

Sefton Council
Core Strategy Options Paper
May 2011



www.sefton.gov.uk/corestrategy

Sefton Core Strategy Options Paper

Report of Consultation

February 2012



This report is divided into sections, which include summaries of comments (and the Council's initial response) about:

Section 1 - The consultation process

Page 3

Section 2 – Options document overall

Page 15

Includes

- issues, vision aims and options, *and*
- Housing issues [use of brownfield land or vacant properties, population issues and the impact of the recession]

Section 3 – Draft Green Belt Study and its methodology

Page 57

Includes objections to development in the Green Belt grouped by topic [nature conservation, heritage issues, loss of agricultural land, traffic issues, capacity of infrastructure and services, flood risk etc]

Section 4 - Draft Green Belt Study [sites specific comments]

Page 99

Objections to development of specific sites in the Green Belt for

- Southport
- Formby
- Crosby and Hightown
- Maghull, Lydiate, Aintree and Melling

Section 5 – Draft Green Belt Study [supporting comments]

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Supporting comments about the draft Green Belt Study and about the development of specific sites in the Green Belt

Section 6 - Draft Green Space Study and its methodology

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- Objections to development of specific urban greenspace sites
- Supporting comments about the development of urban greenspace sites.

[continued over]

Annexes

Annex A – Comments about the consultation process **Page 267**

Annex B – List of petitions received **Page 273**

Annex C - Brownfield (previously developed) sites suggested as suitable for development **Page 277**

Annex D - Comments about studies: **Page 283**

Housing and Employment Studies, the Detailed Green Belt Boundary Review, Draft Infrastructure Study, draft Sustainability Appraisal

Annex E - Comments from neighbouring local authorities, parish councils, statutory consultees and other interest groups. **Page 311**

Introduction

The Council is required by law to prepare a development plan for the borough. This is called the Core Strategy.

This is a long term Plan which looks ahead for a period of about 15 years. It helps to meet the needs of local communities by guiding development and co-ordinating investment within a framework of protecting valuable parts of the environment.

A key part of preparing a Core Strategy is to share ideas about how the borough might change over time and how it should meet the many challenges it faces.

The Options paper was produced in summer 2011 to stimulate this debate. Three main options were proposed which set out different approaches to meeting the Borough's needs for new homes and jobs.

These Options provoked a lot of discussion among local communities. By the end of the 12 week consultation, in August 2011, we had received around 2,500 individual responses, each of which included just under 10 different comments, and a number of petitions containing about 7700 signatures.

Since then we have been recording and analysing these responses. Many issues have been raised which we have needed to discuss with others. For example, we have discussed concerns about the implications of new development for flood risk and drainage with the Environment Agency and United Utilities, as well as with colleagues in Sefton Council.

This Report of Consultation records the whole range of comments we received. This varied from general comments about what issues the Core Strategy should tackle through to people's views on sites in the Green Belt.

We have given our initial response. It is not possible to comment on some aspects until the Council decides its Preferred Option, which is likely to be in late 2012.

To do justice to the many comments we received, the report is long. However it is broken into a number of sections to help you find your way around.

Section One

Introduction

Review of Consultation

Overall Consultation Results



Core Strategy Options

Section One

The Consultation Period

The Consultation took place for a period of 12 weeks from May 23rd to August 12th 2011.

Publicity

The initial approach to publicity was as follows.

- Quarter page adverts for two consecutive weeks in the Trinity Group Newspapers.
- Posters sent out to all Parish Councils, Schools, Libraries, Leisure Centres, Town Halls, One Stop Shops, CVS and many other places including some shops, supermarkets, medical centres, railway stations, youth centres etc. At the first drop-in event , we realised that few people seem to have noticed the posters, and so we changed the design and put the posters up in more places. We also found that whilst many places were sent posters, quite a few did not display them.
- The consultation was on the front page of Sefton's web-site for many weeks during the consultation period.
- Information was sent out by Sefton CVS through Network South which reaches 400 organisations in the South of the Borough.
- E-mails were sent out to everyone on the Active Sefton e-mail database (approx 2,000).
- Information was put on E-Consult (used by the Council and other public bodies in Sefton for consultation).
- We put notices on Active Sefton's Twitter and Facebook pages at the beginning of the Consultation Period and again a reminder two weeks from the end of the consultation.
- Letters or e-mails were sent to everyone on the Local Development Framework database. This is a list of people who have asked to be kept informed of consultation on the development plan.
- Letters and emails sent out from Planning Services during this time advertised the consultation
- There were many articles in local newspapers throughout this period, either on the front page or in prominent places in the paper.

- Early in the process it became apparent from speaking to residents living near Green Belt sites that many had not heard about the consultation. A number of residents expressed their dissatisfaction about not being directly notified. The Planning Committee therefore reviewed the publicity strategy at its meeting in June 2011. The Committee considered whether to write to all residents of Sefton, but discounted this on the grounds of cost. It was decided to write to residents living next to sites that may involve some development. Letters were sent to residents living within 50 metres of a Green Belt site identified as being potentially suitable for development and living next an Urban Greenspace site where a change to its status has been recommended. This was a total of over 8,000 letters.
- The Council commissioned Mott McDonald to run Focus Groups in each of the 7 Area Committee areas to reach a representative sample of the population.

Consultation material

Copies of the Core Strategy Options paper, and all of the supporting studies were placed in all of the libraries, town halls and one stop shops. We also included 4 page consultation leaflets that summarised the consultation, a frequently asked questions paper and copies of the response forms in all of those locations. All of the material was available on the Sefton Council website.

A summary of the comments received on the consultation process is provided in Annex A.

Drop in events and presentations

In order to help the public to understand the Options and the background studies, drop-in events were held in each of the 7 Area Committee Areas. We went to each of the Area Committees and Parish Councils and asked if they would like additional drop-in events or presentations to be held in their areas. As a result, the following public events were held:

Type of event	Venue	Date
Drop-in	Crosby Library	Mon 6 th June 2 – 8pm
Presentation	St Stephen's Hall, Hightown	Mon 6 th June 7:45 – 10.00pm
Drop-in	Melling Primary School, Waddicar	Tues 7 th June 4:30 – 7.30pm
Drop-in	Lydiate Parish Centre	Mon 13 th June 2 – 8pm
Drop-in	Christ Church, Lord Street, Southport	Tues 14 th June 2 – 8pm

Type of event	Venue	Date
Drop-in	Aintree Library, Aintree	Wed 15 th June 4 – 8pm
Drop-in	Formby Pool, Formby	Thurs 16 th June 2 – 8pm
Drop-in	Maghull Meadows	Tues 21 st June 2 – 8pm
Drop-in	Ainsdale Village Church	Weds 22 nd June 3 – 8pm
Presentation	Thornton St Frideswydes Church Hall	Mon 27 th June 6:30 – 9pm
Drop-in	Bootle Library	Weds 29 th June 2 – 8pm
Drop-in	Netherton Activity Centre	Thurs 30 th June 2 – 8pm
Drop-in	Ford Community Centre	Weds 6 th July 2 – 8pm
Drop-in	St Patricks Church Hall, Churchtown	Thurs 7 th July 3 – 7pm
Drop-in	Little Crosby Village Hall	Tues 12 th July 4 – 8pm
Presentation	Bedford Road Community Centre, Bootle	Thurs 21 st July 6 – 7:30pm
Drop-in	Aintree Youth Centre	Mon 1 st August 3 – 8pm
Drop-in	Ainsdale Village Church	Wed 3 rd August 3 – 8pm

In addition to the above we attended a number of other events held by the voluntary, community, representative, business and public sectors, all 7 Area Committees and the Sefton Area Partnership of Local Councils. Some examples of the types of events that we attended include:

- Business – Southport Partnership, Sefton Economic Forum, Housing Market Partnership and the Sefton Chamber of Commerce.
- Youth Groups – 4 schools, ‘Making a Difference’ group (teenagers and young adults who have been in care) and Sefton Youth Cabinet.
- Representative – Older Persons’ groups, Health and Social Care group, Parents’ Groups and the Sefton Access Forum.
- Community Groups – Peel Road Residents, Sefton Estate residents and ‘Boofest’ [organised by One Vision in North Park, Bootle].

Summary of two aspects of our consultation

1. Youth Consultation

We carried out a series of Young Peoples Events in partnership with Sefton’s Young Advisors and Children’s Services.

This included workshops in a secondary school in most of the main settlement areas. We also included attended the Making a Difference Group, the Sefton Youth Cabinet and worked with Forum Housing (a Housing Association for young people).

Sefton Young Advisors designed a feedback form targeted to young people. Young people were asked what they consider to be important. Whilst opinions varied, on the whole most young people valued both providing land for homes, jobs, shops and services, whilst at the same time they wanted to protect green land and the environment. The results neatly reflected the tension between meeting two of the major challenges the Corer Strategy has to address!

2. Focus Groups

MIS Mott McDonald organised focus groups on behalf of the Council in each of the seven Area Committee Areas.

The main findings of the focus groups were:

- Sefton's residents value Sefton as a place to live and work, with an excellent mix of towns, countryside and beaches and good access to Liverpool.
- There were concerns about anti-social behaviour, drugs and closure of shops.
- Many participants were concerned about the current depressed economic climate and felt that this undermined the long term needs for employment land.
- Many were unconvinced about how a falling population equated to an increase in the population.
- Vacant housing and contaminated waste land should be used to meet housing needs.
- General opposition to development in the Green Belt. Those that lived closer to the areas likely to be affected were more likely to oppose Green Belt development than those living further away from the Green Belt.

Review of the approach to consultation

We have reviewed the consultation in the light of our experiences during the consultation and comments received. Whilst we went to a considerable effort to reach as many people as possible, we acknowledge not as many people as we hoped heard directly about the consultation. As a result we are making the following changes:

- We are sending out a notice with the Council Tax that asks people to send us their contact details if they wish to be notified about any future consultations on the Plan. This will ensure that every household and business within Sefton is reached.
- The Council have set up a Twitter account since the consultation. We will use Twitter for future consultations to keep the public updated.

- We will also look again at who we directly notify.

We have also had some criticism of the response forms and some of the Core Strategy documents. A number of people have claimed that they were over-complicated and misleading. Where possible, these will be made simpler for future consultations.

Assessment of Consultation

Overall we received 2537 individual comments during the consultation period. These were received in the following formats:

Letter	858
Email	460
Standard Forms	624
Petitions*	494
Multiple Formats	101
TOTAL	2537

* These are people who made comments on a petition, in addition to signing it.

The response forms included an option to give the age range of the person commenting. 282 did give their age details. These were as follows:

0-15 yrs - 1.7%
16-24yrs - 5.7%
25-39yrs - 9.2%
40-59yrs - 30.8%
60-79yrs - 46.1%
over 80yrs - 6.4%

We also received 14 petitions that included the signatures of 7,776 people. Details of petitions received can be found in Annex B.

Of the individual responses an overwhelming majority [approximately 99%] included an objection as part of their comment. These were mostly to the identification of a Green Belt or greenspace site for potential development but also to other elements of the consultation such as the vision, objectives or the consultation procedure. About 5% of submissions included a positive comment, either to the identification of a site for potential development or on the detail of the consultation documents. Some people made objections and supportive comments as part of the same submission. Many of those who supported Green Belt or Green Space development were landowners or agents acting on behalf of landowners.

Of the 2,500+ individual representations received, about 62% commented on specific areas of land in the Green Belt. The number of individual submissions received for each area was as follows:

Southport Total	393	Hightown*	174
Churchtown*	261	Crosby and Thornton * (includes Little Crosby)	199
Ainsdale (includes Ainsdale Hope)	71	Maghull Total*	318
Lynton Road, Birkdale	21	Lydiate*	74
Formby Total	162	Maghull west (Green Park area) *	96
Formby North*	48	Maghull north (east of rail line)	20
Formby South (west of rail line)	40	Maghull east	41
Formby South (east of rail line)	47	Aintree*	313
Formby East (of bypass)	13	Melling	49

*These areas also were the subject of petitions

Full details on the comments received to each of these sites can be found in Sections Three and Four

Many people also commented on specific greenspace sites. The number of individual comments received for the greenspaces which received the most objections are:

Kerslake Way, Hightown*	157	Former Beech Road Primary School Playing Fields, Litherland	16
Somerville Road, Waterloo*	137	Former St Raymond's School, Netherton*	10
Bootle Stadium Playing Fields*	17		

*These areas were also the subject of petitions

Full details of comments on all the Greenspaces is provided in Section Six

Consultation Questions

A minority of people who made written comments [less than 25%] chose to make their comments on the standard form [see above] and so most people did not complete the full range of consultation questions. This was largely due to the fact that many residents wished to make comments on a specific site and did not want to fill out a form which also asked about other aspects. A number of people raised concerns that the questions were leading and didn't provide the opportunity for them to provide the answer they wanted.

The summaries set out below should therefore be used with caution, as they only represent the views of the limited number of people who completed the main consultation form. More emphasis should be placed on the detailed comments people made. These are summarized in Section Two and later sections of this report. However, the results of the questions from the consultation form are provided below:

	Yes	No
Question One (a) – Do you agree with the issues and challenges we have identified in the Core Strategy	49%	51%

Question One (b) – Are there any other issues or challenges we need to consider? The answers to this question are considered in Section Two of this report.

	Yes	No
Question Two (a) – Do you agree that the Vision and Objectives are appropriate and the right ones for Sefton?	41%	59%

Question Two (b) – If not, what changes would you suggest? The answers to this question are considered in Section Two of this report.

	1	2	3	4	5
Question Three (a) – How important is it that we identify enough land to meet Sefton's housing needs? (where 1 is unimportant and 5 very important)	24%	18%	23%	13%	22%

Question Four (a)– How important is it that we identify enough land for jobs and businesses in Sefton? (where 1 is unimportant and 5 very important)	18%	18%	22%	14%	28%
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	Yes	No
Question Three (b) – We only have a limited amount of land that is suitable for housing in the built up areas. Are there any possible housing sites in the urban area that we might have missed? *	86%	14%
Question Four (b) – Do you think that there are any employment areas that could be developed for other uses such as housing? *	72%	28%

* Sites suggested in response to Questions 3 & 4 are listed in Annex C.

	One	Two	Three
Question Five (a)- Which Option of our three do you think is the right option for Sefton?	67%	19%	14%

Question Five (b) If you do not agree with any of the options described, would you like to suggest an alternative option, or a mix of any of the three options? The answers to this question are summarised in Section Two of this report.

Question Six (a) – (d)	Yes	No
Land in the Green Belt should only be developed when the supply in the urban areas is mostly used up?	52%	48%
Development should only be permitted in the Green Belt to meet housing needs?	25%	75%
Development should only be permitted in the Green Belt to meet employment needs	13%	87%
No development should be allowed in the Green Belt for any purpose?	77%	23%

	Yes	No
Question Seven (a) – If we need to identify land in the Green Belt for future development, do you think our approach in the Green Belt Study is correct?	30%	70%
Question Seven (b) – Do you think there are any additional factors that we should consider to help select appropriate sites for development in the Green Belt?	55%	45%

Question Seven (c) – Are there any areas we have said could be developed that you think should be kept as Green Belt?

The answers to this question are considered in Section Four of this report.

Question Seven (d) – Are there any areas identified in the Green Belt Study for continued protection that you think could be partly or fully developed? The answers to this question are considered in Section Five of this report.

	Yes	No
Question Eight (a) – Do you think our approach to Urban Greenspace is the right one?	39%	61%

Question Eight (b) – Are there any areas identified in the Greenspace Study for protection that you think could be partly or fully developed? The answers to this question are considered in Section Six of this report.

	Yes	No
Question Eight (c) – Are there any areas we have said could be developed that you think should be kept as urban greenspace?	94%	6%

Section Two

Core Strategy Options Paper

Comments on Options Paper

- Issues
- Vision
- Aims and objectives
- Options

General Comments e.g.

- Need to use brownfield land
- Vacant homes
- Declining population
- Affordable housing
- Impact of recession



Section Two

[A] Comments on Core Strategy Options Paper

Summary of Comment	Sefton's Response
GENERAL:	
Consider development of new towns because "Kirkby & Skelmersdale show how well it can be done."	We have not yet decided whether development outside the urban area is necessary. Even if it is necessary, it is considered that there is insufficient space in the rural area to create new settlements. New Towns of this type were created under Development Corporations, not a model appropriate to Sefton.
Green space should be developed before Green Belt.	Studies have been carried out in relation to both greenspace sites and land in the Green Belt. The results of these studies will help us to decide if and how much land may be needed from these two sources.
"Boundary Mentality" as always prevails and worsens the problem — there is a strong case for North Sefton and West Lancashire to be merged into a more viable single authority, which follows natural travel patterns. This would increase green belt availability and could lead to improved public transport services. The housing requirements could then be re-examined.	A joint approach may well have benefits. Joint studies have been carried out e.g. in relation to Green Belt, but each authority has decided to prepare its own Core Strategy. Merging local authorities is a matter beyond the Core Strategy. In any case, housing needs are determined objectively irrespective of political boundaries and merging two authorities or working together would not change the fundamentals unless we agreed that West Lancashire met more of 'our' housing needs and this would imply them proposing more green belt release than they are currently proposing.
Sefton Area Partnership of Local Councils: This Core Strategy and the individual Parish and Community Plans should be recognised as part and parcel of the same work. A commitment should be given in the final document to that end, as this is the intention of the Localism Bill and other councils have already made that commitment.	This can be acknowledged in the final document. The Localism Act provides for neighbourhood plans to help local communities plan for their local areas.
What pressure is there from central government to provide increased development in the North of the country? 2. The study appears to target Southport for development. Can the	None. None of the options suggests that Southport should take more than a proportionate share of development. The housing requirement is based on a study of Sefton alone (although it takes account of cross

council provide written assurance this is not a political decision?	boundary migration assumptions) and is not top-down. If it is proposed to alter the Green Belt boundary it will only be because the Council thinks it is necessary to do so in order to meet local needs.
Sefton should be more pro-active in helping the regeneration of Crosby village. Planting a few flowers is simply not sufficient. Crosby residents want the village to return to a thriving area and this can only be achieved with serious measures such as: - reintroduction of traffic through the village - reduction in or abolition of parking charges - limiting the size of proposed new Sainsbury's supermarket	Discussions are currently being held on this through the Crosby Area Partnership (including reps from Council, traders, community, Merseytravel).
Where's the jobs strategy? By that I don't mean the jargon, I mean committed jobs that can be confirmed. That's the only thing that would make this paper anything other than a developers charter.	The Council will soon be consulting on its Economic Development Strategy which will help to address this. We are committed to maintaining our employment sites in employment use (to maintain and attract jobs) to assist with this process irrespective of which option is pursued
Too much ill planned short termism in Sefton. Need to consider protection of nature, quality of residents lives & appeal to visitors as a town (Southport) more carefully.	The Core Strategy must look up to 15 years ahead. It is agreed that there needs to be a balance between these different aspects, including meeting the genuine needs of Sefton's residents.
2. PROFILE:	
The national and regional context has not been properly considered, nor has the strategy of other councils as well as other bodies contributing to policy and planning affecting the whole Liverpool City Region. There is no integration within adjacent boroughs, nor sufficient consideration to the overall profile of our region and how it is likely to change. For example, Liverpool's Knowledge Economy Plan will result in many more professional jobs, but outside Sefton - as indicated in the Core Strategy documents, two out of every five jobs are held outside the borough. Nor is a decrease in our population to be feared - it is typical of rural areas and we are not a regional capital, only part of one on which we depend significantly.	We do take account of plans in other boroughs, but the Core Strategy also needs to plan for Sefton. There is a balance to be struck in acknowledging that many people will continue to travel to work outside the borough, but also providing for new employment in Sefton too. An 'Overview Study' provides a sub-regional context to our Core Strategy, looking at need and supply on other districts as a context. Sefton is not a rural area.

