure that protection of the historic environment features.
1121-20	Peel Land	Welcome that particular consideration will be given to the protection and enhancement of important historic features of the borough including the Lancashire Mining Museum and Bridgewater Canal.	Support welcomed.
1127-3	Intermodal Logistics Park North Ltd	Setting is not a heritage asset. Therefore, to make the policy sound against the provisions of NPPF, the penultimate paragraph should read: "Proposals which harm the significance	In determining applications, NPPF paragraph 207 states that local planning authorities should require an applicant to describe the significance of any heritage assets affected,

Ref.	Who	Summary of comment	Our response
		of a designated heritage asset will be determined in accordance with legislation and national planning policy."	including any contribution made by their setting.
1129-16	Historic England	Support, subject to change (see comment in Chapter 9 Places) We support the inclusion of this strategic policy on the conservation and enhancement of the historic environment of Wigan. Welcome references made to the Wigan Borough Historic Environment Strategy and the Greater Manchester Historic Environment Record in the supporting text.	Support welcomed. The policy has been amended to reflect comments on archaeology.
1326-3	Private Individual	The only people interested in Haigh Hall are Wigan Council and the volunteers that work there. The rest of us couldn't care less if it falls down and wonder how it justified more levelling up funding than several of our towns added	The award of levelling up funding was based on a robust appraisal of need.
1332-4	Private Individual	Object.	Noted.
Policy PL3: Heritage assets at risk			
100-29	Private Individual	Will the Council identify at-risk heritage buildings in Atherton and seek external or local funding for their protection or reuse?	The Heritage at Risk Register is compiled by Historic England not Wigan Council.

Ref.	Who	Summary of comment	Our response
369-13	Cllr Debbie Parkinson	The Grade I Standish St Wilfrid's Church has a huge problem with its Elizabethan roof structure which could cost millions to repair. The community has raised funds to repair the spire. Help to retain this building should be looked at.	Standish St Wilfrid's Church is an identified asset at risk, with Policy PL3 committing the council to working collaboratively with asset owners and other key stakeholders to facilitate the restoration of such assets.
413-4	Private Individual	It is a shame that the Grade II St Joseph's Church on Caroline Street is not on the Council's 'at risk' list.	The heritage assets listed in the supporting text are from Historic England's Heritage at Risk Register.
1023-44	National Highways	Support the restoration of historic structures and heritage assets where they intersect with the SRN and will collaborate with Wigan Council as needed.	Support welcomed.
1129-17	Historic England	Support, subject to amending the end of the second paragraph to read: "...funding opportunities that can be used to conserve, restore or sensitively regenerate heritage assets."	Support welcomed. The policy has been amended accordingly.
Policy PL4: Development within our Conservation Areas			
100-29	Private Individual	Will the Council undertake a Conservation Area Appraisal for central Atherton and Howe Bridge within the next 12 months?	The Action Plan in the Wigan Historic Environment Strategy includes a programme of ongoing review of the borough's 23 conservation area appraisals and managements plans, with the order of priority to be established in respect to the most

Ref.	Who	Summary of comment	Our response
			outdated, priority town centres, as these often sustain the most rapid and biggest changes.
369-35	Cllr Debbie Parkinson	No future development in the Standish Conservation Area should be made.	Development within Conservation Areas is not inappropriate in principle with Policy PL4 helping to ensure their character, appearance, identity and distinctiveness is preserved.
1023-45	National Highways	National Highways will work with Wigan Council to minimise impacts on designated heritage assets from SRN-related developments. Where adverse impacts are unavoidable, mitigation should be considered.	Noted.
Policy PL5: Non-designated heritage assets			
100-29	Private Individual	Will the Council work with local historians and residents to identify non-designated assets worthy of listing or local heritage status?	Engagement with stakeholders including local historians and residents is supported in principle but sits outside the Local Plan process.
369-3	Cllr Debbie Parkinson	Parks, the war memorial and Quakers burial ground should be maintained.	Policies PL2-PL5 provide a policy framework to protect the impact of development proposals on heritage assets.
901-6	Cityheart Ltd	While the spirit of the policy is appreciated, the approach may go beyond and conflict with national policy. It states that harm to a non-designated heritage asset will only be permitted 'where the benefits of the	Noted. However, no changes are proposed on the basis that it is all relative, with the impact on heritage assets of lower historical value resulting proportionally in less harm.

Ref.	Who	Summary of comment	Our response
		development outweigh the harm'. However, the NPPF clearly differentiates between designated and non-designated assets in the approach to be taken in decision making. Where harm or loss of designated heritage assets is involved, consent should be refused unless public benefits are delivered, whereas for non-designated heritage assets, the NPPF only requires a balanced judgement to be taken overall. It is clear that the bar is set differently for non-designated heritage assets.	
1023-46	National Highways	National Highways will collaborate with Wigan Council to mitigate impacts on non-designated heritage assets where SRN developments are involved.	Noted.
1088-6	Canal & River Trust	It would help us comply/comment if the Council could publish what it considers to be locally important.	The policy will be implemented on a case-by-case basis.
1129-18	Historic England	Support policy and welcome the reference in paragraph 9.29 to the need for a proportionate heritage assessment in support of all development proposals that may affect heritage assets.	Support welcomed.

Ref.	Who	Summary of comment	Our response
Policy PL6: The borough's canals			
858-7	Sport England	Would welcome the inclusion of direct reference to Active Design Guidance within the policy wording, suggested as: Provide opportunities within and connectivity to, the canal network to allow for physical activity and active travel by incorporating the principles of Active Design.	The concept of active design is covered through the application of policy PL1 in the Local Plan.
923-31	The Lancashire Wildlife Trust	Welcome and support the aim to protect and enhance the environmental quality of the borough's canals, including supporting the ecological connectivity and biodiversity value of the canal network.	Support welcomed.
.1023-47	National Highways	Support the policy and will coordinate with Wigan Council and relevant stakeholders to ensure that infrastructure interactions between canals and the SRN are managed without adverse effects.	Support welcomed.
1088-7	Canal & River Trust	Support.	Support welcomed.
1121-19	Peel Land	The Canal can play a key role in growing visitor and tourism economy. The following additional clause is requested: "Protect, and where appropriate, enhance use of the canals for recreation and leisure pursuits and provide	Noted. The policy has been amended to reflect this.

Ref.	Who	Summary of comment	Our response
		facilities that would serve the needs of canal users and visitors".	
1129-19	Historic England	Support.	Support welcomed.
Policy PL7: Extension, alteration or conversion of existing buildings in the Green Belt			
369-32	Cllr Debbie Parkinson	No Green Belt should be taken at all. It should be retained at all costs in Standish.	The policy does not permit Green Belt release. It allows for the appropriate extension, alteration or conversion of existing buildings.
865-7	Sport England	Do not wish to see existing sports facilities in the Green Belt restricted where it is evidenced that improvements are necessary. Suggest an additional point 4 stating: "Significantly enhance outdoor sports and recreation provision for the local community." Recent appeal decisions (see PINS Ref: APP/C4615/W/25/3362441) have supported this approach.	On considering the appeal decision referenced, no changes are proposed. It is considered that permitting extensions by up to 30% should, in most cases, enable sufficient necessary enhancements to outdoor sports and recreation provision, with larger proposals needing to demonstrate very special circumstances.
865-7	Sport England	In relation to conversions, encourage the Council to use this policy to afford outdoor sports facilities protection where this could particularly impact the use of playing field land. Suggest a point 5 stating: "The conversion of existing facilities for and supporting outdoor sport should avoided	No change proposed. The protection of playing pitches is covered sufficiently in Policy PE3, now PE4.

Ref.	Who	Summary of comment	Our response
		unless suitable and appropriate replacement is provided."	
1023-48	National Highways	No comment.	Noted.
1129-20	Historic England	Support the inclusion of criterion 3 which should help to ensure that proposals reflect local character and distinctiveness.	Support welcomed.

Ref.	Who	Summary of comment	Our response
Environment			
282-1	Private Individual	The removal of Grade 2 agricultural land that already provides longstanding biodiversity within the Green Belt is contradictory. How can the removal of Green Belt for development lead to an overall enhancement of biodiversity.	Grade 2 agricultural land is productive but is not a high biodiversity habitat. The designation of green belt land is not based on any measurement of biodiversity. Overall enhancements of biodiversity are a legal requirement through mandatory biodiversity net gain.
369-23	Cllr Debbie Parkinson	Worthington Lakes and the fields around Worthington leading to Hic Bibi Nature Reserve in Coppull should be retained.	Worthington Lakes is an SBI and therefore covered by policies EN1, EN2, EN3 and EN4.
372-5	Private Individual	Object to all environment policies.	Noted, however we believe these policies take a positive approach to our policy requirements and our vision and strategic objectives.
525-1	Private Individual	The plan should include options for Wigan Council to buy small areas of land for nature to prevent them from being developed.	The council cannot just buy small areas of land. However, land does now have an economic value to deliver biodiversity net gain when it cannot be delivered, or fully delivered, on the site that is being developed.
576-23	Private Individual	FC land around Gin Pit is not specifically mentioned. This could be developed as an excellent amenity given its location and current poor maintenance of ditches causing flooding in Blackmoor.	Noted. Although not specifically mentioned the nature of the area means it is covered by multiple policies in the environment chapter.

Ref.	Who	Summary of comment	Our response
922-5	Private Individual	The plan will destroy Green Belt, block off green corridors to a National Nature Reserve and SSSI, and increase traffic.	The plan contains policies in relation to the borough's key nature sites alongside the green infrastructure network and nature enhancement.
1083-1	Lowton East Network Development Forum	The environment is becoming increasingly fragmented due to this local plan.	Disagree, the vision and strategic objective regarding the environment make clear our positive approach for the borough alongside our proposed policies.
1137-21	United Utilities	Suggest an additional policy for Foul and Surface Water Drainage alongside additional policy clauses on the site specific allocations.	This is covered adequately by policy EN10 alongside any site-specific policy criteria.
Policy EN1: Our natural environment			
100-42	Private Individual	The policy should identify Atherton as a priority area for green infrastructure, tree planting and biodiversity corridors. There are opportunities on former colliery and industrial sites suitable for rewilding, and for new formal green spaces near the town centre. The area suffers from poor air quality and urban heat due to low tree coverage. Create a Green Infrastructure Opportunity Map for Atherton with public input. The commitments in the policy are not met in Atherton town centre - no green walls or roofs, minimal or no street trees, and flooding	The proposed plan highlights examples of priority locations for green infrastructure. As an example, Central Park in Atherton has to been added main parks identified in acknowledgement that the town did not feature specifically previously. However, criterion 6 does include our town centres, one of which Atherton with its own policy TC5, the sites allocated in this plan and the PfE Plan which includes three in Atherton, and designated nature sites and other sites under clauses d and e, which would include any such sites in Atherton.

Ref.	Who	Summary of comment	Our response
		issues due to poor drainage and impermeable surfaces. Will the Council deliver immediate greening works in the town centre under EN1?	The plan does not include green infrastructure opportunity mapping, but this is something that would be appropriate in the future. It does not have to be led by the council. Policies EN1 and EN2 sets out how we propose to work in partnership to maintain and deliver green infrastructure.
159-3; 531-2; 537-1; 682-1; 702-1; 855-1; 905-1; 985-2	Standish Voice; residents	Green Corridors and Local Green Spaces designated in the Standish Local Plan should be specifically referenced in Policy EN1.	Although individual sites designated within Neighbourhood Plans are not mentioned specifically in this policy, they are covered by criterion e. Local green spaces are already covered by neighbourhood plans.
229-2	Private Individual	Loss of natural environment through housebuilding in Standish is leading to suffering for wildlife. Trees have been cut down for housing which used to absorb water and clean the air leading to flooding and decreasing air quality to the detriment of health.	Development is now subject to biodiversity net gain, and policies in the Local Plan reflect that, notably policy EN4.
275-3; 305-1	Private Individuals	Loss of Green Belt will add to air quality issues through loss of trees / hedgerows. Vacant properties and brownfield sites should be prioritised ahead of Green Belt.	Brownfield sites are prioritised for housing and employment but do not meet our evidenced need on their own. Policies within the plan are proposed that will protect trees/hedgerows where appropriate, alongside the statutory

Ref.	Who	Summary of comment	Our response
			requirement for developers to deliver 10% biodiversity net gain.
369-4	Cllr Debbie Parkinson	Weekly incidents with deer and cars due to building in Standish and loss of habitat.	Deer are not a protected species but have been increasing in numbers, hence more sightings and more incidents with vehicles.
374-1	Private Individual	Support the protection of our unique green spaces and aim to reclaim even more green space for leisure, wildlife preservation, wellbeing and to offset carbon emissions. The GM call for sites for development map highlights areas already earmarked by housing developers that are on green belt. Need to preserve all the green belt we have and look to plant more trees, reclaim more spaces. Walking/cycling routes in Standish, Haigh, Gidlow have been successful with wildlife thriving and routes well used. It would make a mockery of the huge investment in these important leisure routes if developers were allowed to build houses and access roads on both sides of these new walking/cycling routes as they would be paths through housing sites.	Support welcomed. We assume this comment relates to the Greater Manchester Local Nature Recovery Strategy, which suggests nature recovery priorities for certain areas. Development will need to consider these priorities alongside delivery of the statutory requirement of 10% biodiversity net gain. The area between Wigan and Standish is not proposed for removal from the green belt, or for development. Section 106 funding has been used to secure and improve open space, including in Standish. Agricultural land classification has been considered for all proposed allocations. Policies EN1 and EN2 set out or priorities with regard to the wider green infrastructure network.

Ref.	Who	Summary of comment	Our response
		Oppose green belt land being used for housing between Wigan and Standish as it would constitute urban sprawl, overdevelopment and rob some of the poorer residents (Beech Hill Council Estate residents) of much needed leisure spaces. Section 106 money is never used to reclaim land in the same areas of mass housebuilding, these areas where developers build become overdeveloped and suffer greater levels of pollution. Arable land must be retained due to massive rises in immigration and for food security. Green corridors between conurbations are needed if we are going to meet climate change targets and reduce pollution.	
498-3	Natural England	Advise the policy also makes reference to priority species alongside existing comments for protected species under point e.	Clause e has been amended accordingly.
498-3	Natural England	The catchment area contains a significant amount of peat, as highlighted in the England Peat Status Greenhouse Gas and Carbon (GHG and C) report which should be recognised as a key issue and opportunity. Natural England does not support	Clause c has been amended accordingly.

Ref.	Who	Summary of comment	Our response
		development or peat extraction, in line with its statutory purpose under the Natural Environment and Rural Communities Act 2006 and the Environmental Improvement Plan 2023.	
498-3	Natural England	Recommend that Local Plans align with Places for Everyone - Policy JP-C8 (Transport Requirements of New Development) and Holcroft Moss Planning Obligations Joint Supplementary Planning Document (SPD)	Holcroft Moss is covered sufficiently by PfE Policy JP-C8 and the associated SPD.
573-2	Private Individual	Development should not be permitted that would damage irreplaceable habitats for example loss of ancient woodland cannot be mitigated.	The protection of irreplaceable habitats is covered within the policy however it is not possible to say that development that would damage irreplaceable habitats should not be permitted as this would not be in line with national policy.
923-12	The Lancashire Wildlife Trust	Fully support. Recommend that section e should be reworded to include the protection and enhancement of priority species as well as protected species.	Clause e has been amended accordingly.
923-12	The Lancashire Wildlife Trust	Paragraph 10.14: This should reference the Inspectors report for the Places for Everyone Plan that concluded that peat soil, whether currently supporting mossland habitat or not, should be considered as irreplaceable habitats. Peat soils could therefore be	Clause c has been amended accordingly.

Ref.	Who	Summary of comment	Our response
		referenced here, thereby complementing policies EN5 and EN6 which aim to protect peat soils from harmful development.	
924-4	The Woodland Trust	NPPF states that development leading to the loss or damage of irreplaceable habitats-like ancient woodland or veteran trees-should be refused, unless there are truly exceptional reasons and a proper compensation strategy is in place, this should be recognised in the policy. No compensation strategy can truly replace the ecological value of irreplaceable habitats, meaning their loss will always leave the environment worse off. Given the borough's below-average amount of ancient woodland, protecting these vital ecosystems is especially important and should be recognised in policy.	This is covered by the policy and in the supporting text.
1023-49	National Highways	Support.	Noted.
1061-4	Private Individual	Proposed plans will encroach on Wigan Greenheart - Moss industrial estate and canalside housing development leading to loss of vital greenspace for communities.	We are no longer proceeding with the proposed allocation for the extension of Moss Industrial Estate in the Publication version of the Local Plan. There are no canal side housing development allocations proposed in the plan.

Ref.	Who	Summary of comment	Our response
1088-8	Canal & River Trust	Criteria 4 should be expanded to also include the "Leigh Branch of the Leeds & Liverpool Canal."	Clause 4 refers to 'The Leeds and Liverpool and Bridgewater Canals' which includes the Leigh Branch of the former.
1121-18	Peel Land	Support opportunities for nature recovery and pursuing a number of opportunities on our estate. It must, however, be recognised that the Bridgewater Canal is an active waterway and recreational asset. Request that Part 4 is amended to read: "Where consistent with their ongoing use and maintenance, the Leeds and Liverpool and Bridgewater Canals …."	Clause 4 has been amended accordingly.
1138-6	Tarleton Estates	Adverse effects on biodiversity or geodiversity must be considered in planning decisions. The more significant the impact or the more sensitive / protected the site, the more weight should be given to the harm in the planning balance. While national policy sometimes requires an "exceptional circumstances" or "sequential" test (e.g. for irreplaceable habitats), this is not generally required for all cases of biodiversity / geodiversity harm. In most situations, it's sufficient to weigh the harm against other material considerations. Therefore, the first paragraph of Policy EN1 is seen as too strict and inconsistent with	The policy is clear that the obligations are stronger for sites and species higher up the hierarchy (criteria a-e) than for sites and species lower down the hierarchy, however the paragraph below the criteria has been amended for additional clarity.

Ref.	Who	Summary of comment	Our response
		national policy. It should be revised to state that development harming biodiversity/geodiversity should only proceed if other material considerations clearly outweigh the harm and justify the specific location.	
1356-6	Green Earth Development Group	Policy EN1 should recognise that minerals can only be worked where they are found. The environment, Chat Moss and high-grade agricultural land should be afforded protection within the Local Plan, but it should also recognise that the benefits of mineral extraction should be appropriately weighed against the temporary impacts on Chat Moss and on agricultural land.	Noted. A Joint Greater Manchester Waste and Minerals Plan is under preparation with adoption scheduled in 2028.
1410-1	Private Individual	The Friends of Standish Recreation Ground advocate for the designation of Southlands Rec as a Local Green Space as it is designated in the Standish Neighbourhood Plan.	Although individual sites designated within Neighbourhood Plans are not mentioned specifically in this policy, they are covered by clause e. Local green spaces are already covered by neighbourhood plans.
Policy EN2: Development and green infrastructure			
93-1; 164-2	Private Individuals	Green Belt areas need to be protected, for the benefit of both wildlife and resident wellbeing	This policy is not about green belt. Green Belt policy is largely within the PfE Plan and it is not a designation for wildlife or resident wellbeing. Policies in this plan support nature

Ref.	Who	Summary of comment	Our response
			conservation and recovery alongside access to nature.
576-3	Private Individual	Developers should be responsible for long term management of sites and fined if failure to do so with residents compensated should they suffer harm.	The policy requires long term management. Compensation is not a function of the local plan and is a legal issue between residents and management companies where these are in place.
865-1	Sport England	Would welcome the inclusion of direct reference to Active Design Guidance within the policy wording, suggested as: "Provide opportunities for physical activity and active travel by incorporating the principles of Active Design."	The concept of active design is appropriately covered through the application of policy PL1 in the Local Plan.
899-19	City of Trees	In criterion 1 there is no reference to contributing to climate resilience. This should be acknowledged as trees play an important role and we need to make our new developments more resilient to present and future climate change scenarios.	Criterion 1 has been amended accordingly.
923-32	The Lancashire Wildlife Trust	Fully support this policy and development that enhances existing green infrastructure in line with the Greater Manchester Local Nature Recovery Strategy. If GI is lost, it should be replaced in a way that maintains and improves connectivity for	Support welcomed. The supporting text under the policy has been amended accordingly.

Ref.	Who	Summary of comment	Our response
		wildlife within the development and the surrounding environment. Would like to see reference to recreational provision within new green infrastructure being designed so that existing sensitive or vulnerable biodiversity assets are not adversely impacted upon. The replacement of any loss of tree, woodland and/or hedgerows will be required under biodiversity net gain. It is important that this replacement of habitats is designed to contribute to and maintain ecological connectivity within the development and to the wider environment.	
924-6	The Woodland Trust	Support policy. Wigan currently has an Urban Tree Canopy Cover (UTCC) level of 16.1%, well below the English average of 19.3%. There should be a recognition of this, and a realistic and reasonable target to increase this level over the course of the plan period.	Support welcomed. Tree canopy targets are covered by the All Our Trees - Greater Manchester's Urban Forest Plan prepared by City of Trees which is now referenced in the supporting text.
1023-50	National Highways	Support policy.	Support welcomed.
1088-9	Canal & River Trust	Criterion 5 could be expanded to include the management of Invasive Non-Native Species (INNS), such as floating pennywort, which, if	Noted – however we consider that INNS are adequately covered in policy EN3.

Ref.	Who	Summary of comment	Our response
		left unmanaged, could contribute to flood risk. Riparian habitats should be added to, to include trees, woodland and/or hedgerows.	A description of what natural character means for the purpose of this policy has been added to supporting text for policy EN3.
1129-5	Historic England	The policy should acknowledge the heritage value of landscapes, parks, and open spaces. Green Infrastructure (GI) can play a key role in conserving and enhancing the historic environment by improving the setting, access, and interpretation of heritage assets. In turn, heritage features can enrich green spaces by adding character and a sense of place. The policy should also address the careful management of GI to maintain both its natural and historic value. Suggested change is to amend the policy or supporting text to reflect these points.	The supported text under the policy has been amended accordingly.
1138-7	Tarleton Estates	Regarding trees, woodlands, and hedgerows, argue against requiring a sequential test (i.e. proving no alternative site exists) for developments that cause harm to valued but not formally protected vegetation as this cannot be justified. Instead, such impacts should be assessed through the standard planning balance, with harm weighed appropriately. Recommend amending the	The end of the last sentence of that paragraph in the policy concerned with that matter has been removed.

Ref.	Who	Summary of comment	Our response
		policy wording to reflect this more balanced approach.	
Urban Greening Factor			
100-35	Private Individual	Will Atherton be included in borough-wide Urban Greening Factor pilot schemes? Residents rely on small greenspaces like Central Park and fields at Hag Fold, many of which are under-maintained, dangerous or disconnected pedestrian links to nature reserves or canal paths. This undermines EN2 goals of access to green infrastructure for recreation, active travel, and health.	The Urban Greening Factor will apply as per the proposed policy. The aim of policy EN2 is to increase the accessibility of green infrastructure alongside other policies in the plan.
1121-17	Peel Land	The Urban Greening Factor (UGF) is intended to support achievement of biodiversity net gain which is already a statutory requirement and is designed to be a voluntary approach. It is unjustified to require all major developments to achieve a minimum score, without evidence as to why this is appropriate and viability testing of the implications. Requests deletion of the part of the policy requiring a minimum UGF score. If not deleted, meeting the score should depend on the financial viability of the development and	The UGF is retained in the policy but a new content has been added stating that if the minimum score cannot be achieved applicants should demonstrate why – i.e. viability or ecological reasons.

Ref.	Who	Summary of comment	Our response
		consideration of other ecological contributions.	
1126-7	The Baldwin Estate	UGF is voluntary and developed by Natural England to support urban greening and Biodiversity Net Gain (BNG). The development industry is largely unfamiliar with the UGF calculator. The Greater Manchester Combined Authority (GMCA) is expected to develop regional standards, but these are not yet in place. The Council should provide a clear evidence base explaining what the UGF requires. This is essential for developer understanding and masterplanning. The impact of UGF requirements on development viability must be assessed. There is concern that UGF adds unnecessary complexity, especially alongside existing BNG and Public Open Space (POS) policies. Since BNG is now legally required and POS policies are already in place, UGF may be duplicative and burdensome. Request clarity, evidence, and viability testing before implementation.	As above.

Ref.	Who	Summary of comment	Our response
1138-7	Tarleton Estates	Support the goals of the Local Plan but stress the need for flexibility in applying new policy standards, particularly regarding the Urban Greening Factor (UGF). While the aim of enhancing green infrastructure is supported, there is concern that the rigid application of UGF standards may conflict with the scale and density of development required by the Plan. This could threaten the Plan's effectiveness and deliverability. Suggest that UGF requirements should be applied flexibly, allowing for exceptions where justified by sound planning reasons, especially when balancing other policy objectives. Propose revised wording for Policy EN2 to reflect this, including specific UGF targets for different development types, with allowances for viability and alternative ecological solutions.	As above.
Policy EN3: Blue infrastructure network			
100-24	Private Individual	Existing culverts and piped waterways in Atherton have not been assessed or addressed, despite contributing to poor drainage and ecological fragmentation. The Council should publish a map of existing culverts and piped watercourses in Atherton.	Local Plan policies such as EN3 and EN10 Development and Flood Risk will apply to new development. Policy EN10 requires sustainable drainage schemes in new development.

Ref.	Who	Summary of comment	Our response
		Atherton has no visible blue spaces in public areas. Pedestrian routes over watercourses are rare, uninviting, or inaccessible and there are no public opportunities for water-linked recreation or engagement. Future town centre and neighbourhood developments should include community-scale blue infrastructure, such as wetlands, retention ponds and boardwalks. A plan should be developed to open or re-naturalise suitable sections and Water Framework Directive (WFD) assessments should be applied to existing infrastructure, not just new developments. Atherton's town centre drainage system needs to be assessed and retrofit to meet Policy EN3, and climate resilience standards identifying existing culverts for potential day lighting and naturalisation. Map and prioritise sites in and around Atherton for blue infrastructure, rewilding, and flood mitigation. Integrate water-linked public space design into all future town centre improvements.	Works to watercourses are covered by existing legislation and must consider the Water Framework Directive where appropriate. Assessing and retrofitting Atherton town centres drainage system is not a function of the local plan although the policy would clearly support any works that may be required. The Greater Manchester Local Nature Recovery Strategy covers Atherton already.

