OBJECTION TO BLOOR HOMES PLANNING APPLICATION FOR LAND TO SOUTH OF PEPPER LANE, STANDISH – PLAN AP NO. A/14/79165

I HAVE objections to this planning application in terms of highways and traffic, overlooking/loss of privacy, loss of light or overshadowing, footpaths and safety, noise, layout and density of building, design and appearance, lack of open space, nature conservation and destruction of a potential site of historic interest.

HIGHWAYS

Overview

One of the central aspects of Bloor plan is a 'link' road from Almond Brook Road to Pepper Lane, first proposed in Wigan Council's Standish Infrastructure Assessment. There is confusion in terms of the nature of this road from Wigan Council and Bloor Homes and local residents have not been given a clear idea of what this route will constitute.

Standish Infrastructure Assessment states that this road is needed as a mitigation measure to ease congestion in Standish as part of the wider plan for 1,000 homes in the area. I believe the new link road will not lessen the amount of traffic needing to use Standish crossroads and it may actually increase traffic into the Pepper Lane/Preston Road area of Standish which wants to reach Coppull and Chorley.

Standish Infrastructure Assessment, in its highways conclusions, states that "the critical junction in capacity terms would be Standish crossroads". The plan also acknowledges that most journeys from Standish "terminated in Wigan town centre and its surrounding areas".

A link road from Almond Brook to Pepper Lane would thus have little or no effect on these journeys as drivers who want to reach Wigan using this road would have to travel through Standish crossroads in any case.

To reference the Assessment, in 3.10.4, the modelling has assumed "no growth in background traffic levels" and "traffic growth in the cordoned model areas would be solely due to traffic generated by the proposed development sites".

This assumption has not taken into consideration one of my main worries about the proposed link road in that it will attract traffic from the M6 motorway which wants to access Coppull and Chorley and currently leaves the motorway at junction 28 or at Charnock Richard service station. Thus this will increase congestion in the Standish area. There has been no consideration of this important aspect of the plan by Wigan Council or Bloor Homes.

After informal discussions with the planning department and in answers to Wigan Council's Questions To Cabinet, the council now seems to regard this route is merely an 'estate road', just serving the homes of the proposed estates in the Almond Brook area. However, Bloor Homes' application clearly states that this is not the case and says that this road is "required" in Standish Infrastructure Assessment.

In Bloor's Environment Statement, page 3, it says the road "is intended to provide a boulevard through the site that will relieve pressure at the A49/A5209 junction in Standish an reduce traffic and congestion in the town centre".

In Bloor's Transport Assessment it states that the road through the development corresponds with the requirement in Standish Infrastructure Assessment for a "new link road through Almond Brook between the A5209 Almond Brook

Road (east of its junction with Arbour Lane and the A49 Preston Road), with strategic junctions at both ends".

On page 21 of that Transport Assessment, Bloor states: "The estate road will provide the main vehicular access to the site and will also act as a local distributor route for vehicles travelling between the A49 Preston Road north and Junction 27 of the M6 and surrounding areas. The estate road will therefore be designed to remove traffic from the A49 Preston Road, Pepper Lane, Old Pepper Lane and the surrounding residential streets. Therefore, relieving congestion at the junctions of Pepper Lane/Old Pepper Lane and the Standish Crossroads."

In Bloor's Design And Access Statement (page 26) it describes the road as "a new piece of strategic infrastructure for Standish".

Thus the nature of this road is confused and Wigan Council needs to refuse this plan, or defer it until this issue is settled.

A. Transport modelling

It was stated in error in Wigan Council's Standish Infrastructure Assessment that this link road had been modeled and found to ease congestion at Standish Crossroads. In fact, the report from Transport for Greater Manchester, which Standish Infrastructure Assessment is based on, states that it modeled a mitigation route via Ludlow Street. This street is nearer to Standish, exits onto an A road (Pepper Lane is an unclassified road) and cars going down Ludlow Street would not have to negotiate the busy Pepper Lane/Preston Road junction, which has been identified as a congestion hotspot in a 2012 study by the council. TfGM may have modeled the Pepper Lane exit very differently. I have been told that this modeling is to be redone due to these errors. Because of this the Bloor plan, this plan needs to be refused or deferred until this is carried out and local people can comment on the findings.

The modeling also does not include any data concerning extra traffic going to Chorley that could be attracted on to this link road from Junction 27 of the M6, rather than exiting at Junction 28.

Therefore Wigan Council has not established an evidence-based need for this road in Standish Infrastructure Assessment, which Bloor has used to justify this road.