Natural England would like to see a greater emphasis being placed on the value and importance of the landscape and townscape – these are assets that require protection and enhancement within the overall policy framework for the Borough. Accept that need to protect valued landscapes appears elsewhere.	This comment is accepted in overall terms, and the Preferred Option stage will take more account of this.
The Highways Agency propose that because the Port of Liverpool is a key generator of strategic traffic flows in this part of the conurbation, its important profile in terms of transshipment and employment functions should be emphasized. This would help to set the context for the issues and challenges.	Agreed. This will be reflected at the Preferred Option stage of the Core Strategy. The 'Overview Study', referred to above, provides a sub-regional context to the Core Strategy.
The Profile of Sefton refers to smaller villages in Central Sefton, however, there is no mention of Little Crosby or its importance.	There is a balance in finding the right level of detail. This request will be considered further when drafting the Preferred Option.
3. ISSUES & CHALLENGES [under the following general headings: A - Quality homes and neighbourhoods; B – environmentally sensitive; C – well connected; D – thriving; E – healthy, inclusive & safe]	
The core issue is this: is Sefton a place where people want to live and be happy and proud to live in. If the Council degrades the successful parts of the borough, what is its long term future?	We must strike a balance between protecting what is important to the Borough, and meeting reasonable needs. It would not be the intention under any option to degrade the successful parts of the borough.
Liverpool City Council : There is very little on cross-boundary issues and the need to be complementary to the strategies of adjoining authorities. The relationship between Sefton and Liverpool is especially important given the close functional relationships.	It is acknowledged that there is scope to link more closely with the issues and strategies of adjoining authorities, and in particular with Liverpool. This will be addressed at Preferred Option stage.
'ABetterCrosby' agrees that issues A to E are important, but believe the overarching key issue is to 'Improve the Quality of Sefton's Places'. Whilst a general statement, we believe this needs to be stated as the Core Strategy needs a clear positive message. Quality of Place is fundamental to many of the other issues and challenges identified.	While it is agreed that the quality of place is important, it is considered that quality of life is of overriding importance, including elements like health, accessibility, jobs.
A Quality Homes and Neighbourhoods	
It is important that the Core Strategy responds to local housing needs,	Agreed that meeting housing needs is an important factor and this is

the prevailing economic conditions and market demand for family housing outside the Housing Renewal Areas of South Sefton. A continued over-reliance on high-density schemes in the least attractive parts of the Borough risks a further stagnation of development in Sefton, when there is a clear need for alternative provision.	reflected in the Options Paper. None of the options depends on/ proposes high-density housing in selected parts of the Borough.
We need to address local issues – poor housing in Bootle & Southport; reasons for unoccupied shops/ businesses.	The poor housing in Bootle has been the priority of the Housing Market Renewal Initiative. We have commissioned a Retail Strategy Review of the Borough. This will review the role and function of all shopping parades in the Borough to establish whether they are needed or are surplus to requirements, and if the latter then make suggestions about alternative uses. Unoccupied businesses are part of the national trend reflecting the current economic downturn
Existing planning policy for Sefton needs a complete overhaul. There are too many large houses occupied by one person and too many empty properties (often 2 nd homes). Address current housing density before encroaching on the Green Belt. Gain control over all vacant dwellings in Sefton and re-establish community in these localities	The planning system is not able to influence the number of large houses occupied by one person. We have an empty homes strategy which aims to reduce the number of empty homes and vacancy rates have come down. Many of the empty homes are privately owned. Legislation restricts the ability to purchase empty homes and it is a very expensive and time-consuming process.
English Heritage and others: Issue A5: Local distinctiveness The paper highlights the distinctive character and identity of Sefton's towns and villages and asks how future development can be well designed. This must start from an understanding of the key elements of the natural, built and historic environment which combine to create Sefton's different places. The core strategy should identify critical elements of Sefton's historic environment and their significance and show how this can be used to inspire new development of imaginative and high quality design.	Agree that there is scope for including greater reference to Sefton's historic environment as the basis for encouraging high quality new development .
National Trust support for integrated design and distinctiveness	Noted
Natural England [NE] welcome recognition that solutions to inequalities	Noted. Policies encouraging sustainable design can be included at a

<p>across the Borough include improving quality of natural environment. Enhancing the quality of the natural environment will bring a number of benefits and address issues for example, place setting, nature conservation, health and well being. NE also welcome the inclusion of 'A5 Local distinctiveness'. NE strongly advocates the use of sustainable design and construction techniques in new development as a means of maintaining quality of place.</p>	<p>later stage of preparing the Core Strategy.</p>
<p>It's important to maintain the identity of Southport itself by continuing to preserve the individualistic characteristics of the villages which make up the town. It is NOT an industrial area and has long been recognized as a dormitory residential area for Liverpool. That status needs to be maintained.</p>	<p>The nature of the labour market is that many people travel to work outside Sefton but also many people living in Sefton also work in Sefton and others travel into Sefton to work so there is a clear need to maintain an employment base in Sefton. There is evidence that the most disadvantaged people in need of jobs require employment opportunities locally as they cannot afford to travel very far for work. Sefton is not proposing major additional employment land allocations - in fact no options propose any Green Belt release for employment in south Sefton, and options 2 and 3 propose only modest Green Belt release in north Sefton after 2020 to provide a successor site for Southport Business Park which is expected to be completed by then.</p>
<p>B Environmentally sensitive</p>	
<p>B1 Be more positive about improving environmental quality. Suggested additional issues including coastal quality in relation to visitor pressure; network of green spaces. Support for reuse of former industrial sites Want more on climate change – sustainable design & construction; also location of new development and better facilities for public transport etc</p>	<p>Noted. These will be addressed at the next stage of preparing the Plan.</p>
<p>Sustainability and all natural constraints coastline, flood plain /agricultural land /Green Belt/ habitats /dunes / marshes .. should be incorporated into a major statement. Agricultural economy & underproductive land should be addressed for resources use/ food security</p>	<p>These criteria are contained in the methodology of the Green Belt study. It is proposed to carry out a study of agricultural land to investigate these matters in detail.</p>

Parks/ gardens to be kept to high standard; are to be safe for people. Coast area – keep clean: more litter, fewer tourists; attracts youths, anti-social behaviour	The other comments are noted.
Natural England note that under 'B2 Meeting the challenge of climate change' the focus is on flood risk and carbon emissions from transport. The Core Strategy will also need to consider the part that renewable energy technologies can play in helping to mitigate the effects of climate change. This should include overall environmental performance of new developments through carbon reduction and the need to consider appropriate locations for the development of renewable energy projects within the Borough.	A study has been carried out across the whole of Merseyside to show the locations which have most potential for renewable energy
With respect to reducing Sefton's carbon emissions, have Sefton Council investigated the feasibility of local power generation, CHP, waste to energy projects or district heating schemes?	We are supportive of this where it can prove to be viable.
Sefton has potential to reap the benefits of the strong tidal waters that stretch along our coastline.	All potential for generating renewable energy will always be considered. However, a scheme to use the tidal waters of the Mersey was discounted on cost grounds some time ago.
C Well connected	
The Highways Agency note that Southport's connections to the national motorway network are poor.(part of issue C1) Although there is limited opportunity to greatly affect this with Southport 's geographic position being peripheral to the motorway network, nevertheless local highway schemes which secure improved connection to the M58, in particular the programmed Thornton — Switch Island link deserve some mention in addressing this deficiency	Noted. This reference can be added.
Health and well-being inextricably linked to access to open spaces / places of beauty	Agreed.
A better Crosby believe that the emphasis currently given to the identified issues should be adjusted. We believe the most important is D — Thriving, whilst the attention paid to A - Housing across the Core Strategy is too dominant. In this the Core Strategy could have a clear	The key land use challenge is to accommodate the Borough's needs for new homes and jobs, and this has led to the document focusing on different ways in which these needs can be accommodated. We will look at ways in which other aspects can be given more focus at the

relationship to economic development plans for the borough.	Preferred Option stage. However the reality is that housing is the key issue in most examinations of Core Strategies, and most often the matter in which they are found to be 'unsound'.
Consideration for park and ride schemes need to be reviewed in order to reduce congestion.	Noted.
We are worried about the extra traffic [Aintree]	This will be taken account of in considering whether any sites in Aintree will be selected for development.
Part of the Core Strategy should include your provision for support mechanisms to support the additional housing and employment needs, for example, transport, education, policing and effect on, and extensions to the Council service. An assessment of the effect of the additional residences and jobs will have "knock on" effects and this has not been considered or factored in.	An Infrastructure Delivery Plan will assess the likely implications of development on a whole range of infrastructure, and this will accompany the Preferred Option stage of the Core Strategy.
Highways Agency: Issue C3: - The Options paper notes that in the past new development has often not contributed enough to resolving issues of poor infrastructure and in some cases has made the problem worse by increasing demand in areas with restricted capacity. This emphasises the need to ensure that employment and housing land allocations are accessible by a convenient choice of transport modes, with appropriate improvements to infrastructure funded by developers as part of redevelopment proposals.	Noted. This is the purpose of the Infrastructure Delivery Plan. A transport statement would be required for any new development to ensure that it can be accessed by a range of forms of transport.
Services are an issue in Maghull / Lydiate – lack of investment in local businesses such as in shopping areas, medical provision, investment in local industrial estate at Sefton Meadows and no support for farming	Noted. There have been various proposals for redeveloping the centre of Maghull, including providing new health facilities, but these have not progressed for a variety of reasons. There are currently no funds available to improve industrial estates.
D Thriving	
More emphasis & focus on retraining people that are currently in long term unemployment to help promote more pride & self esteem and sense of community which will in turn will make people more inclined to look after properties and their environment.	Noted . There are currently many opportunities for re-training.
More employment space for small and new businesses. Sustainable	Noted. The Council is about to consult on its Economic Development

development in relation to energy [micro-generation] and food production [local supply chains].	Strategy and may also be able to influence some of these areas.
There is a need to get people off benefits. Sefton has some good facilities to help people get back into work, and also for training.	Noted.
Reduce over priced parking fees which will encourage people to come into the towns to shop & use leisure facilities for longer. Reduce rates for shops so new business can have a chance at starting up.	The level of parking charges in Sefton is comparable with, or below, the levels of comparable authorities. It is not within the scope of the Core Strategy to reduce rates.
More employment for Southport – this will stabilize the population, more housing won't	Noted. Maintaining an adequate employment land supply helps with this too
Local shopping centres are suffering due to ever increasing no of supermarkets and retail outlets outside of the town centres. Causes more traffic pollution & loss of local jobs. Shops in Southport are suffering and it's beginning to look like a ghost town. Tourists will not want to visit.	The emphasis will continue to be on locating retail development within or on the edge of town centres, but government policy allows for shopping to be located elsewhere if there is not sufficient suitable land within centres to meet their requirements.
Much needed retail development in Crosby centre (Sainsburys) and extension to Chapel St, Southport.	Noted. Town centres are proposed to be the key places for new retail development.
Additional ISSUES	
Sefton's townships are extreme in their diversity from Bootle through the central towns and villages and up to Southport. They are diverse in not only character, but form, function and their ability to receive any significant new development when taking account of the availability of services and infrastructure and environmental constraints. Different housing market areas are at play across the Borough and extend well outside the Borough. A different strategy is needed in different parts of the Borough. This is a particular challenge in Southport where the potential to meet development needs is constrained by the stranglehold of the Borough boundary. In this part of the Borough any consideration of the appropriate way forward should include a more serious discussion with the neighbouring Authority about a cooperative approach to meeting future development needs that is not simply dictated by an artificial administrative boundary.	This diversity is acknowledged and the constraints are noted. An 'Overview Study' has looked at the capacity of neighbouring authorities (including West Lancashire) to help meet needs of adjoining authorities. West Lancashire Borough has indicated it would not wish to allocate a significant amount of land for the purpose of meeting needs generated within Sefton.

<p>Every effort should be made to arrest the decline of population. Failure to do so risks undermining the financial viability of existing services/ facilities, a tightening of the labour market placing increased costs on businesses and creating unsustainable patterns of in-commuting. Planning for both a declining and ageing population is a fundamentally mistaken and unsustainable approach and a key challenge should be how we slow down or reverse population loss, especially by attracting or retaining younger, economically active persons.</p>	<p>This is something which would need to be considered further in the light of the implications on the amount of land in the Green Belt which would be needed to satisfy even a stabilised population.</p>
<p>Woodland Trust: support inclusion of accessibility, tackling climate change and improving health as some of the key challenges. However, no reference to the role which a healthy natural environment can play in tackling all three of these challenges. A well connected network of green infrastructure can provide a range of economic and social as well as environmental benefits. Trees and woods are particularly beneficial in terms of alleviating flooding, sequestering carbon to counter climate change, providing areas for healthy exercise and providing shade in summer to help reduce urban temperatures. Sefton has much poorer access to woodland than the average for the north west.</p>	<p>Noted. The scope to tackle these issues in a more integrated way is acknowledged and will be addressed in the Preferred Option stage of the Core Strategy.</p>
<p>A further challenge to add would be to narrow the gap between the most and least well off.</p>	<p>Agreed. This is implied in our support for urban regeneration (Aim 1), and in listing as priority for new development those areas which have specific challenges of regeneration or are in particular need of investment [Principle 1].</p>
<p>Theatres Trust: There should be a reference in the Core Strategy to the enhancement and development of Sefton's leisure and cultural offer which could include theatres. Cultural facilities should be seen as a key ingredient for healthy and vibrant communities rather than as an optional extra.</p>	<p>The Southport Arts Theatre is currently undergoing major refurbishment. The issue of theatres could be referred to under a wider definition of cultural facilities.</p>
<p>We would like to see more facilities for young people</p>	<p>Unfortunately organised facilities for young people are difficult to provide when there is so much pressure on budgets.</p>

4 VISION	
The Vision should aspire to the creation of stable, sustainable and balanced communities across the Borough.	'Stable, sustainable and balanced communities' means different things to different people. It would take some detailed analysis to understand what this might mean in practice and whether it was possible to achieve through the planning system.
There is a need to keep the Green Belt in place to ensure the continued good quality of life for the local residents of Sefton. Hence the need to maintain an appropriate balance between the built and natural environment in Sefton. It seems appropriate that if suitable land is required for housing and development then it is provided elsewhere in the North West region.	It is agreed that the Green Belt is important. Meeting the needs of Sefton residents for new homes and jobs locally is also considered to be important. This is the nub of the challenge which the Core Strategy has to address. The Overview Study shows that whilst there may be some potential for Liverpool to meet some of our unmet needs, shortfalls in supply in West Lancashire and Knowsley to meet their own housing needs mean we can't place any reliance on this.
Consideration should be given not only to the need for new housing but also the effect that such development will have on the existing population in the area. They will have chosen to live or remain in that area because of its locality and to change that by the building of additional housing may fundamentally change the desirability of the area.	Development will always bring change. The challenge is to ensure that, as far as possible, development complements and enhances an area, rather than detracts from it.
The vision for Sefton Borough runs to eight paragraphs. By the very length of the Vision, the key messages fail to come across succinctly. Request that it should be amended to incorporate a much shorter and focused Vision, with the existing text forming the basis of an accompanying commentary.	The format of the vision will be reviewed at the next stage of preparing the Core Strategy.
National Trust: raise issues to do with coastal defence, environmental concerns and the natural value of the coast. Recommend that principles contained in the regional strategy are incorporated e.g. about protection of coast [managing the coastline] .	How issues relating to the coast are incorporated will be reviewed at the next stage of preparing the Core Strategy.
ABetterCrosby suggest that whilst the elements of the vision are all good, we believe there should be a clear 'Golden Thread'- an overarching, positive vision statement that sets an exciting target for the next 15 years e.g. "The Active Coast — one of England's finest coastal	It is acknowledged that there are different ways of formulating a vision for the Borough. This is something which can be considered further at the next stage of the Core Strategy.

<p>boroughs". The extent and diversity of our coastline is a wonderful asset, not currently reflected in the Core Strategy. Within this broad idea each distinct place could promote its own positive future plan. Whilst regeneration of Bootle and Southport is important, all the places of Sefton should be encouraged to develop into better quality places.</p>	
<p>Natural England support the vision subject to the following:</p> <ul style="list-style-type: none"> - although the vision looks to retain what makes the Borough special, much of what follows is relatively generic and could be applicable to a number of local authority areas on the North West coastal area - major development should avoid environmental assets such as protected landscapes, habitats, sites, species and floodplains, and should promote sustainable travel patterns. - under the topic of climate change there is reference to accommodating new forms of renewable energy, which we welcome. However, this is not reflected earlier in the document under Section 3 [Issues & Challenges]. - it is more than a balancing act to just enhance the natural environment given the importance of the coastal area at international and national level. The Vision must also look to the protection of these internationally important natural assets. - The use of the phrase 'where appropriate' suggests limitations and lack of ambition with regard enhancing green space and green infrastructure, and there is no reference to creation of new areas of green space and green infrastructure, which is disappointing. 	<p>Accepted. This will be addressed in the next stage of the Core Strategy.</p> <p>This is included in a number of places within the vision, objective 10, Principle 3, but may benefit from being stated more clearly in one place. Not every issue is able to be included.</p> <p>This is addressed by Principle 3.</p> <p>This phrase simply acknowledges that resources are limited. It is not possible to include a reference to everything in the vision.</p>
<p>The vision is good but too general to disagree with - the issues will be in the detail of what implementation means in practice - particularly around 'development/ affordable' /'specific needs'/ 'sustainable'.</p>	<p>The next stage of the Core Strategy will begin to spell this out in more detail.</p>
<p>The Home Builders Federation: unclear what the plan period for the Core Strategy will be. The section states that it will run to 2028 but does not state what the start year is. It would be helpful if this could be clearly set out in this section, and also on the cover of the Core Strategy.</p>	<p>The start year is the date when the Core Strategy would be adopted. The Options Paper anticipated this to be 2013. This will be set out clearly in the next stage.</p>

Knowing what the plan-period is essential for housing calculation purposes.	
Need for a vision which regenerates the whole area equally cashing in on coast and attractions.. get the transport/ roads right also concentrate on quality regeneration of existing places, helping them to thrive, rather than taking bits of green belt to build more houses. All areas should be given equal quality input to thrive, not just Bootle and Southport. Regeneration is priority especially places like Crosby Village.	It is acknowledged that all parts of the borough are capable of being improved, but it is considered that Bootle and central Southport have particular needs which make them a priority, as expressed by Aim 1.
There is not enough consideration given in the report for building the local economy. Our town centres are suffering and Sefton is doing little to help attract businesses (local and national) in to fill the void left behind by failing/failed businesses. There is no vision for how Sefton needs to market itself over the next 15 years. Not enough is done to capitalise on the large business/tourist opportunities such as the Grand National (which is left to Liverpool to benefit from) or Crosby's Iron Men.	The current economic climate is very challenging. Here is constant effort to try to attract new businesses, but this is not easy when so many businesses are closing down. These issues are more appropriate to the Sefton Economic Development Strategy which will be consulted on soon.
The demand for additional housing is coming from central urban areas in the Borough such as Bootle and Netherton; not rural areas such as Hightown, Formby etc. Housing should be provided where there is an increased need.	There is a need for both general housing and affordable housing in all areas of the Borough, but the level of need varies according to the size of the current population.
The planning strategy should be for a shorter term - long term planning often confronts with the budgets of the changing national governments.	National policy strongly recommends that the Core Strategy looks 15 years ahead.
The focus on housing regeneration in Bootle is wholly unnecessary. The priority should be to remove industrial legacy of unused/ underused/ derelict sites which has scarred Bootle for centuries, degrades the environment, destroys the quality of life & actively drives people away. Suggests emphasis should be on refurbishment and retrofitting energy efficiency. Renovation, refurbishment and training/ skills/ apprenticeships [multiplier effect] makes the difference. Why not set up a local company and DIY SMBC? Beautify the environment – street trees, pocket parks	Lack of funding is a major constraint to making faster progress in removing industrial legacy. We need to maintain our employment land resource to provide opportunities for future jobs locally There is a current scheme to promote energy efficiency in existing housing, Making the environment more attractive is part of Objective 10.
Too much development centred on Southport [refer to sites identified in Ainsdale]	The amount of development proposed in Southport in Options 2 & 3 is not disproportionate in relation to other parts of the borough.

Work with environmental research scientists to clean up land and water adjacent to Southport. Enhance existing waste management and recycling to make areas less polluted and more habitable. More rights of way leading to countryside to Ormskirk & Burscough	Noted. A Waste Plan is being finalised during 2012 – this puts more emphasis on re-use and recycling.
Focus on urban regeneration & re-building community rather than take the easy option to sacrifice Green Belt & prime agricultural land	The Options paper includes urban regeneration as its first principle.
Suggest remove or review para 4.6 as towns & villages do not require mass investment. Re-write para 4.8 as we can NOT give up on manufacturing or public sector jobs. Concentrating on tourism and leisure will do no good in the longer term.	This will be reviewed as part of a continuing discussion on needs and how best to meet them.
5 AIMS:	
Request for an additional aim: “To meet the defined and agreed housing requirement for the Borough in full over the plan period, and to ensure that a minimum five year land supply is maintained at all times. This will require greenfield housing land release to provide family housing”.	The Government already asks local authorities to maintain a 5 year land supply at all times so this does not need to be added as an aim. This is one of the key factors that will be examined by an Inspector at any Core Strategy examination. Further work needs to be done to establish an accurate housing land requirement.
British Waterways support the aims and suggests particular ways in which these could be achieved in relation to the Leeds and Liverpool Canal. They draw attention to the historic significance of the canal and note that its potential contribution towards meeting the aims and objectives of the Core Strategy does not come across in the Options Paper.	Noted. References can be added at the next stage.
Whilst we wholly agree with the 'Vision and Objectives'; we would like to suggest that; similar to the 'new housing' objective, for purposes of clarification, an objective which states; 'to manage new employment land provision to meet' should be included. Moreover, related to the 'sustainable development' aim, we suggest that 'support mixed use development' is included; to set out a key principle of sustainable development at the outset of the Core Strategy.	Objective 7 aims to do this. Mixed use development will be encouraged where appropriate but there are likely to be only limited opportunities to do this. Many industrial activities by their very nature do not sit comfortably located nearby housing uses (e.g. traffic, noise, vibration, disturbance etc).

There is a continued focus on the regeneration of Bootle/Netherton and central Southport. The Core Strategy should support and facilitate new sustainable development across the Borough as a whole, particularly the more attractive market areas around central Sefton.	These areas still face the greatest challenges, but the Options Paper promotes appropriate development across the Borough.
English Heritage support the aims of the core strategy are supported however it is suggested that objective 10 is reworded to replace the word "built" with "historic".	Can review this, but it is not just the historic environment that is worthy of preservation or enhancement.
Include nature conservation assets into 3 rd Aim	The aim is broader than this, and this change is not considered necessary.
Proposed development in Aintree is in opposition to aims of the Core Strategy – urban regeneration, support sustainable development, maintain and enhance local distinctiveness of Sefton & to make sure Sefton contributes and benefits from City Region	The challenge for us is to meet the needs of the borough given that brownfield land is running out and the Government's requirement that local authorities should maintain a 5 year supply of housing land at all times.
Natural England suggest that the aims emphasise mainly socioeconomic issues. We would like to see a more balanced approach, giving due emphasis to the protection and enhancement of the quality of the natural environment and its important role in contributing to biodiversity, health and well being and locally distinctive character across the Borough, as well as tourism and recreation on the coast.	Noted. These comments will be taken into account in preparing the Preferred Option.
6 OBJECTIVES:	
The second objective should be amended to read: "To manage new housing provision to slow down or reverse population decline and meet the needs of a changing population" to accord with the Government's 'Planning for Growth' agenda.	This needs to be considered in the light of further work on the housing requirement.
Reword objective 2 to say 'deliver', not 'manage' housing.	Inappropriate to say deliver, as it is not within the power of the local authority to make housing be delivered.
Add additional objective relating to the importance of ensuring there is sufficient employment land to enable local businesses to expand and to enable new employers to locate in the borough: 'To ensure there is sufficient employment land to meet the needs of / demand in the	This is covered in general terms as part of Objective 7, but a reference to land can be added. However, this cannot be an open-ended commitment to meet demand as there is limited space within the urban area unless we encroach in the Green Belt.