Ref.	Who	Summary of comment	Our response
		Include Atherton in the Greater Manchester Local Nature Recovery Strategy, especially in river and waterway initiatives.	
498-2	Natural England	Suggest acknowledging the relationship of nature-based solutions such as re-wetting peat with Policies EN1: Our natural environment and EN10: Development and flood risk.	Support for nature-based solutions to flood risk is mentioned throughout our water environment policies as is the importance of Green Infrastructure with regards to climate change resilience. Policies EN3, EN10 and EN11 all specifically mention natural flood management and support the objectives of policy EN1.
923-30	The Lancashire Wildlife Trust	Fully support this policy.	Support welcomed.
1023-51	National Highways	Support policy.	Support welcomed.
1088-10	Canal & River Trust	Criterion 4 should not be to the detriment of wildlife. Under criterion 5 the Trust owned Scholes Feeder is local to Wigan and is piped. We would want to be consulted on any works affecting the feeder and we would not want to see any loss of capacity or restriction of use. Criterion 6 - where this relates to crossings and bridges over canals owned by the Canal and River Trust, they would require our	Criterion 4 includes the safeguard "where possible and appropriate to do so" – other policies apply, notably policy EN1. Criterion 5 does not state that all piped waterways are going to be opened up, and without recourse to owners, and certainly doesn't suggest that loss of capacity or restriction of use would be acceptable. Again, other policies also apply, notably policy EN10.

Ref.	Who	Summary of comment	Our response
		separate consent and meet our navigational requirements. This should be added to the supporting text.	The suggested text relating to criterion 6 has been added to the supporting text for the policy.
1121-16	Peel Land	The buffer strips required by criterion 2 are unnecessary as these buffer requirements are already covered by other regulations and the distances proposed exceed those required by the Environment Agency, and no justification is provided for this stricter standard. The requirement should be deleted from the policy and any reference (in supporting text) should be to the EA requirements. Support criterion 4 and suggest Policy PL6 should be aligned with this aim to ensure consistency across policies.	The policy has been amended to recommend that developers aim for 10m to support BNG requirements, Local Nature Recovery Strategy Objectives, flood risk objectives and the Water Framework Directive.
1137-23	United Utilities	Suggest the first two paragraphs of the policy are amended to: "Blue infrastructure is a key component of Wigan Borough's green infrastructure. It proposes a network of multifunctional water-based assets and drainage systems, with priority locations highlighted in Policy EN1: Our Natural Environment." Developers and landowners have specific responsibilities regarding sustainable water	The policy refers to water based assets which include drainage systems as mentioned in the reasoning and explanation, we therefore consider this is covered already. The additional criteria suggested is already covered by policy EN10.

Ref.	Who	Summary of comment	Our response
		management. Therefore, any development proposals that could affect drainage on or around a site or be located on or alongside a waterbody must as applicable: Suggest the following additional criterion: 1. Embed sustainable water management principles at the outset of the design process and make space for multi-functional Sustainable Drainage Systems (SuDS).	
1138-8	Tarleton Estates	Support the objectives of this policy but concerned about the rigidity of its requirements. Strict standards may hinder the Plan's deliverability if they cannot be met in certain development contexts. To address this, suggest adding the following after the six criteria: "Where these requirements are not feasible in the context of the development, and having regard to the requirements and ambitions of other policies within the Local Plan, this will need to be expressly justified based on sound planning reasons to enable the Council to consider the proposal in the round."	We do not consider this is needed as it is covered by s38(6) of P&CP Act (2004) re 'material considerations'.

Ref.	Who	Summary of comment	Our response
1443-1	Environment Agency	We welcome the strengthened emphasis on blue infrastructure and its integration with green infrastructure across the borough. We strongly support the requirement for: • A minimum 10-metre undeveloped buffer zone from the top of the bank of any Main River, and 5 metres from ordinary watercourses, with a fallback to 8 metres where 10 metres isn't feasible or viable. • The buffer zones being natural in character, containing native plant species, and accompanied by a management plan for riparian areas to ensure maintenance access. • The incorporation of Water Framework Directive (WFD) action measures, such as in-channel enhancements, wetland creation, and invasive species management. • The re-naturalisation of modified watercourses, with a presumption against culverting and hard engineering, and the requirement for a WFD assessment.	Support welcomed.

Ref.	Who	Summary of comment	Our response
		Further justification was required for the buffer zone distance, therefore our stance is supported legislatively by: • The latest National Planning Policy Framework (December 2024 version) • The Flood Risk and Coastal Change Planning Practice Guidance (PPG) • The Northwest River Basin Management Plan (RBMP) • National Adaptation Programme (NAP3) • Local Nature Recovery Strategies for Greater Manchester. Therefore, based on the sources such as those above, there is clear justification to implement the 8-10m buffer zone for watercourses. These measures are consistent with the Draft Flood Risk Evidence Assessment, which identifies areas such as Millingford Brook and Borsdane Brook as high-risk and suitable for blue/green corridors and natural flood management.	

Ref.	Who	Summary of comment	Our response
1443-1	Environment Agency	EA Recommendations for Improvement including suggested wording: • The policy could be strengthened by explicitly requiring ecological surveys and WFD status assessments for all watercourses affected by development. ▪ Insert after Bullet 5: 'Development proposals affecting watercourses should be supported by ecological surveys and a Water Framework Directive assessment to ensure compliance with the NW RBMP and its objectives ▪ The Council have a statutory requirement as the LPA to have regard to the RBMP in discharging its functions, as set out in Regulation 33 of the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017. • A clearer definition of "natural in character" for buffer zones would help ensure consistency in implementation (e.g. Biodiversity Metric 4.0 habitat type) would aid in implementation	Support welcomed and suggested content noted. The policy and accompanying reasoning and explanation has subsequently been updated.

Ref.	Who	Summary of comment	Our response
		▪ After "natural in character": "For the purposes of this policy, 'natural character' refers to areas dominated by native riparian vegetation, free from formal landscaping, and designed to support biodiversity and ecological connectivity." • Consider requiring monitoring and reporting mechanisms for the long-term management of riparian zones. This could be set out within the reasoned justification or after management plan requirements (Bullet 2): ▪ 'Management plans should include provisions for periodic monitoring and reporting to ensure ecological integrity and maintenance access.' • In the sentence, "If it can be demonstrated that ten metres is not feasible or viable then eight metres should be achieved in line with Environment Agency regulations." The term 'feasible or viable' could be vague and interpreted loosely so potentially instead the inclusion of "Where it is demonstrably impractical to achieve a 10-metre buffer due to site constraint".	

Ref.	Who	Summary of comment	Our response
Policy EN4: Nature recovery and improvement			
100-3	Private Individual	Biodiversity Net Gain is being diverted away from Atherton to more prominent areas like Wigan Greenheart. Atherton has low biodiversity and poor habitat connectivity, making local BNG crucial. Current policies lack Atherton-specific implementation plans. Small-scale ecological enhancements are often poorly delivered and monitored. Brownfield sites in Atherton are underutilized for nature recovery. Enforce on-site BNG in Atherton, only allowing off-site BNG if on-site is truly unachievable and publishing an interactive map showing BNG locations. Create a Local Nature Recovery Strategy for Atherton, Identifying areas for habitat creation and enhancement, involving schools and volunteers in monitoring biodiversity assets. Ensure proper delivery of small scale enhancements, requiring proof and photos of installed features (e.g., swift bricks, bat boxes) and support community-led audits to track effectiveness.	Biodiversity Net Gain is a legal requirement with its own regulations which must be adhered to. The policy sets out a clear hierarchy as to how offsite biodiversity net gains should be delivered. The Greater Manchester Local Nature Recovery Strategy covers the whole Atherton and contains priorities and objectives for nature recovery. The policy sets out clear requirements for ecological enhancement including swift bricks etc.

Ref.	Who	Summary of comment	Our response
		Prioritise brownfield sites for nature recovery, include derelict and post-industrial land in BNG mapping and pilot an Urban Nature Recovery Zone in Atherton. This will make nature recovery in Atherton visible, local, and lasting, ensuring the town receives equal access to the health, climate, and community benefits of biodiversity.	
576-2	Private Individual	Off-site mitigation should not be allowed on green belt land.	Off-site mitigation will be delivered in line with the legal requirements and the proposed policy; there is no reason why this shouldn't be on green belt land as it entirely compatible with that designation.
760-1	Bolton and Bury Swifts	Keep commitment to provide swift bricks in new development.	This commitment is included within the policy.
865-9	Sport England	Would welcome additional policy wording to ensure that the delivery of BNG does not take place on playing fields where these would impact the delivery of sport.	This is not necessary. Policy PE3, now PE4 would apply.
899-16	City of Trees	Trees/woodland take longer to be established as new habitats for BNG so will the general principle of retaining and working around existing tree cover be applied to development sites?	The retention of trees and hedgerows is covered by policy EN2 which makes clear the requirements for trees and hedgerows and should be read alongside this policy. The mandatory biodiversity net gain regime already encourages the retention of trees and

Ref.	Who	Summary of comment	Our response
		Welcome the multiple references to new tree planting, but what about retaining existing important tree cover and hedgerows? Retaining good quality existing landscaping should include specific reference to retaining hedges - which have declined in number in the UK - and established woodland and significant trees.	hedgerows given the length of time required to create replacement habitats.
923-19	The Lancashire Wildlife Trust	Agree with approach to off-site alternatives and with the location hierarchy for off-site provision. Agree and welcome approach to development delivering BNG that helps deliver nature based solutions. Support the provision of swift bricks, and would recommend a minimum requirement, for example, two swift/bird or bat bricks per residential unit and one swift/bird or bat brick per 50 sqm of commercial floorspace.	Support welcomed.
924-2	The Woodland Trust	Some local authorities require developers to reach 20% BNG. This would not come at a significant additional cost to developers, with evidence from Swale Borough Council showing that the increased requirement from 10% to 20% results in an increased cost from £948 per dwelling to only £1,128 per dwelling. This means that requiring developers to reach	This is not necessary for two reasons: we already have a high proportion of land designated for wildlife protection including international and national designations; and it would not be a viable proposition within the borough relative to other objectives that need

Ref.	Who	Summary of comment	Our response
		20% BNG is value for money financially, as well as making good sense ecologically.	to be achieved around development, as set out in policy PE4, now PE6.
1023-52	National Highways	Support policy.	Support welcomed.
1062-2	Castle Green Homes Limited	The specific ecological enhancements (a-d) are already addressed in detailed ecology reports and may vary by site. Since the list is not exhaustive and introduces ambiguity, it is recommended that this section be removed to ensure the policy remains sound.	Swift bricks are a simple cost-effective way of providing ecological enhancement not just for swifts but other bird species as well. The other enhancements listed make clear that they are required where appropriate.
1074-2	Private Individual	Support reference to swift bricks but needs to reference best-practice guidance such as NPPG Natural Environment 2025 paragraph 017, BS 42021 and CIEEM, which as a minimum include the general aim across a development of a minimum of one nest box per unit.	Those references have been added to supporting text under this policy.
1090-4	CPRE	The Local Plan should require additional Biodiversity Net Gain where justified (see Guildford's policy that seeks more than +10% due to ecological reasons). All new development and infrastructure should support the aims of the Local Nature Recovery Strategy. Support a brownfield first approach, but in cases where land is of ecological value it may be appropriate for	This is not necessary for two reasons: we already have a high proportion of land designated for wildlife protection including international and national designations; and it would not be a viable proposition within the borough relative to other objectives that need to be achieved around development, as set

Ref.	Who	Summary of comment	Our response
		land to be retained for nature or local amenity greenspace.	out in policy PE4, now PE6. Wigan Borough is not Guildford.
1121-15	Peel Land	The potential of suitable land adjacent to the proposed development should be considered before the hierarchy of other off-site locations. This, for example, would enable the Bridgewater West proposals to consider delivery of BNG on land within Chat Moss close to the proposed development before consideration has to be given to the Wigan Greenheart Landscape Recovery Scheme and rest of the hierarchy. It is requested that the first paragraph of Policy EN4 be amended to read: "Where proposals are subject to mandatory Biodiversity Net Gain, this should be delivered on-site or adjacent to it, as a first preference..."	The hierarchy within the policy has been amended accordingly. We are no longer proceeding with the proposed Bridgewater West allocation in the Publication Version of the local plan.
1137-24	United Utilities	Flexibility is needed in delivering Biodiversity Net Gain (BNG), especially around critical water and wastewater infrastructure. On-site BNG may not always be suitable due to space constraints and future development needs. Policies should support off-site BNG options to avoid limiting infrastructure expansion. Additionally, biodiversity enhancements should not be placed directly over essential	The policy sets out the requirements for off-site BNG which would need to be followed if not possible on site. BNG options need to account for utilities but this is part of the detailed design process and does not need to be covered by policy.

Ref.	Who	Summary of comment	Our response
		assets where future excavation might be required.	
1319-1	Swifts Local Network: Swifts & Planning Group	Welcome the inclusion of swift bricks but note that the policy lacks specific guidance on the number of bricks required, falling short of the 2025 National Planning Policy Guidance (NPPG). It is recommended that the policy be updated to align with NPPG paragraph 017, which advises a minimum of one nest box per unit in new developments. The policy should also reference house martins and the protection of existing nest sites, as seen in the 2025 Isle of Wight LNRS. Additional guidance and standards-such as BS 42021:2022, the RSPB's Guide to Nestboxes, and the Brighton and Hove Guidelines-should be incorporated to ensure best practice.	Noted – reference to guidance has been added to the supporting text. Protection of house martin nest sites is covered by the Wildlife and Countryside Act 1981.
Policy EN5: Chat Moss			
865-4	Sport England	Would welcome the inclusion of direct reference to Active Design Guidance within the policy wording, suggested as: Providing opportunities for physical activity and active travel by incorporating the principles of Active Design.	The concept of active design is covered through the application of policy PL1 in the Local Plan.

Ref.	Who	Summary of comment	Our response
923-9	The Lancashire Wildlife Trust	Support the policy but consider that 'where possible' should be removed from criterion 8. Peat soils are an irreplaceable habitat and should be protected from harmful development that undermines their ability to be restored to fen or bog habitat. This would be fully in-line with policy EN6.	This would be inconsistent with national policy.
1023-53	National Highways	Support policy.	Support welcomed.
1079-12	Jo Platt MP	Would welcome an approach to Biodiversity Net Gain that focusses on off-site delivery taking place within the Wigan borough.	This is covered by policy EN4.
1121-14	Peel Land	Chat Moss is a large, ecologically significant area spanning Wigan, Salford, and Trafford, only a small portion lies within Wigan, it presents a strategic opportunity for green infrastructure and public benefit. Peel Land is the main landowner and has been actively involved in restoration efforts. The area is fragmented, with mixed uses (agriculture, recreation, ecology) and complex tenancies. Public access is limited due to, surrounding motorways and canals, few and distant access points, private roads and safety concerns.	The policy aligns with the equivalent policy in the Salford Local Plan to help further cross boundary collaboration. Remnant has been removed from the beginning of the policy as suggested. The Chat Moss Heritage Partnership involves all the partners mentioned and is being lead by Hamilton Davies Trust with a view to developing a wider holistic strategy for the Chat Moss area.

Ref.	Who	Summary of comment	Our response
		A comprehensive, collaborative strategy is needed involving Peel Land, Wigan & Salford Councils, GMCA, Natural England, LWT, and others. Chat Moss could provide recreation and tourism opportunities, support climate goals through peatland restoration and carbon sequestration and trial sustainable agriculture (e.g., paludiculture). Edge developments (e.g., Bridgewater West in Wigan, Port Salford Extension) could help fund and facilitate restoration and Policy J5 includes requirements to support nature recovery in Chat Moss. Suggest removal of the term "remnant" from Policy EN5 as it downplays the Wigan portion's significance. Support criteria 2 and 3.	
1129-6	Historic England	There is no reference to the archaeological importance of Chat Moss in either the policy and/or supporting text. Suggest amending the policy and/or supporting text accordingly.	Criteria 8 and 9 and reasoning and explanation have been amended accordingly.
1356-7	Green Earth Development Group	The policy should recognise that minerals can only be worked where they are found. The environment, Chat Moss and high-grade agricultural land should be afforded	A Joint Greater Manchester Waste and Minerals Plan is under preparation with adoption scheduled in 2028.

Ref.	Who	Summary of comment	Our response
		protection within the Local Plan, but it should also recognise that the benefits of mineral extraction should be appropriately weighed against the temporary impacts on Chat Moss and on agricultural land.	
Policy EN6: Safeguarding soil resources			
576-24	Private Individual	Mosley Common and Higher Green developments are greenfield sites, where will the soil from these sites go as there will be little greenspace left? Will hills be created or valuable resources moved to other areas in the borough.	Soil in new developments with best and most versatile will be managed in line with soil handling plans and sustainable soil management strategies as required by the policy.
923-3	The Lancashire Wildlife Trust	Support and welcome this policy especially criterion 3.	Support welcomed.
1023-54	National Highways	Support policy.	Support welcomed.
1106-7	Harworth Group	Policy EN7 should be amended to reflect the approach set out in the supporting text to Policy J3 at para 6.48, namely that the wording should refer to the outcomes of risk assessments etc as part of the appraisal of unacceptable impacts.	Soil is a vital natural capital asset that supports food production, carbon storage, biodiversity and pollution buffering. Policy EN7 is consistent with our approach to sustainable soil management as set out in Policy EN6.

Ref.	Who	Summary of comment	Our response
1121-13	Peel Land	Criterion 1 is unnecessary as it is covered in national planning policy. The phrase "safeguard the long-term capacity" of best and most versatile (BMV) agricultural land is seen as unclear and the policy lacks specific guidance on how it should be applied to development proposals. Recommend omitting the policy from the Local Plan and relying on national policy to assess proposals involving BMV land.	It is not covered in that way in national planning policy and is an appropriate starting point for the objectives of the policy. The first line includes the word "capacity", not "capability". The policy is being retained with minor amendments and an additional paragraph in the supporting text.
1127-6	Intermodal Logistics Park North Ltd	The policy should be re-worded: Safeguard the long-term capability of the best and most versatile agricultural land ((Grades 1, 2 and 3a) in the Agricultural Land Classification) where practicable as a resource for future generations, unless there are overriding reasons not to do so.	This is not necessary as the end of the criterion already states 'unless there are overriding reasons not to do so', which would include wen it is not practicable.
1356-8	Green Earth Development Group (GEDG)	The policy should recognise that minerals can only be worked where they are found. The environment, Chat Moss and high-grade agricultural land should be afforded protection within the Local Plan, but it should also recognise that the benefits of mineral extraction should be appropriately weighed	A Joint Greater Manchester Waste and Minerals Plan is under preparation with adoption scheduled in 2028.

Ref.	Who	Summary of comment	Our response
		against the temporary impacts on Chat Moss and on agricultural land.	
Policy EN7: Protecting amenity and the environment			
234-1	AB World Foods and Associated British Foods	Policy EN7 is not robust enough to ensure that the existing food manufacturing business can continue to operate, and it would allow them to invest in the future intensification and growth. Request that the policy is amended to require development proposals adjacent to or in close proximity to Employment Areas to demonstrate that they would not detract from employment use and premises, as well as economic potential of designated Employment Area for growth and intensification.	The policy has been amended with an additional criterion 3. making clear that new developments should not harm existing nuisance-generating businesses, so those businesses can keep running and growing without unfair limits. In addition, the second paragraph of the supporting text for the policy, that relates to criterion 2, refers to the 'agent of change' principle, whereby the person or business introducing the land use is responsible for managing the impact of that change. That would include housebuilders near to existing industry.
413-7	Private Individual	Provision of litter bins needs to be a priority.	This is an environmental management matter and not a matter for the Local Plan.
576-25	Private Individual	The council should have responsibility for assessing the impact of development on the environment not developers to avoid a conflict of interest, including cumulative impacts taking into account the wider area.	The council does have a responsibility for assessing the impact of development on the environment, but that evidence is submitted by the developer as part of their planning application. A development needs to accord with the conditions of its planning permissions

Ref.	Who	Summary of comment	Our response
		It is ridiculous to have a policy that states tree planting within a development will mitigate the effects of pollution but as soon as the polluter leaves the development no action is taken.	and any legal agreement that has been signed, including any section 106 agreement.
865-10	Sport England	Suggest additional point 6: Not give rise to any harmful impact on the delivery of sport on playing fields and comply with NPPF paragraph 200.	Policy PE3 refers.
923-8	The Lancashire Wildlife Trust	Support the policy. Agree that there should be no unacceptable impact on air quality, in particular we feel, close to environmentally sensitive habitats such as mossland.	Support welcomed.
925-2	The Coal Authority	Support the policy and inclusion of criterion 4.	Support welcomed.
1023-55	National Highways	Support policy.	Support welcomed.
1088-11	Canal & River Trust	Support. Suggest criteria 5 should include not allowing contaminated 'groundwater' to pollute a surface water as well as contaminated sites adjacent to waterways, where development takes place can create a pathway for contaminated groundwater to enter the watercourse.	Criterion 5, now 6, has been amended accordingly.
1096-3	Taylor Wimpey	Support.	Support welcomed.

Ref.	Who	Summary of comment	Our response
1137-25	United Utilities	For consistency with the National Planning Policy Framework, request that criteria 1 and 2 be amended as follows: 1. Not result in unacceptable levels of pollution, both individually or cumulatively with other existing or proposed development, both operationally and during the construction phase. Developers must demonstrate, where appropriate, that environmental risks have been evaluated and appropriate mitigation measures have been implemented to minimise these as necessary. 2. Not have an unacceptable impact on the amenity and operations and quality of life of occupiers or users of surrounding sites, or future occupiers or users of the proposed development itself, in respect of, but not limited to: air quality, noise, vibration, odour, sunlight and daylight, artificial light, dust, privacy and overlooking, and/or temperature as applicable. These changes are recommended for consistency with the agent of change principle, particularly because minimising an	The policy has been amended with an additional criterion 3, making clear that new developments should not harm existing nuisance-generating businesses, so those businesses can keep running and growing without unfair limits. In addition, the second paragraph of the supporting text for the policy, that relates to criterion 2, refers to the 'agent of change' principle, whereby the person or business introducing the land use is responsible for managing the impact of that change. That would include housebuilders near to existing industry. The proposed amendment to criterion 5, now 6, is too detailed for inclusion in the policy, although we have added reference to the public sewer and have included some of the suggestions within the supporting text for the policy.

Ref.	Who	Summary of comment	Our response
		adverse effect is very different from ensuring that a proposal has no unacceptable adverse effect, and to ensure that the operations of existing businesses (such as wastewater treatment works) are protected from encroachment, which can result in unreasonable restrictions on established uses. Also request that criterion 5 be amended as follows: 5. Not give rise to the pollution of any watercourse, groundwater or mossland, or result in the transfer of any contaminated run-off to surface water drainage or public sewer. Proposals likely to result in contaminants entering surface or foul water drainage systems will not be permitted without the express consent of the asset owner. Where consent is refused, applicants must demonstrate how contaminated water will be addressed at source in their remediation strategy. This updated wording is particularly relevant to ensure appropriate management of flows. It is essential that contaminated water is treated at source to minimise impact on	

Ref.	Who	Summary of comment	Our response
		wastewater infrastructure and the environment.	
Policy EN8: Land reclamation and renewal			
369-10	Cllr Debbie Parkinson	Site 3 (Whelley Loop Line: Chorley Road to Rectory Lane, Standish) should be kept free of new building and be developed as a woodland area in keeping with the community.	The policy proposes this site for walking, wheeling and cycling improvements or nature recovery. As it is part of the Whelley Loop Line, much of which has already been reclaimed for active travel, this would be the most appropriate form of reclamation for this site.
865-3	Sport England	The following sites have the potential to impact playing fields and the policy should account for that within its wording to state that in each case, any proposal will need to meet with paragraph 104 of the NPPF: Site 1: Wigan RUFC playing field. Site 6: Standish St Wilfrid's FC playing field. Site 8: Leyland Park; Hindley Juniors FC; Hindley Green CP School; Thomas Street; playing fields. (see attached) Site 9: Twelve Apostles School; Westleigh high School; Melrose Avenue; playing fields. Site 11: Jubilee Park playing fields. Will object to any policy wording which does not afford adequate protection to these sites.	Site 1 is alongside the Wigan RUFC playing field. Site 6 is alongside Standish St Wilfrid's FC playing field. Site 8 is alongside Hindley Juniors FC. Site 9 is alongside Lawson Avenue Playing Field and Westleigh St Pauls Playing Field. Site 11 is alongside Jubilee Park playing fields. None of these sites directly impinges on a playing field.

Ref.	Who	Summary of comment	Our response
865-3	Sport England	Would welcome the inclusion of direct reference to Active Design Guidance within the policy wording, suggested as: These provide opportunities for physical activity by incorporating the principles of Active Design.	The concept of active design is covered through the application of policy PL1 in the Local Plan.
923-16	The Lancashire Wildlife Trust	Welcome the recognition of conservation value in many sites, we would highlight the importance of invertebrate communities, which are often overlooked in development assessments. Emphasise the ecological role of these sites as stepping-stones that support a resilient network. Support land reclamation efforts aimed at restoring ecological infrastructure damaged in the past.	The supporting text under the policy has been amended in response.
924-3	The Woodland Trust	Site 1 is adjacent to Brock Wood ASNW and Site 4 is adjacent to Fairclough Wood ASNW. The policy indicates environmental improvements will be included but no specific detail is provided. To ensure protection, recommend that a planted buffer of ancient semi-natural woodland to any hardstanding, cutting or compaction based	There are no plans at this stage. The site is already designated for reclamation in the Wigan Unitary Development Plan. Any proposals would need to be in line with policies within the local plan, including the Green Belt.

Ref.	Who	Summary of comment	Our response
		on ecological survey and advice - together with enhancement.	
982-7	Private Individual	Concern with plans for Gidlow Mineral Railway line and would like to see plans as it is directly behind my property. High solar structures are more appropriate for industrial settings rather than rural areas. The current installation in the area is causing distress due to their unattractive appearance and because public funding has been wasted. Do not see the need for any more improvements for the community with regards to Gidlow Mineral Railway and object to any proposals in their entirety.	There are no plans at this stage. The site is already allocated for reclamation in the Wigan Unitary Development Plan. Any proposals would need to be in line with policies within the local plan, including the Green Belt.
1023-56	National Highways	Support policy.	Support welcomed.
1119-5	West Lancashire Borough Council	The reclamation of sites for active travel is supported. There are opportunities to link active travel routes into West Lancashire to the west of M6 Junction 27 as part of an expanded and reclaimed Standish and Gidlow Mineral Railway which we would like to explore with Wigan Council in conjunction with Lancashire County Council.	Noted.