B. Traffic and junctions

The proposal of a junction on to Pepper Lane for this link road is flawed. Pepper Lane is an unclassified road which currently has considerable issues with congestion.

The Pepper Lane/Preston Road junction was identified as a congestion hotspot in a 2012 study by the council and, over the past two years, traffic has increased.

This plan, with a road leading to this junction, will make traffic and congestion in the area far worse.

The peak-time pressure on the junction of Pepper Lane and Preston Road is considerable, with long queues along Pepper Lane at these times. A junction from the new road onto

Pepper Lane will cause major difficulties in congestion backing up both on the new link road and Pepper Lane.

The chip shop at Pepper Lane generates a large volume of customers in the evenings, which increases congestion in this area. More overloading of traffic from this plan would cause major problems, with danger to road safety in this area.

The proposed link road junction on Pepper Lane is problematic, with a number of drives near to it. The speed of traffic on this road means any new junction exiting on to it will be a potential road safety hazard.

This link road would be able to be used by HGVs and smaller commercial vehicles, which should not be routed through a residential area due to problems with emissions and road safety, especially as this route will run next to and very near the boundary with Standish High School.

Due to the closeness of this link road to the school perimeter boundary, including playing fields, I am concerned about the potential impact that exhaust emissions will have on the pupils, especially as my two children attend.

Many studies have found that greater exposure to exhaust fumes, especially from dieselconsuming lorries and buses, increases the risks of poor health, specifically asthma. Obviously, school pupils will be exposed to these emissions during break time and

lunchtime, and during PE lessons when their oxygen intake is increased.

A new road of this nature should not be built near a school.

Wigan's leading asthma doctor, Dr Imran Aziz, has written to Wigan

Council expressing his concerns about the road in relation to the health of pupils.

The following link shows local press coverage about this:

http://www.wigantoday.net/news/local/top-doctor-warns-of-link-road-health-timebomb-1-6451795

The links between exhaust emissions and respiratory disease are long-standing and well-publicised, but recent evidence of damage to the coronary system have also come to light. A major European study, published earlier this year in the British Medical Journal, shows worrying link between airborne pollution and coronary disease.

http://www.bmj.com/content/348/bmj.f7412

The study's conclusion states: "Our study suggests an association between long term exposure to inhalable particulate matter and incidence of coronary events.

"These associations remained for exposure concentrations below the current European limits. The results of this study, together with other ESCAPE findings, support lowering of European limits for particulate air pollution to adequately protect public health." This is echoed in a BBC article, published last week, in which a British Hearth Foundation professor raises concerns about diesel engine emissions and heart disease. http://www.bbc.co.uk/news/uk-scotland-26595625

The article states: "Professor Dave Newby, from the University of Edinburgh and the British Heart Foundation, said most people associated air pollution with asthma or pneumonia or lung problems.

"However, he said most people did not know heart disease was the leading cause of death attributed to or associated with air pollution.

"Prof Newby said the particles released by diesel engines are so small they get deep down into the very deepest part of the lungs and even into the blood stream. "He said: 'We think this can cause really bad effects on blood vessels, on the hardening of arteries and can even cause or precipitate heart attacks."

An American study recently found links between childhood leukemia and increased exposure to exhaust emissions:

http://www.usatoday.com/story/news/nation/2014/03/20/childhood-leukemia-linked-to-heavy-traffic-exposure-cdc-says/6658919/

Growing evidence of health problems linked to exhaust emissions prompted the Greater London Authority declare that it is working with its local authorities to "make further improvements to air quality near schools".

https://www.london.gov.uk/priorities/environment/clearing-londons-air/clean-air-schools This is part of its Cleaner Air 4 Schools programme.

The link road would pass very close to the playing fields of Standish High School. Recently, Liberal Democrats also called for greater pollution protection for schools. http://www.airqualitynews.com/2014/03/17/lib-dems-call-for-greater-pollution-protection-for-schools/

In Wigan Council's Supplementary Planning Document on Development And Air Quality, in 1.6 it states that "air quality is an important material consideration in many planning decisions" and in 1.8 it says "significant adverse impacts on air quality should be avoided if possible". Almond Brook Road and Preston Road have been designated as an Air Quality Management Areas and this development and the link road will increase emissions in these areas, not reduced them as is the council's stated aim.

As such, the link the road conflicts with Objective NRP1 of Wigan Council's Core Strategy which resolves to "ensure that development does not result in unacceptable levels of air pollution or will not have an unacceptable effect on air quality through traffic or emissions". It also conflicts with the Council's Core Strategy Objective A1 to "reduce dependency on the private car".