Borough'	
In relation to objectives 2, 3, and 7 there are significant physical, environmental, social and financial constraints bearing down which will make it difficult for Sefton to achieve these objectives alone or through the planning system alone. Accordingly, these three objectives should have the caveat that they will be secured, in part, through cooperation with our neighbours within the Merseyside City Region and funding bodies, including Central Government.	The financial implications of achieving the objectives should perhaps be a rider in front of the aims and objectives, or at the front of the Plan
Objective 4 - Request change from requirement to provide 'essential' infrastructure to 'appropriate.	What infrastructure is needed will be defined through the Infrastructure Delivery Plan.
Add further Objective to reflect the locational advantages of Sefton and its position in the Liverpool City Region: 'To take full economic advantage of being an integral part of the Liverpool City Region'	It is considered that this is implicit in the 4 th aim and does not need a specific objective
British Waterways suggest a further objective to recognise the significance of the canal and its potential to contribute to the aims of the Core Strategy.	It is considered that this is too detailed to include on its own, but there may be scope to widen one of the objectives to include a reference to making the most of the Borough's natural assets.
Natural England (NE), National Trust , Mersey Forest and the Woodland Trust support objectives 10 & 11. NE however would like to see more emphasis on specific environmental assets including biodiversity, geodiversity and the landscape and make reference to the historic as well as the built environment, together with greater emphasis on the green 'infrastructure'. Objective 8 should not aim to merely minimize environmental impacts but should aim first to avoid any damaging effects first and, failing that, minimize them. Objective 11 should refer to the use of renewable energy technologies, to reflect the comments in the Vision, as a means of helping to reduce Sefton's carbon footprint. An objective should be included about the focus of development within the urban areas, as we support in principle the development of brownfield sites over greenfield land.	These emphases will be considered at a later stage of the Core Strategy. Comments on Objective 8 supported but not appropriate to include in an objective. Reference to renewable technology can be added. The preference for development on brownfield land is expressed in Principle 1.
Home Builders Federation: it is invidious to separate out new housing	We need to operate in the connect of current planning policy guidance

<p>from affordable housing. A single unified objective that aims to meet the housing requirements of the district would be more appropriate and in keeping with the provisions of the draft NPPF. Paragraph 112 of the draft NPPF refers to the need for local authorities to be responsive to local circumstances by considering whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs.</p>	<p>until it changes and we don't, at this time, know what it will change to through new NPPF. When it is published in its final form we will look at this matter again.</p> <p>We believe our policy position re affordable housing is consistent with PPS3, namely that we will seek to provide mixed communities. We should should seek to:</p> <ul style="list-style-type: none"> - set an overall target for the amount of affordable housing - set separate targets for social rented and intermediate housing - specify the size and type of affordable housing - set out circumstances in which affordable housing will be required - set out an approach to seeking development contributions off site. <p>All the above is subject to economic viability. Where viability allows we currently seek 30% affordable housing on all sites of 15 or more dwellings. Subject to what the final NPPF says we would propose to continue this as we consider this is the best way to address our affordable housing needs.</p>
<p>The Theatres Trust queries what 'essential' infrastructure means in Objective 4, and specifically ask whether it includes social infrastructure such as arts venues? Cultural facilities are essential for the vibrancy of your town centres' evening economy but the word 'cultural' does not appear in Objective 6.</p>	<p>The importance of cultural facilities is acknowledged, and will be considered at a later stage in preparing the Core Strategy. The definition of infrastructure in the Infrastructure Delivery Plan could refer to this.</p>
<p>Main objective should be to maintain Sefton as a primary place to live in with a balance between property and countryside, and without diminishing the rural aspect.</p>	<p>This is embraced within the 3rd Aim, to maintain and enhance the local distinctiveness of Sefton and its individual communities.</p>
<p>National Trust wish to see an objective about the coast, with a specific reference to securing benefits to tourism.</p>	<p>Will review objectives at next stage of the plan, but there is a challenge to keep the number of objectives manageable.</p>
<p>Would like to see more affordable & increased choice in pre-school child care. Full-time child care very expensive and could prevent people returning to or starting work.</p>	<p>This is too detailed to be included as an objective of the Core Strategy, but could be considered as part of a wider approach to helping people into work.</p>
<p>7 PRINCIPLES:</p>	
<p>Concern expressed over Principle 1 prioritising new development in</p>	<p>We are committed to addressing regeneration as a priority while</p>

<p>areas which have specific challenges of regeneration or are in particular need of development' as this may simply push new investors to more suitable or attractive sites in neighbouring boroughs. This Principle therefore needs to be balanced against the reality of delivering its requirements for much needed employment and housing development across the borough.</p>	<p>recognising the need to make sure that a supply of sites is available. The emerging Core Strategy has to address both these matters</p>
<p>Principle 2 currently states: 'Development in the urban areas will generally take priority over development in the rural area'. Concern that, given lack of opportunities within the urban area, the Council is potentially restricting the release of sites which may well be in suitable and sustainable locations, and which could help to meet the boroughs need for new housing.</p>	<p>This principle states that our priority is to meet needs first of all within the built-up area. This principle will be reviewed when we have agreed its approach to its Preferred Option.</p>
<p>Principle 4: 'Not all land in the urban area is suitable for development. In particular we want to retain valued green spaces and our employment areas'. Request for flexibility in how this is applied, and that it does not preclude development on all greenspace even if they are no longer used or valued by the public. Also a clear statement is requested that not all employment land is excluded from any other form of development, as mixed use development in particular could be appropriate on employment sites that are effectively failing due to under-investment or poor locations.</p>	<p>This will be reviewed when the Council considers its approach to the green space study which we have also consulted on. We are generally committed to retaining land which is 'designated' as employment land, but there may be other land in employment uses which might be suitable for development for other uses e.g. some of the 'backland' sites in Southport.</p>
<p>Mersey Forest supports Principle 4, and recognizes that not all urban land is suitable for development and the importance of retaining valued green spaces. Also that all green space has some value with some sites delivering more benefits than others, as set out in the greenspace study.</p>	<p>Noted.</p>
<p>Principles 6 & 7 [which direct development which attracts a lot of journeys to town centres] should be more flexible in order to acknowledge that some retail development, health and leisure developments can be accommodated outside town, district and local centres.</p>	<p>The government is committed to 'town centres first' and, unless this changes through NPPF, we will follow this line strictly. However, this does not mean that all retail development will take place in town centres. If development cannot be met within centres we would apply a 'sequential approach' to selecting a site.</p>
<p>Principle 8 [which directs development to the most sustainable locations possible in the Green Belt when supply is drying up in the urban area]</p>	<p>This will be taken into account when the Council has made a decision about which option it prefers.</p>

should be amended to reflect that development on greenfield sites can complement development in the urban area, especially if Options Two or Three are chosen, for example offering a lower density family housing.	
The Home Builders Federation are concerned by Principle 8 that the Council has already made up its mind in advance of knowing whether it has enough brownfield land to meet its housing requirements. Only authorising brownfield development before any greenfield releases are countenanced could cause delivery problems. Both brownfield regeneration sites and greenfield strategic opportunities should be supported equally by the Council in helping to secure delivery of the strategic housing requirement.	As above
Principle 8: Agree that the Council: should direct residential development to land within the Green Belt as the Council is unable to accommodate its housing requirements within the urban area over the plan period. The Core Strategy should include a policy trigger which will allow the release of Green Belt sites in advance of the adoption of the Allocations DPD to ensure a rolling five-year housing land supply	Noted.
Principle 9 is supported and underlines to necessity of having a good understanding of what makes up the special character of Sefton's towns and villages.	Noted.
Principle 10 [which promotes low carbon development] should take account of the feasibility and viability of provision.	Noted.
Mersey Forest - Principle 10 could by way of example make a specific reference to new development "being designed to take into account the effects of climate change".	Noted. There is a balance to be struck between being succinct and including everything which may be relevant.
Natural England: - strongly support Principles 2 and 3 [priority of development in urban areas, and protection of important nature sites]. - welcome the inclusion of Principle 5 [meeting local needs locally]. However, when looking at possibilities for the re-use of urban green space sites, it is important the Council first considers if these can be improved/enhanced as green space that will benefit local community	Noted.

<p>through better management. - welcome and support the inclusion of Principle 10 that covers the issues of low carbon development and climate change.</p>	
<p>8 STRATEGY:</p>	
<p>It should be possible to consider at government level, some form of assisted voluntary migration to populate abroad where figures are low — (eg New Zealand, a similar sized country with 31/2 m population — UK over 60 million).</p>	<p>This is not the concern of the Core Strategy.</p>
<p>Just as Liverpool has, Sefton must use tourism and leisure to slow down the inevitable historical decline that results from the loss of 250,000 manufacturing jobs on Merseyside. We do not need a bigger infrastructure to maintain in Sefton.</p>	<p>Noted.</p>
<p>The Council for the Protection of Rural England suggest that the Council should not ignore the overwhelming wishes of the electorate as articulated in all the public meetings and media cover during the consultation, that there is a distinct lack of support for any development on the Green Belt. CPRE Sefton interprets this as evidence that the general public values the quality of life and sense of place as being of crucial importance. We reject the assumption that the Borough's economic growth is inextricably linked with the greater amount of land that is available for new homes, CPRE Sefton believes that the environmental and social needs of its residents are equally important as economic wellbeing.</p>	<p>In planning for the next 15 years, the Council has to balance a number of competing demands – meeting the genuine needs of its communities whilst at the same time protecting its valued environment. The difficult challenge is how to do this in a way which is best for Sefton as a whole.</p>
<p>Liverpool Council: all ways to maximise the delivery of urban land for housing and bringing back into use vacant properties in Sefton need to have been fully evaluated and explored before it can endorse a strategy which involved significant release of Green Belt land for housing. This is a particular concern given the close functional and physical linkages between the two authorities and the important role the Merseyside Green Belt is always acknowledged to have played in</p>	<p>We have and always would wish to do this where possible</p>

supporting the wider sub-regional strategy of directing investment and development to the conurbation's inner areas, including Liverpool, where there is a substantial resource of vacant brownfield land and buildings.	
The assumption that Sefton and Knowsley should be considered in isolation is challenged, and that substantial provision within Liverpool or on the Wirral is unlikely.	Noted. An Overview Study has been carried out and there is only limited opportunity in adjacent authorities to help meet Sefton's needs.
Conservation should be key to development strategy. Without maximum constraint on development, environmental destruction is inevitable and will continue to accelerate.	This implies that development cannot take place in a way which is sensitive to the environment; also does not address people's genuine needs for homes, jobs and other services. Key is to include policies which ensure that development takes place in a way which limits the impact on the environment and is also able to enhance it.
9 OPTIONS:	
As the Council is still weighing up the various Options, and their advantages and disadvantages, it is not considered appropriate at this stage to respond in any detail to people's views on the Options, unless there are points of fact which may assist the discussion.	
In addition to the individual comments that relate to the Core Strategy Options, two petitions were received in support for Option One and object to development in the Green Belt. These were signed by 422 and 394 residents respectively.	
Comments mainly on Option One	
Option 1 would be a fundamental error on the part of Sefton Council and would mean that Sefton is planning for population and economic decline. Without the required 5 year supply of land, the Council would find themselves dealing with planning applications and planning appeals for speculative greenfield developments instead of a planned, Development Plan-led approach.	Noted.
Option 1 would only provide around 270 new homes per annum, given	Noted.

<p>the 4,850 new home capacity of the urban area. This is clearly significantly less than that is required and would not match the building rates in Sefton over the past 30 years. There would be very little provision of affordable housing and there would be insufficient land for employment development which would undermine economic aspirations. It would also lead to a significant decline in the working age population.</p>	
<p>Option 1 Urban Containment, coupled with restoration of brown field properties, would be least destructive of the environment and most suitable for the area concerned.</p>	Noted.
<p>Greenbelt should be protected throughout the borough with the benefits it brings being utilised. Options 2 and 3 of the Core Strategy document jeopardises many parts of the borough's unique selling points which would attract investors. The borough's infrastructure in many parts is already under extreme pressure and cannot cope with increased strain which widescale house building would incur.</p>	Noted.
<p>Support for Option 1 but, retain sufficient flexibility to move to Option 2 should there be ongoing 'proven' need for more housing which cannot be met other than through limited ingress to green belt. This would enable Sefton to put together a realistic and pragmatic strategy that green belt will not be considered in Sefton until ALL available brownfield sites have been identified and used and majority of vacant homes occupied. This strategy would require:</p> <ul style="list-style-type: none"> • ongoing research to assess implications of changing needs AND • review of land use and need - continually looking five years ahead (to ensure 5 year supply of sustainable and deliverable housing land). 	Noted.
<p>Natural England: Option 1 would allow for the widespread reuse of brownfield sites and increased use of sustainable transport methods. Concerned that the option may result in pressure for development on valuable urban greenspace. Generally support and recognise the potential benefits of redeveloping brownfield sites as opposed to greenfield land, but also recognise that such sites can harbour valuable</p>	Noted.

<p>biodiversity assets which may be lost or disturbed as a result of development. This point is not addressed in the Core Strategy.</p>	
<p>Option 1 will contain the Borough and direct investment within the existing urban area. Under Options 2 and 3 the limited investment likely to be available for the regeneration of the Borough will be targeted at the 'shiny' new developments on the edge of the urban area. There will therefore, be little if any remaining investment available for the older neighbourhoods within the Borough e.g. Maghull Central Square, the old Maghull Library site.</p> <p>By enlarging the geographic extent of the urban area of Sefton, it will be more expensive to run the Borough. Under all the Core Strategy Options, more houses will mean a greater requirement for support services such as bin collections, gritting in the winter etc.</p>	<p>The Council has agreed that any New Homes Bonus money would be directed towards completing the former Housing Market Renewal initiative in the Bootle area.</p>
<p>Option 1 does not identify sufficient land for employment development to secure economic growth in Sefton, particularly in the north of the Borough where the requirement for new employment land is most acute. Additional employment land is required to better facilitate the growth of existing and new business. The need to better support and sustain jobs and promote new development opportunities should be focused in locations attractive to the market with the essential services and infrastructure to secure new employers.</p>	<p>Noted.</p>
<p>Comments mainly on Option Two</p>	
<p>Option 2 would allow for sufficient new employment land to be delivered that would enable businesses from 'backland' sites in Southport to relocate.</p>	<p>Some of the 'backland' industrial sites in Southport will be suitable for housing development, and we have made an assumption that around 20% of these sites will be developed for housing over the Core Strategy period. However, there is no way to force these businesses to relocate, and many of the uses that are present (e.g. car repairs) would not be appropriate on a modern business park. Additionally, many of these businesses operate on low cost bases and may be unable to afford the rent / purchase costs of higher quality modern business accommodation.</p>

<p>Option 2 would still cause a decline in the population of Sefton which would reduce the number of residents of working age, which in the longer term will have a negative impact on the economic prosperity across the borough and is therefore not a pro-active option.</p>	<p>Noted.</p>
<p>Liverpool Council's support for Option 2 is qualified. Liverpool needs to be assured that all ways to maximise the delivery of urban land for housing and bringing back into use vacant properties have been fully explored in Sefton and the ability of Liverpool to accommodate needs has been evaluated before endorsing a strategy which involved significant release of Green Belt land for housing.</p>	<p>Agreed.</p>
<p>Southport Partnership: Option 2 or 3 are the only options to support the Partnership's priorities of people, place and economy. However the protection of the Green Belt is also considered as an important priority for the Board, so for this reason we would be supportive of option two being. This view is not supported by the Political representation of the Board.</p>	<p>Noted.</p>
<p>Support for Option 2 as a minimum, but given the Government's Planning for growth agenda, need to aim for higher than this</p>	<p>Noted.</p>
<p>Parkhaven Trust: As Option 2 is likely to be necessary, in order to reduce the threat to the green belt, options for sites in urban areas should be explored:</p> <ul style="list-style-type: none"> - priority should be given to working with a charity such as Parkhaven who have a long term interest in the community. - land proceeds will be reinvested in services and estate for the benefit of the local community. 	<p>Noted.</p>
<p>The National Trust generally support Option Two; they consider that Option One would not meet the needs of Sefton residents, could undermine the area's economy and could lead to "planning by appeal" by the early 2020's and reduce funding for green spaces such as the Formby coast, and that Option Three would lead to excessive development pressures, particularly in the Formby area. However, in generally supporting Option Two, the National Trust considers that</p>	<p>Noted</p>

<p>development in the Green Belt is "not palatable," would want to make efficient use of land, especially brownfield sites, and consider that a phased approach should be taken to ensure that the most appropriate (brownfield, within centre etc) sites are released and developed first prior to Green Belt land being released. They are also concerned that development around Formby does not result in overdevelopment, put excessive pressure on the coastal recreational area or lose the character of individual settlements</p>	
<p>One Vision Housing support Option 2, meeting the needs of Sefton. If the final core strategy allows for residential development within the Green Belt we would hope that Sefton Council ensures that Green Belt development is mixed tenure and that development does not solely attract high value, private homes with affordable home requirements delivered elsewhere in the borough.</p>	Noted.
<p>Natural England: Option 2 also involves prioritising brownfield sites with risk for biodiversity assets on such sites. Have particular concerns about extent of likely development within the Green Belt and we would wish to see no net loss in Green Belt. The extension of the existing urban areas into the Green Belt should only be considered in the long term if it was unavoidable despite concentrating development within urban areas and focused urban regeneration, in order to meet the required housing numbers. Agree that Option Two is the preferred option, with certain caveats.</p>	Noted.
<p>Ministry of Justice: generally agree that Option 2 is the appropriate option for the direction of growth in Sefton Borough Council area.</p>	Noted.
<p>Comments mainly on Option Three</p>	
<p>Option 3 provides the number of houses which are needed to ensure that the population at the end of 2028 would be the same as currently exists and it would involve attracting new people to the area and reducing the number of people migrating for the area. This is not seeking growth - merely equilibrium - and this fact need to be highlighted.</p>	Noted.

<p>Option 3 is the most appropriate. More people would be attracted to move to Sefton, as would more businesses. This option would provide the most scope for affordable housing provision. This option helps to maintain existing levels of services and facilities and would help to reduce the contraction in the local labour force.</p> <p>All of these important advantages (compared to the other options) should be embraced by the Core Strategy to help ensure economic prosperity for the borough and a wider range of suitable housing accommodation for the changing population and increase in household growth.</p>	<p>Noted.</p>
<p>Option 3 performs better against the stated aims and objectives of the Core Strategy than either of the others; particularly in relation to new housing, affordable housing, services, access to opportunities, town centres and jobs, which are key policy areas. There does not seem to be any logic for preferring Option 2, because Option 3 performs equally as well in terms of health, environment and climate change objectives. It is evident that the build rate in Sefton has averaged 591 pa over the period 1981-2010 (this included a period of constraint on new housing), so the market is capable of delivering higher levels of completions as it returns to normal conditions, boosting economic activity and population numbers.</p>	<p>Noted.</p>
<p>Peel Ports: Whilst the Port remains critical irrespective of which Option is pursued by Sefton Council, Peel Ports believe that Option 3 offers the greatest potential for developing communities and business throughout the Borough and which would complement our own growth strategy as outlined in the Mersey Ports Master Plan.</p>	<p>Noted.</p>
<p>Only Option 3 would serve to achieve Sefton's economic growth aspirations, reducing the rate of population decline and out-commuting. Even then, Option 3 would not result in population growth.</p>	<p>Noted.</p>
<p>The summaries of the three options contain some conclusions which are not supportable in advance of decisions as to which areas are chosen for development. The assumption that developments would be "close to</p>	<p>Noted.</p>

where they are needed" in Option Two for example, or that Option Three "would meet all the Borough's needs for homes and jobs" are not logically sustainable either because of lack of specified location or because they offer a far too general conclusion.	
Support Option 3: the provision of more potential sites for development will allow development to come forward where it is required. The limiting of site availability may result in development being skewed away from areas where there is a real need and into places in the Borough where there may be less of a requirement.	Noted.
Support for Option 3, however wish to express concern that the delivery of elderly housing should be within all options, due to the evidence and issues highlighted even within this report.	Noted.
Support for Option 3: whilst it is acknowledged that this option would require levels of growth above what has been achieved in Sefton over the last 30 years, it is considered that the emerging Core Strategy will cover a time period where the economy will significantly improve and therefore a more ambitious growth strategy is more likely to be achieved.	Noted.
Support for Option 3 but disagree with a number of the disadvantages described for the Option i.e. consider that 3.8% of the Green Belt does not represent a 'significant' amount' especially when Option 2 would result in 2.2% of the Green Belt being developed	Noted.
Support for an alternative option of delaying long term plans until the economic situation improves.	The Government requires local authorities to prepare a plan looking 15 years ahead.
Would Bootle (and Netherton) benefit from being removed from Sefton and placed within the City of Liverpool? As you state the area has far more in common and similar problems, the new north Liverpool Area could benefit from a single strategy.	This is not within the scope of the Core Strategy.
If housing must be built on new sites, it should be as 'eco' as possible – could provide many advantages such as publicity for Sefton, skilled jobs, improve local environment, promote community spirit.	Noted.
POLICIES	

A number of suggestions for policies have been made e.g. in relation to making sure land is available for community facilities, and ensuring specialised accommodation is provided for older people. It will be more appropriate to address these when a strategy has been agreed.

[B] General Responses

This section looks at general comments that we received during consultation. In addition we also received many comments to the studies that supported the Core Strategy Options paper. These are responded to in Annex D.

Need to use brownfield land

Summary of Comment	Sefton's Response
<ul style="list-style-type: none"> • There are many brownfield sites still available which could be developed. Green Belt land is not needed. • The Council has not carried out an exhaustive study to identify all available brownfield sites. • The Council should be more aggressive in identifying and delivering brownfield sites. There is 10 years worth of brownfield land in Sefton. A more comprehensive investigation should be employed to make maximum use of this land 	<ul style="list-style-type: none"> • We have produced a 'Strategic Housing Land Availability Assessment' to assess how much urban land is available for housing development. This has been produced in line with government guidance. This will be updated every 1-2 years, which will allow new sites that emerge to be included in our assumptions. As part of the Options consultation, members of the public were asked to identify any areas they thought could be developed, so that these could be included in the next assessment. • Each time this study is updated, a 'Call for Sites' is publicised - inviting landowners and developers to put forward sites for consideration. • Our most recent study indicates that there around an 8-year supply of housing land in Sefton.
<ul style="list-style-type: none"> • Green Belt should only be used as a last resort when urban 'brownfield' land has been used up. • Brownfield land should continue to be prioritised by Sefton, regardless of the contents of the Government's draft National Planning Policy Framework. If Green Belt land is developed, it will take away investment from brownfield areas. • The draft National Planning Policy Framework will give the go ahead 	<ul style="list-style-type: none"> • At present, national planning guidance requires every Council to maintain a rolling 5-year supply of "deliverable" housing sites. Where this is not in place, we are potentially vulnerable to losing planning appeals. This requirement would need to be taken into account in considering how to phase the release of land. • The government's 'National Planning Policy Framework' is due to be published in early 2012. Whilst a draft for consultation was published last year, the contents of the final version are not yet known.

<p>for developers. Brownfield recycling will be eradicated in favour of cheaper Green Belt</p>	<ul style="list-style-type: none"> We will continue to prioritise the development of brownfield land as far as possible. We are exploring ways to secure new funding to develop difficult brownfield sites in regeneration areas and have had some success in this regard, despite recent funding cutbacks.
<ul style="list-style-type: none"> Sefton should work with neighbouring local authorities to identify brownfield sites in other areas. There is sufficient land in these areas to meet Sefton's needs. 	<ul style="list-style-type: none"> The Liverpool City Region local authorities have carried out an 'Overview Study' to see whether the development needs of one authority could be met within the area of another. Of Sefton's neighbouring authorities, Knowsley and West Lancashire do not have enough brownfield land to meet their own needs. Whilst there may be some surplus land supply in north Liverpool, the Study found that this could only realistically meet some of the needs arising in Bootle and Netherton.
<ul style="list-style-type: none"> Sefton should re-examine industrial sites that have been vacant for many years to assess whether they are suitable for housing. 	<ul style="list-style-type: none"> Some former industrial sites have been identified for new housing, e.g. the former Littewoods Factory in Crosby, and former industrial land alongside Hawthorne Road in Bootle. Other small scale and poor quality industrial sites will also be considered for housing. However, National planning guidance requires that Councils identify land for both housing <u>and</u> business development. Our Joint Employment Land and Premises Study identified a medium to long-term shortage of 'employment land' in Sefton, particularly in North Sefton (Southport and Formby). This Study recommended that the main business parks and industrial estates were kept as a resource for local businesses. Therefore, whilst some industrial and office sites will continue to be redeveloped for housing, the better quality and larger sites will need to be retained.

Vacant homes/homes for sale

Summary of Comment	Sefton's Response
<ul style="list-style-type: none"> PPS3 says that vacant buildings should be brought back into use to deliver new housing. Therefore vacant homes should be counted as part of the housing supply in Sefton. 	<ul style="list-style-type: none"> We have been given clear advice from central government that vacant homes brought back into use cannot be counted against the housing target.