Ref.	Who	Summary of comment	Our response
Policy EN9: Low carbon heat and energy			
383-6	Private Individual	Strongly support policy EN9 and encourage more sustainable energy solutions.	Support welcomed.
576-15	Private Individual	How will this policy be monitored to see how it has performed in 13 years time?	In line with the proposed monitoring framework and the monitoring framework for the PfE Plan.
1022-11	NHS Property Services	Fully support policies that promote carbon neutral development, and the securing of financial contributions where on-site carbon mitigation requirements cannot be met. When considering the implementation of policies related to net zero, we would highlight that NHS property could benefit from carbon offset funds. This will support the NHS to reach the goal of becoming the world's first net zero healthcare provider.	Support welcomed. The policy and other relevant policies in the PfE plan focus on direct emissions reductions through sustainable development, energy efficiency, and infrastructure planning. They are however complementary to mechanisms such as carbon offsetting.
1023-57	National Highways	Support policy.	Support welcomed.
1127-4	Intermodal Logistics Park North Ltd	Support the flexibility provided by the words 'where applicable' as this is crucial where certain measures-such as district heat networks (DHNs) are not viable. DHNs are better suited to developments with consistent heat demands, like residential or hotel uses. In contrast, ILPN's phased and	Support welcomed.

Ref.	Who	Summary of comment	Our response
		speculative nature makes it difficult to plan and implement such systems. Additionally, many commercial and industrial buildings don't require full space heating. ILPN aims to meet policy goals by being net zero in construction and using solar photovoltaics to generate electricity.	
1129-7	Historic England	Improving the energy efficiency of historic and traditionally constructed buildings must be done carefully to avoid harming their character and fabric. While upgrades can help preserve these buildings for the future, exemptions and special considerations in Part L of the Building Regulations recognise the need for balance. Historic England provides extensive guidance on this topic, which should be referenced in the policy's supporting text. Large-scale solar and wind developments may negatively impact heritage assets and landscapes. Such proposals should be compatible with heritage conservation and include decommissioning plans to restore sites with minimal harm and potential environmental enhancements, the policy	Reference has been added to the supporting text for the policy. This is covered sufficiently within the policy and through other policies in the local plan.

Ref.	Who	Summary of comment	Our response
		should be amended to include reference to this.	
Policy EN10: Development and flood risk			
498-1	Natural England	UU have launched a Sustainable Water Fund for councils to offer the opportunity to deliver rainwater management solutions in collaboration and help build a stronger, more resilient North West. In June 2025, DEFRA aim to launch a shared standards on water efficiency for local plans. The shared standards approach is collaborative involving water companies and the EA.	Policy EN13 refers.
1023-58	National Highways	Support policy.	Support welcomed.
1137-22	United Utilities	Many existing drainage systems use combined sewers that handle both foul and surface water, a legacy of older infrastructure. The Environment Act 2021 requires sewerage companies to reduce the environmental and health impacts of storm overflow discharges. New developments should avoid discharging surface water into public sewers. Instead, they should follow the surface water management hierarchy, prioritising sustainable drainage systems (SuDS). Surface water volumes are much greater than foul water. Managing it	Flood risk and surface water management are closely related and sit comfortably in the same policy, especially given that it is the residue of what is needed given content in national planning policy and PfE Plan policy JP-S4: Flood Risk and the Water Environment. The surface water hierarchy is included in the policy. The policy does align with the national policy and guidance as "an attenuated discharge to a public combined sewer" is the position of last

Ref.	Who	Summary of comment	Our response
		sustainably reduces sewer flooding risks and environmental harm. Recommend separate policies should address flood risk and surface water management. All planning applications should demonstrate that the surface water hierarchy has been fully considered. Applications should include a foul and surface water drainage strategy that supports sustainable and climate-resilient development. The policy should align with the NPPF and NPPG, which discourage using combined sewers for surface water discharge.	resort in the hierarchy. Reference to design being in line with the new National SuDS Standards has also been added to the policy.
1088-12	Canal & River Trust	Reference could be added within supporting text to the potential for surface water discharge to the canal, subject to a review of proposals and licence to discharge.	Welcomed and added to the supporting text under the policy.
923-13	The Lancashire Wildlife Trust	Support the policy. SuDS should, where appropriate, include, ecological habitats such as ponds; reedbeds and wetlands. Suggest adding within the justification that water should be retained within the SuDS infrastructure for as long as possible before being released into adjacent water courses.	Support welcomed. The reference to 30% reduction in run-off rates on previously developed land has been removed as it was inconsistent with PfE Policy JP-S4. The policy now requires all development to achieve greenfield run off rates where practicable which is a higher level of protection.

Ref.	Who	Summary of comment	Our response
		Welcome that for development on previously developed land, a 30% reduction in run-off rates will be required and that on greenfield sites run-off rates should not be increased. Request clarification that discharges into surface water should only occur via newly created water features specifically designed for that purpose, not into existing water bodies. Recommend including water quality protections in the policy or adding a separate policy to ensure that water leaving development sites does not harm existing water bodies to prevent any negative impact on the borough's blue infrastructure.	The policy has also been amended to make clear that SuDS should be designed in line with the new National SuDS Standards 2025. Water quality protections are covered by Policy EN7, specifically criterion 6.
924-5	The Woodland Trust	Could include link to Natural Flood Management, identification of areas suitable for woodland creation and tree planting to reduce flood risk.	Reference to the integration of landscape-scale natural flood management features has been added to the policy.
1119-6	West Lancashire Borough Council	In addition to surface water flooding, the policy should also cover fluvial flooding, groundwater flooding, and catchment-wide impacts, especially since the River Douglas flows from Wigan into West Lancashire.	Policy JP-S4 in the adopted PfE Plan also applies, notably criteria 1-5. Fluvial flood risk is covered in the 2nd paragraph of the policy, alongside surface water. Criterion 1 specifically covers fluvial

Ref.	Who	Summary of comment	Our response
		Actions in Wigan affect downstream areas in West Lancashire, policies should reflect this interconnectedness. NaFRA2 shows parts of Wigan are vulnerable to fluvial flooding, the policy should detail how this will be managed. No mention of how groundwater interacts with surface water flooding, this should be included in the policy. The flood risk management hierarchy from National Planning Practice Guidance (ID: 7-004-20220825) should be referenced and incorporated into the policy. EN10 mentions compensating for loss of fluvial flood storage but doesn't explain how or where this would occur.	flood storage and flood flow rates. Criterion 2 covers fluvial flood storage. In addition, policy EN11 safeguards the Wigan Flood Alleviation Scheme, which is highly material to flooding downstream, including in West Lancashire. The proposed policy is in line with national planning policy which makes clear that all sources of flood risk must be considered and this is referenced in the supporting text and includes groundwater. The supporting text also makes states that clear evidence is required where SuDS may not be technically or feasibly achievable which could be due to the presence of groundwater flood risk. The risk of groundwater flooding in Wigan however is low with only a few recorded incidences. Compensation is referred to a level for level, volume for volume basis in line with recommendations from the Environment Agency. What else is reasonable in a borough-wide policy covering all eventualities of that kind?

Ref.	Who	Summary of comment	Our response
369-6	Cllr Debbie Parkinson	Development affects the natural drainage of land with more areas suffering from flooding because of the building of new estates in Standish.	Sustainable drainage systems should result in development not increasing surface water run-off relative to the previous greenfield rate, and should also address any on-site flooding that occurred prior to development.
874-3	Cllr John Harding	Concern with the impact of development proposals upstream on residents in the Lilford Park area that have suffered from significant flooding on 1st Jan 2025 and 26th Dec 2005 and the capacity of Bedford Pumping Station. Upstream flood alleviation is required to store floodwater in the Hindsford Area. Adding a further 320 houses, some of which are in Flood Zones 2 and 3, would do nothing to assist in flood mitigation/reduction.	Sustainable drainage systems should result in development not increasing surface water run-off relative to the previous greenfield rate. Homes should not be located where they are at risk of flooding themselves. This has been accounted for in the site capacity and will be addressed through the site-specific flood risk assessment as part of any planning application.
1002-2	Cllr Gena Merrett	Existing issues of flooding in Golborne associated with Millingford Brook on Bridge Street, Barn Lane, and Edge Green Lane. UU flood related issues on Tanners Lane.	Sustainable drainage systems should result in development not increasing surface water run-off relative to the previous greenfield rate.
576-8	Private Individual	Policies do not take into account anticipated effects of climate change. Stricter criteria should be applied to new developments and they should not rely on outdated flood risk data.	The flood risk maps used do take into account stricter standards related to the anticipated effects of climate change

Ref.	Who	Summary of comment	Our response
859-9	Private Individual	Support policy as it seeks to ensure new development does not place it or existing at risk of flooding from any sources. Must be applied to new development such as at Millers Lane.	Support welcomed.
1062-3; 1099-6	Castle Green Homes Limited; Morris and Persimmon Homes	Policy EN10 states: 'In principle, development should not take place in locations at risk of any form of flooding'. This is not consistent with paragraphs 170 to 182 of the NPPF and should be removed. Guidance expects development to be directed to areas with the lowest risk of flooding. There is no reason for a local policy on flood risk, as this is covered by national policy.	This text has been replaced in line with national policy. This policy is filling the gaps left by national planning policy and PfE Plan policy JP-S4.
1121-12	Peel Land	This is inconsistent with national policy. National policy requires a sequential approach (and where applicable "exceptions test") to the selection of sites. In particular NPPF paragraph 187b, 188 and footnote 65 44 with preference for sites at lowest risk of flooding. The first paragraph of the policy should reflect this.	The first sentence / paragraph of the policy has been amended accordingly.
1127-5	Intermodal Logistics Park North Ltd	The policy in question exceeds national planning policy by requiring developments to reduce flood risk elsewhere, rather than simply ensuring they do not increase it. This	The first sentence / paragraph of the policy has been amended accordingly.

Ref.	Who	Summary of comment	Our response
		higher standard may not comply with Regulation 122 of the CIL Regulations 2010, as it imposes obligations unrelated to the specific development. Additionally, there's a drafting error in the penultimate paragraph where the word "not" is mistakenly omitted before "feasible."	
1138-9	Tarleton Estates	The first requirement of the policy does not reflect national planning policy in relation to flood risk. Accordingly, the first part of Policy EN10 should be updated to read: "Development should be directed towards sites which are not at risk of flood as a first preference. In principle, Development should only be permitted to not take place in locations at risk of any form of flooding where the sequential and exception tests are satisfied (in accordance with national planning policy) as necessary and should be designed to ensure that it does not increase the risk of flooding elsewhere, in line with national planning policy."	The first sentence / paragraph of the policy has been amended to refer to the sequential approach.
1443-2	Environment Agency	We support the application of the surface water hierarchy and the requirement for Sustainable Drainage Systems (SuDS) in	Support welcomed.

Ref.	Who	Summary of comment	Our response
		major developments, designed in line with the National SuDS Standards 2025 and the GM SuDS Design Guide. We particularly welcome: • The requirement for level-for-level, volume-for-volume compensation for any loss of fluvial flood storage. • The expectation that greenfield sites do not increase runoff rates, and that brownfield sites reduce runoff by at least 30%, rising to 50% in Critical Drainage Areas. • The emphasis on multi-functional SuDS and avoidance of underground piped systems unless justified. • The need for holistic drainage strategies in phased developments, discouraging reliance on pumping stations. These provisions align with national policy and best practice, and we support their inclusion. EA Recommendations for Improvement: • The policy could benefit from a requirement for SuDS to be designed with	The proposed policy and supporting text have been updated based on these recommendations.

Ref.	Who	Summary of comment	Our response
		biodiversity and amenity objectives, not just flood risk reduction. o In the paragraph referencing the four pillars of SuDS and CIRIA guidance, wording as: 'Sustainable drainage systems should be designed to deliver biodiversity and amenity benefits, in addition to managing water quantity and quality' • Consider mandating SuDS performance monitoring and maintenance plans to ensure long-term effectiveness. o 'Major developments should include a SuDS maintenance plan and performance monitoring strategy to ensure long-term effectiveness.' • A clearer definition of "exceptional circumstances" within the reasoned justification for discharging to combined sewers would improve transparency. o Paragraph beginning "Connections of surface water drainage to the existing combined sewer…': 'Exceptional circumstances must demonstrate that all other options	

Ref.	Who	Summary of comment	Our response
		in the surface water hierarchy are technically or economically unfeasible, supported by clear evidence' • The statement "unless exceptional circumstances" should be amended as the term is not defined within the policy and therefore introduces ambiguity and the risks undermining the flood resilience. We would further state that robust evidence should be required to support any exception (e.g. Hydrological modelling, Cost-benefit analysis, alternative mitigation proposals) or potentially a consultation clause requiring formal engagement with the Environment Agency and Lead Local Flood Authority (LLFA) before any exception is granted. • We recommend the inclusion of a policy requirement that, where development is located upstream of flood-vulnerable communities, it should actively contribute to downstream flood resilience. This could include: o Provision of additional flood storage beyond baseline requirements.	

Ref.	Who	Summary of comment	Our response
		○ Use of multi-functional SuDS designed to retain water during extreme rainfall events. ○ Integration of landscape-scale natural flood management features.	
Policy EN11: Flood water storage areas			
368-1	Private Individual	Concern over capacity and reliability of pumps at Bedford Pumping Station. The impact of new homes on surface water and sewer overflows need to be considered on existing flood risk in the Lilford area. 830 homes South of Atherton, 600 East of Atherton will directly affect the Lilford Flood Basin. Attenuation ponds will help but are not adequate in terms of delaying water in significant lengthy storms. Strongly in favour of major improvements to flood prevention at the Lilford Flood Basin with urgent need to consider a Hindsford Flood basin idea.	Pressures on the Bedford pumping station are acknowledged in the supporting text under the policy. A new flood storage basis in the Leigh East catchment is being sought. The main problem is with existing development. Sustainable drainage systems should result in new development not increasing surface water run-off relative to the previous greenfield rate.
576-17	Private Individual	Blackmoor area does not appear in flood risk plans despite having suffered from flooding.	The proposed policy does not specifically reference all instances of flood risk or flooding but supports the implementation of future flood storage in catchments should there be an identified need.

Ref.	Who	Summary of comment	Our response
874-10	Cllr John Harding	Concern with the impact of development proposals upstream on residents in the Lilford Park area that have suffered from significant flooding on 1st Jan 2025 and 26th Dec 2005 and the capacity of Bedford Pumping Station. Upstream flood alleviation is required to store floodwater in the Hindsford Area. Adding a further 320 houses, some of which are in Flood Zones 2 and 3, would do nothing to assist in flood mitigation/reduction.	Pressures on the Bedford pumping station are acknowledged in the supporting text under the policy. A new flood storage basis in the Leigh East catchment is being sought. The main problem is with existing development. Sustainable drainage systems should result in new development not increasing surface water run-off relative to the previous greenfield rate.
1033-2	Private Individual	Section 10.69 is incorrect, as clearly (see events of 1 Jan 2025) this has not prevented flooding downstream in Leigh. It protects Higher Folds and the assets at your Bedford Pumping Station.	Noted. The words "or reduce" have been added to the text concerned. The pumping station is not ours, however. It is owned and operated by the Environment Agency.
1079-11	Jo Platt MP	Policy EN11 supports flood management schemes for Borsdane Brook, but similar action is urgently needed upstream of the Lilford Park Basin, which has failed twice in nine years. Significant improvements are required to prevent future flooding in the area. Additionally, the policy lacks identified flood storage solutions for the Leigh and Atherton constituency, despite suitable sites- such as those in flood zones 2 and 3 in Hindsford being allocated for housing. The	The supporting text for the policy, as revised, identifies the delivery of flood storage in the Leigh east catchment as the next priority, to reduce pressure on the Bedford pumping station.

Ref.	Who	Summary of comment	Our response
		council must ensure development does not increase flood risk and should prioritise identifying new flood storage areas to adapt to climate change.	
1023-59	National Highways	Support policy.	Support welcomed.
1443-3	Environment Agency	EA support the safeguarding of Lilford Park Basin and the Wigan Flood Alleviation Scheme, and the proactive approach to identifying and delivering new flood storage areas, particularly in the Leigh East catchment, and the Borsdane Brook catchment. Welcome the requirement for developers in these catchments to collaborate with stakeholders and deliver flood risk reduction measures unless exceptional justification is provided. Recommend: Consider including criteria for prioritising future flood storage sites, based on ecological value, community benefit, and flood risk reduction potential.	Support welcomed. We have added reference to criteria for prioritising future flood storage sites to the supporting text.
Policy EN12: Groundwater source protection zones			
1023-60	National Highways	Support policy.	Support welcomed.

Ref.	Who	Summary of comment	Our response
1137-26	United Utilities	Support. To provide additional assistance to applicants / developers, recommend that the explanatory text reference the latest government guidance which includes The Environment Agency's Approach to Groundwater Protection (February 2018 Version 1.2) or any updated guidance relevant at the time of determination.	Support welcomed. Reference to the guidance has been included in the last paragraph of the supporting text for this policy.
Policy EN13: Water efficiency			
1021-7; 1126-8	Home Builders Federation; The Baldwin Estate	This requirement is unnecessary. The mandatory national standard is 125 litres, which already improves on existing housing stock and serves as an effective water demand management measure. For a local authority to enforce the optional 110-litre standard, it must demonstrate a clear local need using evidence from local water and sewerage companies, the Environment Agency, catchment partnerships, and/or viability and housing supply assessments. The Environment Agency does not classify Wigan or the North West as water-stressed, so the HBF believes the policy is not justified and inconsistent with national guidance.	UU adopted 2024 Water Resource Management Plan recommends that councils enforce a water efficiency standard of 110 litres per person per day. This is supported by national planning guidance as valid justification for an optional standard. Furthermore, evidence they point to shows that can be achieved at no extra cost for developers.

Ref.	Who	Summary of comment	Our response
1023-61	National Highways	Support policy.	Support welcomed.
1062-5	Castle Green Homes Limited	The Council has not evidenced the inclusion of this optional standard in the policy. Proposed amendment: "All new residential developments must achieve, as a minimum, the water efficiency standard of 125 litres per person per day in line with the optional requirement in Building Regulations, subject to site viability and other site-specific constraints."	UU adopted 2024 Water Resource Management Plan recommends that councils enforce a water efficiency standard of 110 litres per person per day. This is supported by national planning guidance as valid justification for an optional standard. Furthermore, evidence they point to shows that can be achieved at no extra cost for developers.
1137-27	United Utilities	Support policy. United Utilities Water (UUW) has adopted the 2024 Water Resource Management Plan, recommending that local authorities enforce a stricter water efficiency standard of 110 litres per person per day. This is supported by national planning guidance as valid justification for implementing the optional standard. Recent evidence (from the April 2024 Future Homes Hub report) shows that meeting this water efficiency standard does not add extra cost for developers. Therefore, any viability assessments should reflect this finding.	Support welcomed.

Ref.	Who	Summary of comment	Our response
People			
100-17	Private Individual	Atherton is in most deprived 20% with limited green space in town centre, under resourced and overstretched youth services and community facilities. Public realm needs improvements. Seek acknowledgement of deprivation status and request a place-based health and wellbeing improvement plan. OSR should be used to identify Atherton as unprovided and address shortfalls. Seek greenspace or recreation hub for town centre. Developers should contribute to community infrastructure, green infrastructure, active travel, and reduce isolation through public spaces. Youth provision is critically underserved.	The issues raised are covered by policies TC5, PL1 and PE1-PE8.
241-3; 276-5; 282-6	Private Individuals	Must protect green spaces for mental health. Building on the Green Belt is contrary to this.	The proposed allocations on existing Green Belt land are supported by exceptional circumstances cases.
369-9	Cllr Debbie Parkinson	Standish needs better access to primary health care. Doctors don't stay in the area. Schools are full and nurseries have long waiting lists.	Infrastructure capacity is covered in policy PE4, now PE6.

Ref.	Who	Summary of comment	Our response
758-1	Private Individual	Westleigh and other deprived areas need youth services/hubs for trained youth worker support in their own catchments to reduce antisocial behaviour, gang culture and crime.	Policy PE4, now PE6 provides an opportunity to address this through developer contributions where it can be justified.
Policy PE1: Planning for healthier living			
159-8; 531-5	Standish Voice; Private Individual	Due to poor access to primary health provision in Standish, suggest the threshold for developers being required to submit a Health Impact Assessments in Standish is reduced from 150 homes to 25 homes.	Policy PE1 requires proposed developments of 10-149 homes to be supported by a Planning for Health Checklist, which should adequately assess health impacts locally.
229-3	Private Individual	Development in Standish has had a detrimental impact on medical services, long wait times for appointments and prescriptions. Large number of hot food takeaways and less places to buy healthy food. No youth clubs or areas for youths to meet. Recreational parks on housing developments not being maintained.	These issues are covered by policies PE2-PE7.
858-5; 865-2	Sport England	Support the broad policy aims for healthier living, particularly points 1, 2 and 3. but would welcome the inclusion of direct reference to Active Design Guidance within the policy wording to state: Proposals should provide opportunities for physical activity and active	The concept of active design is covered through the application of policy PL1.

Ref.	Who	Summary of comment	Our response
		travel by incorporating the principles of Active Design.	
923-10	The Lancashire Wildlife Trust	Support. Welcome that access to the natural environment is recognised as helping to maintain healthier living.	Support welcomed.
1021-8	Home Builders Federation	Councils should normally consider the health impacts with regard to the level and location of development when preparing their Local Plan. The policies should collectively ensure health benefits and limit any negative impacts. As such any development that is in accordance with that plan should already be contributing positively to the overall healthy objectives of that area. Consequently, where a development is in line with policies in the local plan a HIA should not be necessary. Recommend this policy is amended to state that 'where development proposals depart from the Plan and are likely to have a significant impact on the health and wellbeing of the local population they should be accompanied by a Health Impact Assessment or a Planning for Health Checklist dependent on the scale of the development. Applicants should demonstrate that due consideration has been given to the potential	The Integrated Assessment considers the health impact of the Local Plan overall, however, this is at a strategic level. This policy facilitates the delivery of healthier developments at a site level and therefore helps ensure that key principles are considered effectively at the masterplanning / design stage.

Ref.	Who	Summary of comment	Our response
		impact of the proposed development on the health and wellbeing of the population, based on the following topic areas, as applicable . . .'.	
1022-10	NHS Property Services	Welcome the inclusion of a comprehensive policy on health and wellbeing in the Local Plan and encourage the Council to engage with the NHS on this matter ahead of the Regulation 19 document being prepared.	Support welcomed.
1023-62	National Highways	Support the requirement of Health Impact Assessments and the promotion of active lifestyles.	Support welcomed.
1058-4	Cllr Debra Wailes	Community provision is vital in Hindsford and the proposed new developments in Atherton. Community cohesion plays a prominent role in health.	Policy PE6, now PE7 supports, in principle, the retention and enhancement of existing community facilities in the borough.
1090-6	CPRE	CPRE is committed to ensuring the Wigan Local Plan protects and enhances our rural places, for the benefit of all in the future. Our health is inextricably linked to the health of our natural and built environments. We need to encourage more access to nature and green space, and this should be supported though a Local Plan that focuses on bringing forward development that is balanced in	The Local Plan meets these aims, as set out in the vision and strategic objectives.

Ref.	Who	Summary of comment	Our response
		terms of economic, social, and environmental factors.	
Policy PE2: New hot food takeaways			
100-13	Private Individual	To prevent further decline and imbalance in Atherton town centre and to improve community health we request: a. An audit of takeaway density in Atherton, with thresholds enforced b. Refusal of new takeaway proposals that breach the policy's density, proximity, or adjacency rules c. Public access to takeaway monitoring data, including locations, compliance status, and proximity to schools d. Local ringfencing of mitigation fees for cleaning, waste management, and public realm improvements in Atherton e. Active enforcement of healthier menu options and commercial waste handling f. A moratorium on new takeaway licences in oversaturated areas until diversity and amenity improve.	Policy PE2 addresses this.

Ref.	Who	Summary of comment	Our response
369-8; 982-2	Cllr Debbie Parkinson; Private Individual	Too many in Standish.	The policy will restrict further hot food takeaways where the concentration limit is breached, but there is already a similar policy in the Standish Neighbourhood Plan.
1412-2	Private Individual	King St West and Wigan Lane are over-provided.	The policy will restrict further hot food takeaways where the concentration limit is breached.
1023-63	National Highways	No comment.	Noted.
1107-1	Brookhouse Group Ltd	Applying a "strong presumption" against the provision of takeaways in all other areas outside designated centres is overly restrictive and goes well beyond the scope of similar policies in national or local planning policy. It is not clear from the current wording what would be the circumstances in which the grant of planning permission would or could be acceptable. The policy shouldn't restrict takeaways on retail parks, on which it is widely accepted that they are appropriate uses and are typically separated from residential areas and schools. Not aware of clear evidence suggesting that preventing the development of hot food	The representation appears to relate to fast food restaurants and drive thru restaurants such as McDonalds, Burger King, KFC, rather than hot food takeaways, which aren't covered by this policy. The prevention of new hot food takeaways close to schools is adequately covered by the NPPF.

Ref.	Who	Summary of comment	Our response
		takeaways will cause or contribute to a reduction in obesity rates amongst adults. It should therefore be recognised that there are appropriate locations for such uses including sites such as Parsonage Retail Park. In 2024, the BBC reported on findings from Medway Council which showed that despite restricting HFTAs close to schools, childhood obesity actually increased. The policy should be revised to focus on the prevention of new hot food takeaways in close proximity to schools, in line with the wording of Paragraph 97 of the NPPF.	
1107-1	Brookhouse Group Ltd	Significant concerns as to the legitimacy of a proposed financial contribution to mitigate "potential" impacts of such development, where permission is granted.	Such financial contributions have been sought via section 106 for many years in accordance with existing policy and associated supplementary planning guidance. They effectively contribute towards the implementation of measures including litter bin maintenance, street cleaning and CCTV, which help to mitigate impact on nuisance and amenity.
Policy PE3: Protection of open space, sport and recreation provision (now policy PE4 in the Publication Plan)			
100-25	Private Individual	Welcome the recognition of Central Park and People's Place as Neighbourhood Parks,	Policy PE4 seeks to protect, manage enhance and where appropriate expand the borough's

Ref.	Who	Summary of comment	Our response
		however these are not meeting local needs in Atherton.	network of open spaces in accordance with national policy and open space standards.
100-25	Private Individual	There is no major or principal park provision in or near Atherton town centre, leaving large residential areas underserved. Will the Council commit to upgrading Central Park and People's Place in line with modern accessibility and play standards? Will Atherton be considered for a new strategic recreational site or major greenspace investment, as part of the Local Plan?	Commitment to upgrade specific parks, e.g. Central Park and People's Place, is outside the remit of the Local Plan.
100-25	Private Individual	Atherton cannot afford to lose any more open space given existing limited provision. Concerned that underused playing fields or amenity land may be reclassified or sold off despite local need. Will the Council undertake a public consultation before any open space loss or change of use is considered in Atherton? Can a moratorium on open space disposal be introduced for areas already below the borough's accessibility and quantity standards?	Policy PE4 protects against the loss of open spaces where evidence demonstrates that there is an under-provision.
100-25	Private Individual	There is insufficient sports and recreation facilities in Atherton to meet demand. Without better provision, the town risks further youth disengagement, health decline,	With Howe Bridge Leisure Centre, Atherton has one of the biggest and best equipped sports and leisure centres in the borough, which also has a suite of outdoor pitches.