C. Acccessibility

The link road reduces accessibility for people on this proposed estate and in the Shevington Moor/Robin Hill/Pepper Lane area.

The link road would cut across many footpaths, severely impacting on their effectiveness and attractiveness in being used by residents who currently use them for walking, cycling and horse riding.

The greatest impact of this link road will be on The Line, the disused rail line which links the Old Pepper Lane/Shevington Moor/Robin Hill areas to Standish High School and Standish centre. The link road will cut this link forever at a time when we need to enhance existing infrastructure.

The Line is described as both "a key footpath route" (6.3.1) and "an important route" (6.3.2.) in Standish Infrastructure Assessment. This link road would cut The Line in two. In the open space and recreation section (6.1.5), the plan states there should be an upgrade to The Line "to enhance east-west connectivity". A link road would cut right across The Line and sever unhindered access to and from Standish centre.

The Line is currently used by people accessing Standish centre and pupils accessing Standish High School. A link road will prevent the safe use of The Line for this purpose. Traffic safety measures on this link road could be put into place but the size and capacity of this road suggests that safety of pupils using The Line will still be an issue.

Parents will be reluctant to allow their children to use this route, as they currently do, as there would be a perceived increase in danger due to them having to cross a main road at the busiest times of the day.

'School run' traffic could increase due to this, which is obviously detrimental to an active lifestyle, which has been promoted in Wigan's Transport Strategy.

Furthermore, Wigan has been at the forefront of the 20's Plenty campaign and 20mph zones have been implemented on roads near schools in the borough. A reduction of speed to 20mph is reported to cut child pedestrian accidents by 70 per cent. This proposed road would need to be a 20mph zone.

This proposed link road also conflicts with the key principles adopted by the Transport Strategy for Wigan only a year ago.

At the heart of the Transport Strategy, cornerstone of Wigan Local Plan Core Strategy, is the principle of sustainable travel which stresses the importance of walking and cycling as the means to reduce traffic congestion over the long term.

The Transport Strategy states (p29) that walking is an "important element to getting to places" and highlights that disused rail routes, like The Line, are important to promote walking and cycling.

It says these disused rail routes provide a "firm foundation and provide major steps in the right direction for developing the pedestrian network".

The Line is one of the most important non-car routes in the Standish area and is wide enough to support sustainable travel on foot, by bike, and for horse riders.

The Strategy states: "One of the outcomes of this strategy will be to develop these routes to improve connectivity and develop a network that interlinks communities with local facilities." The link road proposal conflicts with this principle as it will destroy this connectivity.

On cycling (p30), the Strategy states: "We need to improve and promote the overall network to make it more attractive for communities and students."

The strategy also points out that one of the main barriers to people deciding to cycle is when cycle routes come into contact with roads.

The Strategy also states that the council needs to "make the best use of our historical assets (disused railway lines and canal tow paths) to provide the routes . . . to connect communities to education and employment opportunities". The disfiguring of The Line and consequent cutting off the northern part of Standish from this route conflicts with this ambition.

The Strategy (p37-38) also notes that obesity in Wigan is set to rise to 80% in adults and 50% in children by 2050 and that active travel plays a key role in reducing this. To destroy sustainable travel connectivity in favour of a link road conflicts with this. The Strategy (p39) states that good air quality should be promoted through sustainable travel and that serious health problems are associated with air pollution and that main roads are where the majority of emissions occur.

This link road, which will be wide enough to accept HGVs which are of a particular problem when it comes to dangerous diesel emissions, would pass the boundary of Standish High School.

The Strategy (p54) states that there should be a review of existing freight movements "to ensure future routes, mapping and signage . . . are efficient and complement our congestion reduction ambitions".

The link road conflicts with this as the direction of this route improves logistics to Chorley, not Wigan, thus increasing the attractiveness of journeys to Chorley to the economic detriment of Wigan borough.

It is in conflict with the congestion reduction ambitions as this link road could increase freight movements in this area of Standish by providing a quicker link from the M6's Junction 27 to Chorley than existing routes via Junction 28.

The council has adopted a Transport Strategy (p55) which states: "Building new roads isn't the answer to long-term congestion relief." This link road is in complete contradiction to this statement.

The Strategy resolves that on trying to reduce traffic congestion, there needs to be a "robust" approach to the evidence. How can this be said to have been done when the traffic modeling for this link road has not been properly or comprehensively carried out? The Strategy states that its aspirations for sustainable travel must be "rigidly implemented". How does this square with this situation? Has there been an impact study carried out to discover what effect this link road will have on sustainable travel in the Old Pepper Lane/Shevington Moor/Robin Hill areas of Standish?