<ul style="list-style-type: none"> • Sefton should stand against government and argue the common sense approach • Vacant property stock should be taken into account 	<p>plan is 'sound' or not. If the plan is found to be 'unsound' then we will not be able to use it as a basis for decision making.</p> <ul style="list-style-type: none"> • In our response to the recent consultation on the Government's draft 'National Planning Policy Framework' we argued that vacant homes brought back into use should be counted against the housing target. We await the final document, which is due to be published shortly.
<ul style="list-style-type: none"> • There are a mixture of different housing types and price ranges available, it is clear there is not the market for any housing type • Many houses are struggling to sell in the current climate. This will equally apply to new houses that are constructed. 	<ul style="list-style-type: none"> • Mortgage availability and the current economic climate mean that some properties are struggling to sell. The Core Strategy must plan ahead for 15 years, and assume that in the medium term economic conditions will return to normal. • Even in the current market, new family housing has continued to sell well and locally active house builders tell us that there is still a strong demand for this type of property. It is acknowledged however that the market for new apartments is more difficult.
<ul style="list-style-type: none"> • Consider compulsory purchasing vacant properties 	<ul style="list-style-type: none"> • Compulsory Purchase Orders can only be used in very narrowly defined circumstances, and are very time consuming and expensive to pursue.
<ul style="list-style-type: none"> • <i>The Matchmaker Scheme</i> (Champion, 6/7/11) should be considered 	<ul style="list-style-type: none"> • The Matchmaker scheme is being actively pursued by the Council
<ul style="list-style-type: none"> • Empty Dwelling Management Orders should be used to return dwellings to market 	<ul style="list-style-type: none"> • Empty Dwelling Management Orders can only be used on properties that have been vacant for more than 2 years, and it is necessary to demonstrate that other interventions have failed before one can be used. They are also costly and time consuming to pursue, and nationally very few have been used.
<ul style="list-style-type: none"> • Developing empty homes will remove eyesores, improve communities and local businesses 	<ul style="list-style-type: none"> • Long-term vacant homes are the focus of our available resources.

Declining population/no need for new homes

Summary of Comment	Sefton's Response
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<ul style="list-style-type: none"> • A declining population is nothing to be feared 	<ul style="list-style-type: none"> • Sefton has had a declining population for the past 30 years. Both Options 1 and 2 assume a continuing decline in the population.
<ul style="list-style-type: none"> • Why are more houses needed if Sefton has a declining population? • The housing numbers stated are too high compared to the population loss • Despite demographic change, the population decrease should warrant far less development than is planned 	<ul style="list-style-type: none"> • On average people are living in smaller households, with more 1 and 2 person households (this for a number of reasons). For example, if Option One ('urban containment') is chosen there would be 15,000 fewer people in Sefton by 2028, but there would be about 5,000 more households. Under Option 2, there would be about 7,000 fewer people living in Sefton but about 8,300 more households.
<ul style="list-style-type: none"> • The available housing stock should be able to cope with a declining population 	<ul style="list-style-type: none"> • See above
<ul style="list-style-type: none"> • Declining populations are resultant from natural movements and market forces 	<ul style="list-style-type: none"> • The declining population in Sefton is the result of demographic change and net outward migration. The availability of housing is a key factor affecting the latter, although it is acknowledged it is not the only factor.
<ul style="list-style-type: none"> • Small pockets of housing are acceptable if needed, but not hundreds 	<ul style="list-style-type: none"> • Comments noted
<ul style="list-style-type: none"> • The studies data is out of date, Maghull's population is declining 	<ul style="list-style-type: none"> • The most recently available demographic information has been used in the studies we have produced.
<ul style="list-style-type: none"> • Building houses will not attract additional people to the borough 	<ul style="list-style-type: none"> • None of the 3 Core Strategy Options would result in an increase to the number of people living in Sefton.
<ul style="list-style-type: none"> • Elderly people prefer to stay in their own homes and sheltered accommodation is losing popularity. New homes are not needed • An ageing population would require more specialist housing 	<ul style="list-style-type: none"> • A proportion of older people will want to stay in their homes rather than move out. Others will chose to move into more specialist accommodation. In future years there will be more older people than at present, and housing provision will need to reflect this. • As the population becomes more weighted towards older people, more specialist accommodation will be required. This will need to be addressed through the Core Strategy process.
<ul style="list-style-type: none"> • Business parks will not reverse population decline 	<ul style="list-style-type: none"> • As well as identifying land for new housing, a Core Strategy should also address the business needs of the local area.
<ul style="list-style-type: none"> • The modal shift would mean those of a working age would need 	<ul style="list-style-type: none"> • Comments noted

affordable housing nearer to the places they work	
<ul style="list-style-type: none"> The population is increasing 	<ul style="list-style-type: none"> Sefton's population has been gradually declining for over 30 years

Affordable housing

Summary of Comment	Sefton's Response
<ul style="list-style-type: none"> The mix of tenures appears too highly weighted in favour of affordable properties 	<ul style="list-style-type: none"> Sefton's current policy is to require 30% affordable housing from all developments of more than 15 dwellings, subject to economic viability. This is consistent with national planning policy and similar to the approach taken by neighbouring Councils.
<ul style="list-style-type: none"> The work involved in infrastructure (roads, drainage, etc) will push the price of these homes beyond a relative affordability. 	<ul style="list-style-type: none"> The infrastructure costs associated with development will usually be borne by the developer Whilst we can have an influence over the type of housing that is provided, the asking price of new market homes will be determined by the developer, except where affordable homes are provided.
<ul style="list-style-type: none"> There should be more affordable, rather than superior, housing. This will aid young families and first time buyers Affordable housing never really is so, young people can not live in their own villages Any new buildings should be affordable There should be as much affordable housing as possible Affordable family sized properties are required instead of apartments 	<ul style="list-style-type: none"> It is recognised that there is a clear need for more affordable housing in Sefton. Our policy is to require 30% affordable housing from all developments of more than 15 dwellings, subject to economic viability. The strong preference in Sefton is for social rented housing. Whilst some smaller Housing Association schemes are 100% affordable housing, large-scale developments of 100% affordable housing are unlikely to be viable unless funded by the Homes and Communities Agency. Our current policy requires that developers provide a proportion of affordable housing as part of their schemes. Our Strategic Housing Market Assessment found that there was a greater need for family sized affordable housing rather than for apartments

<ul style="list-style-type: none"> • Provision of affordable housing would have a negative effect on the local area and house prices • ‘Nice’ communities will be ‘brought down’ by affordable housing tenants who are of a different class. This is unfair. • Affordable housing will mean social issues arise. E.g. ‘feral youths,’ litter • Affordable homes bring unwanted behaviour & noise • Less affluent people will move in, potentially increasing antisocial behaviour and crime • People who live in Green Belt area have worked hard to live there. Why should social housing be built there? • Social housing should not be put in desirable areas • Affordable housing is an attempt at social engineering. An ‘us and them’ mentality will be created • People uprooted from their communities may feel isolated from their social and work circles 	<ul style="list-style-type: none"> • There is a very clear need for more affordable housing in Sefton, as is shown by the number of people on local waiting lists, and evidence within the Strategic Housing Market Assessment. Delivering new affordable homes is both a local and a national priority. • In Sefton, affordable housing need has been calculated by settlement. In each settlement there is a need from people already living in the area. This need is strongest in Southport and Formby, although is also present in most other settlements in Sefton. • The government's affordable housing policy (as set out in PPS3) is that mixed communities should be created. PPS3 also states that local authorities should look to address affordable housing needs arising in their areas.
<ul style="list-style-type: none"> • Affordable housing will be high density such as flats and terraces, this will be out keeping with the current mix of properties 	<ul style="list-style-type: none"> • The evidence suggests that the main shortage of affordable property in Sefton is for family homes, not apartments.
<ul style="list-style-type: none"> • What are the criteria for purchasing an affordable home? These properties should go to local residents only • Affordable housing will be available to foreigners 	<ul style="list-style-type: none"> • In Sefton, we exercise 100% nomination rights for all social rented properties delivered through the planning system. This is enforced by legal agreement.

<ul style="list-style-type: none"> • Green Belt land is rarely used for affordable housing. More likely 4 or 5 bed properties will be constructed for greater profit • The planned properties are designed for Yuppies • Green Belt land is expensive, these homes will not truly be affordable 	<ul style="list-style-type: none"> • Our current policy is that 30% affordable housing is required from all developments of 15 or more dwellings. If Option 2 or 3 were chosen, this would equally apply to sites that are currently in Green Belt. • Any affordable housing that is provided would be allocated to those in housing need.
<ul style="list-style-type: none"> • Private landlords housing social tenants is not cost effective, especially compared to traditional council housing 	<ul style="list-style-type: none"> • We no longer own or develops housing. The vast majority of new affordable housing is managed by Housing Associations.
<ul style="list-style-type: none"> • Virginia Street has recently had an affordable development, is there a need for another one? 	<ul style="list-style-type: none"> • Southport has the highest affordable housing need of any settlement in Sefton. Our Strategic Housing Market Assessment identified a need for at least 658 new affordable homes. A total of 46 affordable homes were provided at the Virginia Street development.
<ul style="list-style-type: none"> • Most existing affordable housing is owned by people with multiple properties or charities to house drug addicts and homeless people 	<ul style="list-style-type: none"> • The vast majority of affordable housing is owned by Housing Associations, which are charitable organisations.
<ul style="list-style-type: none"> • Affordable housing should be in Bootle to increase town centre footfall and trade • Brownfield sites are more appropriate for low cost housing 	<ul style="list-style-type: none"> • The majority of existing affordable housing is in Bootle, and affordable housing will continue to be constructed in Bootle. However, there is also a need for new affordable housing in all other settlements in Sefton.

Premature, especially during recession

Summary of Comment	Sefton's Response
<ul style="list-style-type: none"> • People don't have the money / can't get a mortgage to move from their current properties • Demand for housing will only grow following economic recovery • The strategy does not reflect the area's needs considering the recession. It doesn't take account of the scarcity of lending, and the fragility of local business 	<ul style="list-style-type: none"> • The Core Strategy is required to plan for the long term (15 years from date of adoption). This will include periods of recession as well as 'boom' periods. The Core Strategy must therefore look beyond short-term economic difficulties. • Need / demand for housing is driven by demographic considerations as well as economic considerations. • Basic demographic factors such as natural change, migration, and

<ul style="list-style-type: none"> • 11 years of economic stagnation and an inability to recover to pre-recession prosperity till 2027 makes such expenditure unfeasible. • 480 dwellings a year is far too high during recession. • There is a lack of full-time employment to warrant construction of so many new houses • Due to poor economic forecasts and the enduring housing market slump none of the options are viable • We have not left a recession, development will be a 'white elephant' 	<p>social trends at a national level (such as smaller household sizes) will drive forward housing need, irrespective of mortgage availability.</p> <ul style="list-style-type: none"> • The housing target will be updated as new data emerges. It is unlikely to remain fixed for the full 15-year period.
<ul style="list-style-type: none"> • The reliance on an ailing public sector will add to unemployment. 	<ul style="list-style-type: none"> • Reduced public sector employment is clearly an issue of concern in Sefton.
<ul style="list-style-type: none"> • Housing growth is not necessary if there are no plans for economic growth in place • The Core Strategy ignores the local economy. Not enough is done to aid failing business or attract new ones 	<ul style="list-style-type: none"> • The Council will soon be consulting on its draft Economic Development Strategy which will set out a plan for economic growth. • Core Strategies can facilitate growth by identifying land for development.
<ul style="list-style-type: none"> • Housing creation is not needed, job creation (on brownfield land) is more appropriate 	<ul style="list-style-type: none"> • Core Strategies are required to identify land both for new houses, office / industrial development, and retail.
<ul style="list-style-type: none"> • There could be a return to recession coupled with continued falling house prices it is impossible to predict housing need. • We will emerge from the recession with differing priorities to when we entered it. It is premature to plan for houses when there is currently no local need 	<ul style="list-style-type: none"> • The studies we have carried out will be updated as new statistics and data are published to ensure that the information we have is as accurate as possible. • The government has urged Local Authorities to “press ahead without delay in preparing up-to-date development plans”.
<ul style="list-style-type: none"> • The housing target was established by the RSS in 2003, a time of economic prosperity. Economic difficulties are likely to endure, these figures are inappropriate 	<ul style="list-style-type: none"> • The housing target contained in the Regional Spatial Strategy (RSS) was approved in 2008. This targeted Sefton to deliver 500 houses per annum (on average) to 2021. The Government is in the process of

<ul style="list-style-type: none"> The Core strategy was instigated 5 years ago in a more buoyant economy. Subsequently it uses out of date figures 	<p>revoking all Regional Spatial Strategies. Once this is done, it will be for the Council to select a new housing target</p> <ul style="list-style-type: none"> The evidence underpinning the Core Strategy uses the most recently available data and information. It is planned to update a number of studies before preparing the next stage of the Plan.
<ul style="list-style-type: none"> Fewer people are living alone. Building more houses could add to the current housing crisis 	<ul style="list-style-type: none"> This is not true. For many years there has been a clear trend towards more people living alone or in smaller households. This is forecast to continue.
<ul style="list-style-type: none"> The construction industry is facing financial difficulties, there is a risk of contractors going bust and work stalling 	<ul style="list-style-type: none"> Comments noted
<ul style="list-style-type: none"> New Housing development at Cable Street has had less than 25% of new properties sold after 2 years 	<ul style="list-style-type: none"> Comments noted
<ul style="list-style-type: none"> The austerity measures means there would not be the necessary infrastructure investment 	<ul style="list-style-type: none"> Where new development is proposed, the developer will be required to fund new infrastructure associated with the development. We are required to specify what infrastructure is needed to accompany the development in an Infrastructure Delivery Plan. This will be prepared alongside the Core Strategy. Funding has been confirmed to build the proposed 'Thornton to Switch Island Link Road'
<ul style="list-style-type: none"> Would non-Sefton residents get any jobs that are created? 	<ul style="list-style-type: none"> We cannot insist on this but the Council can ask employers to sign a local labour agreement. This could help to ensure new jobs go to local people.

The Council is out to make money etc

Summary of Comment	Sefton's Response
<ul style="list-style-type: none"> The Council will take the New Homes Bonus. This should be returned to the community to compensate for development 	<ul style="list-style-type: none"> The New Homes Bonus is a new central government initiative to encourage new housing development. It has not played any role in

<ul style="list-style-type: none"> • The New Homes Bonus is too tempting an option, new development will always be preferred over empty homes or brownfield recovery • Development will be of a low quality to generate as much cash as possible under the New Homes Bonus • The New Homes Bonus is a bribe to build on green space • The New Homes Bonus is not the correct method to address the budget deficit • 'The Council will pocket £10 million' 	<p>deriving the 3 Options, which are each based on different premises (urban containment, meeting needs, stabilising the population).</p> <ul style="list-style-type: none"> • The New Homes Bonus will not lead to poor quality development, as the Bonus itself is paid by central government rather than the developer. • If an Option is chosen that involves the development of land currently in Green Belt, the developer will be required to provide a package of benefits to the local area.
<ul style="list-style-type: none"> • Developers are seeking the cheaper option of Green Belt construction over relatively costly Brownfield remediation 	<ul style="list-style-type: none"> • Developers have played no part in setting out the 3 Options that were subject to public consultation. Regardless of the Option that is pursued, we will continue to prioritise the development of brownfield land as far as possible.
<ul style="list-style-type: none"> • Extra people means extra council tax revenue • Talk of growth, is a byword for growth in council tax revenue, not economic • The Council are looking to make money by matching the council tax banding of existing neighbouring properties • Plans are 'selfish.' An ulterior motive is at hand, proposed by the few to spoil it for a majority • Sefton Council should not be concerning itself with raising revenue • 'When all said and done, it's probably all down to money' 	<ul style="list-style-type: none"> • Potential Council Tax revenue growth has played no part in deriving the 3 Options, which are each based on different planning considerations (urban containment, meeting needs, stabilising the population). There is no ulterior motive.

<ul style="list-style-type: none"> • Green Belt should not be removed to generate cash and short term gains • Everyone are winners (financially) except the residents, who will have to deal with the negative long term consequences 	
<ul style="list-style-type: none"> • The Council is bound by the Government to undertake the correct procedure. This has not happened, shortcuts are being taken to save money 	<ul style="list-style-type: none"> • The Council has followed government guidance closely in preparing the Core Strategy Options.
<ul style="list-style-type: none"> • The Council are taking advantage of government legislation 	<ul style="list-style-type: none"> • We have interpreted planning policy and legislation in preparing the 3 Core Strategy Options.
<ul style="list-style-type: none"> • The Council has only identified sites which they own 	<ul style="list-style-type: none"> • This is not true. The vast majority of potential Green Belt sites that have been identified are not owned by the Council.
<ul style="list-style-type: none"> • Formby has been targeted because land prices are higher there than the rest of the country • Southport is the main source of revenue for Sefton. Construction is being targeted here to take advantage of high tax brackets 	<ul style="list-style-type: none"> • No settlement has been specifically targeted for development. The Green Belt study has been applied consistently across Sefton.
<ul style="list-style-type: none"> • How will all this be afforded amidst cutbacks? • The budget would be better spent on improving services for existing Sefton ratepayers • The taxpayer will have to pay for the increased spread of already thin resources 	<ul style="list-style-type: none"> • It is a statutory requirement to prepare a Core Strategy. If a Core Strategy is not prepared then we would be vulnerable to losing planning appeals.

Other comments

Summary of Comment	Sefton's Response
<ul style="list-style-type: none"> • The development of Green Belt land could put agricultural jobs at 	<ul style="list-style-type: none"> • Very few people are employed full time in agriculture in Sefton. It is

<p>risk. This has not been considered.</p>	<p>proposed to carry out a study of agricultural land quality and of the implications development of this might have, including those for agricultural jobs.</p>
<ul style="list-style-type: none"> • The recent rejection of a canal boat marina at Lydiate is a precedent 	<ul style="list-style-type: none"> • Individual planning applications cannot create a precedent for the preparation of a Core Strategy
<ul style="list-style-type: none"> • The Green Belt appeals cited in Thurrock and Rushcliffe are not of direct relevance to sites in Sefton. 	<ul style="list-style-type: none"> • The precise circumstances in each local authority will obviously be different. However, planning appeal decisions provide an example of how the Planning Inspectorate can interpret key planning matters, and they simply highlight the potential risk of planning by appeal in the absence of an approved Core Strategy.
<ul style="list-style-type: none"> • The level of development proposed in the Core Strategy is more of an attempt to regenerate a declining borough than address genuine housing needs. 	<ul style="list-style-type: none"> • Each of the 3 Core Strategy Options is based on a separate premise, and each is transparently justified.
<ul style="list-style-type: none"> • The national and regional context has not been properly considered, nor has the strategy of other councils in the Merseyside area. 	<ul style="list-style-type: none"> • The national, regional, and Merseyside contexts have been fully considered in preparing the 3 Core Strategy Options.
<ul style="list-style-type: none"> • The assessment of housing need in Sefton is based on the Regional Spatial Strategy for the northwest. This should not be the case as the government has announced that Regional Spatial Strategies are to be revoked. 	<ul style="list-style-type: none"> • None of the 3 Core Strategy Options are based on the Regional Spatial Strategy for the northwest
<ul style="list-style-type: none"> • Liverpool's Knowledge Economy Plan will result in many more professional jobs, but outside of Sefton. 	<ul style="list-style-type: none"> • Comments noted.

Section Three

Comments on the draft Green Belt Study Methodology

Comments on Green Belt Development in General

Including:

- Traffic and access
- Infrastructure
- Agricultural land
- Nature Conservation
- Flood Risk
- Impact on Historic Environment



Section Three

Green Belt Study Responses

In total, about over 1500 individual comments were submitted relating to the Green Belt. Many of the comments received were to the draft Green Belt Study and its methodology [section A] whilst others were more generally against development in the Green Belt for a number of reasons [section B].

A Comments on the Draft Green Belt Study Methodology

Following the draft Green Belt Study methodology, all comments were assessed against five purposes of including land in the Green Belt (set out in Planning Policy Guidance note PPG2 and the draft National Planning Policy Framework). However, not all of the reasons people gave about why land should be kept as Green Belt fall neatly into this analysis.

The five purposes of the Green Belt according to both Planning Policy Guidance note (PPG) 2: Green Belts and the draft National Planning Policy Framework are:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns from merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Most respondents thought there was no need to build in the Green Belt because they disagreed with the evidence about need, or felt that our future needs could be met using brownfield sites and empty homes, or considered that people could live and / or commute elsewhere. Many felt protecting the natural environment was more important than meeting needs. They felt that it was not sustainable to keep building in Sefton, and that we need to retain our agricultural land for food production etc. The Council needs to protect the Green Belt for future generations.

The view was widely held that we'd either already made up our minds and hence the consultation was pointless, or, if it was genuine, we should listen to what the people have said ('Localism').

In relation to the development of individual areas, across the whole of Sefton respondents felt that development should be ruled out because the road network could not cope with any more traffic, and because of the impact development would have on existing infrastructure and services, particularly when there is less money available to retain what we've got, let alone provide more.

All the comments received will help the Council identify any extra work that it needs to carry out, and assess the sustainability and suitability of individual areas. Although many people commented on the use of an area of land (e.g. agriculture, recreation), no land in the Green Belt was ruled out of consideration for these reasons alone. Further work is needed to assess the impact of development on the farm economy, whilst land used for recreation was generally excluded because of the wide range of benefits that these areas provide.

Summary of Comment	Sefton's Response
General comments	
Sufficient land will become available to meet all foreseeable housing needs in Sefton / the Crosby area without the need to build in the Green Belt [Bill Esterson MP]	Our evidence, particularly the Strategic Housing Land Availability Assessment (SHLAA) and the Joint Employment Land and Premises Study (JELPS), indicated that there was insufficient land in Sefton's urban areas to meet needs set out in the Review of the Regional Strategy's Housing Requirement for Sefton and the JELPS.
Sefton Council should not ignore the overwhelming wishes of the electorate as articulated in all the public meetings and media cover during the consultation. This has indicated that there is a distinct lack of support for any development on the Green Belt. [CPRE]	The Council has to take public opinion into account in deciding which Option to take forward. It also has to take account of national planning policy, and the evidence. The weight that the Council gives to each of these aspects will ultimately be tested at the examination by an independent Inspector and the Secretary of State.
The Core Strategy must state that no Green Belt land will be released before all alternatives have been exhausted. If Green Belt land has ever to be released any decisions are measured against the original purposes for the creation of Green Belts.	The Council needs to maintain a five year housing land supply at all times. If it cannot do this, it may have to release some sites in the Green Belt to make up the shortfall.
The planning committee must preserve full control over any inappropriate planning application on Green Belt.	This already happens – under the scheme of delegation, if a proposal is against policy it must be reported to Planning Committee.
In general, Natural England [NE] does not in principle support the loss of Green Belt land to development and supports the protection of Green Belt land, as these areas can provide valuable open space on the urban fringe with associated benefits including recreation, human health and enjoyment and biodiversity conservation. Some Green Belt land is of poor quality and a stringent policy of avoiding any development on	Natural England has made positive comments about the Green Belt Study. It accepts that there may be some less sensitive areas in the Green Belt that might be preferred for development than other areas not in the Green Belt.