Ref.	Who	Summary of comment	Our response
		and reduced community activity. Will the Council ensure that Atherton benefits proportionally from the Playing Pitch and Outdoor Sports Strategy? Can the town receive targeted investment in youth-friendly and inclusive facilities, such as outdoor gyms, courts, and MUGAs?	
100-25	Private Individual	Allowing for the development of ancillary facilities such as toilets, clubhouses, or changing rooms is supported in principle, if it enhances public access, community use, and inclusivity, especially in under-resourced areas like Atherton. Will the Council prioritise dual-use, low-cost community sport and wellness spaces in Atherton? Can local clubs and voluntary groups be supported in accessing funding to maintain or improve existing community sports sites?	Support welcomed. Policies PE4 and PE6, now PE7 support the retention of, and new, open space, sport and recreation and community provision, where appropriate. Partnership working between the Council and local stakeholders, including local clubs and voluntary groups, is important to realise our objectives.
369-1	Cllr Debbie Parkinson	Standish needs a park in the north.	The Open Space Report does identify an under-provision of parks and gardens in the Standish area. Policy PE3, now PE4 and PE5 provide a planning framework to help facilitate meeting insufficient open space, play space, sport and recreation provision through developer contributions.

Ref.	Who	Summary of comment	Our response
564-2	Private Individual	Baxter Pit, Winstanley, needs maintenance.	Noted.
576-5	Private Individual	There is insufficient play provision in Blackmoor / South Astley.	The Open Space Report concludes that there is sufficient play provision in the Astley area, though an undersupply in Tyldesley / Mosley Common. Policy PE3, now PE4 and PE5 provide a planning framework to help facilitate meeting insufficient open space, play space, sport and recreation provision through developer contributions.
865-5	Sport England	Support the overall policy approach to linking playing field protection to the NPPF and its criteria and requirements. Suggest the second paragraph also references the evidence base and end with: "...in conjunction with the following open space standards and evidence base."	Support welcomed. The policy has been amended in line with the suggestion.
865-5	Sport England	With regard to Leigh Sports Village and Robin Park, the policy should require proposals to meet ALL of the policy criteria. Also suggest an additional fourth criterion as follows: fourth point as follows: "Support the ongoing or potential use for community and grassroots sports use."	An additional clause has been added as suggested. It is not considered necessary for further development of these complexes to meet all the criteria as the objectives could be met across separate developments and meeting one of the objectives isn't necessarily going to jeopardise the delivery of other identified objectives.

Ref.	Who	Summary of comment	Our response
899-20	City of Trees	Query link to Tree and Woodland Strategy. Suggest a standardised planning condition for new tree planting on development sites to achieve climate resilience, improved air quality, social and visual amenity, and biodiversity, including minimum planting standards and establishing requirements for woodland and trees outside of woodlands.	The management of trees and woodland on development sites is covered by policy EN2.
923-17	The Lancashire Wildlife Trust	Where larger open spaces such as golf courses are considered surplus to requirements, their contribution to nature networks and wildlife corridors, as well as their on-site habitats, should be considered and appropriate biodiversity requirements incorporated into any development plan.	This is covered in policy EN4.
967-1	Private Individual	Parks need reviving.	Enhancing the borough's network of open spaces, including parks, is an objective of Policy PE3, now PE4.
982-5	Private Individual	Playing fields should be protected. Loss of green spaces in Standish to development should not be replaced out of area.	Playing fields have not been lost to development in Standish. Policy PE3, now PE4 protects playing fields in conjunction with evidence of need and site specific recommendations in the latest Playing Pitch and Outdoor Sports Strategy.

Ref.	Who	Summary of comment	Our response
1023-64	National Highways	TfGM support, recommend Streets for All guidance and Local Transport Note 1/20 for walkability and accessibility.	Support welcomed.
1121-11	Peel Land	Support. Suggest making explicit that Council will work with partners to create new green spaces to serve local communities.	The policy has been amended to state that the Council will work with partner groups and organisations.
1412-5	Private Individual	More outdoor gyms - suggest Diggle Street / Frog Lane	Noted.
Policy PE4: Development and social infrastructure (now policy PE6 in the Publication Plan)			
1021-9; 1062-1; 1097-2; 1099-7; 1116-4; 1126-9; 1131-5; 1132-4; 1138-10; 1131-5	Home Builders Federation; Castle Green Homes Limited; Vistry Group Ltd; Morris and Persimmon Homes; Anwyl Homes; The Baldwin Estate; Barratt Homes Manchester; Trustees of Legh Estate and Bloor Homes;	The policy approach is contrary to Regulation 122(2) of the CIL regulations 2010. The policy is seeking to adopt a CIL-style mechanism without following the correct process. Lack of evidence supporting the £5,000 charge. The initial draft Local plan or the draft Infrastructure Delivery Plan do not evidence this need. Contributions should be based solely on identified and evidence-based requirements, not a flat-fee per dwelling, which may undermine or delay the delivery of housing. The blanket approach does not take into account site-specific considerations and existing capacity in the area.	Noted. The policy PE4, now PE6 has been amended to align with Regulation 122, including the removal of the standard charge per home. The new proposed approach will be based upon evidenced need and considers existing capacity in the area. The policy is also subject to viability, therefore taking into account site specific considerations.

Ref.	Who	Summary of comment	Our response
	Tarleton Estates; Barratt Homes Manchester		
1062-1; 1097-2;	Castle Green Homes Limited; Vistry Group Ltd;	Support that the policy is subject to viability which aligns with NPPF paragraph 59.	Support welcomed.
1099-7	Morris and Persimmon Homes	There is no reference to how site-specific viability will be taken into account.	This has been added to the policy PE4, now PE6.
1138-10	Tarleton Estates	The principle of securing contributions to fund social infrastructure is sound. However this needs to be considered on a case-by-case basis having regard to on-site provision of infrastructure which a contribution would otherwise fund; the direct and evidenced impact of the development - individually and cumulatively - and the extent to which the development will utilise existing remaining capacity within existing infrastructure; the viability of development; and the cost of the mitigation based on a specific proposal.	The policy PE4, now PE6 has been amended to reflect this.

Ref.	Who	Summary of comment	Our response
1099-7	Morris and Persimmon Homes	There is no reference to whether the contribution applies to affordable housing or retirement and other specialised housing; It appears that apartments and large family housing would be treated identically.	The policy PE4, now PE6 no longer applies a standard charge per home. The policy applies to all developments.
1132-4	Trustees of Legh Estate and Bloor Homes	The £5,000 per dwelling approach should be fully considered as part of the viability appraisal.	The policy PE4, now PE6 no longer applies a standard charge per home.
1062-1	Castle Green Homes Limited	The policy needs to make clear that the £5,000 per dwelling payment replaces s106 planning contributions for individual items of infrastructure to avoid double counting.	The policy PE4, now PE6 no longer applies a standard charge per home.
1062-1	Castle Green Homes Limited	The policy appears to conflict with paragraph 11.27 which states that developer contributions will be appropriate to reflect the needs in the locality of the development. Suggest replacing the second and third paragraph of the policy with: 'A financial contribution will be required from each new home (including the conversion of non-residential buildings to homes) to reflect identified needs in the locality of the development' and the deletion of the second and third sentence in the fourth paragraph.	The policy PE4, now PE6 has been amended.

Ref.	Who	Summary of comment	Our response
1096-7; 1116-4; 1121-10	Taylor Wimpey; Anwyl Homes; Peel Land	Larger sites, including the proposed allocations, will generally incorporate provision for such infrastructure, either on-site or off-site. The plan should make this clear and confirm that Policy PE4 does not apply to such sites or does not apply in full.	This clarity is not needed in the revised policy PE4, now PE6.
1121-10	Peel Land	It is essential that requirements for commuted sums are fully justified by evidence of needs; that the sums sought are fair and proportionate; that they have been subject to viability testing; and are applied to the individual circumstances of sites and the development proposed. Needs to be informed by a viability appraisal. Reserve the right to comment further at the Regulation 19 Plan stage.	A viability assessment has been prepared to support the plan.
1022-12	NHS Property Services	The NHS, Council and other partners must work together to forecast health infrastructure requirements and related delivery costs to support the projected growth and development across the Local Plan area. This would ensure that the assessment of existing healthcare infrastructure is robust, and that mitigation options secured align with NHS requirements.	The council is working collaboratively with the NHS Integrated Care Board to assist with the effective implementation of the policy PE4, now PE6, namely in terms of preparing, and keeping up-to-date, evidence of healthcare infrastructure needs at a sub-borough level to inform appropriate developer contributions. The policy PE4, now PE6 no longer applies a standard charge per home, and a viability

Ref.	Who	Summary of comment	Our response
		Recommend that the Council engage with NHS Greater Manchester ICB to add further detail within the Local Plan and supporting evidence base (such as the Infrastructure Delivery Plan) regarding the process for determining the appropriate form of contribution towards the provision of healthcare infrastructure where this is justified. As a starting point, we suggest the 4-step process set out in Section 5 of the Council's Planning for Health SPD (2022). In the absence of a viability assessment, request further clarity as to how the 30% of £5,000 per home has been established. To ensure compliance with Regulation 122 of the CIL Regulations, request the following addition to the policy: "Strategic residential-led developments may require the provision of health, education, community facilities and sport and recreation on-site. In such circumstances, this will be in-lieu of the element of the developer contribution apportioned to that use. The parts of the financial contribution apportioned to other infrastructure types will remain. On-site healthcare provision should be provided as a	assessment of the Local Plan has been undertaken.

Ref.	Who	Summary of comment	Our response
		turnkey, fully fitted out facility (ready for occupation) constructed at developer cost to NHS specification provided leased at a peppercorn rent for the entirety of occupation." Policy PE4 flat rate financial will likely to be insufficient and will not provide a proportionate contribution towards mitigating impacts of healthcare services. A robust mechanism is vital to ensure that health infrastructure is delivered.	
100-30	Private Individual	Infrastructure in Atherton is already over capacity. Will the Council publish an annual report detailing where developer contributions are spent at town or ward level? Can Atherton be identified as an area of critical infrastructure need, ensuring it receives an above-baseline share of contributions? Support the £5,000 fee but it must be enforced consistently and spent locally. Concern that viability will be an excuse not to pay. Will developer contributions from Atherton schemes be ringfenced for infrastructure in Atherton? Can "viability" waivers be independently	The council produces an Infrastructure Funding Statement annually, explaining how it is collecting, monitoring and spending developer contributions made through Section 106 obligations. The standard charge per home has been removed. Viability assessments prepared by developers in support of reduced developer contributions are independently and impartially assessed.

Ref.	Who	Summary of comment	Our response
		scrutinised and published, to prevent unnecessary reductions in contributions? Welcome the proposal that contributions will be apportioned by local need, with flexibility to increase funding for elements with greater deficiencies. Can local community groups be involved in the planning of how community facility and recreation contributions are used? Support allowing on-site infrastructure delivery in-lieu of financial contributions, but only if the facilities are publicly accessible, appropriately located, and not purely tokenistic.	
369-29	Cllr Debbie Parkinson	S106 money can't help with old outdated roads where houses have been built and each has 2-3 cars. The main roads in and out of Standish cannot take any more vehicles.	Section 106 contributions are an important source of funding to address identified deficiencies in infrastructure capacity.
865-6	Sport England	The contributions towards sport facilities should be based on Sport England's Playing Field Calculator and Built Facilities Calculator, which we would welcome being referenced in the policy. This will provide an up-to-date cost as the basis for calculations based on area need.	The Sport England's Playing Field Calculator was used to inform the conclusions of the Playing Pitch and Outdoor Sport Strategy, which will influence the level of developer contributions sought.

Ref.	Who	Summary of comment	Our response
1023-65	National Highways	Support.	Support welcomed.
1079-5	Jo Platt MP	Whilst the policy acknowledges that new homes places added pressure on school capacity and states that developers must contribute proportionally to mitigating their impact, the Local Plan does not reference how the capacity of our schools will be addressed. We cannot continue to build new homes if the result is that we need to make children take up school places a considerable distance away from home, which is evident in Atherton and Tyldesley. I do not see evidence of developer contributions being apportioned to address the deficiencies of secondary school capacity in areas such as Atherton and Tyldesley.	Working in collaboration with infrastructure providers, including the Council's education service, the implementation of policy PE4, now PE6 will be informed by up-to-date evidence of infrastructure needs at a sub-borough level.
1082-2	Private Individual	Support.	Support welcomed.
Policy PE5: Open space and play provision in new developments			
100-33	Private Individual	On-site open space should be the default in Atherton and other underprovided areas, with strong quality and accessibility standards for all new green and play spaces. Play areas should be designed for all ages, including teens and carers. Public access should be	On-site open space is often not viable or feasible on developments of below 100 homes, where an equivalent financial contribution is required to fund maintenance costs of existing provision within the locality.

Ref.	Who	Summary of comment	Our response
		guaranteed, with open space never locked to the wider community. There should be clear, long-term maintenance plans, that are published and monitored. Policy PE5 must be enforced.	The policy will be enforced with reduced contributions only permitted where supported by a robust viability assessment. The policy requires continued public access and for the scale and specification of on-site play equipment to be agreed with the Council.
369-24	Cllr Debbie Parkinson	Developers do not deliver what is required e.g. play areas, allotments, roads, lighting, parks.	Developers are legally bound to deliver infrastructure in accordance with section 106 agreements.
865-8	Sport England	For clarity, encourage the preclusion of playing field from this policy as it relates solely to non-playing field open space and play provision. Provision of playing field and outdoor recreation facilities in new development needs to be evidence based and a response to the local area demand.	Playing fields are covered in Policy PE3, now PE4.
901-7	Cityheart Ltd	'Housing' should be more explicit e.g. 3 bed dwellings, as high level of provision unlikely to be required in high density developments of smaller dwellings.	Accessible open space provision is important for all, not just families and children, therefore it is considered that developments of higher density and/or smaller homes should contribute. The supporting text states that the appropriate balance between provision of new open space and the enhancement of existing open space will be determined having regard to factors including the type and density of the

Ref.	Who	Summary of comment	Our response
			proposed housing development, as well as other site specific factors.
923-26	The Lancashire Wildlife Trust	The provision of new open space should not lead to a reduction in the value of any ecological features within the development site. Where habitats and open space is delivered through the requirements of BNG, then the priority is for the provision of biodiversity enhancement. The use of the same land to provide for recreational and open space requirements should not adversely impact biodiversity aims and objectives.	This is covered sufficiently by policy EN4.
1023-66	National Highways	Support.	Support welcomed.
1116-5	Anwyl Homes	Concern about the blanket contribution amount for all new homes. Unclear how this policy works alongside site allocation policies which also require on-site open space provision e.g. Policy H4 specifically requires the enhancement of Leyland Park and the provision / enhancement of sports, open space and recreational provision.	The policy has been amended to provide sufficient clarity.

Ref.	Who	Summary of comment	Our response
1126-10	The Baldwin Estate	Development at Landgate would deliver enhancements at Bryn Recreation Ground and therefore comply with this policy.	Noted.
1132-5	Trustees of Legh Estate and Bloor Homes	It is not understood where the 25 sqm blanket approach has come from and it needs to be fully evidenced and justified. Concern that the current wording does not consider whether any site-specific considerations would prohibit the 25 sqm per dwelling standard being met. Exceptions referred to only relate to proximity to adjacent areas of open space rather than on-site considerations. Evidence for the 25 sqm approach should be provided and it is recommended that some flexibility is added into the policy to allow for any on-site constraints.	25 sqm has been the requirement since the first Unitary Development Plan was adopted in 1996 (Policy L1A 'Local Open Space within New Housing Developments').
1137-28	United Utilities	Request the following additional criterion: 'The delivery of open space must evaluate and identify opportunities for sustainable surface water management. Open space proposals must be integrated with the strategy for sustainable surface water management.'	Sustainable drainage and green infrastructure are adequately covered by policies in the Environment chapter namely EN2, EN3 and EN10.

Ref.	Who	Summary of comment	Our response
Policy PE6: Community facilities			
100-34	Private Individual	Loss of Formby Hall and downsized library created a community infrastructure void. Atherton needs a flagship multi-use civic space. Facilities considered for retention or funding need a minimum quality and accessibility standard and community groups should be consulted. The policy must prevent managed decline and unconsulted closures, request moratorium on community facility loss in underserved towns until a borough-wide strategy is in place. Full public consultation on any proposed closure with alternate options like community ownership to be explored. Housing growth should fund new civic spaces.	Policy PE6, now PE7 supports the retention and enhancement of existing community facilities in principle, with their loss only allowed where firmly justified – criteria 4a-c. Policy PE5, now PE7 seeks to address deficiencies in infrastructure capacity, including community facilities.
306-1	Private Individual	Multi-cultural community centre will attract people from different backgrounds to do business in Wigan.	Noted.

Ref.	Who	Summary of comment	Our response
369-14	Cllr Debbie Parkinson	Standish has a thriving library, 3 churches and community centre. More community areas are needed for new parents and young children. A swimming pool is needed in Standish Leisure Centre.	Policy PE6, now PE7 seeks to address deficiencies in infrastructure capacity, including community facilities.
1022-13	NHS Property Services	Support provision of sufficient, quality facilities but policy approach is not effective in current state. Policies aimed at preventing loss or change of use of community facilities and assets (regarding health care) can have potential harmful impact on NHS delivery of essential facilities and services within communities. Flexibility regarding estate is required as disposal of redundant or no longer suitable facilities is crucial to funding new and improved services. Proposed addition to supporting paragraphs: Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, this will sufficiently satisfy the requirements of criterion 3 of the policy."	In respect of this policy, community facilities include libraries, cultural buildings, places of worship and spaces to accommodate meetings, social activities and community events. It does not include health facilities.
1023-67	National Highways	No comment.	Noted.

Ref.	Who	Summary of comment	Our response
Policy PE7: Development supporting users of publicly provided support services (now policy PE8 in the Publication Plan)			
100-31	Private Individual	Atherton has an unchecked concentration of vulnerable housing including HMOs, complex needs, unregulated housing for prison leavers, substance misuse services, or care properties offering support with no quality oversight. Local services are overstretched, with ASB and fly tipping increasing. Request dispersal requirements and saturation acknowledgement. Planning applications are approved without reference to commissioning need, community not made aware of who facilities are intended to support, no oversight once operational. Request residents be consulted on support-based housing apps, especially in clustered areas. Policy must actively prevent cumulative overloading of vulnerable accommodation in any single area, unregulated support units under PD rights, service users placed without proper support. Request proof of commissioned support services in place before supported housing is approved.	This policy is about development supporting users of publicly provided support services, not the users themselves, although it is designed to ensure that it is about the needs or residents of the borough and not people from surrounding boroughs HMOs are covered by policy H10.

Ref.	Who	Summary of comment	Our response
		Suggest Community Impact Threshold introduced, a public register of supported and specialist housing across the borough, stronger enforcement against unregulated or uncommissioned facilities.	
576-18	Private Individual	Shouldn't be needed, treatment shouldn't be for non-borough residents. No mention of asylum seeker accommodation and effect on local communities.	Private sector operators buy up property where it is cheaper, in places like Wigan Borough, to generate trade.
1023-68	National Highways	No comment.	Noted.

Ref.	Who	Summary of comment	Our response
What happens next			
100-37	Private Individual	Request a commitment to publish a clear, accessible Consultation Report that identifies where and how community feedback has shaped the next draft and a guarantee that all comments, including those from residents' groups, local businesses, and town stakeholders, will be given equal weight alongside institutional responses. The Publication version must contain specific actions and measurable commitments for Atherton and evidence-led reasoning for accepting or rejecting proposals made by our community. The Publication version must be fair, accessible and inclusive. Request that the Council provides plain-English guides, videos, or summary briefings, and that dedicated engagement events are held in Atherton, led by planning officers who can explain how to engage meaningfully; and that written or verbal responses are accepted in formats accessible to those without technical knowledge or digital access.	This report provides feedback. The Local Plan is a borough-wide plan. It cannot overly concern itself with one part of the borough to the detriment of other areas. The Publication stage is not a consultation as such, it is more about publicity of the opportunity to submit comments. It is a formal legal stage. There will be no engagement events. Any comments received will be submitted to the Planning Inspector to be considered through the independent public examination. There will be posters and paper copies in libraries.

Ref.	Who	Summary of comment	Our response
		Request that updates are also made available via physical displays in libraries, community hubs and town centres; and that Atherton has the opportunity to formally nominate community representatives to participate in any advisory groups, hearings or pre-submission discussions before January 2026.	
276-4	Private Individual	No illusions you will do your best to ignore your constituents, so we will do our best to take our grievances to the wire. If you can do deals with Peel you can do other deals and reverse/change your reports based on more factual evidence.	Nobody is being ignored and no deals have been done.
372-10	Private Individual	Object.	Noted.
638-1	Private Individual	No consultation session was held in Lowton. The consultation sessions were not effective consultation as we were told what the Council is planning to do rather than be asked for our ideas of what should be done.	There was an event in the east side of Golborne, which is adjoined to Lowton.
730-1	Private Individual	Publicity of the plan should be expanded to be inclusive to those residents who live in Standish, particularly older people and those without access to IT. The plan is a hard read and would be better received if summarised in equivalent PowerPoint presentations.	There was no consultation meeting in Standish because there was no site allocation proposed in Standish.

Ref.	Who	Summary of comment	Our response
		There was no consultation meeting in Standish.	
1033-3	Private Individual	There is little evidence of the plan being supported by a robust evidence base. Specifically, the inaccurate Environment Agency data with people buying properties in flood areas which are officially rated as low risk.	The evidence is available on the council's website and on the Environment Agency's website.
1121-9	Peel Land	The Local Plan should set out a monitoring framework which makes clear the indicators that will be monitored; what performance measures and data will be used; and what course(s) of action would be taken if monitoring suggests a need for further action.	A monitoring chapter is now included as chapter 13.

Ref:	Who:	Summary of comments	Our response
Appendix 2: Car Parking Standards for New Developments			
369-17	Cllr Debbie Parkinson	Standish cannot possibly meet these requirements. More car parking is desperately needed in Standish.	The standards are for new development.
1062-4	Castle Green Homes Limited	The proposed parking standards excludes garages as car parking spaces for C3 dwelling houses. It is deemed unreasonable due to lack of justification and should be removed or appropriate justification provided in T4.	Garages have not been counted as parking spaces for two decades or more. They are generally, and very easily not used for parking.
1381-6	TfGM	Appendix 2 discusses the consideration of a zonal approach, aiming to lower car parking standards in areas with better public transport connections, potentially could be based on GMAL.	A zonal approach is not adopted within Appendix 2. Policy T3 lists certain circumstances where the Council may accept parking which is lower than the standards listed in Appendix 2 but this is based on a site-by-site basis.

Appendix A: Responses received from residents and individuals to the site allocation policies

Policy H4: South Hindley:

Summary of comments	Our response
Traffic	
Even with the link road, an additional 2,000 homes will inevitably add significant level of traffic onto already congested roads.	Informed by a robust transport assessment, appropriate transport interventions will be required as part of the development to effectively mitigate the impact on the local transport network, as required by Policy T2 and PfE policy JP-C8.
The link road will increase congestion on both the A578 Leigh Road and A58 Liverpool Road which are already busy.	Informed by a robust transport assessment, appropriate transport interventions will be required as part of the development to effectively mitigate the impact on the local transport network, as required by Policy T2 and PfE policy JP-C8.
Significant improvements to the road network are needed before adding more homes, to alleviate the high volume of vehicles through Market Street, which was clearly never designed for current traffic levels.	Informed by a robust transport assessment, appropriate transport interventions will be required as part of the development to effectively mitigate the impact on the local transport network, as required by Policy T2 and PfE policy JP-C8.
The link road must not become a bypass style through road that divides the community. It must be safe for walking, wheeling and cycling enabling safe connection from the development to Hindley town centre, schools, the local centre, parks, and off-road links. Request the masterplan includes segregated active travel routes and traffic-calming measures.	The proposed link road has been located to the south of the proposed residential dwellings to ensure that active travel linkages to existing built up area of Hindley are maintained. The link road will include adequate provisions for walking, wheeling and cycling.

Summary of comments	Our response
The link road should include bus priority measures, not just car lanes.	Criterion 4 requires the link road to be of a suitable standard to accommodate bus services.
Pollution:	
It will worsen air quality as a result of additional traffic.	This is covered by Policy EN7.
Flooding:	
The site is already prone to flooding and its development will make this worse.	Flood risk management is covered in Policy EN10.
Impact on wildlife:	
Irreversible destruction of habitats and local wildlife that will have long- term consequences for biodiversity.	Criterion 7 requires the development to make provision for biodiversity. The appropriate protection of habitats, wildlife and biodiversity in the borough, are covered sufficiently in the Environment policies, including EN1, EN2 and EN4.
The development will separate Victoria Fields, Lilford Park, Low Hall, Amberswood, Bickershaw Country Park and Pickley Green which currently connect as a wildlife corridor that has developed over the last 50 years along disused rail lines and footpaths.	Criterion 6 requires a strategic green infrastructure network within the site and to be in accordance with a comprehensive landscape-led masterplan.
Loss of recreation land:	
Loss of recreational land for walking, dog walking etc.	Criterion 6 requires the development to provide a strategic green infrastructure network within the site, including the provision / enhancement of sports, open space and recreation provision.

Summary of comments	Our response
Leyland Park:	
The enhancement of Leyland park is vital. It must be physically integrated into the new neighbourhood, include new inclusive play equipment, toilets, and a pavilion or café, offer space for community events, not just sports. Full community engagement is requested into the redesign and enhancement of Leyland Park, with a commitment for its long-term management.	Criterion 6 requires the enhancement of Leyland Park.
Health and wellbeing:	
The development will detrimentally affect the quality of life for existing residents.	The development will be supported by a health impact assessment as required by Policy PE1.
Historic environment:	
The development will require Victorian bridges and embankments to be demolished.	The protection of non-designated heritage assets are covered in Policy PL5.
Impact of the development on the Roman Road which crosses the site and Stone Bridge at Dog Pool Brook.	The protection of non-designated heritage assets are covered in Policy PL5.
Contaminated land:	
Contaminated land on the site associated with the asbestos spillage and the 1979 fire at the former Turner Brothers Asbestos factory which was located on the site.	Criterion 5 of Policy EN7 addresses this.
Environmental and remediation issues should be managed transparently, with clear, published remediation strategies made available for public scrutiny and long term monitoring of site safety put in place.	Site assessments undertaken to support planning applications for the development of the site will be made available on the Council website.