The Strategy states that when talking to developers, the council will "promote sustainable travel options". How can the council do this when it does not set an example in doing this itself?

This link road also conflicts with the Wigan Council Rights Of Way Improvement Plan for the many reasons given above.

The Bloor plan does not show all existing footpaths that are currently used. The council needs to check all the current footpaths in the area, official and unofficial, and make sure they are protected and enhanced if this plan is approved.

There needs to be much more provision for walkers, and especially cyclists, as per Wigan Council's Transport Strategy.

D. Privacy and overlooking

In terms of privacy and overlooking, this link road will be right next to my boundary line and a habitable room. My family's privacy will be greatly compromised both inside the house and garden.

E. Environment

The Bloor plan states that the "mosaic" of habitats and "connecting habitats" will be retained within the area, but this is not possible with a link road dissecting the site. This link road cuts the migration route of frogs and toads to their ancestral ponds in a number of areas on the site.

If this link road goes ahead, suitable measures need to be in place to protect toads, which are a safeguarded species.

DESIGN AND LAYOUT

Bloor Homes says it is a developer which builds quality homes but the estate needs to be less dense to achieve this. There should be more open space left for the new residents to enjoy.

There are also some existing hedgerows and trees, especially two trees with Tree Preservation Orders, which the plan shows will be uprooted. This includes an historic hedge on Pepper Lane which will be destroyed to make way for the link road junction. These hedgerows and trees need to remain to increase the sense of greenery in the development.

No three-story homes should be included as this would detract from the current 'feel' of the residential area.

The homes that are proposed to front on to the link road (a main road which will take through traffic and lorries) cannot have driveways exiting straight onto the street due to planning guidelines. This needs to be corrected.

ENVIRONMENT AND ECOLOGY

Bloor Homes has not taken the environment and ecology of this area seriously enough. Historic studies have found that great crested newts live in this area and need to be catered for.

Bloor's application states it has not found evidence of great crested newts on its site, but the historic evidence, coupled with the confirmed habitat of these newts in the Primrose Lane area, and informal sightings by the public of these creatures means they need to be catered for.

There are a number of bat roosts in this area. There are a great number of bats which use this area to feed. Their habitats need to be protected.

The grassland and wooded areas contain a great number of species, which I have personally seen. They include: deer, foxes, stoats, hedgehogs, frogs, toads, newts, mice, shrews and voles. The birdlife includes, collared doves, jays, tits and finches of all types, pheasant, kestrels, robins and herons. No trees or hedgerows should be removed from the site in order to preserve some habitat for these creatures.

An independent ecology assessment of the area should be undertaken before any planning application is submitted.

NOISE AND DISTURBANCE

The construction phase of a development of this scale would have a huge impact on the surrounding area in terms of disruption, noise and air quality and visual impact. This is likely to be phased in response to sales and will impact on the community for a considerable time, causing much distress and inconvenience. This is too much for one small area to take, especially next to a school.

The poor ground conditions in terms of drainage and the historic use of the area for mining will mean piling taking place and there is a major concern around surface water in the area which will need to be fully addressed and will prove very difficult to overcome due to the scale of this proposal.

Dust and dirt and vibration will impact all surrounding houses and there would be the danger of heavy construction vehicles in an area next to a school and access routes for pupils.

This current greenfield site is a haven for tranquility and, aside from other ecological impacts, provides an escape in an area already affected by noise from the M6 motorway for walkers and cyclists.

The sound from not just cars but buses and HGVS on the proposed link road would create noise pollution for homes and Standish High School.

LACK OF OPEN SPACE

The safeguarded land at Almond Brook is used by residents as open space for walking, running, cycling and the exercising of dogs.

This new development will drastically reduce the amount of open space people can enjoy. This will mean there is inadequate recreational space for people to enjoy and to exercise in.

Ashfield, the main recreational area in Standish, is two miles away from this area. The plans to not give due regard to this, especially as the SBI in the area will need to be fenced off from human activity to protect the wildlife there.

SITE OF ARCHAELOGICAL INTEREST

Part of the site, where the Bloor Homes estate meets the Wainhomes estate, is an area which could be of national importance in terms of archaeology.

A renowned historian, Dr Graham Robb, in his new book, pinpoints this area as the meeting place between two route lines which were important to the ancient Celts and also could have been to the Romans.

This intersection could be of significant historic importance and Dr Robb states that: "It may well be that archaeological treasures are waiting to be unearthed on the site of the Roman settlement, and that the new road will destroy a part of British history."