Summary of Comment	Sefton's Response
General comments	
<p>Green Belt land can increase pressure for development elsewhere, on land that may be more environmentally sensitive.</p> <p>Some Green Belt land can and should be enhanced to provide more greenspace benefits. Where the Green Belt is to be reviewed we consider that criteria used in the Green Belt Study are appropriate as part of a careful and systematic review. There should be no net loss, and development on any areas removed from the Green Belt as part of a review should itself provide greenspace, so bringing about a net gain in greenspace.</p> <p>NE believes that the search for the most environmentally sustainable locations for future development should be based on a thorough understanding of environmental capacity and the cumulative impacts of development.</p> <p>Sefton needs to take into account the guidance in the emerging draft National Planning Policy Framework and the great importance the Government attaches to the Green Belt.</p>	<p>In estimating an indicative capacity for any land in the Green Belt that might be developed, we have included assumptions about the need for other uses including Greenspace.</p> <p>This will be carried out before we identify our Preferred Option, through assessment such as Habitats Regulations screening and Sustainability / SEA Appraisals.</p> <p>The Council is aware of this requirement, and will ensure that its emerging Plan complies with the approved national policy planning framework.</p>
<p>Looking at the Merseyside sub-region, the idea that it is necessary to lose large areas of important green belt to meet assessed housing need does not make sense. There are plainly many large and small areas of developable housing land, brownfield land, and land which no longer serves a green belt purpose, which could be used for new housing. We challenge in particular the assumption that Sefton and Knowsley should be considered in isolation and that substantial provision within Liverpool or on the Wirral is unlikely.</p> <p>Both PPG2 and the draft NPPF recognise that it is appropriate to review Green Belt boundaries in the preparation of local plans. However, Green Belt boundaries should not be altered other than in exceptional circumstances. Top-down housing need policies, which contradict common sense, are not sufficient justification.</p>	<p>The Merseyside 'Overview Study' has assessed the possibility of authorities meeting some of their neighbour's needs. This concluded that, with the exception of a small part of needs arising in south Sefton, this is not a realistic proposition.</p> <p>The Council regularly updates its housing land availability assessment (SHLAA) so as to identify all the suitable, available and achievable brownfield housing sites, in order to ensure that development in the Green Belt would be a last resort.</p> <p>In accordance with Government policy, the Council has reviewed Sefton's Green Belt boundaries as part of the Plan preparation. Green Belt would only ever be released to meet identified needs, at the appropriate time and as a last resort.</p>
<p>Sefton does not have to build on green belt to become a more desirable, agreeable and special place to live and work. We do not need</p>	<p>The Council is required to meet its identified needs if we are to have a 'sound' plan. If it does not, it will have to demonstrate where our needs</p>

Summary of Comment	Sefton's Response
General comments	
<p>the destruction of the Green Belt. With a contracting population, the human / concrete footprint of this population should decrease. Excellent agricultural land in Sefton should not be destroyed by unsustainable development in the Green Belt.</p>	<p>can be met. It would also have to demonstrate why it cannot support sustainable growth, because it considers that safeguarding the natural environment are more important than meeting needs.</p>
<p>If green belt is ever used, it should be in locations that impact very little on the green belt close to existing homes, i.e. separate sites with new facilities rather than dragging down those areas that enjoy green belt and would lose it.</p>	<p>This representation suggests that the ideal form of development would be a new village provided with appropriate facilities and infrastructure. The scope for this was considered as part of the early work on the Green Belt Study and Plan. However, Sefton's linear shape and the extent of the environmental constraints in the Borough meant that a potential site could not be identified.</p>
<p>The Green Belt is a valuable buffer zone between settlements and prevents urban sprawl. It is an irreplaceable asset. Agricultural land and semi-rural areas are an asset to Sefton which should be protected.</p>	<p>The Council agrees. That is why development in the Green Belt is only being considered as a 'last resort' because exceptional circumstances exist as we are running out of 'deliverable' land in our urban areas.</p>
<p>If it is not possible to retain all the Green Belt, developments should be significantly smaller than proposed, and only used when all other sites have been exhausted</p>	<p>The areas identified at the options stage included more land than would be required to meet either option two (meeting needs) or three (a stable population). If either of these options, or a combination of options, were chosen as the Preferred Option, not all of the areas identified would be needed. They would only be released in a phased manner when sites in the urban areas had largely been developed, in order to enable us to identify a continuous '5 year' supply of housing land.</p>
<p>The Council has ignored Government guidance in Planning Policy Guidance (PPG) 2 which states that Local Authorities must prevent urban areas from growing beyond their boundaries, and prevent neighbouring towns and villages from merging. The buffer between Maghull and Lydiate has been lost, despite previous Council commitments.</p>	<p>The Council disagrees. The Green Belt methodology, which was independently validated, followed the approach to Green Belt release set out in PPG2. Land which it was essential to keep permanently open, in order to prevent neighbouring settlements from merging, was ruled out of consideration during the early stages of the Green Belt Study. The Council agrees that Lydiate and Maghull have merged into a single settlement as a result of development which has taken place in the area since the 1960's.</p>
<p>Purpose 1: To check the unrestricted sprawl of large built-up areas This purpose was assessed in the draft Green Belt Study by assessing whether any Green Belt 'parcel' (the result of sub-dividing the Green Belt into areas with a similar land use and character for assessment) was adjacent to or detached from any town or village.</p>	

Summary of Comment	Sefton's Response
General comments	
<p>The Green Belt was established in the 1980's to check the outward spread of the built-up areas, and protect the countryside from development.</p>	<p>The Green Belt will still do this. If any development were to take place in the Green Belt, the Council would endeavour to identify land which would have the least impact on the Green Belt. Land on the edge of the larger urban areas was generally considered to be more sustainably located as new development would more easily be able to connect to existing infrastructure and service provision.</p>
<p>Sefton is not suited to continual urban development, and its Green Belt should continue to be protected. The Green Belt has to be substantial to differentiate between different settlements. Sefton should retain its mix of urban and rural settlements and landscape character as much as it can.</p>	<p>The Green Belt will continue to be protected. However, we are also required to demonstrate in our Plan how we will meet our housing, employment and other needs. Sefton comprises a number of urban areas and smaller settlements. The Options paper suggested that we should meet needs in the area where they arise. But this must be balanced against the importance of the environment, as some areas of Sefton are not suitable for development because of significant constraints including areas at high risk of flooding, and internationally important nature conservation sites.</p>
<p>While Natural England support the valuable urban containment role played by the Green Belt and believe this should continue, a robust strategic review of Green Belt boundaries should form an integral part of the appraisal of future development options in the Local Development Framework.</p>	<p>The approach adopted in carrying out the draft Green Belt Study complies with national planning policy guidance contained in Planning Policy Guidance note (PPG) 2 and the draft National Planning Policy Framework. The draft Green Belt Study was carried out to inform the preparation of the Plan by identifying areas where development should not take place, and areas where it could if needed.</p>
<p>The Green Belt protection was set up to do what it was meant to do, protect it from being built on and stop towns and villages merging into one. It should not be touched. If it is Sefton's master plan to merge Southport and surrounding areas with Liverpool so they become a single urban area, the identity of Southport will be gone for good.</p>	<p>The Council does not consider that the amount of development needed in the Green Belt to meet either Options 2 or 3 would have a significant impact on the overall extent of the Green Belt in Sefton. Less than 5% of the Green Belt would be needed if Option Three was chosen as the Council's Preferred Option. There is no intention that any settlements in Sefton would merge; the draft Green Belt Study ruled out areas at risk as 'essential gaps' at an early stage.</p>
<p>It is so important to keep the North of the borough as it is. If you continue to invade it and turn it into another area of featureless sprawl, you will destroy its value as a very necessary belt of countryside that is enjoyed by so many visitors, and will encourage more de-population.</p>	<p>The Council is required to balance meeting needs with protecting the environment. At the Options stage, it not only ruled out coastal areas (for nature conservation or flood risk reasons), but also golf courses which are part of the local economy.</p>

Summary of Comment	Sefton's Response
General comments	
	However, the Options paper also pointed out, that unless significant development takes place in the Green Belt (under Option Three) higher levels of out-migration would take place than is currently taking place [as noted in the 'Review of the Housing Requirement for Sefton Study'].
If Green Belt release is allowed, this will be a precedent for further Green Belt release every few years until there is no Green Belt left.	Sefton's Green Belt was established in 1983 and has remained largely intact since that date. However, Government guidance states that when Green Belt boundaries are reviewed, we have to consider their permanence in the long term, and beyond the Plan period. (2028). This may include identifying 'safeguarded' land to meet long term needs.
<p>Purpose 2: to prevent neighbouring towns from merging into one another</p> <p>This was assessed in the draft Green Belt Study as to the extent that areas had to be kept open, or whether any development could take place on one or both edges of the gap between settlements without this leading to neighbouring towns and villages coalescing.</p>	
<p>It is important to maintain a gap between areas, to destroy the gap would be detrimental to Seftons' heritage. The distance between settlements needs to be effectively maintained with suitable gaps – not just nominal strips.</p> <p>Green Belt land is there for a purpose, to protect and conserve countryside for future generations and to produce green space to stop one village merging with another and this should be a huge consideration.</p>	<p>The draft Green Belt Study identified those areas that have to be kept open in order to keep adjoining settlements from merging ("essential gaps"). All areas that have to be kept open were discarded from consideration at an early stage of the Study. This was considered site by site. The Study indicated, at paragraphs 4.26 and 4.27 that the size of gap required would vary depending on the size of the settlements under consideration. In the case of small villages and hamlets the gap may be as narrow as a single field, but a wider gap several kilometres wide would be required between the larger settlements.</p>
A visual representation of all 'essential gaps' would be helpful, to ensure consistency across Sefton.	Appendix 2 of the draft Green belt Study sets out how each parcel was classified in relation to each Green Belt purpose. A plan could be attached in this Appendix to show this.
<p>The following gaps between settlements were identified:</p> <ul style="list-style-type: none"> • Between the eastern edge of Southport and houses on Moss Lane in West Lancashire; • Between Ainsdale and Formby; • Between Woodvale and Formby; • Between Formby and Hightown; • Between Formby and Ince Blundell • Between Hightown and other villages; 	<p>Most areas between settlements were identified as having to be kept open. The draft Green Belt Study identified 'essential gaps' between these towns and villages to prevent them from merging with their neighbours, should the Council decide that it needs to promote some development in the Green Belt as part of the Plan.</p>

Summary of Comment	Sefton's Response
General comments	
<ul style="list-style-type: none"> • Between Hightown and Crosby / Blundellsands; • Between Little Crosby and Crosby / Thornton; • Between Thornton, Homer Green, Lunt and Ince Blundell • Around Sefton village, which would lead to Maghull and Thornton merging; • Between Maghull, Melling and Aintree; • Between Aintree and the M57 motorway; • Between Liverpool and Formby; • Between Sefton and West Lancashire. 	
<p>People also commented that the following settlements should not be allowed to merge, even though there is no land in the Green Belt separating them:</p> <p>Between Thornton and Crosby;</p> <p>Between Maghull and Lydiate.</p>	<p>As this land is not Green Belt, as there is no longer any open land between these places, this was not included in the draft Green Belt Study.</p>
<p>Purpose 3: to assist in safeguarding the countryside from encroachment</p> <p>Although the draft Green Belt Study identified what the dominant land use was in every 'parcel' (the name given to areas of land used for the Green Belt assessment), no areas were discarded from the Study on this basis.</p>	
<p>Any urban extension will be an urban encroachment. Once some Green Belt release is permitted, what is to stop further extensions taking place in the future?</p>	<p>The draft Green Belt Study states wherever possible, strong boundaries will be chosen to identify 'developable areas', in the same way that strong and robust boundaries were used to identify parcels. However, this was not always possible, particularly if part of the parcel was not considered suitable for development because of constraints such as the land having a high risk of flooding, or where only small-scale "rounding off" was proposed on the edge of a settlement. If any of these areas were needed for development as part of the Plan's Preferred Option, the Council would require appropriate strong new boundaries to be provided. These are likely to include areas of greenspace and sustainable drainage systems (SuDS) which would act as a buffer and create a soft edge between the outer edge of the new development and the start of the Green Belt.</p>
<p>The views of open space contribute to the character of the area, making it a pleasant place to live. It is not quantified by a monetary value, but</p>	<p>The Council accepts that views into and out of the countryside and access to these areas are an important to people's 'quality of life' and</p>

Summary of Comment	Sefton's Response
General comments	
<p>simply how it makes me feel. We bought our house for the views; for a quiet retirement; as a good healthy place to bring up children etc.</p>	<p>key reasons why people choose and pay a premium to live in or near the Green Belt. The Council has not yet made any decisions about whether any development in the Green Belt should be permitted. If any development is promoted, the Council will require that development is of the highest quality, and compatible with nearby housing.</p>
<p>The unique semi-rural nature of Hightown will disappear for good, along with all that we value.</p>	<p>The Council disagrees. If Hightown were to be identified as suitable for a small amount of growth in the Plan (a suggested maximum of 10%), this would not fundamentally alter the character of Hightown or the general extent of the Green Belt in this area. Any development in this area would be attached to the east of Hightown, and any recreation areas such as cricket pitches and playing fields would either be retained or re-located.</p>
<p>Access to the countryside between Moor Park and Little Crosby (S077 and S078). The area is highly valued for its natural beauty and tranquillity, and for recreation /access to the countryside.</p>	<p>If development were proposed in this area, the development would be bounded by greenspace on its northern edge. The setting of both the Moor Park and Little Crosby would be assessed to ensure that this is preserved and enhanced before any development could be permitted.</p>
<p>Access to the countryside west of Maghull (Green Belt parcels S110, S111, S112)</p>	<p>If development were to take place in these areas, access to the countryside using any existing public rights or ways and bridleways would be retained.</p>
<p>Purpose 4: to preserve the setting and special character of historic towns</p>	
<p>There are no nationally important historic towns in Sefton, although there are numerous Conservation Areas, many of which are in our villages and rural areas. This purpose was therefore assessed in the draft Green Belt Study by whether development in any parcel could affect the setting of a Listed Building or Conservation Area. This would need to be given detailed consideration if development in any identified area was proposed as part of the Core Strategy's Preferred Option. No parcels were therefore discarded for this reason.</p>	
<p>The historical heritage of the green belt and conservation areas feature little, but should feature greatly. There should be an essential gap between settlements, particularly those of historical, agricultural and ecological value.</p>	<p>The second aim of the Merseyside Green Belt is to ensure that towns and villages retain their individual characters. National planning policy contained in Planning Policy Statement (PPS) 5: 'Planning for the Historic Environment' states that the extent of the setting is not fixed and may change as the asset and its surroundings evolve. For this reason, the draft Green Belt Study states that whilst we noted parcels where the setting of a Conservation or other historic asset may need to</p>

Summary of Comment	Sefton's Response
General comments	
	be taken into account if development is proposed, this can only be assessed when a detailed proposal is put forward.
<p>Areas where people felt that the Council should take the setting of historic places into account included:</p> <ul style="list-style-type: none"> • Land at Churchtown; • Between Crosby / Thornton and Little Crosby; 	<p>No decisions have yet been taken about whether any development should be permitted in the Green Belt as part of the Plan. If it were to be proposed to take forward sites in these locations, appropriate surveys and assessments would need to be carried out, to determine the heritage importance of each area (including views and settings). This could restrict the area that would be potentially suitable for development.</p>
<p>Many people also commented on the historic roots of places in Sefton. Lydiate village was one area where people were concerned that the historic character of this village would be lost were more development to take place.</p>	<p>The Council has taken particular note of land that is designated as a Conservation Area or historic parkland, as this has a special value in the Sefton context.</p>
<p>Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land</p> <p>The draft Green Belt Study determined that the relationship between development in the Green Belt and urban regeneration (one of the aims of the Merseyside Green Belt) could only be assessed when any planning application was submitted, and any regeneration initiatives that were in existence at that time. This was therefore not assessed as part of the draft Green Belt Study.</p>	
<p>If Sefton's distinctiveness and high quality environment are not championed and managed appropriately, the deprivation index of the whole borough will rise, dragging down those areas which are Sefton's key desirable features.</p>	<p>The Council disagrees with this assertion. There is no evidence to prove any links between new development and high levels of deprivation.</p>
<p>A 1981 appeal decision stated that "the Green Belt around Formby is of sub-regional significance, because it has a key role in aiding urban regeneration".</p>	<p>The Council acknowledges that one of the reasons for establishing the Merseyside Green Belt (which includes the Green Belt in Sefton in 1983) was "to check the outward spread of the built up area, direct development into existing towns, and encourage their regeneration". However, the Green Belt has now been in existence for almost 30 years, and the scope to continue directing development into the urban areas is coming to an end due to a lack of deliverable sites. The Council will however seek to ensure that if and when Green Belt were to be released, it would be done in a way that will complement regeneration in the urban areas in Sefton and across the wider Merseyside conurbation. The Council has decided to use all the New Homes Bonus it receives to</p>

Summary of Comment	Sefton's Response
General comments	
	complete the regeneration of the former Housing Market Renewal area in Bootle to complete its regeneration.
Other comments relating to the draft Green Belt Study Methodology and conclusions	
Applying one of your own standards, there is no natural boundary between the proposed site (Green Belt parcels S077 and S078) and Little Crosby / the Blundell estate. The proposal is to use half the field, but what is to stop the creep of this development?	The draft Green Belt Study only identified the area adjacent to the Holy Family Catholic High School as being potentially suitable for development, in order to preserve an open area around Little Crosby Hall. If this site were to be identified for development in the Plan's Preferred Option following a detailed assessment of the setting of the Hall, a Development Brief would be prepared to guide the type and extent of development. This would, amongst other things, limit the amount of land that could be developed and ensure that a greenspace edge was created as part of the development to protect the Hall's setting.
What are the definitions of 'essential' and 'narrow' gaps (used in the Green Belt Study)? These terms have not been used consistently across Sefton.	These definitions are explained in paragraph 4.36 of the draft Green Belt Study. Our identification of the gaps was validated by Envision, consultants appointed to scrutinise every aspect of the Study, and amendments to the classification were made where they disagreed with the Council's assessment.
The risk of piecemeal alterations to Green Belt boundaries will result in the creeping erosion of the Green Belt and its impact on the area. The parcel-by-parcel analysis is faulty because it fails to take full account of the cumulative effect of the changes.	Government advice in both Planning Policy Guidance (PPG) note 2 and the draft National Planning Policy Framework indicates that Green Belt boundaries should only be altered in exceptional circumstances. A review of existing Green Belt boundaries should only be carried out when a Local Plan (Plan) is being prepared or reviewed. As the evidence suggests that there is insufficient land in the urban area to meet identified needs, the Council considers this to constitute exceptional circumstances and has undertaken a Green Belt Study. The Methodology was approved by independent consultants, who agreed that the approach of dividing the Green Belt into small 'parcels' for assessment was an appropriate approach. The Plan will determine whether development in the Green Belt should be allowed as part of its Preferred Option, and the scale of development in each settlement. This approach would ultimately be tested by an independent Inspector who

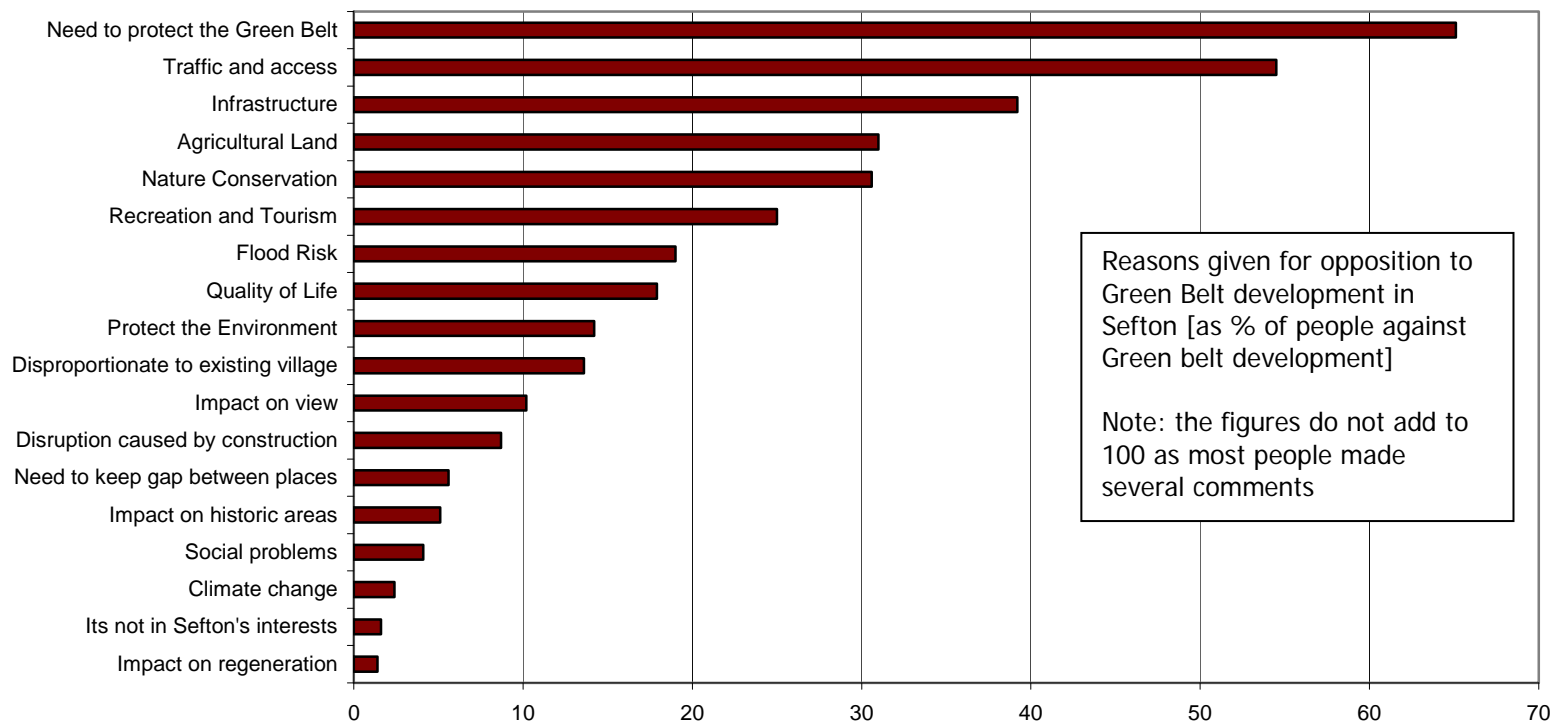
Summary of Comment	Sefton's Response
General comments	
	would recommend whether our Plan is 'sound' and can be adopted.
<p>Little Crosby should not be split across several parcels. A better solution would be to consider the boundary of the Conservation Area + Hall boundary as a single parcel.</p> <p>Parcels S077 and S078 should be identified as lying entirely within an 'Essential Gap' and not partly within an 'Essential Gap'. S084 (Crosby Hall) should be part of the Little Crosby village parcel (S072) and hence should not have been ruled out as being the 'Essential Gap' to be kept open.</p>	<p>The Council disagrees, as the two areas have separate and distinct land uses and characters (which were the criteria for identifying Green Belt parcels). In addition, each has a different impact on the openness of the Green Belt - Little Crosby village is more built up than the Crosby Hall grounds. These distinctions are also reflected in the fact that these areas are designated as two Conservation Areas.</p>
<p>Table 5.1 outlines the Constraints Hierarchy and further explanation is provided, for example in paragraph 5.10 and 5.11, about sites that are nationally or internationally recognised for their nature conservation importance and the duty on local authorities to conserve habitat types and species of principle importance to biodiversity. Natural England welcome the inclusion of these criteria and the rationale set out in paragraph 5.10 for the exclusion of nationally and internationally important sites together with land adjacent to these sites. What is not clear is whether the study has taken account of sites which have significant ecological links with land in the designated areas, for example, land that has potential to be used by migratory birds, which also use a Special Area of Conservation (SAC) or Special Protection Area (SPA), at different times of the year. Such land would need to be treated in the same way as priority habitats and Local Wildlife Sites for the purposes of the Study.</p>	<p>The Council has taken account of land which has significant ecological links with land in the designated areas, for example, land that has potential to be used by migratory birds, which also use a SAC or SPA, at different times of the year. Such land would be treated in the same way as priority habitats and Local Wildlife Sites for the purposes of the Study. The text in the Green Belt Study will be amended to make this clear.</p>
<p>Natural England notes the rationale for treating the 'best and most versatile' agricultural land as a restrictive constraint. The weight to give this national objective will also now have to be guided by the Draft National Planning Policy Framework.</p>	<p>The Council will take this into account. Paragraph 167 of the draft National Planning Policy Framework states that Councils should "take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, Council should seek to use areas of poorer quality land in preference to that of higher quality, except where this would be inconsistent with other sustainability considerations or the Local Plan's (Plan's) growth strategy and where [poorer quality]</p>

Summary of Comment	Sefton's Response
General comments	
	land is unavailable or unsuitable". This is the approach adopted by the Council.
<p>I am not convinced of the criteria in section 6 of the Core Strategy for identifying the suitability of green spaces for potential development. Many of the criteria applied appear to be based on very black or white views, rather than having a regard for quality of life. For example it is stated that land will be assessed by criteria such as likelihood to flood, wildlife value, or if high quality agricultural land, which even as stand alone arguments are very powerful, yet the strategy states that irrespectively land may still be identified as suitable for potential development. I fail to see the logic in such an approach and how other criteria such as transport access can reasonably outweigh the environmental benefits.</p>	<p>The draft Green Belt Study was carried out in a systematic way and validated by external consultants. In section 2, land in the Green Belt was assessed against the 5 purposes of including land in the Green Belt, as set out in national planning policy guidance. Section 3 then assessed the remaining areas (parcels) against a wide range of designations that ruled further sites out of consideration. It is agreed that this was a 'black or white' approach. Quality of life issues are subjective and therefore not possible to measure. If Green Belt land is required for development further work will be required to identify the most suitable sites, however good accessibility will not overcome significant environmental constraints.</p>
<p>Errors in documentation - Appendix 1 of the study contains a list of all 'parcels' identified for review. The descriptions of parcels S004, S005 and S006 contain grammatical errors that render them meaningless. The first sentence relating to S004 simply makes no sense, while the second incorrectly refers to parcels in the plural. The final sentences for 5005 & 5006 include consecutive verbs (is has) that are superfluous.</p>	<p>This will be checked and any errors corrected before the Study is finalised.</p>
<p>A map showing the 'essential gaps' would be helpful.</p>	<p>This and other maps to illustrate when the various parts of the Green Belt were excluded from consideration will be included in the Green Belt Study when it is finalised.</p>

B Objections to Green Belt Development

This section of the Consultation Report considers the comments made against development in the Green Belt, rather than to the draft Green Belt Study methodology or process [as set out in section A above]. In addition to the individual comments a petition was also submitted signed by 1367 local residents against development in the Green Belt. There were other petitions from specific locations in Sefton and these are covered in Section Four.