Summary of comments	Our response
The homes are not needed:	
There are many abandoned buildings that should be converted into affordable homes.	The Council proactively works with property owners to bring empty properties into residential use. It also uses a number of tools and incentives to bring long-term empty homes back into use. It is focusing on enforced sales for empty homes that warrant enforcement action.
There are many people living in Council homes who can afford their own home.	Local homes available to purchase through affordable home ownership schemes such as shared ownership and the council's equity loan scheme are promoted to existing tenants who may be interested in home ownership.
There are many underoccupied homes that should be freed up for families.	The council tries to encourage movement within its own stock – including the freeing up of larger family homes for reoccupation – by prioritising existing tenants (including those who are wanting to downsize) for new accommodation through the use of Local Lettings Policies.
Housing mix:	
Genuinely affordable housing, especially social rent, should be prioritised.	This is a requirement of Policy H2.
The mix should include bungalows, accessible homes and family sized homes.	Criterion 2 requires an appropriate mix of house types, sizes and tenures, including affordable housing, in accordance with Policy H2.

Summary of comments	Our response
All new homes should meet national space standards.	This is a requirement of PfE Policy JP-H3.
Larger homes should not be overlooked in favour of high density targets.	Policy H2 requires the provision of a mix of housing types, sizes and tenures across the borough to help address identified housing needs.
A local oversight group should be established to monitor housing mix and affordability delivery. A clear mechanism to review housing types by phase, in response to shifting local demand.	The Local Plan includes a monitoring framework which commits to monitoring housing mix and affordable housing delivery.
Local Centre:	
The Local Centre must meet community needs and not just be a tick box. It should meet the needs of existing residents, not just future residents. It must include everyday essentials (e.g. small supermarket, post office, pharmacy), community facilities (e.g. a flexible hall, café, nursery, or health outpost) and safe, inclusive public spaces. There should be consideration for social enterprises and independent traders, not just chain stores.	Criterion 3 requires the Local Centre to meet local needs and to serve new and existing residents.
Local stakeholders and community groups should be engaged in the design and use planning of the local centre.	Consultation on this will be considered at the planning application stage.
Green infrastructure:	
Support the east-west green infrastructure corridor but it must serve as a functional, accessible open space that can be used for recreation, supports wildlife and is a buffer from traffic.	Agree. This will be covered within the comprehensive landscape led masterplan for the site.

Summary of comments	Our response
Social infrastructure:	
Schools. Health and other social infrastructure cannot be an afterthought.	Agree. This is covered in criterion 10.
Request early delivery of a new primary school, clarity on funding for local secondary school expansions	Sufficient contributions towards school provision will be determined in accordance with criterion 10 and policy PE4, now PE6.
A joined-up approach with health commissioners is needed to plan new GP or health outreach provision	This is covered in policy PE4, now PE6.

Policy H5: South of Atherton

Summary of comments	Our response
Support:	
Homes are needed to meet housing demand, particularly affordable housing.	Support welcomed.
Traffic:	
The development will exacerbate already significant traffic congestion in Atherton.	Informed by a robust transport assessment, appropriate transport interventions will be required as part of the development to effectively mitigate the impact on the local transport network, as required by Policy T2 and PfE policy JP-C8.
The one-way system at Tyldesley backs up all the way to the traffic lights just past the Gatehouse pub on Manchester Road.	Informed by a robust transport assessment, appropriate transport interventions will be required as part of the development to effectively mitigate the impact on the local transport network, as required by Policy T2 and PfE policy JP-C8.
The traffic going towards Howe Bridge is just as bad.	Informed by a robust transport assessment, appropriate transport interventions will be required as part of the development to effectively mitigate the impact on the local transport network, as required by Policy T2 and PfE policy JP-C8.
Roads through Tyldesley, Leigh and surrounding areas, and especially heading into Bolton, are already heavily congested, and prone to being gridlocked at peak times.	Informed by a robust transport assessment, appropriate transport interventions will be required as part of the development to effectively mitigate

Summary of comments	Our response
	the impact on the local transport network, as required by Policy T2 and PfE policy JP-C8.
Lack of investment in infrastructure to support recent housebuilding.	The development will need to be supported by a Transport Assessment in accordance with Policy T2 and PfE Policy JP-C8. Any significant impacts will need to be subsequently mitigated as part of the proposals for the site.
Is the access going to be from Lodge Road, Hamilton Street or Tyldesley Road? What traffic management is proposed?	All three roads will provide access to different development plots within the allocated land. Informed by a robust transport assessment, appropriate transport interventions will be required as part of the development to effectively mitigate the impact on the local transport network, as required by Policy T2 and PfE policy JP-C8.
Through road:	
Where will the through road join the A577? Concern about the safety of any junctions along the A577, where accidents and near misses already occur.	It is anticipated that a new junction would be provided between 175 and 239 Tyldesley Road.
The junction of the through road at Leigh Road, Howe Bridge and the infrastructure in the Howe Bridge area would struggle to cope with the volume of traffic.	Informed by a robust transport assessment, appropriate transport interventions will be required as part of the development to effectively mitigate the impact on the local transport network, as required by Policy T2 and PfE policy JP-C8.

Summary of comments	Our response
The through road would effectively form bypass to Atherton for vehicles travelling from Tyldesley, which may detrimentally impact on businesses in Atherton who rely on passing trade.	The aim of the through road is to bypass Atherton to reduce traffic congestion within the town which will assist local businesses to attract customers who may be dissuaded from accessing Atherton due to concerns around congestion and increased journey times. The link road will remove unnecessary through traffic whilst supporting local trips.
The through road should not connect to Millers Lane, which is completely unsuitable for through traffic.	Informed by a robust transport assessment, appropriate transport interventions will be required as part of the development to effectively mitigate the impact on the local transport network, as required by Policy T2 and PfE policy JP-C8.
Concern about the impact of the through road on Bee Fold Lane.	Informed by a robust transport assessment, appropriate transport interventions will be required as part of the development to effectively mitigate the impact on the local transport network, as required by Policy T2 and PfE policy JP-C8.
Lodge Road:	
Lodge Road is already congested in term time as there are 2 primary schools (Hindsford CE and Sacred Heart), Fred Longworth High School and Hindsford Day Nursery.	The Transport Assessment would assess the impact on the local road network including Lodge Road.
Pollution:	
Additional traffic will add pollution to an area already renowned for poor air quality.	This is covered by Policy EN7.

Summary of comments	Our response
More development will add to noise pollution, including at the construction stages.	This is covered by Policy EN7.
Impact on water and sewage pollution.	This is covered by criterion 5 of policy H5 and policy EN10.
Overdevelopment in Atherton:	
There has already been a significant level of homes built or approved in Atherton over recent years.	This site is not in the Green Belt. Not delivering this site would result in the need for further Green Belt release to meet identified housing needs.
The proposed development will merge Atherton, Tyldesley and Leigh.	Atherton and Tyldesley already form part of the same urban area. The Green Belt to south of the site allocation prevents merger with Leigh.
Atherton has had a disproportionate amount of new homes in the borough. Development should be spread more evenly.	This site and the proposed allocation at East of Atherton are not in the Green Belt. Not delivering these sites would result in the need for further Green Belt release to meet identified housing needs.
New homes are not needed / alternative sites:	
The homes are not needed. There is no justification for them – we are already over our quota.	The housing requirement for the borough is set in the adopted Places for Everyone Plan (2024) which accords with Government requirements.
A number of new builds in the area are still yet to be purchased, demonstrating lack of demand.	Housing requirements in the borough are set by the Places for Everyone Plan and are derived from a standard methodology of housing needs set by Government.

Summary of comments	Our response
There are plenty of brownfield sites and vacant properties that should be developed instead.	Whilst brownfield sites will be optimised, there is an insufficient supply of previously developed sites in the borough to meet identified housing needs to 2039 without greenfield delivery.
If housing is needed, there is available land to the north of Atherton that should be used instead.	There are some small sites to the north of Atherton that also form part of the borough's housing land supply.
Build in Hag Fold instead.	There are limited opportunities in Hag Fold for future housing development.
Impact on Atherton High School	
The school playing fields face the site. It will be uncomfortable for pupils to do PE in view of new houses. The pollution may impact on pupils with asthma etc.	This is covered by criterion 2 in Policy EN7.
Loss of a nice view from the school.	The loss of a view is generally not a material planning consideration.
The construction of the homes will be noisy adjacent to a school and will disrupt children's education.	This is covered by criterion 1 in Policy EN7.
Impact on social infrastructure capacity:	
Doctors and dentists are already over capacity.	This is covered by policy PE4, now PE6.
Leigh does not have an A&E department.	Policy PE4, now PE6 requires development to provide or contribute towards the provision of the infrastructure needed to mitigate its adverse impact. This can include contributions toward

Summary of comments	Our response
	addressing identified infrastructure capacity issues in health and care provision.
Local schools and nurseries are already over capacity. Where exactly is the funding for school places going, and what's the timeline for delivery?	This will be determined in accordance with policy PE4, now PE6.
There have been no noticeable improvements in social infrastructure capacity despite notable growth in recent years.	Noted. Developer contributions towards social infrastructure will be determined in accordance with policy PE4, now PE6.
Lots of facilities have closed down e.g. swimming pool, Formby Hall Community Centre and the town hall, and the library has reduced in size.	Noted. Developer contributions towards social infrastructure will be determined in accordance with policy PE4, now PE6. Policy PE6, now PE7 protects against the loss of viable community facilities.
Impact on wildlife:	
Impact on wildlife including deer, foxes, hedgehogs, grouse, pheasants, hares, kingfishers, blackcaps, finches, owls, water voles, rabbits, squirrels, mice, bats, buzzards, kestrels, willow tits, nightjars and pollinating insects.	Development is now subject to biodiversity net gain, and policies in the Local Plan reflect that, notably policy EN4.
Lots of wildlife on the green footpath behind Fallowfield Way.	Development is now subject to biodiversity net gain, and policies in the Local Plan reflect that, notably policy EN4.
Loss of trees that are valuable habitats for numerous birds.	The management of trees and woodland on development sites is covered by policy EN2.

Summary of comments	Our response
Following the loss of the linear park with the construction of the much-needed guided busway the wildlife has had reduced space in which to live.	Development is now subject to biodiversity net gain, and policies in the Local Plan reflect that, notably policy EN4.
Loss of farmland	
Loss of a farmer's field, which would impact on the farmer's livelihood.	The landowners are supportive of the allocation.
The field is used for sheep and cattle which would need to be relocated.	The sheep and cattle would need to be relocated to another site.
Loss of farmland needed for growing food.	There is no best and most versatile agricultural land on the site.
Impact on the environment:	
Loss of trees.	The management of trees and woodland on development sites is covered by policy EN2.
Loss of community allotments at the top of Lodge Lane, which is leased by Hindsford Day Nursery and used by children.	The loss of allotments would need to be considered in accordance with policy PE3.
Chanters Brook is a locally important environmental feature that plays a role in wildlife connectivity. It should be preserved as a green infrastructure corridor.	Agree. This is covered in criterion 6 of the policy.
Loss of countryside:	
Soon there will be no countryside left in Atherton.	Unfortunately, there is an insufficient supply of brownfield sites to meet identified housing needs. Criterion 4 of the policy requires the development to ensure good walking, wheeling and cycling connections into countryside locations to the south of the site.

Summary of comments	Our response
Loss of recreation land:	
The land is well used by walkers, joggers, cyclists, dog walkers, horse riders, birdwatchers, children and families.	Noted. Criterion 4 of the policy requires the development to ensure good walking, wheeling and cycling connections into countryside locations to the south of the site.
There aren't many fields in Hindsford which are open to the public now that the schools have fenced off their fields.	Noted. The school playing fields have been fenced due to safeguarding requirements.
We are rapidly running out of green spaces and this is one of the last in the area.	Noted. Criterion 4 of the policy requires the development to ensure good walking, wheeling and cycling connections into countryside locations to the south of the site.
Rights of way need to be maintained, including the footpath on Lodge Lane.	The footpath on Lodge Lane will be retained. Criterion 4 of the policy also requires the development to ensure good walking, wheeling and cycling connections into countryside locations to the south of the site.
Impact on health and wellbeing:	
The greenspace and wildlife are important for people's mental health and wellbeing.	Noted. Criterion 4 of the policy requires the development to ensure good walking, wheeling and cycling connections into countryside locations to the south of the site. The development will also need to be supported by a Health Impact Assessment in line with Policy PE1.

Summary of comments	Our response
Research clearly shows more mental health problems are in built up urban areas.	The development will also need to be supported by a Health Impact Assessment in line with Policy PE1.
Increased air pollution due to additional traffic will affect people's health, particularly those with respiratory conditions, increasing strain on the NHS.	Policy EN7 requires developments to not have an unacceptable impact on air quality.
The amenity of residents on Millers Lane, and their quality of life, will be detrimentally impacted during the construction phase.	Residential amenity is covered in Policy EN7.
Increased traffic will result in more accidents and potential dangers for pedestrians, including schoolchildren.	Any future planning application will need to be supported by a detailed transport assessment in accordance with Policy T2. This will ensure that the development impact is appropriately mitigated.
Flood risk:	
Chanters Brook plays a role in local water management and should be preserved as a green infrastructure corridor. Development near flood-prone areas must strictly adhere to Local Plan Policy EN10 (flood risk).	Agree. The development will need to accord with Policy EN10.
The proposal will increase flood risk downstream in the Liford area (Elmridge estate). The site is in the catchment area of Chanters Brook which flows to the pumping station at Holden Road via Lilford Brook. As the pumping station approaches its limits, the penstock gates at Lilford Park are closed. This has resulted in 2 catastrophic floods, one on Boxing Day 2015 and the next on New Year's Day 2025. The solution to flooding problems in the Lilford area lies, partly, in the inclusion of upstream flood attenuation which should include additional water storage facilities in the Hindsford area.	Noted. The Council is fully aware of the areas of flood risk downstream. Policy EN10 requires developments to be designed to ensure that they do not increase the risk of flooding elsewhere, in line with national planning policy.

Summary of comments	Our response
Adequate surveying of the area has been called into doubt after the flooding of recently built houses in the Lilford area. This is very worrying for the existing residents of Millers Lane and does not inspire confidence in the developers.	Policy EN10 requires developments to be designed to ensure that they do not increase the risk of flooding elsewhere, in line with national planning policy.
The site floods every Autumn/Winter and can cause damage to nearby properties.	The development will need to accord with Policy EN10.
Millers Lane lacks a working water / sewage collecting system.	Water / sewage capacity is the responsibility of United Utilities.
Housing mix:	
A mix of homes should be provided including affordable homes for local people, homes for first time buyers and homes for older and disabled people.	Criterion 1 requires an appropriate mix of house types, sizes and tenures, including affordable housing, in accordance with Policy H2.
Smaller homes are required, rather than executive homes.	Criterion 1 requires an appropriate mix of house types, sizes and tenures, including affordable housing, in accordance with Policy H2.
Policy contradictions:	
Hypocritical for a council spending so much public money on advertising environmental awareness to be making such environmentally destructive plans. This country is good at talking conservation whilst at the same time removing green spaces.	Environmental protection is a key objective of the Local Plan as set out in the strategic objectives and in the proposed policies, particularly on the Environment chapter. However, the Council has a statutory duty to identify sufficient sites to meet identified housing needs and there is an insufficient supply of brownfield sites to meet this.

Summary of comments	Our response
	Not developing at South of Atherton would result in the need to release further Green Belt land.
Other:	
Question the wisdom of building so close to former open cast coal mine - there is subsidence in the area.	This is covered by Policy EN7, criterion 5.
Development should reflect the character and scale of surrounding areas.	This is covered by Policy PL1.
Development near the Grade II listed St Anne's Church must respect the visual setting and scale of surrounding buildings and be subject to a Heritage Impact Assessment.	This is covered by criterion 7.
High-quality construction and green design principles should be embedded from the outset, with a local design code informed by the community.	This is covered by Policy PL1.
There are electric pylons all the way across the field adjacent to the brook.	Appropriate easements will be needed.
There are gas pipelines on site that need to be considered.	There are no gas pipelines within the site. The Mawdsley-Warrington gas pipeline is south of the site.
There are culverts under Millers Lane that need to be considered.	This will be considered at the planning application stage against policies EN3 and EN10 in this plan.
There is Japanese knotweed on some of the land, which can damage homes.	Any Japanese Knotweed on the site will need to be cleared appropriately and in compliance with relevant legislation.
The new development will reduce property values.	This is not based on evidence.

Summary of comments	Our response
Loss of livelihood for farmer on site	The majority landowner (Tarleton Estates) is promoting the site.
The top of Millers Lane was dug up to install new water main for Bloor Homes phase 2 development. I was told this water main is planned to continue onto Hamilton Street and down Crab Tree Lane for this development? Would it not make more sense to install this down Millers Lane to the phase 2 development? New water main and road water / sewage system could be installed at the same time connecting all the houses on Millers Lane into this new system.	This is the responsibility of United Utilities who will be a key stakeholder at the planning application stage.
There needs to be better co-ordination of the provision of water infrastructure serving new residential development.	This is the responsibility of United Utilities who will be a key stakeholder at the planning application stage.
It is being proposed for greed.	It is being proposed to make an important contribution to meeting identified housing needs on land outside the Green Belt.

Policy H6: East of Atherton:

Summary of comments	Our responses
Transport:	
There is not enough public transport in the area, including a poor rail service. The line should be electrified and more carriages provided for existing services.	The public transport network is managed by TfGM and National Rail any improvements required as part of the proposals will be discussed with these two bodies.
The road network is already congested, and the development of the site will make it worse.	Informed by a robust transport assessment, appropriate transport interventions will be required as part of the development to effectively mitigate the impact on the local transport network, as required by Policy T2 and PfE policy JP-C8.
Serious consideration needs to be given to traffic management from the site exit point, which is near a bend that goes from 30 to 40mph. The provision of traffic lights will have a negative impact on traffic flow and create a higher risk of accidents.	Informed by a robust transport assessment, appropriate transport interventions will be required as part of the development to effectively mitigate the impact on the local transport network, as required by Policy T2 and PfE policy JP-C8. The current proposals for the site do not include a signalised access on Bolton Road. This access is located within the 30mph speed limit zone, and it does not increase to 40mph near the site.
Tyldesley and Atherton will be adversely impacted with more traffic clogging up the town centres.	Informed by a robust transport assessment, appropriate transport interventions will be required as part of the development to effectively mitigate the impact on the local transport network, as required by Policy T2 and PfE policy JP-C8.
Douglas Road, Weston Street and Marton Drive are not suitable for access for any new development.	There are no proposals to access the site from Douglass Road or Weston Street. Marton Drive will be used to provide

Summary of comments	Our responses
	a secondary emergency access only with barriers installed to restrict access for all other vehicles.
A vehicular connection to Chanters Industrial Estate would become a rat run, and increasing highway safety concerns at an already dangerous junction.	Informed by a robust transport assessment, appropriate transport interventions will be required as part of the development to effectively mitigate the impact on the local transport network, as required by Policy T2 and PfE policy JP-C8.
Improvements to cycling and walking connections are needed.	Improvements to the cycling and walking network will form part of the proposals for the site.
Real time travel information should be provided.	This is currently being discussed with TfGM.
The extension of Chanters Industrial Estate will lead to more HGVs causing traffic issues.	Informed by a robust transport assessment, appropriate transport interventions will be required as part of the development to effectively mitigate the impact on the local transport network, as required by Policy T2 and PfE policy JP-C8.
The area is convenient for public transport.	It is with frequent bus services along Bolton Road.
Social Infrastructure:	
There are not enough GPs in the locality to meet the extra demands of the development.	Sufficient contributions towards health provision will be determined in accordance with criterion 10 and Policy PE5.
There are not enough school places, especially secondary school places, and no indication of future provision.	Sufficient contributions towards school place provision will be determined in accordance with criterion 10 and policy PE4, now PE6.

Summary of comments	Our responses
Additional health and education capacity is needed early in the development to ensure services are in place.	Sufficient contributions towards health and school place provision will be determined in accordance with criterion 10 and policy PE4, now PE6.
Pollution:	
More traffic will lead to noise pollution, air pollution and pollution related illnesses.	This is covered by Policy EN7.
Utilities:	
The site is subject to flooding, houses on Douglas Road have flooded.	The development will be subject to a flood risk assessment in accordance with national planning policy and Policy EN10.
The capacity of the waste and recycling centre and the scrap yard at Chanters need to be considered as there will be extra demand from new residents.	This is not a material consideration to this allocation.
There are pylons that are a hazard on the site.	Appropriate easements will be needed around the electricity pylons.
Site development:	
There are plenty of brownfield sites and underutilised buildings which should be used for housing before greenfield sites are developed.	Unfortunately, there is an insufficient supply of deliverable and suitable brownfield sites within the borough to meet identified housing and employment needs to 2039.
There has been a disproportionate level of homes in Atherton already, and the town is overdeveloped.	This site and the proposed allocation at South of Atherton are not in the Green Belt. Not delivering these sites would result in the need for further Green Belt release to meet identified housing needs.

Summary of comments	Our responses
Industrial and housing development do not mix.	Criterion 7 requires the provision of a green infrastructure corridor between the employment and residential development. Residential amenity is also covered in Policy EN7.
There are potential subsidence issues due to past mining activity, including at Crawford Avenue.	The development will need to be supported by a risk assessment at the planning application stage.
Shakerley is built on rubble and is unstable, this development of the site will make this worse.	The development will need to be supported by a risk assessment at the planning application stage.
The site should have higher density housing in the north of the site.	This is covered in criterion 2.
Any extension of the industrial estate for employment uses should not impact negatively on the residential amenity of existing residents and future housing elsewhere within the allocation.	Residential amenity is also covered in Policy EN7.
The plan mentions that development should not be higher than existing development, but how does this relate to existing bungalows?	It is not clear where the plan states this. However, the development will be required to be of a high standard of design in accordance with Policy PL1.
Green and blue infrastructure:	
There are owls, foxes, deer, bats, skylarks, lapwings, herons, pheasants, newts, rabbits, hedgehogs, kestrels, starlings and buzzards on the site.	Development is now subject to biodiversity net gain, and policies in the Local Plan reflect that, notably policy EN4.
The Hindsford Brook corridor should be protected.	This is covered in criterion 7 and would also be considered against policies EN2-4.

Summary of comments	Our responses
Loss of green infrastructure on the site will impact detrimentally on mental health and wellbeing.	Criteria 5, 7 and 8 of the policy require the provision of green infrastructure, good walking, wheeling and cycling connections within the site and to adjacent areas, and provision for biodiversity.
General Comments:	
Loss of Green Belt.	The site is not within the Green Belt.
There will be an increase in urban seagulls hovering over the area which are a nuisance.	This is not supported by evidence.
The housing proposed does not meet the need for affordable housing and housing for older people or people with disabilities.	Criterion 2 requires a mix of house types, sizes and tenures, including affordable housing, in accordance with Policy H2.
Housing will be bought by investors who will rent out and take the money back overseas.	Who buys homes on the open market is not within the control of the Council or within the remit of the Local Plan.
Any housing should be covenanted for owner occupation for 15 years.	A range of housing types, sizes and tenures are needed. The council cannot compel people to live in their own home.
This is only being done for financial gain for the developers and to gain more council tax revenue.	The site will make an important contribution towards meeting identified housing needs outside the Green Belt.

Policy H7: Landgate:

Summary of comments	Our responses
Traffic:	
This proposal will increase traffic in this part of the borough and is unrealistic taking account of existing traffic problems in the area.	Informed by a robust transport assessment, appropriate transport interventions will be required as part of the development to effectively mitigate the impact on the local transport network, as required by Policy T2 and PfE policy JP-C8.
The use of Bryn Green Avenue as a through road:	
Bryn Green Avenue is unsuitable for HGVs and buses. It is too narrow, has on-street parking, and has driveways accessed directly from the road. Additional traffic, including HGVs, will create substantial safety risks for residents, including children and families, and impact on residential amenity.	Informed by a robust transport assessment, appropriate transport interventions will be required as part of the development to effectively mitigate the impact on the local transport network, as required by Policy T2 and PfE policy JP-C8.
A through road will increase the risk of road traffic accidents and pose additional risks to residents' cars and property and the electricity sub-station.	Informed by a robust transport assessment, appropriate transport interventions will be required as part of the development to effectively mitigate the impact on the local transport network, as required by Policy T2 and PfE policy JP-C8.
Excess traffic may block emergency access for fire engines and ambulances, particularly where there is only one access road to enter and exit.	Informed by a robust transport assessment, appropriate transport interventions will be required as part of the development to effectively mitigate the impact on the local transport network, as required by Policy T2 and PfE policy JP-C8.

Summary of comments	Our responses
What measures will be put in place to protect existing residents, such as traffic calming?	Informed by a robust transport assessment, appropriate transport interventions will be required as part of the development to effectively mitigate the impact on the local transport network, as required by Policy T2 and PfE policy JP-C8.
The use of the road as a through route was not made to clear to residents when purchasing their properties.	Noted, however the Council is not involved in private property sales or the discussions which occur during conveyancing.
Residents were told that a through road couldn't be delivered as the recreational land that it needs to cross was gifted to Bryn residents.	It is unclear what agreements were made with local residents. The necessary ownership arrangements will be discussed during the planning application process.
An alternative road could be provided connecting to the existing Land Gate Lane.	Informed by a robust transport assessment, appropriate transport interventions will be required as part of the development to effectively mitigate the impact on the local transport network, as required by Policy T2 and PfE policy JP-C8.
Will residents be liable for maintenance / damage that may occur to the new road, as estate roads are generally not adopted.	These discussions will occur as part of the planning application process. Any agreements for access over privately adopted roads will require the necessary agreements and permissions.
This route has been chosen solely to save money.	The most appropriate route has been considered and will be informed by a robust transport assessment as required by Policy T2 and PfE policy JP-C8.
Has a transport assessment been undertaken to support the through route?	Informed by a robust transport assessment, appropriate transport interventions will be required as part of the

Summary of comments	Our responses
	development to effectively mitigate the impact on the local transport network, as required by Policy T2 and PfE policy JP-C8.
Pollution:	
Extra traffic will result in increased air pollution, which needs to be subject to an air quality assessment. The area is already subject to air pollution from the motorway junctions.	This is covered by Policy EN7.
The new road will result in noise 24 hours a day, which needs to be subject to a noise assessment.	This is covered by Policy EN7.
Need for homes:	
There is no need for the additional homes because there are houses on both estates that remain unoccupied.	The housing requirement is set in the Places for Everyone Plan which is based on identified housing needs.
Social Infrastructure and community:	
Local services, including schools, doctors and dentists, are already over capacity and cannot absorb the additional demand from new residents. There are no meaningful plans to address this.	Sufficient contributions towards health and school place provision will be determined in accordance with criterion 8 and policy PE4, now PE6.
What will happen to Landgate School and its pupils?	Criterion 3 requires the development to retain Landgate School or appropriately replace it if a suitable location can be found either on-site or elsewhere within the borough.
Will financial contributions for education be used for schools near to the site, or elsewhere in the borough?	In accordance with policy PE4, now PE6, financial contributions will be sought to mitigate the adverse impact of the development within a reasonable catchment of the infrastructure concerned.

Summary of comments	Our responses
What has happened to previous funding for social infrastructure that was to be provided by housebuilders?	This is set out in the Council's Infrastructure Funding Statements for Section 106 which are published annually.
Additional residents may impact negatively on sense of community and safety.	This is not based on evidence.
Concern about proposed mixed housing development on site.	The house types, sizes and tenures on site will be determined in accordance with Policy H2.
Health and wellbeing:	
This proposal is unfair on existing residents. It will be detrimental to their quality of life and impact negatively on mental health and on wellbeing	Impact on residential amenity is covered by Policy EN7.
Wildlife / Ecology:	
What information has been received from ecologists regarding the proposals?	A preliminary ecological appraisal has been undertaken for part of the wider site allocation that would form the next phase of development on the Landgate site. A report to cover the whole allocation will need to be provided to support a planning application for the development of the site.
The development will impact negatively on wildlife, including protected species. This includes bats, newts, owls, buzzards, nesting birds, deer, rabbits and squirrels.	Development is now subject to biodiversity net gain, and policies in the Local Plan reflect that, notably policy EN4.
The proposals will have impacts on mature trees.	The management of trees and woodland on development sites is covered by policy EN2.

Summary of comments	Our responses
Green Infrastructure / Recreation Ground:	
This development will destroy Green Belt.	The site is not within the Green Belt.
This development will destroy vital green areas, which serve as both environmental buffers and community recreation space. Keep the area green.	Criteria 6 and 7 require the settings of the fishing ponds to be safeguarded and enhanced for recreation and wildlife and for the playing pitches to be retained or reconfigured and enhanced.
The Recreation Ground has been gifted to local people, so should not be destroyed and playing fields should not be lost.	Criterion 7 requires the retention or reconfiguration and enhancement of the playing pitches, including the provision of ancillary changing facilities and car parking.
A play area / park was proposed as part of phase 1 of this development, with developer funding, but has never materialised. What has happened to this?	The report on A/17/84450/MAJOR To erect 157 no. residential dwellings together with associated access, spine road, internal roads, parking, landscaping and associated works States: Given that it forms part of a wider development site, a financial contribution towards public open space and play provision would normally be required. However, in this instance the applicant has demonstrated that the development is not viable with any financial contributions. Playing field provision on the wider Landgate site is to be maintained at 'Bryn Rec' and the site is also well served by the neighbouring Edmund Collins park and associated play facilities. The application is considered to comply with the requirements of Policies R1E and C1B."
Alternative Sites:	
There are many brownfield sites and derelict areas in the borough that should be developed instead.	Unfortunately, there is an insufficient supply of suitable and deliverable brownfield sites to meet identified housing and

Summary of comments	Our responses
	employment needs in the borough to 2039, meaning that greenfield sites are also needed to meet needs.
Roman Road:	
Development should not be allowed to interfere with the Roman Road that runs through the site.	Criterion 8 has been added to require an archaeological investigation of the Roman road prior to the development.
Public Rights of Way:	
How is the public right of way that crosses Bryn Road to be accommodated?	Given their legal status all PRoW must be incorporated into the design of new developments. Any changes to the route of a PRoW need to be agreed as part of a PRoW diversion process and be consulted on and agreed with the Council.
Mining and subsidence:	
Has a mining survey been undertaken and the site assessed for subsidence?	A ground conditions report has been prepared for part of the allocation. However, a further assessment will need to be undertaken and provided to support a planning application for the development of the site.
Views of local people:	
The Council needs to listen to the views of local people who should be involved in decision making for this site. Quality of life should be the main concern - not money.	The views of local people have been invited and considered at key stages throughout the preparation of the Local Plan, including on the Initial Draft Local Plan which is the basis of this report.
Information on the site:	
There is a lack of public information about what is proposed on the site.	The consultation relates to the Initial Draft Local Plan which was made available for comment. Further details will be

Summary of comments	Our responses
	submitted as part of future planning applications which will be subject to public consultation.
Suggestions if site is taken forward:	
A weight restriction should be imposed on the through road to limit the size of industrial vehicle.	The Council would not introduce a weight restriction on the through road because the route will be a designed as classified road, intended for use by all modes of traffic. To do so would be likely to have the effect of increasing HGV flows along other local roads.
There should be a reduced speed limit on Bryn Green Avenue for lorries and buses.	Any proposals for highways mitigation or changes to the road network will be considered as part of the planning application process.
HGVs or buses (other than service buses) should not be permitted outside certain hours.	Any proposals for highways mitigation or changes to the road network will be considered as part of the planning application process.
Noise and air pollution surveys are conducted on a regular basis and permitted levels of pollution provided in advance of commencement of any works.	This is covered in Policy EN7.
Residents are consulted on proposed works and timings of construction.	Consultation on the proposals for the site will be undertaken as part of the planning application process.
Housebuilders should access the site via Landgate Lane to minimise disruption on Bryn Green Avenue.	Access proposals will be considered as part of the review of the proposals which will be informed by a robust transport assessment as required by Policy T2 and PfE policy JP-C8

Policy H9: Sustainable housing growth in Standish

Summary of comments	Our response
Green Belt:	
The plan should not release any Green Belt in Standish for housing.	The sites in Policy H9 are not in the Green Belt.
Loss of productive farmland.	The sites are not productive farmland.
Loss of agricultural land needed to grow food.	None of the sites are considered to be best and most versatile agricultural land.
Loss of recreational land:	
These are the few remaining green areas in Standish for recreation – walking, dog walking, areas for children to play - that help physical and mental health and wellbeing. Important that access to green spaces is retained.	The sites are all in private ownership with limited public access. Public rights of way will be retained or appropriately re-routed as part of new developments.
Victoria Pit is a beautiful conservation area, used for recreation and full of wildlife.	Victoria Pit is not one of the sites identified in Policy H9. Site H9.3 is north of Victoria Pit to the north of Fairhurst Lane.
Contradicts other policies in the plan which are to retain and enhance access to greenspaces.	The Council has a statutory duty to identify sufficient land to meet identified housing needs.
H9.3 is the only green space between two very large housing areas.	The principle of development on the site was established in 2006 when it was safeguarded for future development in the Unitary Development Plan.
The land at Lurdin Lane (H9.5) is used by walkers.	The land at Lurdin Lane is private land without public access. Lurdin Lane to the south and

Summary of comments	Our response
	Fairhurst Lane to the north are outside the site and would remain as footpaths.
Impact on wildlife:	
Loss of biodiversity.	Development is now subject to biodiversity net gain, and policies in the Local Plan reflect that, notably policy EN4.
Loss of natural habitat Impacting on wildlife, including deer, ducks, pond habitats, squirrels, rabbits, hares, foxes, badgers, owls, newts, bats.	Development is now subject to biodiversity net gain, and policies in the Local Plan reflect that, notably policy EN4.
Reports every week of wildlife being killed or injured on our roads.	Development is now subject to biodiversity net gain, and policies in the Local Plan reflect that, notably policy EN4.
Need to protect the ponds which home a vast array of wildlife.	Development is now subject to biodiversity net gain, and policies in the Local Plan reflect that, notably policy EN4. Policy EN3 also applies to waterbodies such as ponds.
Insufficient infrastructure capacity:	
The village has doubled in size in the last 15 years with over 3,000 homes built, but the infrastructure has not kept pace, impacting on the standard of life for local residents.	This is covered by policy PE4, now PE6.
There is already insufficient capacity at Standish Medical Practice and at NHS dentists, with the NHS objecting to the housing development at Pepper Lane on capacity grounds.	Sufficient contributions towards health provision will be determined in accordance with policy PE4, now PE6.

Summary of comments	Our response
Local primary and secondary schools are already oversubscribed.	Sufficient contributions towards school place provision will be determined in accordance with policy PE4, now PE6.
There is a lack of community facilities to meet local demand.	Sufficient contributions towards community facilities will be determined in accordance with policy PE4, now PE6.
Standish is poorly served by public transport with buses sitting in the same traffic. The area is not served by rail.	Standish is served by frequent bus services into Wigan town centre, including the 632. The introduction of rail services has been explored however this review proved the introduction of rail services is not feasible at this stage.
There is insufficient car parking provision in the centre of Standish. The land at Preston Road should be utilised for additional parking provision.	Noted. Policy TC10 has been amended to specifically mention the site at Preston Road for compatible uses including car parking.
Standish needs another school - the ideal site would be the land to the West of Old Pepper Lane, as this would greatly reduce the number of cars travelling into the schools around the centre of Standish.	Sufficient contributions towards school place provision will be determined in accordance with policy PE4, now PE6.
Housebuilders developing the recent completions have reneged on their requirements to deliver allotments, a park area and a footpath linking the school and the leisure centre.	The council is engaged in legal discussions with the housebuilder with regard to this.

Summary of comments	Our response
Local road network:	
Further development will exacerbate already heavily congested routes notably Standish crossroads, Pepper Lane, Almond Brook Road, Rectory Lane, and High Street at peak times.	Informed by a robust transport assessment, appropriate transport interventions will be required as part of the development to effectively mitigate the impact on the local transport network, as required by Policy T2 and PfE policy JP-C8.
Roads are at a standstill when there are roadworks.	It is understood that roadworks worsen the traffic situation on local roads however these roadworks are essential to maintaining and improving the local road network. Where possible, roadworks are scheduled to create as minimal impact as possible.
Transport links must be improved to accommodate recent and future growth.	Policy T1 outlines our future transport priorities. This list of priorities includes a commitment to improving east-west connections within the borough. These proposals are aimed at improving the transport links in the borough and supporting growth.
A transport survey is needed to demonstrate that additional homes are unsuitable.	Informed by a robust transport assessment, appropriate transport interventions will be required as part of the development to effectively mitigate the impact on the local transport network, as required by Policy T2 and PfE policy JP-C8.

Summary of comments	Our response
Additional traffic generated from further housing development will worsen air quality.	Informed by a robust transport assessment, appropriate transport interventions will be required as part of the development to effectively mitigate the impact on the local transport network, as required by Policy T2 and PfE policy JP-C8.
The narrow rail bridges on Rectory Lane and Bradley Lane further constrain traffic.	There is very little we can achieve in these locations given the structural issues related to altering these bridges and the impact this would have on rail services within the local area.
Impact on the character of the local area:	
Loss of 'village' character due to overdevelopment.	Policy PL1 requires new development to be of a high standard of design consistent with key characteristics identified in the National Design Guide, including context, identity and built form.
The historic importance of the town's industrial heritage must be preserved.	Noted. Policy PL2 specifically mentions Standish as having a historic centre with a medieval core.
House types and tenures:	
Any further homes should be for older people and/or those with mobility issues, including specialist accommodation, bungalows, smaller homes – ageing population, overconcentration of family homes	This is covered by Policy H2.
Affordable housing requirements should be robustly enforced. Homes starting at over £200,000 are not affordable.	This is covered by Policy H2.

Summary of comments	Our response
More large homes are not needed.	Policy H2 requires new housing developments to contribute to the provision of a mix of housing types, sizes and tenures across the borough to help address identified housing needs.
Support development that will bring needed homes and jobs to the area	Support welcomed.
Development of these sites not needed:	
The sites are all greenfield land which is contrary to the 'brownfield first' philosophy. Brownfield, vacant and/or derelict sites should be developed instead.	Whilst the Council seeks to optimise brownfield land to address identified housing needs, there is an insufficient supply of deliverable brownfield land to meet needs to 2039 without some greenfield development.
Housing should be focused in Wigan town centre instead to aid regeneration e.g. Pagefield Mill.	There are a number of brownfield redevelopment sites within Wigan town centre, and other centres, that are included within the borough's housing land supply to 2039 including The Galleries, Eckersley Mill and Pagefield Mill.
Standish has done its fair share over the last 10 years. It is time to develop in other areas. Orrell, Shevington, Aspull and Parbold seem to have escaped over development.	Residential development opportunities in Aspull, Orrell and Shevington are significantly constrained by the Green Belt, whereas the sites in Policy H9 are not within the Green Belt. Parbold is located outside of Wigan Borough.

Summary of comments	Our response
Flooding issues:	
More homes would exacerbate flood issues on Chorley Road which floods as the culvert cannot take any more water since houses have been built.	Flood risk is covered by Policy EN10.
The water culvert near The Crown is flooding.	Flood risk is covered by Policy EN10.
The sites need to be retained for natural drainage / soakaways.	Flood risk is covered by Policy EN10.
Victoria Pit:	
Loss of grassland and woodland, including woodland planted after consultation with the local population to help the environment and improve air quality.	Proposed site H9.3 is located north of the former Victoria Pit site which was planted following local consultation.
Loss of land for recreation, including walking, dog walking and cycling.	The sites are all in private ownership with limited public access. Public rights of way will be retained or appropriately re-routed as part of new developments.
Impact on wildlife and a haven for birds, including great, blue, long-tailed and coal tits; greenfinches, goldfinches, chaffinches and even the occasional bullfinch; jays, dunnocks, house sparrows, wrens, robins, chiffchaffs, goldcrests, willow warblers, mistle and song thrushes, woodpeckers and even a buzzard or two have been spotted - a huge variety for such a small area.	Development is now subject to biodiversity net gain, and policies in the Local Plan reflect that, notably policy EN4. Policy EN3 also applies to waterbodies such as ponds.
Impact on ponds and its habitats.	Development is now subject to biodiversity net gain, and policies in the Local Plan reflect that, notably policy EN4. Policy EN3 also applies to waterbodies such as ponds.

Summary of comments	Our response
Land to east of Robin Hill Lane:	
The development was rightly refused by the Council in October 2024.	The decision was appealed and granted planning permission by the Government in October 2025 following a hearing.
Lancashire Wildlife Trust have stated that the loss of biodiversity on the site would be of huge concern.	Development is now subject to biodiversity net gain, and policies in the Local Plan reflect that, notably policy EN4.
Impact on wildlife who use the site – deer, insects including bees and butterflies.	Development is now subject to biodiversity net gain, and policies in the Local Plan reflect that, notably policy EN4.
Pepper Lane is heavily trafficked at peak times and there is a lack of pedestrian crossings.	The site was granted planning permission in October 2025 and was supported by a transport assessment.
Other issues:	
Existing employment areas in Standish should be retained.	Policy J2 designates Bradley Lane Industrial Estate and Mayflower Industrial Estate as employment areas.
The retention and creation of jobs in Standish should be a priority.	Policy J2 designates Bradley Lane Industrial Estate and Mayflower Industrial Estate as employment areas.
Standish needs to capitalise on its popularity as a retail and hospitality centre.	Agree. This is a key objective of Policy TC10.

Summary of comments	Our response
The Council has wasted lots of money on needless infrastructure like cycle lanes.	Disagree. The off-road cycle lanes along The Line and between Standish and Gidlow have proved very popular and encourage modal shift.
The impact of additional homes will reduce house prices of existing homes.	The average price of second-hand house sales in Standish has increased by around 20% since 2020.
Recently completed homes on estates off Rectory Lane suffer from railway noise, especially at night. Some obligation on the builders and Network Rail to implement acoustic shielding should be implemented on any additional homes on site H9.2 and H9.3.	Noted. This is covered by Policy EN7.

Policy J3: Land north of M6 Junction 26, Wigan

Summary of comments	Our response
Support for the proposed development:	
The link road will address traffic congestion and highway safety issues, particularly from HGVs, in Orrell Post, reduce air pollution, and create a safer environment for pedestrians near schools.	We are no longer proceeding with the proposed employment site allocation at land north of M6 Junction 26, Wigan and no land is proposed to be removed from the Green Belt in the Publication version of the Local Plan.
A box junction should be considered at the A577 junction to alleviate congestion caused by vehicles from the motorway pushing through the lights to join a queue on A577 and blocking the junction when the lights change.	As above
It is not good quality arable farmland and is largely grass with limited wildlife.	As above
The site is bounded on all four sides by significant roads, including A roads and a motorway, and is therefore an accessible, suitable place to create local jobs.	As above
Green Belt:	
It is inappropriate development which will cause harm to the openness and permanence of the Green Belt, encroach into the countryside and cause urban sprawl.	As above
The benefits of the development, including improved access to Martland Park and speculative industrial units, do not outweigh Green Belt harm.	As above
It will merge Orrell and Pemberton which are two distinct areas that were separate Urban District Councils until 1972.	As above

Summary of comments	Our response
The M6 does not create a separation between these two urban areas. Therefore, the harm to the Green Belt purposes would be significant, not moderate.	As above
Alternative sites outside the Green Belt have not been explored contrary to national planning policy, guidance and legislation.	As above
Contrary to Labour's commitment to protect Green Belt land.	As above
The Green Belt Assessment has been prepared in a non-impartial way to justify its removal.	As above
Allowing development on this site sets a dangerous precedent for further encroachment into protected countryside.	As above
Grey belt:	
The site does not meet the definition of grey belt.	As above
Who decides on its reclassification from Green Belt to grey belt? The public should have been consulted on the site's reclassification.	As above
The Council should publish how the 'Golden Rules' which apply to proposed development both in the Green Belt and grey belt have been satisfied.	As above
The grey belt assessment of the site is inconsistent with those undertaken for other sites in the local plan.	As above
Site Selection Assessment:	
The Site Selection Assessment incorrectly suggests the M6 forms a barrier that defines the setting of Orrell, when the M6 actually bisects Orrell.	As above
The Site Selection Assessment clearly considers transport links but does not commit to sustainable infrastructure. While bus stops exist on nearby lanes, there's no bus route commitment, no cycle lanes, and the nearest train stations (~1.1 km away) are deemed by	As above

Summary of comments	Our response
the assessment as "not easily accessible". However, this site is still marked as "transport-connected."	
Jobs:	
The site would not generate many jobs as industry is becoming increasingly automated and operated by robots. The jobs created would be low skilled and low paid.	As above
There are many jobs advertised in the area for skilled and unskilled employees but are not taken up so why would this be any different?	As above
Wigan has two outstanding sixth form colleges and excellent rail links. Instead of trying to attract more road-based workers, why aren't we investing in technical infrastructure, high-tech business spaces, and skilled job creation? Let's stop the "brain drain on the train".	As above
The logistics sector is populated by employees on zero-hour contracts.	As above
It is not legally possible or socially equitable to restrict job opportunities to borough residents.	As above
The Council should survey employers on Martland Park and Heinz to assess the proportion of employees who live nearby to qualify their assertion that jobs will contribute to improving deprivation in local areas.	As above
Many unemployed people in the area are not actively seeking work. Many are happy taking government benefits.	As above
No demonstrable need:	
The Economic Market and Employment Land Assessment identifies an employment land supply of 997,100sqm, exceeding the identified need of 647,000sqm. The proposal would add to this already oversupply, contrary to NPPF paragraph 82 which advises that planning policies should be shaped by evidence of need and market demand.	As above

Summary of comments	Our response
There is enough industrial development in the borough already, including at the nearby Martland Park, Miry Lane Industrial Estate and Ainscough Business Park.	As above
There are plenty vacant brownfield sites, disused industrial premises and units for sale that should be developed instead, aiding regeneration – examples given include Martland Park, Pagefield Mill, Marus Bridge.	As above
Sites on the Council's Brownfield Land Register should be considered first.	As above
Proposed employment developments near M6 Junctions 24 and 25 have yet to be implemented.	As above
Concern that the units will be built speculatively given the level of vacant warehouses in the borough.	As above
The Council should be working with site owners and potential employers to utilise existing sites before encroaching on new land, particularly Green Belt.	As above
Evidence documents for the GMSF / PfE Plan state that Wigan town has amongst the highest employment rates, the lowest 0-17 year olds and highest 45-59 and 60-75 year olds in the borough. So why is this needed in this area when the local community is predominantly older / retired or already in employment?	As above
The borough has low wages with jobs predominantly in the factory / warehousing sectors already. Why do we need more of the same?	As above
Alternative sites:	
Jobs should be generated in the town centre instead.	As above
Skelmersdale, St Helens and Warrington are better placed for employment, with existing logistics development in these locations which meet Wigan's needs.	As above

Summary of comments	Our response
The site would be in direct competition with employment developments at M6 Junction 25, Parkside, Haydock and Warrington.	As above
Employment development should be focused to the Wigan-Bolton Growth Corridor (Northfold).	As above
There is a large farm for sale on Mossy Lea Road in Wrightington with direct access to the M6, but not surrounded by homes, which would be a better option.	As above
The Council should invest in creating a two-way junction at M6 J25 to increase the attractiveness of that site rather than adopting a piecemeal approach.	As above
The alternative site at Drummers Lane (assessed in the Site Selection Assessment) is more deliverable.	As above
Traffic:	
The development would result in a severe detrimental impact on local road infrastructure in breach of NPPF paragraph 104.	As above
A full traffic impact assessment is needed ahead of these plans.	As above
The link road to the M6/M58 at Orrell is already under pressure as it has been recognised that it is substandard for an exit for an interchange of two motorways. It is documented that the link to the A577 was a temporary addition, which would have been removed had the eastern extension of the M58 to bypass Wigan and link into the M61 been constructed.	As above
The local road network is already over capacity, particularly at peak times. The current T-junction at A577/M6 cannot cope with existing traffic levels.	As above
During the recent closure of Spring Road, traffic was diverted through the Latham Lane area, causing significant increase in pollution, noise etc.	As above

Summary of comments	Our response
Spring Road, Prescott Lane, Bell Lane, and Latham Lane are narrow lanes with on-street parking which already cannot cope with the level of congestion.	As above
The site is not served by public transport.	As above
Highway safety:	
Spring Road is too narrow for two lorries or buses to pass each other without mounting the pavement. This stretch also has parked cars.	As above
Spring Road to the east of the site is an unclassified road. The ability to upgrade it is limited to the north by homes and to the south by both homes, a tree belt, and TPO trees close to the Old Springs Public House.	As above
Additional traffic, including HGVs, will worsen pedestrian safety, particularly school children who use that route, contrary to local active travel plans.	As above
Emergency services:	
Access for emergency services would be affected by increased congestion, delaying emergency response times.	As above
Road condition:	
More HGVs will accelerate wear and tear on local roads, including Gathurst Road and Spring Road, and increase incremental damage to properties through vibrations.	As above
Traffic (other):	
The proposed junction on Orrell Road with the motorway slip road will require a right turn lane from the Pemberton direction, otherwise traffic chaos will ensue. This could require the demolition of houses to accommodate this.	As above
Increased traffic is contrary to the Paris Agreement, as it will increase global warming.	As above
The site is inaccessible to people in the east of the borough by road or public transport.	As above

Summary of comments	Our response
HGV drivers consistently take the shortest route, regardless of regulations. This will result in an increase in HGVs using unsuitable roads.	As above
There are no committed investments in active travel infrastructure, such as cycle lanes or footpaths, or any planned enhancements to local bus services. This contradicts the Council's Local Transport Strategy and Greater Manchester's 2040 transport vision.	As above
It is not clear what the wider transport measures referenced in criterion 4 are.	As above
The council should consider using intermodal rail freight, where goods are transported partly by rail and partly by road.	As above
Link road:	
There are already suitable routes for HGVs from M6 Junction 25 to Martland Mill on existing bypass roads.	As above
The link road is not identified in the Council's transport plans.	As above
The link road will increase congestion in Orrell and Pemberton.	As above
The link road would replicate the heavy congestion from HGVs experienced currently on Spring Road and Latham Lane.	As above
The road is unnecessary as since the opening of Walthew House Lane the traffic runs smoothly from the motorway.	As above
The Council purposely opened the gate on Walthew House Lane to strengthen the case for the link road, due to the increased levels of traffic it has caused.	As above
Any traffic reduction as a result of the link road would be nullified by the additional HGVs and commuter traffic generated by the new commercial developments.	As above
It will become a hotspot for racing meet-ups, like the new A49 link road.	As above

Summary of comments	Our response
A new motorway junction north of M6 J26 with a new road crossing the golf course to the north of Spring Road would be more effective in reducing traffic in Orrell and Pemberton.	As above
Utilising the railway line that is approximately 0.5 miles from Heinz would be a better option – it would reduce pollution and reduce traffic, notably HGVs.	As above
The delivery of the M58 Link Road would make the proposed link road unnecessary, as it would provide more suitable access to Martland Park, via Robin Park Road and ease congestion on A577 Orrell Road.	As above
The link road will attract an additional 700 HGVs daily, adding to the 300 already.	As above
Heinz has submitted its own application to build a railhead to decrease their carbon impact and resilience on road transport. This undermines the need for the proposed employment development and the link road.	As above
The junction with the A577 would not be big enough and result in more congestion in the surrounding areas.	As above
A Council spokesperson at the drop-in session said the building of the road would not be mandatory and would be up to the developer to fund and build it.	As above
The link road will require the demolition of a number of properties.	As above
It is proven that new roads do not reduce congestion.	As above
The Council should detail how the link road will be delivered and funded. Concern that each developer will only fund access to their individual warehouse resulting in a cul-de-sac.	As above
Buffer zones:	
Sufficient buffer zones between industrial units and housing should be required to protect residential amenity.	As above

Summary of comments	Our response
National planning policy and the Control of Major Accident Hazards (COMAH) Regulations 2015 recommend clear separation between industry and housing.	As above
Any facility handling flammable or hazardous substances would trigger regulatory thresholds under Dangerous Substances and Explosive Atmospheres Regulations 2002) and must not be sited without sufficient buffer zones.	As above
Proximity of industrial premises to homes raises issues in the event of fire, chemical release, explosion or other emergencies. The Fire and Rescue Service may be hampered where roads are narrow or congested.	As above
Contrary to the Health and Safety at Work etc. Act 1974 which imposes a duty on operators - and by extension planning authorities - to ensure safety not only to workers but to members of the public affected by industrial operations.	As above
Health and wellbeing:	
The proposal is in breach of NPPF paragraphs 130 and 185, which require planning to safeguard local amenity and health.	As above
The site is an important environmental barrier between residential areas and the M6, helping to minimise pollution levels which pose a significant risk particularly to children, the elderly and people with pre-existing respiratory conditions.	As above
Noise and light pollution:	
Noise from machinery, vehicle movements and deliveries (including at unsociable hours), will exacerbate noise pollution	As above
Sound monitors on Spring Road have shown that noise levels are already above the acceptable level for nearby residents due to the motorway.	As above
Light pollution – including from 24/7 operations, floodlighting	As above