It was this part of the consultation that attracted the most comments [60+% of respondents made some comment against Green Belt development]. The main reasons that were provided for opposition to Green Belt development are set out below, with two thirds of respondents stating a general need to protect the Green Belt, with many people providing additional reasons. Each of these issues is considered in turn in the tables that follow. Section Four looks at many of these issues in relation to different areas of Sefton



[1] Need to protect the Green Belt

In addition to the specific comments on the draft Green Belt Study, and how this was undertaken, a huge amount of comments were made to the need to protect Sefton's Green Belt from development. Many of these were objecting to the principle of development in Green Belt and the table below sets out the key issues that were raised. Many other people provided further qualification of why development should not be permitted in the Green Belt and these issues are set out [in order of how often the issue was raised] in the remainder of this section.

Summary of Comment	Sefton's Response
Need to protect the Green Belt	
<p>The Green Belt should be protected from development for the following reasons:</p> <ul style="list-style-type: none"> • Releasing Green Belt is fundamentally wrong in principle. • It would deny future generations enjoyment of this green and pleasant land. • Once Green Belt land is gone, it is gone forever. • Green Belt land has successfully checked the urban spread in Sefton and has helped to retain the attractive landscape for local people. • Developing the Green Belt will result in many of Sefton's towns and villages merging together and losing their individual characteristics. • There are fewer and fewer Green Belt sites and less and less countryside due to development. The countryside needs to be protected. • Views across the open farmland to the coast are part of what makes much of Sefton special. • The Council have a duty to protect the Green Belt and control urban growth and urbanisation. Allowing development on the Green Belt will put the Council in breach of its statutory duties. • Unrestricted building will ruin the country as a whole. • Development needs not as important as protecting the Green Belt. • Development of the Green Belt is Environmental Vandalism. 	<p>The comments are noted.</p> <p>The draft National Planning Policy Framework [which is still to be finalised] says the Government attaches great importance to Green Belts. It also says (as current guidance contained in PPG2: Green Belts) that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. The Council would only look to allow development in the Green Belt in exceptional circumstances.</p> <p>The Green Belt has been successful in encouraging the regeneration of the urban area, but land in the urban area which is suitable for development is beginning to run out.</p> <p>The draft National Planning Policy Framework, says that if the Green Belt boundaries need to be reviewed, this should only take place when a local Plan (Core Strategy) is being prepared. We must plan for the long term – 15 years ahead – and the government requires Local Authorities to show how they will meet needs in their areas, in particular, needs for new homes and jobs.</p> <p>The Plan will be examined by a government appointed Planning Inspector who will decide if the Plan is "sound".</p>

Summary of Comment	Sefton's Response
<p>Need to protect the Green Belt</p> <ul style="list-style-type: none"> (Various) Planning decisions from 1982 and earlier have consistently protected the Green Belt. There is no reason to warrant overturning the Council's approach for the 2006 Unitary Development Plan and Inspectors' viewpoints. I purchased my property overlooking the Green Belt based on the assurance that the 1983 Merseyside Green Belt Local Plan would continue to be upheld. 	<ul style="list-style-type: none"> Since the establishment of the Merseyside Green Belt, Sefton Council and the Planning Inspectorate have consistently placed a great deal of protection on the Green Belt. Green Belt can and only will be released for development in exceptional circumstances. When designated, the Merseyside Green Belt was never intended to be permanent. No guarantee could ever be given by anyone about the Green Belt boundaries remaining unaltered.
<ul style="list-style-type: none"> There could be claims against the local council for wrongfully allowing this land to be built on as there has been elsewhere. 	<p>The Plan is subject to a statutory process. As part of this, the Plan will be examined by a government appointed Planning Inspector who will decide if the Plan is "sound". As and when the Plan is found "sound" and adopted by Sefton Council it will be subject to a "call-in" period when it can be subject to judicial review.</p>

[2] Traffic and access issues



There was concern that development of sites in the Green Belt would add to traffic congestion and that access to a number of sites was unsuitable. It is agreed that a detailed assessment should be carried out of the implications for the highways network if it were proposed to take forward any sites in the Green Belt. This section sets out the main general points that were raised in regards to traffic and access issues. Site specific traffic and access issues are considered in **Section Four**.

Summary of Comment	Sefton's Response
<p>Traffic and access issues</p> <p>Sites identified on the edge of towns are often at the edge of existing transport networks with narrow roads and poor accesses. Public transport is, in many cases, either non-existent or infrequent. Therefore building new houses in the Green Belt on the edge of settlements is likely to create more congestion on unsuitable roads.</p>	<p>A poor local highway network is not necessarily a reason to prohibit new development but is an important factor to be considered in the type, level and phasing of development. A new development can sometimes include significant improvements to the highways infrastructure and can enable access to other forms of transport including public transport.</p> <p>Additional housing can make public transport services more viable.</p> <p>If it is proposed to take forward sites in the Green Belt, a detailed assessment would be carried out of the implications for the highways network. If this concludes that it would be too expensive or technically too difficult to improve the infrastructure, this would be a reason to remove a site from further consideration for development.</p> <p>Due to long term highway concerns, the Council in any events intends to carry out some detailed transport modelling in some areas of Sefton including Maghull and Formby.</p>
<p>Many Green Belt and Greenspace sites have poor access points that are unsuitable for service vehicles (i.e bin lorries) and for emergency vehicles.</p>	<p>Please see comment above. In general, development can provide improvements to access points to be made. The detailed assessment referred to above would also include access.</p>
<p>The lack of public transport and bus companies changing routes and times, seemingly "on a whim" means that new development will result in more people using cars.</p>	<p>The Council continues to work with Merseytravel and the bus and rail operators to try and improve existing public transport for local communities.</p> <p>New development can, in some cases make bus routes viable where they previously weren't and result in an increase in services.</p>
<p>Developing more houses and expanding towns into the Green Belt will result in more cars and this will result in more people with health complaints like asthma and other respiratory diseases. Green Belt acts as lungs for built up areas and we need to protect/enhance the Green Belt and not build on it.</p>	<p>If it is decided to take forward any sites in the Green Belt for development, the Council will require greenspace to form part of the development.</p> <p>It is Council policy to require that large developments are served by a choice of forms of travel and are not entirely dependent upon the</p>

Summary of Comment	Sefton's Response
Traffic and access issues	
	motorcar.
The Council struggles to maintain existing roads. More houses will make the situation worse.	The Council have an annual maintenance budget for its highways. More houses can result in payments to the Council for improvements to the highway network.
Concerns across Sefton about the impact of construction traffic along often narrow lanes if housing were ever built. These include noise, disturbance, structural damage on existing buildings, lorries bringing in construction vehicles and removing topsoil and health and safety.	In any construction project there will be some disturbance for a limited time. Where construction takes place a management plan would have to be prepared which will control the impacts of construction traffic.
More can be made of the canal as a green route for boats and for walking and cycling.	Agreed. The Council actively promote the canal for walking and cycling. The Council are seeking to complete the last section of canal towpath improvements in Aintree between Wango Lane and A59 Ormskirk Road. It forms part of the Strategic Cycle Network and on completion the Council will be promoting its use more widely.
<p><u>Merseytravel</u></p> <ul style="list-style-type: none"> • The Core Strategy and Local Development Framework documents should be fully interlinked with the Local Transport Plan (LTP3) and provide for the integration of land use and transport planning. • Development should be placed where it is most accessible by a choice of transport alternatives. • Where development takes place where there is not a significant choice of travel, developers should contribute towards improvements. • Public Transport can help develop the tourist potential of the coastal assets included Southport "The classic resort, the golf courses and Another Place". • Recognises the importance of taxis in helping improve 	<ul style="list-style-type: none"> • Agreed. • Agreed. Where possible, any development will be directed to the most accessible locations e.g. retail uses to town centres. However, due to the shortage of developable land, accessibility is only one factor. Where a site is not accessible by a choice of forms of transport, the Plan will require improvements to be made. • Agreed, the level and type of improvement is outlined in the Council's planning guidance called, "Ensuring Choice of Travel SPD". • Agreed. Improving public transport can help meet a number of the Core Strategies to achieve wider objectives, including tourism, accessibility to jobs and services and social inclusion. • Noted. We support the recognition in the Local Transport Plan (LTP3) of the importance of taxis. • Agreed.

Summary of Comment	Sefton's Response
Traffic and access issues	
<p>accessibility for disadvantaged communities.</p> <ul style="list-style-type: none"> Recognises the importance of the Port of Liverpool and asks that the Core Strategy supports its development. Lists a series of projects in an appendix to be considered as part of the Community Infrastructure Levy. 	<ul style="list-style-type: none"> Noted.

[3] Impact on [deficiency of] services, facilities and other infrastructure



Many people thought that existing services, facilities and infrastructure were under strain and that further development would simply make things worse. Regardless of what option is pursued in the Plan the Council will need to show that it is backed by appropriate levels of infrastructure. The Plan will need to be supported by an Infrastructure Delivery Plan which will set out any infrastructure needed, how much it will cost, who it will be provided by and when. This section sets out the main general points that were raised in regards to services, facilities and infrastructure. Sites specific services, facilities and infrastructure issues are considered in **Section Four**.

Summary of Comment	Sefton's Response
Impact on [deficiency of] services, facilities and other infrastructure	
<p>Development should not be permitted in the Green Belt as there are inadequate services, facilities and infrastructure to cope with any locally increased population. This includes</p> <ul style="list-style-type: none"> A lack of nurseries and both primary and secondary school 	<p>The Council are aware of number of inadequacies in local infrastructure. The consultation has helped to build up a better picture of what infrastructure local people see as a problem and will help us in discussions with infrastructure providers. Infrastructure providers</p>

Summary of Comment	Sefton's Response
Impact on [deficiency of] services, facilities and other infrastructure	
<p>places. In fact many schools are already at capacity and local children already struggle to gain a place in the school of their choice.</p> <ul style="list-style-type: none"> • A lack of available GPs and/or health centre to serve any new homes. Many current GPs and Health Centres are already running at over capacity and local residents often have to wait many weeks for an appointment. • There is already problem with accessing hospitals. Additional homes will make this problem worse. • There is a lack of NHS dentists in many areas and those that exist are at capacity and local residents have to often wait several weeks and even months for an appointment. A large number of new homes in the area will compound this issue. • Increasing the number of new homes, local population and size of the built up area will put strain on emergency services. It is unlikely that additional resources will be given to the emergency services and are likely to be stretched putting areas/residents at risk • A significant amount of new homes will put additional strain onto local electricity, gas and water supply. Many areas already struggle with poor utility coverage and additional homes will compound these issues. • The local sewer system struggles to cope with the current levels of waste. This would be made worse by additional homes. • Many areas do not have suitable telephone or broadband coverage. • There are not enough local leisure and recreation facilities for local people. Building on the Green Belt will not lose areas available for recreation but will add further strain onto existing facilities. • Many areas that are proposed for development do not have local 	<p>regularly monitor how effective their service is and are able to plan ahead to accommodate any increased demand through additional population/households.</p> <p>Regardless of what option is pursued in the Plan the Council will need to show that it is backed by appropriate levels of infrastructure. The Plan will need to be supported by an Infrastructure Delivery Plan which will set out any infrastructure needed, how much it will cost, who it will be provided by and when.</p> <p>In many cases a current deficiency in local infrastructure is not a reason to prohibit new development but is an important factor in the type, level and phasing of development. Development can often help improve a deficiency in infrastructure and the requirement for new infrastructure would have to be set out clearly as a condition before development can proceed.</p> <p>If in discussions with local people, developers and infrastructure providers, it is apparent that providing the necessary infrastructure is too costly or difficult then this would be a reason to remove a site from further consideration for development.</p>

Summary of Comment	Sefton's Response
Impact on [deficiency of] services, facilities and other infrastructure	
<p>shops, including post offices and other services, for residents and people will be forced to use cars.</p> <ul style="list-style-type: none"> • The locations that are proposed for development are suburban in nature and do not provide employment opportunities for new or existing residents. This will force people to drive to work increasing local congestion and problems with air quality • Public transport is inadequate in many of the areas proposed for development. • There are existing problems with a lack of parking in local centres. Additional homes will put added pressure on existing parking facilities. • The Council already struggles with its services, such as bin collections and road gritting. Adding more home and extending the built-up area will stretch services even more. 	
<p>The Core Strategy does not show how the housing growth will be supported by sufficient new infrastructure or how this will be funded.</p>	<p>Until the preferred option is chosen it is not possible to say what level of infrastructure is required. At this stage the Council are continuing to build up a picture of current infrastructure and work closely with infrastructure providers so that it is clear what improvements would be required for the preferred option.</p> <p>Regardless of what option is pursued in the Plan we will need to show that it is supported by appropriate levels of infrastructure. The Plan will need to be supported by an Infrastructure Delivery Plan which will set out any infrastructure needed, how much it will cost, who it will be provided by and when.</p>
<p>Have infrastructure providers been consulted on the Core Strategy plans?</p>	<p>Yes. We work closely with infrastructure providers and will continue to do so during the whole Plan process. In many cases infrastructure providers can only provide general comments at this stage but we expect more specific input once a preferred option is chosen.</p>

A considerable number of the comments on the impact of development on services and infrastructure relate to concerns about existing drainage and sewerage infrastructure – existing capacity and drainage system problems. See below for other issues in relation to flood risk.

Summary of Comment	Sefton's Response
Impact on [deficiency of] drainage and sewerage infrastructure	
<p>The proposed development site and/or wider area suffers from drainage/ flooding problems already.</p> <p>Local drainage system (drains/sewers, foul sewers) already at full capacity.</p> <p>Development (especially given climate change) will make existing flooding /drainage problems worse (area affected, depth etc).</p> <p>For example, sewers blocked or overflow intermittently, regularly or in wet weather / heavy rain, leading to foul and surface water flooding.</p>	<p>Public sewers and sewerage infrastructure, and flooding from them, are the responsibility of United Utilities. United Utilities are also responsible for preparing Forward Plans which set out their priorities for new or improved infrastructure.</p> <p>The Council is responsible for many highway drainage systems.</p> <p>Where sewerage or drainage infrastructure upgrades are required in order for development to proceed, the developer would usually be expected to fund these. In some cases this may also improve the existing situation.</p> <p>The Council is required to prepare an Infrastructure Plan alongside the Plan, to show that the latter can be implemented. The Council will continue to talk to United Utilities and other infrastructure providers, both for preparing the Plan in general, and regarding these points raised in this consultation.</p>
<p>Existing problems and increased flooding will affect contents, property & buildings insurance premiums. Some local homes already struggle to get insurance. May also make these homes more difficult to insure or sell.</p>	<p>The Council follows government guidance and, together with the Environment Agency and United Utilities, carries out flood risk management. The government and the insurance industry are working to resolve issues of premiums in higher flood risk areas).</p>

[4] Agricultural land

One of Sefton's assets is that it includes a lot of high quality agricultural land. There was great concern over the potential loss of this valuable asset. The Council will be carrying out further work to assess the importance of Sefton's agricultural land. This section sets out the main general points that were raised in regards to the loss of agricultural land. Site specific agricultural comments are considered in Section Four. In

addition to the individual comments a petition was also submitted signed by 428 local residents against any grade 1 or 2 agricultural land being removed from Sefton's Green Belt.

Summary of Comment	Sefton's Response
Agricultural land	
<p>Most of the land around Sefton and in particular Maghull, Lydiate, Melling, Alntree, Thornton, Crosby, Hightown, Formby and Churchtown are classified as being grade 1 or 2 – the best and most versatile agricultural land. There is only a very small amount of grade 1 is quality in the country and much of the remainder is in the Fenlands and southern England where the land is suffering with more frequent drought through climate change. There is very little more grade 2 agricultural land and this should be protected as an irreplaceable economic asset as we need agricultural land to meet future food production needs.</p>	<p>Noted. The draft Green Belt Study has taken into consideration the agricultural land classification where the land identified is Best and Most Versatile Agricultural Land (BMV).</p> <p>The Council will carry out further work to assess the importance of Sefton's agricultural land.</p> <p>In any case, if it is necessary to remove land from the Green Belt for development, then the current national planning policy guidance will be followed.</p>
<p>The Green Belt Study ignores the advice in Planning Policy Statement 7 (PPS7) and its own Unitary Development Plan policy (GBC7). Both PPS7 and GBC7 protect the Best and Most Versatile Agricultural Land from development except where there is no other land of a lower grade that is available.</p>	<p>Agricultural Land Quality has been taken into account as part of the Green Belt Study and was identified as being a constraint in stage 3a of the study. Where part or all of a parcel of land is BMV then it has been noted on the individual site appraisals.</p> <p>If it is necessary to remove land from the Green Belt for development, then the current national planning policy guidance will be followed.</p>
<p>Only 3% of the agricultural land in the UK is Grade 1. This area contains most of the Grade 1 land in Sefton. Sefton contains 1/5 of the Grade 1 agricultural land in England. Once it has been built on it will be lost forever. Have you informed the Ministry of Agriculture?</p>	<p>Information provided by Natural England indicates that Sefton contains less than 0.6% of the total Grade 1 agricultural land in England.</p> <p>We have contacted the Department for Environment, Food and Rural Affairs (DEFRA) and the Department of Communities and Local Government (CLG) about the potential loss of agricultural land. The CLG response is as follows:</p> <p>“We need more homes, and jobs in expanding businesses in rural as well as urban areas, but not at the expense of local amenity or the wider environment. The policy within the draft Framework maintains current protections for agricultural land. The Government is fully aware of the</p>

Summary of Comment	Sefton's Response
Agricultural land	
	importance of agriculture and the food production industry. Accordingly, local planning authorities are asked to consider the needs of the food production industry and any barriers to investment that planning can resolve. They should take into account the economic and other benefits of the best and most versatile agricultural land; that is, land in grades 1, 2 and 3a of the Agricultural Land Classification compiled at the behest of DEFRA. Where significant development of agricultural land is shown to be necessary, planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality, except where this would be inconsistent with other sustainability considerations or the local plan's growth strategy and where poorer quality land is unavailable or unsuitable".
<p>It is important to protect land for growing food because the United Kingdom is going to have to grow an increasing amount of its own food for the following reasons:</p> <ul style="list-style-type: none"> • Food becoming increasingly expensive because: <ul style="list-style-type: none"> ○ Climate change making more areas of the globe less suitable for growing food, ○ A global population that is increasing in size very quickly each generation and China and India in particular having to buy an increasing amount of food on the international market, ○ Increasing amounts of political instability and wars globally, ○ Increasing costs of transport and fuel. • It is becoming increasingly environmentally unsustainable to ship food around the globe. 	<p>DEFRA's consultation paper on food security (July 2008) indicates that the UK enjoys a high level of national food security. Threats to our food security are more likely to come from sudden disruption to supply chains (local, national and international).</p> <p>DEFRA also acknowledges that climate change presents one of the biggest challenges to food production.</p> <p>The Council will be carrying out further work to assess the importance of Sefton's agricultural land.</p>
The importance of high quality or best and most versatile agricultural land as a valued resource continues to be recognised in the recently published Draft National Planning Policy Framework, which provides further guidance to local authorities where significant development of agricultural land is demonstrated to be necessary. The Council will need	Agreed. The draft National Planning Policy Framework is expected to be approved soon and will be taken account of when making future decisions.

Summary of Comment	Sefton's Response
Agricultural land	
to consider this guidance when taking forward proposals to the next stage of the Core Strategy.	
The Council has provided no evidence at all to demonstrate to the public that the serious issue of proposed loss Best and Most Versatile agricultural land could be overcome or that there are not less constrained areas available to meet the purported development needs.	<p>The Council will be doing further work on agricultural land to understand its importance. As part of this we will be better able to assess whether its loss can be overcome.</p> <p>If land is required to be removed from the Green Belt then the most constrained sites have already been discounted through the Green Belt Study. We would look at other constraints in more detail at the appropriate stage.</p>
What are the plans to compensate for loss of agricultural land? An Environmental Impact Assessment of the land must be carried out. The cost of the compensation of the lost ecosystems and agricultural land under the EU guidelines (which states land of equal quality and environmental benefit to that which is lost must be compensated for by being replaced elsewhere or damage paid for) alone may prevent some developments.	The Options paper did include an initial Sustainability Appraisal. Later stages of the Plan will also be subject to a Strategic Environmental Assessment (SEA) to assess its Environmental Impacts.
A private Members Bill is going through Parliament where Local Authorities would be prohibited from granting planning permission on grade 1 agricultural land except in exceptional circumstances.	<p>If the Bill is enacted, this would provide a clear framework for what decision the Council could make.</p> <p>Please see this link for further details on the Bills Progress: http://services.parliament.uk/bills/2010-11/planninggrade1agriculturallandprotection.html</p>
<p>Some of the agricultural land is of a different quality to that indicated on the DEFRA maps.</p> <p>A number of submissions have suggested that the agricultural land classifications are inaccurate. Some submissions include consultants reports showing that the agricultural land is of a lower quality than shown by DEFRA. Other submissions have suggested inaccuracies where land classified as urban is still farm land.</p>	<p>The agricultural land classification maps are drawn up on a broad [national] scale and are based on a series of assumptions about soil types and climate. They are therefore not intended to be absolutely accurate for specific sites.</p> <p>If any areas of agricultural land were proposed to be taken forward for development, an independent assessment of agricultural land quality would be carried out.</p>

Summary of Comment	Sefton's Response
Agricultural land	
	The Council will also review submissions on the agricultural land quality as part of a study to understand the importance of agricultural land.
It is imperative that an independent soil expert produce a detailed report for public consideration.	The Council will be carrying out an agricultural land study in order to fully understand the quality of Sefton's farmland, the soils and the importance of the agricultural economy in Sefton and nationally.
<p>The Council should be consulting farmers as they understand agricultural land.</p> <p>Developing the agricultural land will result in the loss of jobs amongst farmers and farm workers. Should Greenbelt restrictions be lifted and if planning permission were to be granted, the landlord could then serve a valid notice to quit on tenants. This could have a devastating effect on the local farming economy. Concern about the loss of the rural way of life</p>	<p>Agree. As part of further work on agricultural land the Council will consult the National Farmers Union.</p> <p>2010 data confirms that fewer than 500 people work in agriculture in Sefton. We will review the impact upon agricultural employment as part of the further work on agricultural land.</p>
<p>The Core Strategy process has not put enough emphasis on the need for sustainable development, 'green' issues and the vital nature of local food production. Agricultural land has been raised on the agenda by campaigners and should have been given due weight from the outset by the Council.</p>	<p>Agricultural land quality has been considered from the outset within the Green Belt Study and the Plan Options Paper. Many submissions through the consultation process have stated that they consider it is as important an issue as protection of nature sites and areas with high flood risk.</p> <p>The Council have to work within existing planning guidelines. This places a high degree of importance on agricultural land quality but it is not a prohibitive constraint in the way that flood zone 3 and international nature designations are.</p>
<p>The Frequently Asked Questions (FAQs) and Paragraph 10.37 of the explanatory notes of the Sefton UDP, refers to the Best and Most Versatile agricultural land as follows: <i>"This land is a national environmental asset and economic resource which should be protected from irreversible development for future generations."</i></p>	<p>Noted. This remains the aim. However, it is possible that other considerations may mean that some high quality agricultural land needs to be developed. If this is the case then the Council will ensure that as little as possible is removed from the Green Belt.</p>
<p>Much of Sefton's farming land is low lying and susceptible to flooding. Therefore it is not suitable for development.</p>	<p>Please see the section on flooding (below).</p>

Summary of Comment	Sefton's Response
Agricultural land	
Agricultural land is used for wider uses such as for grazing horses, wildlife and leisure.	Noted.
Agricultural land has a natural beauty that when lost, will be lost forever.	Noted.
Some submissions accepted that we may need more land for homes and jobs but considered that protecting land for growing food is more important than any other consideration.	Noted. In developing the Plan the Council will have to balance a number of needs and aspirations including providing new homes and retaining land for growing food locally. As a result of the Plan Options and Green Belt Study consultations, the Council are aware of the great importance attached to agricultural land by many of its residents.
<u>Natural England</u> The importance of high quality or best and most versatile agricultural land as valued resource continues to be recognised in the recently published Draft National Planning Policy Framework, which provides further guidance to local authorities where significant development of agricultural land is demonstrated to be necessary. The Council will need to consider this guidance when taking forward proposals to the next stage of the Core Strategy.	Noted.

[5] Nature Conservation



Sefton Borough includes sites and species of local, national and international importance for nature; most notably the Sefton Coast which is an internationally important wetland and coastal habitat, and homes to internationally important bird and other species. Information about ecology in Sefton is set out in the Liverpool City Region Ecological Framework (see <http://www.sefton.gov.uk/ecologicalframework>). Many people raised concern about the impact potential development may have on these sites and species. This section sets out the main general points that were raised in regards to the loss of agricultural land. Site specific comments on nature are considered in **Section Four**.

The draft Green Belt Study identifies international and national wildlife sites as prohibitive constraints (stopping development). Regionally Important Geological Sites, Local Nature and Wildlife Sites and Priority Habitats are identified as severe constraints.

Summary of comment	Sefton's Response
Nature conservation	
<p>Sefton Council should be supporting the ambitions of the government and the White Paper "The Natural Choice" when considering the impact of the Draft Green Belt Study. Nature should not be taken for granted or undervalued - it has a vital range of benefits and eco-systems services.</p>	<p>Noted. The Council recognises its statutory duty to take account of biodiversity. Its recent approval of the Liverpool City Region Ecological Framework shows the importance of nature to the Council, and how it underpins potential development opportunities. The Council has a difficult challenge in protecting and managing nature and providing homes and jobs. It is focusing on maintaining its Core Biodiversity Areas while finding opportunities to expand the Ecological Framework by working with developers.</p>
<p>Need detailed reports about the local wildlife and natural environment (including an Environmental Impact Assessment) conducted over at least a twelve-month period, to allow for seasonal fluctuations in different species before any decisions on the suitability of potential development sites can be made. For example, may need:</p> <ul style="list-style-type: none"> • Detailed ecological studies / wildlife assessments, • Environmental Impact Assessments, • Habitats Regulations Assessments. 	<p>Noted. There is a legal requirement for Habitats Regulations Assessment, Strategic Environmental Assessment and Sustainability Assessment of the Plan.</p> <p>If it is proposed to consider any sites further for development, the appropriate surveys would need to be carried out to help make the final decision.</p> <p>We have asked the Council's environmental advisors, the Merseyside Environmental Advisory Service, for their views on these issues.</p>
<p>The proposed development site and/or wider area is designated for its international, national or local importance, or used by species (such as migrating birds or geese) which use these designated sites.</p> <p>The proposed development site and/or wider area includes nationally protected or endangered species.</p> <p>The site is an important part of a wider ecological network or eco-system, for example the Sefton Coast.</p>	<p>Legislation and government guidance mean, in effect, that international, national or local designations have different levels of protection.</p> <p>This was reflected in the approach of the draft Green Belt Study. 'Parcels' [i.e. areas of land] which have international or national nature designations were ruled out at Stage 3 (i.e. not taken forward for further consideration). Local Wildlife Sites and Regionally Important Geological Sites are severely restrictive constraints (but would not entirely prohibit new development).</p>

Summary of comment	Sefton's Response
Nature conservation	
Natural England comment that the approach to conserving valued environmental assets should seek first to avoid loss or harm, before considering the need for mitigation or compensatory measures. E.g. for housing, the Port, development generally. The development plan process must maintain the integrity of the network of sites.	Wildlife issues, including local designations, for parcels that may be possible development sites, are being looked at in more detail. We have asked the Council's environmental advisors, the Merseyside Environmental Advisory Service, for their views on these issues.
The proposed development sites and/or wider area are valued and important habitats for wildlife - flora and fauna – which should not be lost. [In many cases individual species are listed, for example of birds, fish, bats, butterflies, insects, reptiles, other mammals, plants, mosses and lichens.]	Noted. Wildlife issues, including species and habitats referred to in comments, are being considered further. We have asked the Merseyside Environmental Advisory Service for their views on these issues. If it is proposed to consider any sites further for development, the appropriate surveys would need to be carried out to help make the final decision.

[6] Recreation/ Tourism

Sefton Borough has an extensive Rights of Way and permissive path network, including parts of longer distance routes such as the Coastal Path, Trans Pennine Trail (Cheshire Lines Path) and canal towpath. There is public access to much of the Coast, and to countryside recreation areas such as Newlands (Town Lane, Southport), the Rimrose Valley, and Sefton Meadows and other community woodlands in south Sefton. There are a number of playing fields and pitches in the Green Belt, and other recreation facilities such as golf courses. The Green Space Strategy for Sefton makes clear the importance of green space and recreation facilities to Sefton (see www.sefton.gov.uk/greenspacestrategy).

This section sets out the main general points that were raised in regards to the impact on Green Belt land used for recreation and tourism. Site specific comments on recreation and tourism are considered in **Section Four**. In addition **Section Six** considers the comments received to the draft Greenspace Study, including comments on specific greenspace sites.

Summary of Comment	Sefton's Response
Recreation / Tourism	
The proposed site and/or wider area is important for local people and others, giving access to open countryside. The range of recreation and leisure activities include children's play, dog-walking, walking, cycling, horse-riding, grazing and stables, sports and enjoying nature.	If any site within the Green Belt were to be taken forward for development: <ul style="list-style-type: none"> We would intend to secure both no net loss of the quality of provision, and also enhanced facilities. It is anticipated that development briefs or master plans would set the requirements

Summary of Comment	Sefton's Response
<p data-bbox="185 280 483 312">Recreation / Tourism</p> <p data-bbox="185 320 1111 453">The proposed site and/or wider area is a safe, tranquil and healthy natural environment, for all ages, easily accessible for people's homes. Important for enjoying peace and quiet in the countryside, away from hustle and bustle of busy urban areas.</p> <p data-bbox="185 491 1055 555">Development would lead to a loss of valued recreation, leisure and tourism amenities for local people and others.</p> <p data-bbox="185 593 1099 692">The proposed development would lead to a loss of a range of types of green space, for example parks, playing fields, open countryside and rights of way, nature areas and quiet areas.</p> <p data-bbox="185 730 1048 759">Loss of recreation space is contrary to the ethos of 'Active Sefton'.</p>	<p data-bbox="1234 320 1619 352">for any area to be developed.</p> <ul data-bbox="1205 360 2089 560" style="list-style-type: none"> <li data-bbox="1205 360 2089 523">• Developers would be expected to provide high quality, publicly accessible green space on a significant part of the overall parcel, which should typically provide a range of benefits in relation to the following aspects: wildlife, landscape, flood risk management, visual /quality of life, climate change and recreation. <li data-bbox="1205 531 1984 560">• Rights of Way networks would be retained and enhanced.

[7] Flood Risk



Sefton is a low-lying, coastal authority, which makes it potentially vulnerable to flooding from a variety of sources. The main information about flood risk in Sefton is up to date river and tidal flood risk information (Flood Zones) from the Environment Agency and recent Sefton work on the Surface Water Management Plan. This largely updates the information in the Sefton Strategic Flood Risk Assessment (2009) (see <http://www.sefton.gov.uk/sfra>), which also sets out areas with a low risk of groundwater flooding.

The draft Green Belt Study identifies the areas at highest risk of river and tidal flooding – Flood Zone 3b and Flood Zone 3a for housing, and Flood Storage Areas - as prohibitive constraints (i.e. stopping development). Land at medium risk of river and tidal flooding - Flood Zone 2 – is a severe constraint.

The risk from flooding to new homes and the increased risk from flooding to existing homes was a concern for many residents across Sefton. This section sets out the main general points that were raised in regards to the impact of development in Green Belt to flooding. Site specific comments on flooding and flood risk are considered in **Section Four**

Summary of Comment	Sefton's Response
<p>Flood Risk</p> <p>The proposed development site and/or wider area is in a flood risk area. It would be unwise to build here - the risk should not be ignored. For example it is</p> <ul style="list-style-type: none"> • In a flood plain / just outside a flood plain / next to a river, • In a flood risk area / Flood Risk Warning / Alert area, • In an area benefiting from sea or river defences, • Low-lying. <p>The proposed development site and/or wider area, including main access roads, already has flooding problems - river, surface water or other flooding. For example:</p> <ul style="list-style-type: none"> • Roads, fields garden areas flood seasonally, regularly or in wet weather / heavy rain, • Surface water flooding, • High water table / boggy. <p>Development (including more hard surfaces) would strain the existing drainage systems and make existing flooding /drainage problems worse (area affected, depth etc). There are other safer, low risk areas elsewhere suitable for housing.</p> <p>Climate change (including sea level rise) will make existing problems worse.</p>	<p>The Council directs development to sites with the lowest risk from flooding in line with government guidance in Planning Policy Statement 25, and the draft National Planning Policy Framework. This takes into account flood risk from all sources, including river and tidal flood risk and surface water flood risk, bearing mind existing drainage systems.</p> <p>Where land has not yet been ruled out as possible development sites, flood risk issues will be looked at in more detail (including recently available surface water flood risk information). The impact of climate change will also be considered, in line with government guidance.</p> <p>If any site were to be brought forward for development, the developer would be required to carry out a site–Flood Risk Assessment, to demonstrate that flood risk could be managed and reduced.</p>
<p>Existing problems and increased flooding will affect contents, property & buildings insurance premiums. Some local homes already struggle to get insurance. May also make these homes more difficult to insure or sell.</p>	<p>The Council follows government guidance and, together with the Environment Agency and United Utilities, manages flood risk. The government and the insurance industry are working to resolve issues of premiums in higher flood risk areas.</p>

Summary of Comment	Sefton's Response
Flood Risk	
In other areas the Local Authority has been sued for allowing building on land with flood risk issues. Will this happen in Sefton?	The Council's approach to development and flood risk on particular sites is in line with government advice.

[8] Quality of Life issues

Residents raised many issues in relation to the quality of their life being affected by development in the Green Belt. These often include issues that are covered elsewhere in this report, but this table provides an overview of the issues raised.

Summary of Comment	Sefton's Response
Quality of Life issues	
<p>Green Belt contributes towards the Quality of Life of residents across Sefton's communities. This is because of:</p> <ul style="list-style-type: none"> • The openness, views and natural feel, • Recreation, • Health benefits (both mental and physical), • Impact on the appearance of the area/village, • Wildlife, • Quality of air, • Helps provide natural flood defence. • Provide easy access to nature. • Low crime and perception of crime. <p>Building by the Green Belt will make take away these benefits for people who have chosen to live by the Green Belt.</p>	<p>It is accepted that there are a wide range of benefits associated with living next to the countryside that contribute towards quality of life.</p> <p>If land is needed to be removed from the Green Belt for development, the character of the area would clearly change. However, new green space and natural areas would be required within the development along with links to the countryside. Sustainable drainage would also be fully integrated within the development.</p>

[9] Environment general [landscape]

Sefton Borough has no international, national or local landscape designations, although there are some sites of local geological interest which are almost all either coastal sites or quarries or railway cuttings. Nevertheless many people in Sefton appreciate the local landscape and consider that this needs protecting. This section sets out the main general points that were raised in regards to the general environment and

landscape. Site specific comments to the general environment and landscape are considered in **Section Four**. In addition comments were also raised in relation to the wider environment and climate change [see below].

Summary of comment	Sefton's Response
Environment general [landscape]	
<p>The proposed site and/or wider area is an attractive landscape close to people's homes. Beautiful natural area.</p> <p>Part of the appeal of nearby existing housing is the rural character, landscape and environment of the surroundings area. Pleasant transition from busy urban areas or suburban housing into rural peace and tranquility, which contributes to the setting and character of the wider area.</p> <p>Need to protect the countryside, landscape and natural features of the environment.</p>	<p>Noted. No landscape in Sefton is protected by a designation at a national, local or other level, and so quality of landscape would not be an over-riding constraint which would stop development.</p> <p>Assessment of landscape character in Sefton is based mainly on the 2003 Landscape Character Assessment Supplementary Planning Guidance Note (SPG). If any site within the Green Belt were to be taken forward for development, the Council would expect green space to be provided, and the boundary between buildings and the rural area to be sympathetic to the landscape character of the surrounding area.</p>

[10] Impact on house price/view

Summary of Comment	Sefton's Response
Impact on house price/view	
<p>The development will spoil the view we have from our home. House was purchased because of the view and a premium was paid for the view. Our house value could fall significantly because of the proposals. Will compensation be paid? Will the Council Tax in our area be decreased?</p>	<p>Whilst it is appreciated that people enjoy a view over open land, this is not something which can influence decisions about the location of development. There is no provision for reducing Council Tax, or to receive compensation if development takes place</p>
<p>If development proceeds we will seek compensation from the Council under the Compensation Act 2006.</p>	<p>The Compensation Act 2006 relates to claims for damages in negligence or breach of statutory duty in relation to disease caused by asbestos.</p>

[11] Disruption caused by building work

Summary of Comment	Sefton's Response
Disruption caused by building work	
There were will be disruption, mess, noise and other inconveniences as a result of building work. The lorries needed for the construction will bring congestion and pollution to the area and cause chaos and potentially be a hazard.	Unfortunately there will always be some disruption to existing residents during building work. The Council always try to minimise this during construction through conditions placed on developers, such as working hours and choice of access for construction vehicles.

[12] Impact on Historic Environment



Sefton contains a number of identified Conservation Areas, Historic Parks and Gardens and many listed buildings. It also contains other identified and unidentified archaeological remains. Many residents raised concerns that development in the Green Belt would destroy, damage or compromise some of Sefton's heritage assets. This section sets out the main general points that were raised in regards to the historic environment. Site specific comments to the historic environment are considered in **Section Four**.

Summary of Comment	Response
Impact on Historic Environment	
The National Trust consider that whilst the setting of Listed Buildings is noted, and in many cases may be correct, it is by no	Noted. Should options for development within greenbelt be required to be progressed, detailed analysis of sites with heritage implications will be

Summary of Comment	Response
Impact on Historic Environment	
<p>means universally true that settings are localised. At the other extreme, for example, the Trust (National Trust) is aware of an appeal case where the impact upon the setting of a Listed Building was a determining issues in dismissing the appeal — when the Listed Building was some 11km from the appeal site. So although it would not have been appropriate to establish the setting of every Listed Building, and all other heritage assets, in Sefton as part of the Green Belt Study, equally at some point as the list of potential sites is narrowed down the likely impacts upon the historic environment must be considered. In effect it would be included in the constraints set out in Table 5.1 (para 5.6). However, Listed Buildings along with the settings of all heritage assets should be treated as "Severely Restrictive." It is unclear how, in practice, the adverse impacts of development could be mitigated in the ways set out. There appears to be a clear contrast here with the approach to national nature conservation designations and the automatic discounting of 'adjacent land'. — designated heritage assets are also national (or international). The Trust believes that the correct approach was adopted for nature conservation designations, and is concerned that a commensurate approach has not been taken to heritage designations.</p>	<p>undertaken to identify sensitivities which impact on the potential for development. The methodology did not automatically discount adjacent land to national/international nature protection designations, therefore the approaches taken to protected sites is broadly commensurate. Heritage assets [non-designated] and their settings are highly varied in their nature and significance. Therefore it was considered inappropriate to rule out the development of a large parcel of land on the basis of the presence of a heritage asset alone. It is however recognised that this would be likely to limit the development potential of a site, and would merit more detailed consideration at a later stage, including taking into account the particular significance of the heritage asset affected.</p>
<p>Have English Heritage, the Campaign for Rural England and Natural England been approached to for comment on this aspect of the SMBC Core Strategy consultation process?</p>	<p>Yes. Their comments have been included into this consultation report</p>

[13] Social issues

Summary of Comment	Sefton's Response
Social issues	
<p>New areas of housing will increase crime and anti-social behaviour. It</p>	

Summary of Comment	Sefton's Response
Social issues	
will stretch our emergency services.	

[14] Impact on climate change and Sefton's carbon footprint

Summary of Comment	Sefton's Response
Impact on climate change and Sefton's carbon footprint	
<p>Zero carbon developments should be sought. Development needs to mitigate against climate change. Development should be BREEAM excellent wherever possible</p> <p>The existing sustainable qualities Sefton has (farmland, good train network, renewable energy, etc.) should be made the most of, to make the borough one of the most sustainable in the country</p> <p>Need to consider implementing renewable energy projects to mitigate the effects of climate change.</p>	<p>The Council is committed to a low carbon Sefton, making sure that future development is as 'low carbon' as practicable - located, designed and constructed as sustainably as is practicable. It is important for development to be energy efficient and incorporate renewable sources of energy where possible such as micro-renewable forms of energy, wind turbines, combined heat and power, and stand-alone renewable energy schemes are also important. This is in line with government guidance on sustainable development and renewable energy.</p>
<p>Increased traffic will increase pollution, thus contributing to global warming. Level of proposed development will impact on Sefton's Green Agenda (Beacon Status for Cleaner Air) in terms of the pollution (both noise and carbon emissions) from the increase in traffic.CO2 emissions will worsen and have a detrimental effect on local wildlife.</p> <p>Pedestrianisation of town centres and a serious cycle network would go a small way to mitigating climate change and oil shortages. The Core Strategy should go further in promoting sustainable transport.</p>	<p>Like the Local Transport Plan (LTP3) the Plan will seek to reduce any increase in use of vehicles (notably private cars), fuel use, emissions and global warming through a range of policies. This will benefit nature sites and wildlife as well as the wider environment.</p> <p>Where possible, development will be directed to the most accessible and sustainable locations. Where a site is not accessible by a choice of forms of transport, the Plan will require improvements to be made, notably to cycling, walking and public transport networks and services. This includes pedestrianisation where appropriate.</p>
<p>Increased green infrastructure would be beneficial, notably for carbon storage, as well as other reasons.</p>	<p>The Council recognises the importance of protecting and enhancing green space and green infrastructure through the Plan process. For example, if any green space site were to be developed in the future, new public green space would be provided as part of the development.</p>
<p>Self-sufficiency in food production would help reduce the carbon footprint.</p>	<p>The Government's view is that the UK is largely self- sufficient in terms of food security and it is not necessary for individual boroughs to be</p>

Summary of Comment	Sefton's Response
Impact on climate change and Sefton's carbon footprint	
	self-sufficient. The role of shops and supermarkets as a link between food producers and purchasers means that food produced locally would not necessarily be consumed locally.
Flooding is a big problem locally and unpredictable weather trends may exacerbate this. This would endanger any new housing.	Please see the section on flooding (above).