Summary of comments	Our response
Air quality:	
The site should be supported by a full independent air quality impact assessment, including its impact on Orrell Road and at M6 Junction 26.	As above
Air pollution – including from dust, fumes, or emissions depending on activity. Residents have repeatedly requested air quality monitoring in the area.	As above
Part of the site is within an Air Quality Management Area, and new employment development and a link road will exacerbate this.	As above
Overheating:	
Need to take consideration on existing homes to night time cooling who do not have any other means of cooling their homes through the warmer months other than opening windows.	As above
Privacy / overlooking:	
The development and new road will lead to overlooking and overshadowing of nearby homes.	As above
Crime and fear of crime:	
Concern over increased vandalism and more people hanging around imposing on the safety of local residents.	As above
Impact on schools and care homes:	
The site is close to schools and will increase harm to our children's respiratory systems and general health and potentially generate noise, smells and pollution that would detrimentally affect the quality of education provided.	As above
Impact on children attending Redwood House Children's Nursery on Orrell Road, who benefit from access to countryside and animals adjacent to the nursery.	As above

Summary of comments	Our response
The site is close to a care home on Spring Road. Vulnerable groups should not be exposed to more pollution.	As above
Unwilling landowner:	
The land has been farmed for over 100 years and the family do not want to lose their livelihood, has not been engaged with a developer and is not willing to sell.	As above
Removing the farming family from their land is a violation of the Right to Private and Family Life, as protected under Article 8 of the European Convention on Human Rights	As above
Impact on the environment:	
No detailed ecological protections or enforceable mitigation strategies are offered in the current policy.	As above
Loss of productive farmland:	
The site contains best and most versatile agricultural land which should be retained for agriculture and food security.	As above
Net zero:	
Contrary to the Government's net zero target and Wigan Council's climate change pledges and obligations under the Climate Act 2008.	As above
Contradiction with sustainability goals and climate mitigation set out in NPPF Section 14, Core Strategy policy CP12 and proposed policy EN4 in the initial draft Local Plan. The proposal would result in irreversible soil loss and a net increase in carbon emissions due to increased HGV activity.	As above
Carbon heavy infrastructure within the Green Belt is contrary to national and local policies promoting decarbonisation, green infrastructure and climate resilience.	As above

Summary of comments	Our response
The site functions as a carbon sink, agricultural resource and wildlife corridor. There's lots of scope for carbon sequestration and reduction through the planting and retention of mature woodland, standing grassland and peatland.	As above
Biodiversity net gain:	
Contrary to the Environment Act 2021 which requires biodiversity net gain. The planner at the event said the site would need to deliver 10% biodiversity net gain but paragraph 6.58 states that this should be met on-site only as far as it is reasonable to do so.	As above
Past industrial developments, including at Martland Park, have set a precedent where companies neglect their environmental responsibilities leaving the area littered and degraded.	As above
Flood risk:	
The site is prone to flooding and developing over green spaces will exacerbate it by reducing natural drainage.	As above
The land is subject to regular flooding particularly around Ackhurst Brook to the western end of the site. There is also a significant flood risk at the eastern end of the site with regular road closures on spring road.	As above
Homes on Oxford Road (west of M6) have been affected over the years by sewer flooding with raw sewage in gardens.	As above
Latham Lane is prone to drainage issues with sewerage causing contamination. This could become an even bigger issue if several more properties were to become part of the drainage system.	As above
Flooding on Spring Road is a perennial issue when there has been a protracted period of wet weather, and it can also flash flood following rain after a dry period.	As above

Summary of comments	Our response
The site sits adjacent to low-lying areas with poor natural drainage, yet no robust mitigation is outlined in the policy, such as sustainable urban drainage systems, retention ponds, or green infrastructure.	As above
The area's existing infrastructure is inadequate to absorb increased surface water, and climate change is expected to increase the frequency and intensity of storm events.	As above
Impact on wildlife and ecology:	
The proposal lacks a credible Ecological Impact Assessment or Habitat Regulations Assessment contrary to both the Conservation of Habitats and Species Regulations 2017 and the Natural Environment and Rural Communities Act 2006 (Section 40).	As above
The site's role in ecological connectivity is overlooked. It acts as a buffer and corridor between woodland patches and watercourses, that if lost would have significant impact to nature connectivity. A detailed ecological survey is needed. The mosaic of grassland, ponds and woodland / hedgerows will likely be of high biodiversity value.	As above
Under the Wildlife and Countryside Act 1981, it is illegal to harm or disturb bat roosts.	As above
Loss of an active farm which supports diverse wildlife, including cattle and calf rearing, sheep grazing.	As above
Disruption to the local natural ecosystem, by disturbing breeding cycles and displacing species, including: barn owls, bats (endangered), bees, birds of prey, blackbirds, butterflies, buzzards, curlews, deer, doves, egrets, field mice, foxes, frogs, great crested newts, hawks, hedgehogs, herons, horseshoe bats (red list species), house martins, kestrels, lapwings, oyster catchers, partridges, pheasants, pigeons, pipistrelle bats, rabbits, roe deer, sky larks (red list species), snipes, sparrowhawks, Spotted Flycatchers (Red listed), squirrels, starlings, swallows, swifts, thrush, water voles, wildfowl, woodpeckers	As above
Has Natural England or other wildlife bodies been consulted?	As above

Summary of comments	Our response
Impact on trees and woodland:	
The site borders Porter's Wood, an area of ancient woodland.	As above
Loss of trees (including mature oak and those with Tree Preservation Orders) which naturally absorb pollution.	As above
Loss of ancient hedgerows and rare plant species.	As above
Donkey sanctuary:	
Loss of donkey sanctuary which has been there for 25 years. Will it be replaced? Loss of a cats home for the Cats Protection League.	As above
Loss of recreational land:	
It is one of the last remaining greenspaces in the local area for recreation, dog walking and for children to play.	As above
Loss of public right of way that is well used by the public for recreation, dog walking and as a walking route to local schools, including St Peter's.	As above
Access to open space and nature is more important than ever after the pandemic, for recreation and mental health benefits.	As above
Impact on health and wellbeing:	
Continuous exposure to industrial noise, odour and visual disturbance can cause chronic sleep disruption, elevated stress and anxiety, and increased risk of respiratory conditions (if air quality is compromised).	As above
Such exposure will impact local residents who work from home.	As above

Summary of comments	Our response
The open space and public right of way provides opportunities for social interaction with fellow walkers which boosts mental wellbeing.	As above
The fields and farm help me keep my PTSD at the correct level. Increased mental health issues will further impact on the capacity of the NHS.	As above
New homes:	
Why build new homes when there are many vacant homes in the local area.	As above
Local schools, GP surgeries and dentists are already oversubscribed.	As above
Public consultation:	
The consultation was inadequate – There was only one site notice, and the consultation portal wasn't mobile phone friendly and appeared to have been purposely designed to be confusing and difficult to access.	As above
Who are the 'key stakeholders' identified in criterion 1 of Policy J3? The tone of the policy suggests the Council is pressing forward without meaningful consultation, despite significant local opposition.	As above
Lisa Nandy MP considered the GMSF proposals in 2016 to be unsuitable due to the impact on the Green Belt, air quality and road congestion. Nothing has changed.	As above
The site has been discounted on two occasions due to logistical issues. Nothing has changed.	As above
Design / character:	
The proposed development would alter the historical and cultural significance of the local area, and its rural identity and character.	As above

Summary of comments	Our response
The proposed employment development would not be in keeping with the character of the area, would dominate views, reduce openness and degrade the rural setting, contrary to Core Strategy Policy CP10 and NPPF paragraph 135.	As above
There is no clear design code to limit height or massing	As above
Policy contradictions:	
Green Belt loss undermines the existing Development Plan and is therefore contrary to Section 38(6) of the Planning and Compulsory Purchase Act 2004.	As above
Contrary to environmental policies in the plan which claim to protect and enhance our green spaces and state that access to the natural environment and open spaces are a fundamental part of people's health and wellbeing.	As above
Contrary to the letter sent to local residents which states that an ambition of the plan is "protecting and enhancing our green spaces and ensuring more people can enjoy them".	As above
Other site constraints:	
A gas pipeline runs alongside the M6 motorway which can't be developed over.	As above
No consideration is given to the site's mining legacy. It was heavily mined in the 18th and 19th Centuries, impacting on its deliverability. Much of the workings are unrecorded and the Coal Authority have limited knowledge of it.	As above
Reputational risk	
Legal and reputational risk to the Council should it approve a development that causes demonstrable harm to residents.	As above
In 2016, a former Council Leader promised the land was protected under a 25-year Green Belt agreement. If approved, it will erode public trust in Wigan Council. Reversing this	As above

Summary of comments	Our response
position, without exceptional justification, would be irrational and open to legal challenge, and breach standards of fairness under case law (Kides v South Cambridgeshire DC).	
Profit / greed:	
The proposal prioritises external demands over the fundamental civic duty of protecting the well-being and rights of local residents. Does the Council just want increased business rates?	As above
Viability:	
Have Wigan Council got enough money to build this development as there are other half-finished developments including in Wigan town centre?	As above
Given the level of infrastructure already in disrepair in the borough, this proposal is a misuse of public funds.	As above
Historic environment:	
How will appropriate account be taken of the impact of development upon the heritage significance of Listed Buildings close to the site?	As above
Other:	
The proposal fails to demonstrate how local communities would benefit - no guarantee of jobs for local people, and no active travel or sustainable transport pledges.	As above
The walking, cycling and wheeling routes and enhancements to the subway required in criterion 6 are just words to appease the community.	As above
The loss of the open space will significantly increase the risk of wildfires.	As above

Policy J4: Moss Industrial Estate Extension, Aspull Common, Leigh

Summary of Comments	Our response
Traffic:	
The development would add traffic to roads that are already over capacity.	We are no longer proceeding with the proposed employment site allocation at Moss Industrial Estate Extension, Aspull Common, Leigh and no land is proposed to be removed from the Green Belt in the Publication version of the Local Plan.
The route to the site is via Atherleigh Way and Newton Road, which are congested at peak times, and will be impacted by planned housing at Pocket Nook.	As above
The plan offers no assurances for the delivery of the Atherleigh Way Bypass which needs to be delivered before any further development in Golborne or Lowton.	As above
The following junctions are already over capacity: The four ways at the Hare and Hounds; access to the A580 at Lane Head; access to the A580 at Stone Cross Lane.	As above
There are already significant highway safety issues along St Helens Road / Newton Road due to traffic congestion, narrowness of road, proximity to four schools etc.	As above
More HGVs will damage our roads further.	As above
Road safety around four schools will be directly affected by any further growth of the industrial estate.	As above

Summary of Comments	Our response
The increased traffic will be detrimental to existing transport companies, like Clarke's, who presumably located here due to its 'easy access' to the A580 and M6.	As above
Sandy Lane:	
Many HGVs already access/egress the site using Sandy Lane, which is unsuitable for industrial traffic. A weight limit or restriction measures (e.g speed bumps, chicanes, signage) are needed on Sandy Lane, or the entrance needs to be closed.	As above
HGVs often block the road at the Newton Road / Sandy Lane junction due to it being too narrow / tight.	As above
Traffic passing over the two speed ramps between Sandy Lane and Walter Leigh Lane is very noisy, and the houses adjacent are starting to show internal cracks due to use by large vehicles. The ramps need to be removed or replaced.	As above
Access onto St Helens Road / Newton Road:	
The main access to the estate is too tight and already overloaded and inadequate, particularly at school pick up / drop off times. Lorries often struggle to turn in and out due to their size causing traffic queues.	As above
Alternative access points:	
The site could be better accessed via Aspull Common.	As above
Pollution:	
Air pollution is already above legal limits at Lane Head and surrounding areas, and the proposal will make this worse.	As above
Noise pollution from construction, traffic and industrial activities can impact people's mental health due to disturbance and sleep disruption.	As above

Summary of Comments	Our response
Noise and exhaust fume surveys should be carried out with the results shared with residents.	As above
Public transport:	
Better public transport links to Warrington and Newton is required to help reduce reliance on cars.	As above
Poor public transport connections and no cycle paths means it's unlikely that active travel will make any difference to reducing traffic volumes.	As above
We need tram/train, not wasting money on cycle lanes etc.	As above
Most employees won't commute on foot, cycle or public transport. Many jobs on existing industrial sites are physical in nature, requiring long periods of standing, often hourly paid where lateness is not tolerated. Bus services are not reliable enough. Also, statistics reveal consistently that cycling remains a leisure activity, rather than a means of travel to work.	As above
The site entrance is some distance from either of the two bus stops and even after arriving at the entrance, a lengthy walk is required to many of the units.	As above
Green Belt:	
The land is currently good quality well maintained Green Belt.	As above
Insufficient evidence has been provided to demonstrate exceptional circumstances to justify removal of the site from the Green Belt. It is inappropriate development in the Green Belt contrary to national planning policy.	As above
Grey belt:	
It doesn't qualify as grey belt.	As above

Summary of Comments	Our response
In line with the 'golden rules' which requires 50% affordable housing, with this being an industrial estate should there be affordable units as the Moss Industrial Estate rents are very expensive.	As above
Unwilling landowners:	
The current owners want to farm and don't particularly want to sell.	As above
Loss of productive farmland:	
Selling good quality farmland for industrial use is depleting locally grown food sources and destroying Lowton's heritage as a farming community.	As above
What is going to happen to the fertile soil that will be scraped off the site? This soil should not be sent to landfill.	As above
Loss of recreational land:	
Loss of land for recreation, including walking, dog-walking.	As above
Impact on the well-used footpath which connects Green Lane to the Pennington Flash.	As above
The public right of way on Walter Leigh Way which is used 7 days a week to access the country park will become more dangerous due to increased traffic.	As above
Employment:	
The existing estate is not fully let, with advertisements on its website for empty units to rent. The demand for a major expansion is not clear.	As above
Smaller businesses are more suited to this residential location.	As above
Could vacant units on the existing estate not be repurposed?	As above
There are numerous brownfield sites across the borough that could be prioritised for such development without sacrificing protected land.	As above

Summary of Comments	Our response
Parkside East is a better and more appropriate location for employment development with direct access to the M6.	As above
Alternative sites include land accessed via Greenfold Way in Leigh.	As above
The paperwork claims the site will generate c. 900 jobs, but how many of these will be during its construction?	As above
No guarantee that the development will create jobs for local people or attract local companies.	As above
Most of the sectors earmarked for the site – manufacturing, distribution, construction and health and social care sectors – will generate a lot of HGV movements on already heavily congested roads.	As above
The quoted 45,000 sqm appears incorrect given the size of the site.	As above
Design:	
Concern about the design, scale and layout of the proposed development and that it could impact on local character.	As above
Impact on amenity to nearby residents:	
Impact on privacy due to overlooking.	As above
Noise and disturbance.	As above
Air pollution.	As above
Impact on the adjacent National Nature Reserve:	
The extended Industrial Estate will continue to box in the National Nature Reserve at Pennington Flash – leaving water run off problems, light pollution and less green corridors for wildlife movement.	As above

Summary of Comments	Our response
The extension will affect the NNR as it will block off another green corridor, new houses are already being built along the canal and bats/birds have already been disrupted, this extension will increase light pollution even further and will be another nail in the coffin for wildlife.	As above
Any major construction work and natural habitat in this area would be a major concern.	As above
Footpaths around Pennington Country Park are regularly unpassable with areas of mud with no drainage, which will be worse as the fields take most of the drainage.	As above
The proposal will encroach on Pennington Flash National Nature Reserve which is a popular destination for bird lovers and will certainly have a detrimental effect on all visitors by restricting areas to explore and enjoy and will also disrupt the habitats of the resident wildlife.	As above
Impact on flora and fauna:	
Impact on wildlife: Deer, cranes, protected birds, woodpeckers. There are over 230 different species of birds recorded at the National Nature Reserve. The flora and fauna has taken decades to flourish.	As above
Impact on trees/hedgerows and native plants and irreversible damage to the ecosystem and biodiversity.	As above
Impact on landscape: potential negative impact on landscape character, including visual intrusion.	As above
The council has already allowed new housing on the other side of the canal (West Leigh waterfront) so this green corridor to the Flash has already been closed off.	As above

Summary of Comments	Our response
Contradictory to other policy objectives:	
One of the council's objectives is to maintain/improve health of residents / environment, this plan will reduce health of residents including polluted breathing, broken sleep due to noise, stress caused by ripping up greenbelt and sitting in more traffic congestion.	As above
Runs counter to the government's stated commitment to protecting the Green Belt land and promoting healthier lifestyles.	As above
The Council has always refused residential development on the site on the west side of Sandy Lane because it is Green Belt and needs to be protected.	As above
Precedent:	
What assurances do we have that more Green Belt release will not follow?	As above
Impact on health and wellbeing:	
Access to green open spaces is vital for people's mental health and wellbeing.	As above
Increase in air pollution – Carbon Dioxide.	As above
Impact on infrastructure:	
New jobs will attract more families to the area which will impact on already overstretched schools, doctors and dentists.	As above
Impact on the capacity of utility infrastructure – gas, electricity, water, sewage systems.	As above
Site Selection Assessment:	
The newly created Criterion 7 is not included in any of the six defined in Greater Manchester Site Selection criteria listed in the Places for Everyone Plan Site Selection Background Paper, July 2021	As above

Summary of Comments	Our response
Dispute the conclusion that the extension can be provided without causing any 'major disbenefits'.	As above
Other:	
3 of the 4 proposed employment allocations are within 4 miles of each other, with Lowton having been selected to provide a disproportionate amount of industrial development. 345,000 sqm of the identified 647,000 sqm is in Lowton (when combining Moss Industrial Estate extension and land wet of Winwick Lane).	As above
The development will deliver no benefits for local people.	As above
Planners have submitted incomplete information i.e. poor maps which omit schools. Heavy footfall and term-time parking will therefore not be considered.	As above

Policy J5: Bridgewater West, Astley

Summary of comments	Our response
Green Belt:	
The development would result in the loss of a vital section of Green Belt, which serves as a buffer between neighbouring communities, prevents urban sprawl, and preserves the natural character of the area.	We are no longer proceeding with the proposed employment-led site allocation at Bridgewater West, Astley and no land is proposed to be removed from the Green Belt in the Publication version of the Local Plan.
Boothstown and Higher Green would merge, removing the distinct identity of each area, contrary to Green Belt purposes (a) and (b).	As above
The proposed development would encroach into the countryside, contrary to Green Belt purpose (c).	As above
Your own site selection assessment concludes that this development would cause moderate harm to the purposes of the Green Belt and meets 4 of the 5 Green Belt criteria.	As above
Exceptional circumstances have not been demonstrated.	As above
Large areas of Green Belt and farmland have already been lost to development in the surrounding areas over the last 30 years.	As above
The Green Belt plays a vital role in preserving the natural ecosystem and contributes greatly to the rural character and environmental health of our community.	As above

Summary of comments	Our response
This proposal comes only 12 months after the adoption of the Places for Everyone Plan, within which the development of this site was rejected. Nothing has changed.	As above
The proposal does not meet the 'golden rules' set in NPPF as it does not include 50% affordable housing, provide necessary improvements to local or national infrastructure; or provide new, or improvements to existing, green spaces that are accessible to the public.	As above
The adjoining Green Belt land is not as accessible as this site, so there are no alternative places for users of the public rights of way to use instead to access open greenspace.	As above
Grey belt	
The site does not meet the grey belt test. Only a small part of the site used to be brownfield (belonging to the pit), the remainder has always been productive farmland.	As above
Your assessment for grey belt only tenuously fits one of the seven criteria and this would be urban sprawl connecting the villages of Astley and Boothstown.	As above
Your own site selection assessment fails to meet the 7 criteria given to meet grey belt classification; this alone should be enough to have prompted no further action. You have failed to monitor your own review process.	As above
Site selection:	
Criterion 3 is very subjective, and compliance with it is dubious. Whilst the site is adjacent to the A580 and close to the M60, constant traffic congestion in the area will reduce its market attractiveness.	As above
There is no clear evidence that alternative, more suitable sites were properly considered.	As above
Integrated Assessment	
The assessment of the site is subjective. The 3 positive impact opinions are biased towards a positive outcome for the planned development.	As above

Summary of comments	Our response
The plan and accompanying Integrated Appraisal fail to adequately assess and mitigate the significant negative environmental, social and infrastructure impacts associated with the proposed development at Bridgewater West.	As above
The claim at paragraph 5.3.11 of the IA that there are 'likely to be positive effects with regard to biodiversity, as there is a heavy focus on achieving biodiversity net gain, enhancement of strategic wildlife sites and corridors and urban greening' is not supported by evidence.	As above
Dispute the claim at paragraph 5.3.5 of the IA that a positive effect will be seen regarding climate change and resilience.	As above
The use of the words 'likely' and 'potential' are misguided and do not provide confidence, particularly as we have seen houses close by already flooded by nearby development on a regular basis.	As above
The IA states that the site falls within an area categorised as being medium-high sensitivity to commercial development. Why then, is such development being considered? Paragraph 5.3.6 states that there is a degree of uncertainty with regards to the potential effects of employment growth.	As above
The IA accepts that the area is already an AQMA. How can the twin proposal of removing green areas and increasing traffic not make the air quality worse?	As above
The IA states at paragraph 6.6.5 that 'it should be acknowledged that existing bus stops … are across the A580 and not ideally accessible'. 6.6.28 states that whilst the plan 'should' support opportunities for a shift towards public transport, walking and cycling, development could exacerbate the trend towards heavy use of private vehicles currently seen in the area. Yet the IA predicts a 'minor positive effect'.	As above
IA underestimates the transport impacts of development in this location. The road network is already at or beyond capacity during peak periods, and the plan fails to demonstrate how	As above

Summary of comments	Our response
sustainable transport alternatives (walking, cycling, public transport) will be delivered or made viable.	
The loss of productive agricultural land is unjustified and insufficiently weighed in the IA.	As above
The IA states "There is a lack of accommodation for small businesses, both offices and small industrial units." This is just not true, and if it were then the site currently being developed off Chaddock Lane would meet this need. Even if it was correct, then adding more industrial units and offices would over-develop the area for commercial purposes.	As above
Brownfield first approach:	
The site's development reflects a departure from the brownfield first approach. There must be enough brownfield sites in the borough to be developed before taking Green Belt. The Council's brownfield land register (December 2024) identifies brownfield sites with a potential capacity for around 7,260 new homes.	As above
Accept that brownfield sites are inherently more difficult and expensive to develop - but that is an issue that local and central government should be finding ways to overcome, as opposed to eating up Green Belt land because it is easier.	As above
Employment development:	
Other employment sites should be developed instead. There are plenty vacant brownfield sites and industrial premises that can be developed instead, aiding regeneration and avoiding Green Belt loss. Logistics North (Bolton) is still under development.	As above
Employment sites closer to the motorway should be considered instead.	As above
Enough employment already:	
A business park already exists on the opposite side of the A580. Just beyond this is a site off Astley Park Way that already has planning permission for a business park. Two sites are enough for business parks in the area.	As above

Summary of comments	Our response
There isn't a job shortage. There are currently over 800 jobs available within 5 miles of Wigan (Indeed).	As above
The EMELA concludes that there is a surplus of 10.6 hectares of employment land in the existing local plan. However, the land requirements highlighted in the Local Plan are based on the 'Policy-On' scenario - a best-case employment scenario where demand for employment grows perfectly in-line with Wigan Council's aspirations and is significantly over-and-above the scenarios based on projected labour demand (informed by Experian's June 2023 employment forecasts) and on past trends.	As above
Wigan Council commissioned the EMELA prior to the adoption of the PfE Plan in 2024, why did the Council agree to the PfE in the knowledge that the borough's alleged employment needs would be hugely under met? There was surely some indication prior to its adoption.	As above
No / low demand:	
The anchor tenants you seek have already set up elsewhere, e.g. MediaCity.	As above
There are 952 available industrial units available within 10 miles of Astley, 362 of which are in the Leigh area. If these aren't being utilised, why do we need more? Why are you not investing in working with the owners of those instead?	As above
There isn't demand for high quality, professional, scientific, technical, manufacturing, ICT and creative sector jobs in this location. These businesses are drawn to city centre locations with easy access to train routes.	As above
The site aims to create jobs in research, development, and technology, but Wigan's current employment ratio of just 0.59 jobs per working-age resident and wages 13% below the national average suggest limited local demand.	As above

Summary of comments	Our response
A combination of geopolitical issues in parts of the oil-producing world and high inflation, high interest rates, rising unemployment, and falling job vacancies in the UK, will likely reduce the demand for commercial property in the medium term.	As above
Significant traffic congestion would deter business investment. Employees would struggle to get to work given the traffic and lack of public transport connections.	As above
Jobs:	
No guarantee that the jobs will be for local people, as you cannot force businesses to only employ locally. Bringing in businesses that may pay slightly more than the average wage won't employ those who simply don't want to work, it will just attract people from outside the area.	As above
The jobs would require specialist skill sets, and therefore the majority of the employees would commute from further afield increasing traffic.	As above
You are using old census data that approximately 60,000 people travel out of Wigan Borough for employment and only 20,000 travel in. Regardless, with only 2,000 new jobs being created, this development would not make much of a dent in this.	As above
Will become housing instead:	
The business park will be removed from your plans and replaced with more high spec homes for the rich!	As above
The employment uses could remain unoccupied due to low demand and be replaced with more homes. As a proposed location for high tech business, this area does not seem logical, there is currently, and for the foreseeable future, no shortage of office and industrial premises on the market.	As above

Summary of comments	Our response
Amenity issues caused by the employment uses:	
The policy allows some small scale Class B2 general industry uses close to the A580. This may generate noise, dust, fumes and vibrations which is unacceptable in a residential village.	As above
What size will the businesses and leisure facilities be, and how many vehicles will be generated?	As above
Traffic:	
The proposed development would cause severe impacts on the local road network contrary to NPPF paragraph 111. The A580, routes to the M60 at Junction 13, and the wider local road network are already gridlocked.	As above
In the period up to 2023, 101 road accidents were recorded in this area. The proposed access is dangerous and is likely to increase this.	As above
A recent planning application near RHS Bridgewater was rejected specifically due to its impact on M60 J13, highlighting just how unsustainable this location is for additional development.	As above
The overall development, including employment, homes and tourism uses, could contribute to over 10,000 extra vehicle journeys each day (in and back out). No upgrades to the infrastructure have been planned to accommodate this.	As above
Traffic congestion on Higher Green Lane:	As above
There are already severe traffic issues on Higher Green Lane, with 16T lorries accessing businesses in Lower Green despite restrictions and a directive to use the tip road.	As above
Due to its small car park, the entrance to Astley Point gets blocked at weekends with cars backed up onto Higher Green blocking the exit/entrance to the A580.	As above

Summary of comments	Our response
While the business park would be a good addition, it would need to be sited close to the East Lancashire Road with its own junction.	As above
Additional access points from the A580 would increase traffic congestion.	As above
An access at the junction between public footpath Ty 238 and the listed buildings at Manor Farm would detract from the setting of these listed buildings.	As above
No highway or public transport improvements are proposed to resolve existing congestion issues. Without these, the proposal is unsustainable.	As above
Infrastructure should be in place before new homes and employment uses are built.	As above
Existing road infrastructure is inadequate with solutions overlooked, such as dual lane expansion on Newbrook Road, and underused bus lanes taking up valuable road space.	As above
A link road from the A580 to the M60/M62 motorway is needed to ease congestion.	As above
Traffic assessments supporting major developments are never robust and biased to allow them without adequate mitigation.	As above
The plans lack any detail around how existing infrastructure could cope.	As above
These proposals should be put on hold until the impact of the approved housing development at Mosley Common has been fully realised, before approving more development.	As above
Public transport:	
The area is poorly served by public transport with limited investment to resolve this. This will result in increased car dependency, congestion, and pollution.	As above
The village lost its train station in the 1960s. No attempt has been made to reopen this station despite the significant increase in homes.	As above

Summary of comments	Our response
There is no provision for tram and/or rail services into the city centre to alleviate the already grid locked traffic congestion.	As above
Buses are just stuck in the same traffic jams as the cars, which will be worse with the additional vehicles from houses and industrial units. The circuitous number 35 bus to Manchester already takes an hour.	As above
There are no bus services in Astley. The V1 and V2 services don't serve Astley, and local bus services were stopped when the guided busway opened.	As above
Impact on utilities infrastructure:	
No mention of improvement to the current sewage system, which is Victorian in most parts of the area, and is noted to have issues, will be unable to cope.	As above
Our utilities may be ill-equipped to handle a sudden increase in demand	As above
The site doesn't benefit the local community.	As above
The proposal lacks the guarantee of on-site health and education facilities, instead requiring a financial contribution to off-site provision.	As above
Health:	
GP surgeries, dentists and hospitals are already severely over capacity.	As above
Education:	
There is a lack of school places locally, with some children having to attend school in Westleigh or Little Hulton, adding to traffic congestion and impacting on children's wellbeing.	As above

Summary of comments	Our response
Crime:	
An increase in population density without corresponding investment in local infrastructure or policing may lead to increased crime rates.	As above
Need for robust assessments:	
What engagement have you had with Natural England? Will you be sharing details of those reports?	As above
The council should conduct a thorough environmental impact assessment to evaluate risks to wildlife.	As above
Biodiversity net gain:	
How can you deliver 10% biodiversity net gain when replacing an area of valuable greenspace with an abundance of wildlife with development?	As above
Green lung:	
Higher Green acts as a green lung for Astley, Tyldesley and Boothstown.	As above
Impact on ecological designations:	
The site is part of the Manchester Wetlands Nature Improvement Area. Wigan Council are partners in this project which has received government funding. This development surely goes against the objectives of the MWNIA scheme.	As above
The site consists of a diverse mosaic of arable farming, woodland and trees, hedges, unimproved acid grassland, ponds, ditches and water courses, a playground and amenity grassland football pitch and is adjoining the Bridgewater canal thereby providing connectivity to other areas.	As above
Close proximity to a SSSI.	As above

Summary of comments	Our response
Impact on wildlife:	
This land is not just open space, it is home to significant wildlife populations. This is an unacceptable environmental sacrifice and an irreversible loss to local biodiversity. Loss of a key habitat for birds (including some red or amber listed) - barn owl, blackcap, bullfinch, buzzard, chiffchaff, common whitethroat, dunnock, fieldfare, goldcrest, grasshopper warbler, greater spotted woodpecker, grey partridge, grey wagtail; house sparrow; linnet, meadow pipit, kestrel, kingfisher, lapwing, linnet, mallard, mistle thrush, moorhen, raven, red kite, redwing, reed bunting, skylark, song thrush, sparrowhawk, starling, tawny owl, wheatear, willow tit, willow warbler, woodpigeon, yellowhammer, yellow wagtail. Loss of key habitat for wildlife – including deer, roe deer, hare, brown hare, fox, pheasant, rabbit, great crested newt (protected), pipistrelle bat, weasel, mole, St Mark's flies, speckled wood butterfly, gatekeeper brown hawker butterfly, meadow brown butterfly, common blue. Impact on plant species including spotted orchid, bee orchid.	As above
Local roe deer have already lost a large part of their habitat with the building of the RHS.	As above
The loss of the protected great crested newt would potentially be a breach of environmental protections.	As above
Several small ponds and ditches are found on the site and there is a small stream running across the eastern corner of the site. Some types of pond are designated BAP Priority habitats. According to the Greater Manchester BAP all ponds and lodges are considered of value.	As above

Summary of comments	Our response
Loss of productive farmland:	
The site contains some Grade 2 and a lot of Grade 3 agricultural land which is good to moderate quality. Loss of valuable agricultural land that is needed to grow food risks damage to our farming industry and food security.	As above
Impact on trees / hedgerows:	
There are over 3 miles of mature hawthorn hedgerows and over 300 mature trees that will be lost/destroyed.	As above
At least four pockets of deciduous woodland are present on site and are listed as priority habitat in the National Environment and Rural Communities Act 2006 (still current in 2022) and the UK Biodiversity Action Plan (BAP).	As above
Strong objection to "Incorporate high quality landscaping within the site and along site boundaries to mitigate impacts on the landscape character and minimise visual impacts, including the retention of existing good quality landscaping, and the planting of new suitable trees and hedgerows" when the proposal will destroy wonderful mature trees and hedgerows to plant new ones.	As above
Japanese knotweed is widespread— which along with the flooding would make development costly and problematic.	As above
Flood risk:	
The green spaces play a critical role in natural drainage and flood prevention. The removal of trees, filling in natural drainage ditches, and ripping out hedgerows will make local flooding reach catastrophic levels. This area clearly absorbs flood water and naturally protects the surrounding areas from flooding being low lying and boggy. If this were to be lost if could increase the natural resilience of the area to further impacts of climate change.	As above

Summary of comments	Our response
The land behind Ellesmere Street in Higher Green regularly floods in heavy rainfall, and has underground springs that drain into the East Lancashire Road.	As above
Flood plains have been built on causing houses to be flooded when we have heavy rain. The area cannot cope with anymore building.	As above
Increased flooding of the area will occur due to non-permeable concrete, paving and tarmac replacing fields.	As above
No full flood modelling is evidenced.	As above
Wigan and Salford Councils should ensure during the consultation process that legally binding contracts are drawn up to ensure that the flooding issues are resolved prior to any planning being granted.	As above
A big proportion of the land is over 2 metres below the canal. I recently walked along the north side of the canal during the last dry spell and noted at least 3 different areas where the canal is leaking onto the adjacent land. As this will surely get worse it will eventually lead to the canal bursting its banks as it has done recently near Lymm. If properties were to be built on this land the potential amount of damage and loss of life doesn't bear thinking about.	As above
The canal banks haven't been maintained adequately and are currently leaking, the site also has drainage ditches and mature trees, the area already regularly floods, if this goes ahead, the houses built adjacent to the canal banks are liable to flood, as are the many houses nearby.	As above
Sewage flooding:	
Linkfield Drive in Boothstown has flooded with foul water/sewage 9 times since 1997, with many properties installing water pumps in case of flooding. The sewerage / drainage system is already inadequate to serve the area.	As above

Summary of comments	Our response
The field adjacent to Linkfield Drive is the lowest point and adjacent to houses, and floods in heavy rainfall, with United Utilities installing a holding tank. The proposed development would make this significantly worse. The field acts as a unofficial flood plain and after a storm can take several days for the flood water to recede. Climate change is adding to the issue. United Utilities admitted additional housing in the area, drives, hard standings, tarmac roads all add to surface water being unable to soak into the ground.	As above
There are sewage issues in surrounding areas with frequent overflow of sewage in Mosley Common.	As above
Loss of recreational land:	
Loss of open land and public rights of way that many use for recreation – walking, cycling, dog walking, birdwatching, horse riding etc. The proposed development offers no meaningful green areas for recreation or environmental benefit. Loss of the area's last remaining natural sanctuary away from the roads, housing and industrial areas. The delivery of leisure and visitor attractions are not wanted. The nature and open spaces currently provided need to be retained, not lost to a man-made recreational area, that will be an eyesore and probably poorly managed.	As above
The proposal claims to improve access to green space and preserve the integrity of the public rights of way, but the site already has a myriad of public footpaths providing access to surrounding communities	As above
Loss of playground next to the old scout hut.	As above
The Ellesmere St playing field and playground in Astley is much used and loved by children in the area for many years.	As above

Summary of comments	Our response
According to the British Horse Society (BHS), this is the only safe off-road bridleway for horse riders in the area.	As above
The proposed buffers, recreational lakes and the rerouting of the footpaths might mitigate the loss of the open space somewhat. There should be at least one green corridor running parallel to the canal between Boothstown and Higher Green.	As above
Pollution:	
The proposed clean air zone over Greater Manchester was due to apparent poor air quality. This development will make air quality much worse due to increased traffic congestion.	As above
What air quality assessments have been undertaken?	As above
Concern about increased noise from both additional traffic and industrial development detrimentally impacting the quality of life for residents living nearby.	As above
Security lights illuminating the business park at night will worsen light pollution.	As above
Concerns about potential industrial, waste, or chemical operations within the employment area and the nearby canal and brook being polluted by the businesses.	As above
Impact on health and wellbeing:	
The open fields and local wildlife are valuable for people's mental health and wellbeing.	As above
A detrimental impact on mental health and wellbeing will add further strain to the NHS.	As above
We should be showing our children the benefits of recreation and exercise, not showing them how we are so greedy and selfish. The Council has a duty to consider the emotional and psychological effects of such developments, not just the economic or logistical factors.	As above
New homes:	
Strongly object to over 3,000 houses in the Green Belt.	As above

Summary of comments	Our response
Too many homes have already been built or approved in the area – North of North of Mosely Common, Garrett Hall, former Maxilead Metals site etc. There has been disproportionate growth compared to other parts of the borough.	As above
More luxury homes are not needed in this area and contrary to the plan objective of providing an appropriate mix of homes including affordable housing. If homes are to be built, they should be smaller, affordable homes (predominantly 1 and 2 bed social homes).	As above
There are already hundreds of houses for sale in Astley and Boothstown, and lots of vacant homes that should be renovated and occupied instead.	As above
With a projected working-age population growth of just 0.07% from 2023-2043, the 300 homes could lead to under-occupation or increased commuting.	As above
The council's flexibility allowance of 2,159 homes raises the risk of speculative building and potentially exceeding genuine need based on the Places for Everyone Plan rather than current demographics.	As above
If homes are needed, could they be built at a higher density to reduce the overall land take and retain some green spaces?	As above
Developers will no doubt produce viability assessments showing that affordable homes and Section 106 contributions are not viable.	As above
Affordable Housing:	
The Council should buy existing vacant properties for social housing– this would be much more cost effective and environmentally friendly than building new ones.	As above
Labour are relaxing Green Belt policy to help deliver more social and affordable housing, but the homes proposed are high value and won't meet this. Any Green Belt land that is built on must target 50% affordable housing.	As above

Summary of comments	Our response
The need for affordable housing is not a justifiable reason to build on the Green Belt. There are currently 6,656 houses within a 10 mile radius of Astley listed for sale under £225,000, with a further 5,784 available for rent in the same area.	As above
Proposed visitor attractions:	
The marina, recreational lakes and improved walking and cycling links are not needed as we already have the canal and open green spaces.	As above
There is an underused marina in Boothstown which undermines the need for one here.	As above
There is no information about what the leisure and visitor attractions might comprise. If this relates to the museum this should say so.	As above
Local Centre:	
There is no need for a local centre; all the shops in the village have closed and there are local facilities at the garages on the A580 and at Cross Hillock and Blackmoor that need supporting.	As above
If you conclude that we need more shops, these should be directed towards rejuvenating Leigh and Tyldesley where there are lots of vacant units.	As above
Heritage:	
The plans will have a devastating impact on the local historic environment, which includes the only museum to Lancashire's coal mining history and the last surviving coal mine winding gear in the North West	As above
What is Peel doing to preserve this historic monument?	As above
Around 50 detectorists came to our village to search for Roman remains on farmland (at the end of the growing and harvesting season)!	As above

Summary of comments	Our response
Evidence base:	
There appears to have been a lack of research regarding the land, the infrastructure, the traffic, the wildlife, the trees/hedges, the housing availability and overbuilding, the employment, the professions and the average salaries.	As above
Contradictions to other policies:	
Contradiction to claims that the council and national government are prioritising the environment.	As above
This proposal is counter to other active programmes run by the Council to improve wellbeing through exercise and using green space.	As above
The proposed development for Astley and Boothstown contradicts every point listed in proposed Local Plan policy EN2.	As above
The loss of this ecologically sensitive land in the Green Belt contradicts the borough's 2019 climate emergency commitment.	As above
As a local authority you have a climate change strategy, an air quality and transport strategy but how do these fit with your plans to build on the greenspace between Boothstown and Astley.	As above
This is a complete change of policy by Wigan who have always regarded the south side of the A580 (East Lancs Road) as protected from any mass development. I have been in planning meetings where this has been publicly stated as an objection to a proposed development.	As above
A focus on brownfield regeneration elsewhere in Astley, backed by robust infrastructure investment and ongoing community consultation would align more closely with the Progress with Unity missions of fair opportunities and flourishing neighbourhoods, preserving this site's ecological and cultural value.	As above

Summary of comments	Our response
Contrary to the commitments made by the Council as part of the Great Manchester Nature Improvement Area project.	As above
Bridgewater West is not within the key growth locations referred to in PfE Policy JP-J1 (criterion G), which includes the Wigan-Bolton Growth corridor in Wigan Borough.	As above
Site constraints:	
There is a mine shaft on the land to the north of Ellesmere Street.	As above
Consultation methods:	
The consultation should not be confined to Wigan residents, given the location.	As above
The consultation event in Tyldesley provided no further detail or visual clarification regarding how the proposed development would affect the Green Belt land.	As above
Many residents feel that the consultation process has been insufficient and that local voices have not been meaningfully heard or incorporated into the planning process.	As above
Disproportionate:	
The development will be disproportionate to the size of Higher Green and the roads that serve it. The village has fewer than 250 homes and no shops or community facilities.	As above
Astley has had a huge amount of housing and employment development in the last few years. Please look elsewhere and let us keep the little green space we have left for residents to enjoy.	As above
Ethics:	
Ignored protests, unheard communities. A growing feeling that local voices, particularly from places like Tyldesley, are being systematically sidelined in favour of greed, financial gain and developer interests.	As above

Summary of comments	Our response
The integrity of Wigan (and Salford) Council planning decisions has to be questioned when influenced by large corporations such as Peel.	As above
Other:	
The proposed plans appear to be out of scale and not in keeping with the rural and historic identity of Astley Green and the wider Bridgewater West locality.	As above
These proposals appear in excess of Wigan's commitments in the Places for Everyone Plan which had a more holistic and detailed assessment of the impact of development on infrastructure.	As above
As someone who has recently agreed the sale of my property in the area, I was alarmed to learn of these plans at this late stage. Had this information been available earlier, it would have had a significant influence on my decision-making process and potential buyers' confidence in the area's future.	As above
No building in the Green Belt should be allowed until migration issues in this country are resolved so we have a better understanding of what we really need.	As above
There is also mention of development at south of Astley Point, which will damage the area further.	As above
Would it not be more sustainable and economically sound to redirect funding and planning efforts toward revitalising existing town centres like Tyldesley, Leigh, or Atherton, where the transport links and community infrastructure could more readily support investment?	As above
Does the need for the coal and brick clay deposits on the site to be extracted (paragraph 6.88) mean that residents are going to have to put up with dust in dry weather and mud and dirty roads in wet weather?	As above

Policy J6: Land west of Winwick Lane, Lowton

Summary of comments	Our response
Green Belt:	
National planning policy requires Green Belt land to be released only in exceptional circumstances—none of which have been demonstrated here.	We are no longer proceeding with the proposed employment site allocation at land west of Winwick Lane, Lowton and no land is proposed to be removed from the Green Belt in the Publication version of the Local Plan.
The site plays an important role in separating the towns of Winwick, Newton le Willows and Lowton.	As above
The site plays an important role in preventing the merger of Wigan, Warrington and St Helens.	As above
Site Selection:	
The only site assessment criteria met is that the land has the capability to secure investment and could resolve a local issue by (possibly) providing a bypass for Lane Head – but this is not a good reason for the development.	As above
Brownfield first approach:	
Unlike the first two phases of Parkside which were on the former colliery site, this third phase is on good quality arable land, contradicting both local and national policy which require brownfield alternatives to be exhausted before farmland is considered.	As above

Summary of comments	Our response
Vacant brownfield sites, disused industrial premises and units for sale should be utilised prior to the loss of productive agricultural land in the Green Belt.	
Jobs	
A high proportion of the jobs will be retained by those transferring from their existing roles on the Manchester site, with limited new jobs for local people to access, with the majority likely to be low paid, unskilled warehousing jobs. The recent consultation from Tritax Bigbox did little to convince otherwise.	As above
The number of long-term jobs will likely be limited given that the warehousing and distribution sector is rapidly becoming automated, with forecasts suggesting near-total automation by 2035. Light industrial and manufacturing sectors are also experiencing increasing levels of automation.	As above
No demonstrable need:	
The site wasn't considered to be needed in the Places for Everyone Plan, what has changed? The proposal is in excess of Wigan Council's commitments in the Places for Everyone plan that had a more holistic and detailed assessment of the impact of development and consequential infrastructure impact across the region.	As above
The Economic Market and Employment Land Assessment identifies an employment land supply of 997,100 sqm, exceeding the identified need of 647,000 sqm.	As above
Traffic (general):	
The area is already gridlocked at peak times, with a survey in March 2023 recording 108,000 vehicles per week using Winwick Lane, an average of 15,000 vehicles daily. The development will add to already overloaded roads.	As above
Winwick Lane wasn't built for the current levels of traffic. It is too narrow and does not have adequate walking or cycling provision.	As above

Summary of comments	Our response
Moving the traffic lights on Winwick Lane may work at weekends but will not stop standing traffic outside the houses during the week as they will be stuck waiting to access Newton Road purely due to the number of vehicles along Newton Road.	As above
We need bolder action — like closing Winwick Lane to through traffic (but keeping access to Kenyon Hall from the M6/A580). That would make a big difference.	As above
The proposal for a large biomass plant in Warrington closer to M6 J22, will compromise the area further.	As above
The A580 is fit for purpose and runs to all motorways. Traffic should be made to use these roads rather than through small neighbourhoods where people reside.	As above
Road surfaces cannot sustain the weight load and heavy traffic and have caused massive potholes. Road maintenance will be required more frequently due to the extra weight on the local roads.	As above
The house is shaking every time the heavy vehicles and traffic goes past our home and hitting the potholes they have created.	As above
Traffic (weight restrictions):	
Weight restrictions are needed northbound on Winwick Lane from its junction with the Parkside Link Road roundabout and in both directions on A572 Newton Road from its junction with the A580 to its junction with A572 Southworth Road.	As above
The 7.5t weight limit imposed in Culcheth has impacted on traffic levels in the area with traffic now diverted through Kenyon and Winwick Lane.	As above
Wigan Council's refusal to introduce a weight limit on Newton Road, alongside Warrington's continued blocking of restrictions on Winwick Lane, highlights a clear failure to distribute new traffic volumes in a balanced or responsible way. Effective cooperation between the two Councils is needed.	As above

Summary of comments	Our response
Due to weight restrictions imposed by the 3 councils, with the exception of M6 J22, all other HGV access to the Parkside SRFI will be via Wigan roads.	As above
Traffic (proposed link road):	
The bypass road should be built and opened before the SRFI is operational and the employment site complete as it will result in added congestion on already heavily congested local roads. St Helens Council opened the Parkside link road before phase 2 was complete.	As above
The Local Plan should include a tentative bypass route on the Policies Map and provide guarantees of its delivery if the SRFI is approved by government. The route needs to be robustly costed to ensure that a sufficient contribution is agreed with the developer to enable delivery, with clarity on how the bypass is to be fully funded.	As above
A bypass from the new roundabout at Parkside to a new junction with A579 Atherleigh Way on the A580 should be the preferred option as this will deliver better transport links to South Leigh and will provide the biggest regional benefit.	As above
Warrington Borough Council has obstructed the logical extension of Atherleigh Way, forcing Wigan to consider building the entire bypass on its own land. This not only requires an additional and unnecessarily complex junction on the A580 but also increases the likelihood of delays, congestion, and safety issues.	As above
Residents were advised recently that the proposed bypass would join the A580 at Lane Head, potentially turning Lane Head into just a large junction of the East Lancs Road.	As above
Acknowledge the attempt to get the developer to contribute to a bypass, but this is likely to fail as the developer will only contribute if the traffic modelling demonstrates an adverse impact.	As above

Summary of comments	Our response
While the bypass would help alleviate traffic congestion and air pollution, concern that it would open up more Green Belt for development.	As above
Active travel:	
Winwick Lane is unsuitable for more traffic. It is too narrow, and without pavements or cycle paths is dangerous for pedestrians and cyclists.	As above
A footbridge with a bike ramp is needed at the side of Dolly's Bridge and foot/cycle access to the A580 cycle path.	As above
Given the site's location adjacent to the motorway, most employees will likely commute by car, rather than by public transport or walking or cycling.	As above
Lack of public transport:	
There are no bus services in the vicinity of the site, with the nearest services on Newton Road about one mile away.	As above
Frequent public transport from Lowton to Warrington is needed along Winwick Lane and to Newton via the link road, perhaps tying in with rail stations.	As above
Focus should be on greatly improved bus services. Employer-subsidised bus services to and from nearby towns and rail stations should be considered.	As above
Impact on the environment:	
Development will be a massive blot across the semi-rural part of Lowton. People sought to live in this area due to its rural natural green spaces.	As above
Development will impact on the wildlife, including amphibians (frogs / toads / newts) which are known to wander quite some distance from their ponds, rabbits, badgers, foxes,	As above

Summary of comments	Our response
lapwings. The development of Parkside has already impacted on wildlife with deer being seen on farmers' fields off Newton Road and a badger killed on Winwick Lane.	
By adding the Winwick Lane site to the wider Parkside development it becomes a vast and disproportionate development on the current landscape.	As above
The IA confirms that the site will have a major negative impact on land and soil resources.	As above
The proposal contradicts the Local Plan's commitment to nature recovery, biodiversity net gain and environmental stewardship.	As above
Highfield Moss:	
The Highfield Moss SSSI must be preserved at all costs. The proposed development entails deep excavation, construction on greenfield land, and extensive new infrastructure which pose serious risks to the local water table and the drainage patterns essential to the peatland's health. Undermining a high-value carbon store like Highfield Moss is contrary to Wigan Council's Climate Emergency declaration in 2019 which explicitly recognised the need for urgent action to reduce greenhouse gas emissions.	As above
Highfield Moss will be surrounded by development on all sides. The destruction of our natural environment, effects on wildlife and the irreversible nature of the damage done can never be recovered.	As above
Highfield Moss and the public rights of way rights of way within and around the site are well used for recreation, including walking, dog walking and cycling. The development will remove that valuable resource from Lowton residents.	As above
The wording in criterion 11 is less than reassuring and needs to be stricter to preserve Highfield Moss.	As above

Summary of comments	Our response
Highfield Moss SSSI is a beautiful and important wildlife habitat which cannot be destroyed by this development, as an absolute minimum water run-off, noise and light pollution must be effectively mitigated.	As above
Loss of agricultural land:	
The site contains best and most versatile agricultural land which should be retained for farming. National food security should be a key focus, as it promotes sustainability ad reduces the need for food imports. Growing food is far more important than storing Chinese imports.	As above
The land is currently farmed, and the owner wishes to continue agricultural operations.	As above
Flood risk:	
Paragraph 6.99 says flood risk must not be increased. As the Environment Agency data is incorrect (in their own view) and therefore no ability currently exists to identify the current flood risk, how would this condition be articulated, or enforced? The 'clause' does not make sense in this regard.	As above
Pollution:	
Local government has a duty of care to ensure all steps are taken to protect communities from exposure to pollutants. New industrial development and increased HGVs will omit dangerous gases and toxins close to residential area.	As above
Air quality has been monitored at Lane Head and at the north of Winwick Lane since 2018 with nitrogen dioxide levels consistently exceeding the legal limit of 40ug/m3, and at times being the highest level in Greater Manchester. So why promote this site for more traffic generating and polluting industrial uses?	As above

Summary of comments	Our response
Impact on health and wellbeing:	
Negative impact on people's mental health and physical wellbeing. There is a lot of evidence linking green spaces with better health and wellbeing.	As above
Evidence base:	
Noted that the starting point for traffic modelling of the SRFI will be the use of the Parkside Link Road Traffic Model (PLRTM) which did not show any adverse impact at Lane Head. The model has serious flaws which were highlighted at the Parkside Link Road public inquiry.	As above
Other:	
Disappointing that the three councils cannot work together to find the best solution for this area, which suffers from its location at the extremity of the borough and being at the mercy of decisions taken by Warrington and St Helens.	As above
Compulsory purchase orders should not be used to remove an unwilling farmer from their land.	As above
The consultation was not publicised sufficiently with many residents in Lowton unaware of the proposals. The consultation should not have been confined to just residents in Wigan Borough given its location.	As above
If the wider site gains national approval, we will expect robust mitigation to be put in place and any planning conditions to be rigorously monitored and discharged.	As above
This will have a massive impact on my ability to enjoy my own home on Newton Road; there will inevitably be light pollution and noise (where there is none at the moment) and more worryingly, a massive increase in articulated lorries using Newton Road to access the site.	As above

Summary of comments	Our response
The expansion of SRFI beyond Parkside Colliery appears to be happening incrementally, likely to avoid full scrutiny. There has been no integrated assessment across Wigan, Warrington, and St Helens boroughs.	As above
Wigan submitted written objection to St. Helens plans for a SRFI / Parkside. The reasons for those objections still exist so what accounts for Wigan's change of heart?	As above
Provision of solar panels on all roof surfaces should be required – and is there any way the power generated could benefit local residents?	As above
Lack of infrastructure planning to support recent and future developments. Despite the rapid increase in new housing in Lowton and surrounding areas, we have seen little to no investment in the essential services needed to support this growing population.	As above