[15] It's not in Sefton's best interests

Summary of Comment	Sefton's Response
It's not in Sefton's best interests	
<p>Giving the green light for development on the Green Belt is not in Sefton's best interest. The 'will of the people' should be acknowledged. Currently the Core Strategy goes against the wishes of the people. Planners must not assist land grabbing developers who are disinterested in local residents</p> <p>The projected housing figures neither reflects the needs of residents or the declining population. The Council is following Government directives. New housing developments will not be suitable for the local community</p> <p>Councillors have been elected' to ensure residents interests and views are protected. These should be taken into account before any decision is made. Under the Localism Bill, community wishes (anti-development) should hold sway over planners or councillors</p>	<p>No decisions have been taken about which option to pursue yet or whether development will take place on the Green Belt.</p> <p>Decisions will be made by Councillors, who will decide on the best option for Sefton and its residents. They will consider all the evidence, including the wishes of the local residents when they come to their decision.</p>

[16] Impact on regeneration

Summary of Comment	Sefton's Response
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Impact on regeneration	
<p>Greater emphasis is needed within the Core Strategy on regeneration. Whilst regeneration of Bootle and Southport is important, all the places of Sefton should be encouraged to develop into better quality places, and the emphasis of the text should be on all places equally. Sefton needs to work harder on encouraging investment in the redevelopment of brown sites. Ensure that good planning strategy is used to encourage urban regeneration.</p>	<p>Regeneration is a key issue in many parts of Sefton. Greater emphasis will be placed on regeneration across Sefton in subsequent versions of the Plan. However, there will be areas that take priority for regeneration, i.e. those areas identified as in greatest need.</p>
<p>We note focus on regeneration, but welcome recognition that solutions to inequalities across the Borough include improving quality of natural environment. Enhancing the quality of the natural environment will bring a number of benefits and address issues for example, place setting, nature conservation, health and well being.</p>	<p>As mentioned above greater emphasis will be placed on regeneration in later versions of the Plan and we will explore the different ways, including the natural environment, this can be implemented.</p>
<p>Southport Town Centre is crying out for regeneration e.g. Eastbank & Tulketh Streets. This would revitalize the Town Centre area. This area may suit older people as it is close to services.</p>	<p>As mentioned above greater emphasis will be placed on regeneration in later versions of the Plan, including for individual areas such as Southport.</p>
<p>It is important to revitalise and regenerate areas in Sefton that are neglected and in economic decline — development in these areas would boost them economically. Priority should be given to</p> <ul style="list-style-type: none"> ○ Redevelopment of sub-standard housing in south Sefton. This would solve the housing problem and bring economic revival. ○ Development in areas such as Bootle where there is a need for homes and jobs ○ Prioritising regeneration of brownfield land and in the existing urban area ○ Protecting Green Belt areas from development as this directs investment into existing urban areas and boosts regeneration ○ Regeneration over needs of developers who would find it more profitable in developing Greenfield sites. 	<p>Regeneration has been a key focus in Sefton in the past and will continue to be so in the Plan. The Council agrees that regeneration can transform an area and will continue to look for opportunities through the Plan to do so.</p> <p>Studies have concluded that Sefton are reaching the end of its supply of available brownfield land for development and that the Council may need to consider land in the Green Belt for development in the longer term. This does not preclude a continued need for regeneration and regardless of what preferred option is chosen the Council will continue to look at ways to bring investment in Sefton.</p> <p>All the Green Belt in Sefton has helped to aid urban regeneration. However regeneration is also promoted by many other factors, including, economic growth, availability of funding and private sector investment.</p> <p>Developer profit will not be a factor in determining what the preferred</p>

Summary of Comment	Sefton's Response
Impact on regeneration	
<p>The money earmarked for new build projects would be better spent on regeneration and renewal of housing in the poorer areas of the borough. Option One [urban containment] would provide the best way to achieve this rather than direct investment at new developments on the edge of existing towns and villages.</p>	<p>option for the Plan will be.</p> <p>There is no public money earmarked for new build projects. Any new build would be financed by the private sector and would be 'new' investment in Sefton.</p> <p>It is not true to say that options two and three would result in areas in need of regeneration being neglected. Priority will always be given to those areas that have a most pressing regeneration need. Any investment in new development will be provided by the private sector as part of the development and will not be diverted from existing regeneration priorities.</p>
<p>The Council's recent policy of housing 'restraint' was designed to concentrate development and investment in the most deprived parts of the Borough. Options Two and Three represent a complete about face from this policy, which sought to target regeneration where it is most needed. The regeneration of these targeted areas is not complete and Options Two and Three fail to provide a continued incentive for developers to invest in priority areas.</p>	<p>The housing restraint policy in Sefton was implemented in response to Regional Spatial Strategy at the time, which sought to restrict housing development throughout the borough. This helped to direct development into South Sefton and was very successful. However subsequent guidance, including more recent Government Guidance, placed more emphasis on planning for growth and as a result Sefton, as with other Local Authorities, lifted its housing restraint policy.</p> <p>We agree that regeneration in Sefton is not complete but restricting development outside these areas is not the only method to do so.</p>
<p>The intermediate labour market and the third sector can play a key role in the transition from long-term unemployment to work. The Green economy offers many opportunities for this such as community regeneration projects and environmental projects.</p>	<p>Comment noted. The Plan will be an important document in realising the economic objectives of the Council [including its emerging Economic Development Strategy] and its partners. We will continue to work with others so that the Plan helps all aspects of investment in Sefton and the creation of jobs.</p>
<p>Development of land in the Green Belt and/or wider area could harm existing local businesses [e.g. farms, equestrian, leisure] that rely on a rural setting. Rural regeneration should be a consideration.</p>	<p>The Council would not continue to propose any sites for development if the landowner did not wish to sell. If the Plan preferred option requires Green Belt land for development a number of factors will be considered in identifying areas, including current use.</p> <p>The Council will be carrying out an Agricultural Land Study that will</p>

Summary of Comment	Sefton's Response
Impact on regeneration	
	include an assessment of the economic importance of agricultural and associated uses to the Sefton economy.

[17] Land ownership issues

Summary of Comment	Sefton's Response
Land ownership issues	
Land ownership issues have not been addressed or considered when identifying development sites	<p>The draft Green Belt Study aims to take an objective view of the suitability or otherwise of 'parcels' of land for development and release from the Green Belt. Landowners' views are important, and if Green Belt land were required, under Options 2 or 3, this would only be brought forward for development with the landowners' consent (The Council does not intend to purchase land compulsorily).</p> <p>Landowners, like others in the community, have had the opportunity to comment during the Options consultation.</p>

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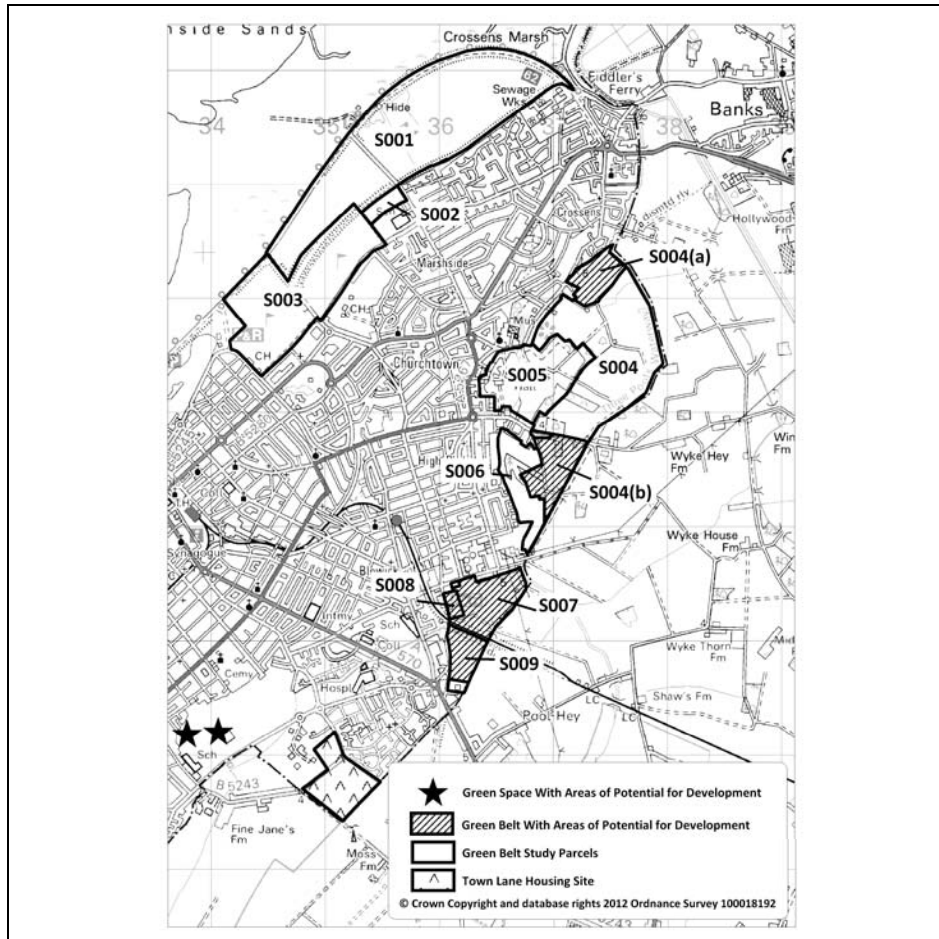
Section Four

Draft Green Belt Study Objections on Individual Areas

Southport
Formby
Crosby and Hightown
Maghull and Lydiate
Aintree and Melling



Objections to Green Belt Sites Southport generally and Churchtown Area



This section of the Consultation Report looks at comments made to specific Green Belt sites [or parcels] in the Southport and Churchtown area during consultation.

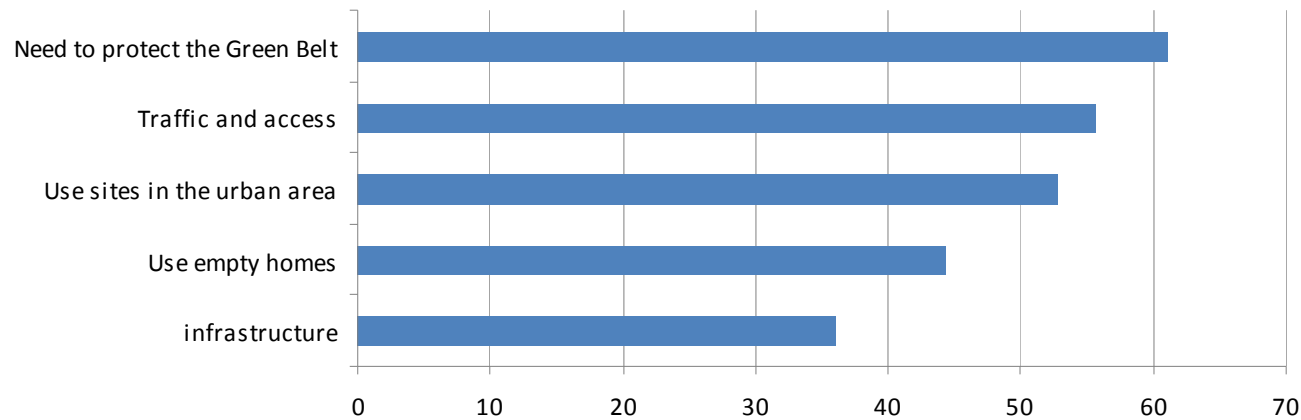
The Green Belt sites that were identified as having some potential for development in the Southport and Churchtown area are shown in the map to the left.

This section only includes comments that relate to Green Belt sites in Southport and Churchtown. Other more general comments on Green Belt sites are set out earlier in this report e.g. agricultural land, flood risk, vacant homes.

This section includes separate tables for the following areas of Southport and Churchtown

Southport overall	No parcel specified
Churchtown	parcels S004, S004b
Southport East	parcels S007, S008, S009

Southport Overall



This chart shows the top 5 issues mentioned in this area against development in the Green Belt [as % of individual comments received for the area]

Note: the figures do not add to 100 as most people made several comments

The most common concern from individual respondents (61%) was the irreversible loss of the Green Belt, and urban sprawl. 55% of responses related to traffic – especially congestion and access to and within Southport. The next most important concern (52%) was the need to use up brownfield sites rather than consider land in the Green Belt, and 44% of respondents raised the high number of vacant homes as an issue.

Summary of Comment – Southport generally	Sefton’s Response
Protect the Green Belt / will lead to urban sprawl / once lost can't be recovered	
Leave the land alone or Southport will become yet another concrete jungle. Strongly oppose the use of Green belt land to be developed and built upon.	No decisions have been taken about whether development will take place on the Green Belt. However, the Options paper suggests that this may be necessary if Sefton is to meet its future housing and employment needs (Option 2), or if it is to stabilise its population (Option 3).

Summary of Comment – Southport generally	Sefton’s Response
<p>The “Old Hospital” hamlet (in West Lancashire) would cease to exist as a separate rural community if the gap were filled through housing development and undoubtedly threaten the character of the hamlet.</p>	<p>Although there are a small number of houses immediately across the Sefton boundary in West Lancashire, it is not considered that they form a hamlet. There are two houses built on the site of a former hospital, together with a small strip of ‘ribbon development’ on the north side of Moss Lane. As no development is proposed in this area in the West Lancashire Local Plan, the character of this area would not change, although it would be closer to the edge of Southport if development were to take place south of Moss Lane in Green Belt parcel S004(b).</p>
<p>Developing the land by Moss Lane would result in 'urban sprawl', and would fail to maintain the integrity of the Green Belt. The area identified for development does not adjoin the current urban area adequately.</p>	<p>It is agreed that there is limited connection between Green Belt parcel S004b and the urban area. If we choose an Option that promotes the development of this site, the new Green Belt boundary would follow Three Pools Waterway. This would form a robust boundary which would prevent urban sprawl to its east.</p>
<p>Little Green Belt is left surrounding the built up areas. This is why the residents in the north of Sefton do not want to lose this vital area of green open countryside (between Ainsdale and Formby) to more development.</p>	<p>Comments noted</p>
<p>Traffic - inadequate access, congestion, poor public transport accessibility, pollution</p>	
<p>Future development will cause more transport issues in the Southport area and a full transport study will be needed.</p>	<p>Agree. Further work would need to be carried out to understand the existing and future capacity of the highways network and where future improvements may be required.</p>
<p>The issue of transport to and from North Sefton needs to be considered. There needs to be a better link to motorway system for North Sefton. There are poor road and rail links to the rest of the North West so where is the incentive for larger non-retail or production based companies to set up in this area? The emphasis should be on providing better transport links.</p>	<p>The building of the Thornton Switch Island Link road will improve access from Southport to the motorway network. However, it is acknowledged that wider links between Southport and the region could be improved and opportunities for funding and improvements will continue to be sought through planning and other strategic plans.</p>

Summary of Comment – Southport generally	Sefton’s Response
Empty homes / vacant properties / number of houses for sale	
At the present time over one thousand houses are either vacant or for sale in the Southport area alone and a large majority of these are in the first time buyers category	The issue of vacant homes is addressed in Section Two of this report
Impact on services + infrastructure - drainage / shops/ schools at capacity / lack of health services	
Southport’s population has exploded in recent years from 80,000 to about 100,000. It is not fair to inflict thousands more when our infrastructure and services are under stress at the expense of our Greenbelt land and safety. The question is, "can Southport sustain another 2000 or so people in the resort?"	This is not the case. The population of Southport has increased slightly in recent decades [from over 87,000 in 1971 to over 90,000 in 2001]. None of the Options would result in an overall increase in Sefton’s population.
Development of this will also require a major main sewer down existing roads, as the existing sewers are already inadequate and over loaded.	Public sewers and sewerage infrastructure are the responsibility of United Utilities. United Utilities are also responsible for preparing Forward Plans that set out their priorities for new or improved infrastructure. We continue to work with United Utilities to make sure any improvements to sewers are provided when and where required.
Area prone to flooding	
Southport is built on a flood plain, Crossens and Churchtown lie below sea level, hence the need for the Three Pools waterway, and The River Crossens (sluice) to name but two of a list of waterways that flow around and through the area, the land in the designated area is of peat and clay mix, so water, peat and clay are not the ideal combinations to build 460 'new' houses on.	If these sites were to be taken forward, further work including about surface water flood risk, would be required to show that flooding issues have been taken into account.
Nature conservation	
Domestic gardens once provided corridors for wildlife but many of these are now paved over to the detriment of wildlife in our towns. This is very noticeable in Southport.	Comment noted.
Impact on historic environment	
Churchtown is a historic village from which Southport originated and has a unique character of its own with a small village square and white	As the proposed developable areas in Green Belt Parcel S004 do not abut the Churchtown Conservation Area and there are no views to it

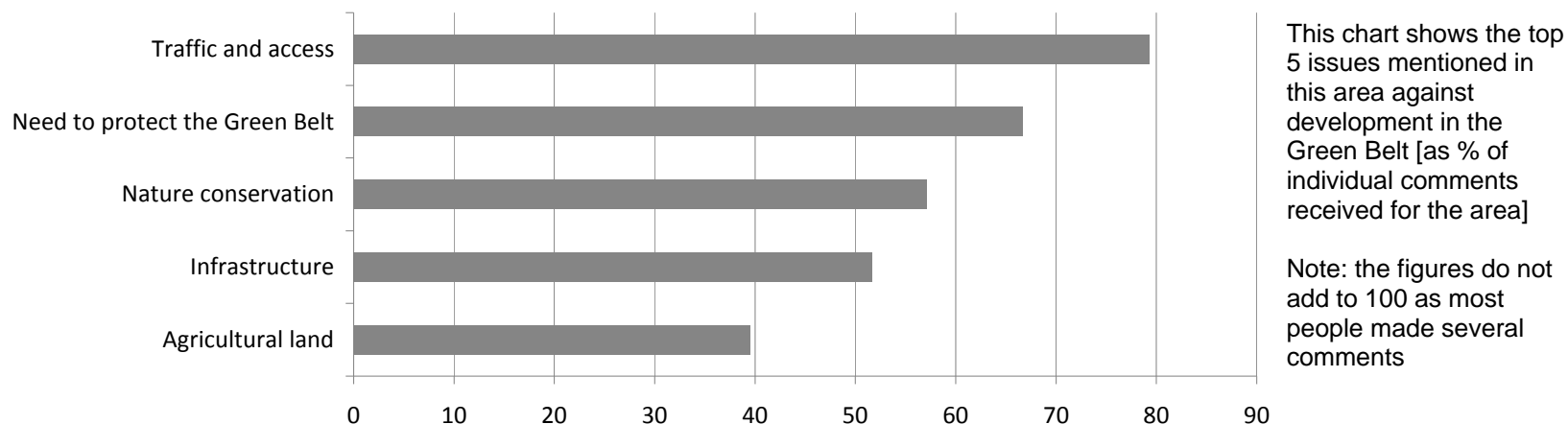
Summary of Comment – Southport generally	Sefton's Response
washed thatched cottages. Development of the size and nature proposed would vandalise this uniqueness, which is irreplaceable and adds something special to the diversity and attractiveness of the town and the borough.	form the open countryside beyond Meols Hall, we cannot agree that development in these areas would impact on the setting of this Conservation Area.
<p>Churchtown is a conservation area and a historic village with a unique character of its own. Development should not be permitted close to the to the village as</p> <ul style="list-style-type: none"> • It will create traffic congestion and put people off visiting the village • Go against the main aim of conservation area designation which is to protect the local environment from change • It would gradually threaten the ancient village of Churchtown and the historic Meols Hall estate. • It would vandalise this uniqueness, which is irreplaceable and adds something special to the diversity and attractiveness of the town and the borough. 	<p>Agree that Churchtown is a tourist attraction and that this aspect of the area is important to maintain. However, the identified sites would not impact on the appearance or character of the Churchtown conservation area.</p> <p>The aim of conservation is to prevent those changes which would be harmful to the historic character or appearance of the area. The presence of a conservation area does not inhibit <u>all</u> change. Further information about the historic landscape elements and archaeology of the sites would be necessary to enable proper consideration as to what impact development within these sites would have.</p>
Disproportionate to the size/character of the settlement/already at capacity	
<p>Southport is attractive for being an eclectic collection of villages, please do not spoil it with large unattractive housing estates.</p> <p>It is important to maintain the identity of Southport itself by continuing to preserve the individualistic characteristics of the villages which make up the town. It is not an industrial area and has long been recognised as a dormitory residential area for Liverpool. That status needs to be maintained.</p>	<p>We would always try to make sure that any new development blends in with existing homes so that the character of the area is not spoiled. We would involve local residents in the detail of any proposals to ensure this is the case.</p>
<p>There is still a considerable area of land available for development on the Kew business park. More is not required at this time.</p>	<p>The suggested location for a new business park to the east of Southport would be intended as a successor to the business park at Kew.</p>
There's a recession so it's the wrong time to plan for the long term / the economy's too weak to support growth	
<p>Southport town centre is suffering from high levels of vacancies and there seems little prospect of replacement businesses taking over. This would seem like the wrong time to plan for growth when there are few</p>	<p>Southport, like most centres during the recent recession, has had an increase in the number of commercial vacancies. The Core Strategy will have to link with other strategies [such a the emerging Local Economic</p>

Summary of Comment – Southport generally	Sefton’s Response
jobs for people.	Strategy] to make sure that Southport is best placed to make the most of opportunities for growth and investment in the future.
Employment land / industrial units do not guarantee jobs	
Southport is simply not an attractive location for large businesses to reside due to the poor road networks and Southport Business Park is already struggling to find tenants to complete the plots available.	The Thornton Switch Island Link will improve road access to Southport and this is due to be completed in 2014. Whilst the business park has not yet been completed this is largely due to infrastructural problems [which will be addressed in the near future] rather than lack of demand.
Southport's local economy is very largely based on service industries and no serious case can be made for making land available which in any case would lead to a change in the basic nature of the town with its undoubted attractive qualities.	Comment noted
Although Southport is a tourist area the types of employment opportunities needs to be diversified to provide jobs for local people	We will continue to work to attract more businesses to the Southport area
Not a sustainable location for development	
Logistically Southport is in a terrible geographic position we are a thirty minute drive away from any motorway, without employment in the area are these 'new residents' going to commute to Manchester, Warrington or Liverpool to work?	The construction of the new Thornton to Switch Island Link road will improve links between Southport and the motorway network. The most recent census information shows that the majority of working people who live in Southport, also work in Southport.
Other	
Sefton is extremely detached from the Southport area and this shows it. A Lancashire council wouldn't have even considered building on farmland, They know how valuable it is to keep the countryside “the countryside.”	West Lancashire are also producing a Local Plan for their area and have recently identified land in their Green Belt for new housing and employment development. Details can be viewed at www.westlancs.gov.uk
Main concern and question to begin with is that it appears these new homes are actually not even intended for those from the local town, but are in fact for people from a different county altogether.	Our Strategic Housing Market Assessment 2008 (SHMA) found that Southport had the highest need for new affordable housing of any settlement in Sefton. This was based on an assessment of the needs of people already living in Southport.
Because the government wishes to build for an estimated demand for an increased number of houses in the future this should not be addressed with a 'bird shot' approach. Any new homes should be built	As part of the option consultation we presented 3 potential housing targets. Each of these were derived based on locally specific circumstances.

Summary of Comment – Southport generally	Sefton’s Response
<p>where the demand arises and not expected of every council in the country irrespective of each and every differing situation. We should do what is good for this town and local area and not to suit the whims of a government whatever the political colour.</p>	
<p>Unlike the rest of Sefton, Southport has a relatively self - contained labour market. Most people living Southport work in the local area, although some commute to other areas. This means that future employment needs should, as far possible, be met in the north of Sefton</p>	<p>Our Employment Land & Premises Study found that there are only limited connections between the employment markets in north and south Sefton. This will need to be considered through the Core Strategy.</p>
<p>Permanently receding sea in the north of the area. This land will be suitable for domestic building in the very near future. Should consider any future building on the satisfactory sandy based areas in front and behind the resort and use the areas of made up land used by Southport town council as a domestic waste tip in the Town lane/ Kew areas.</p>	<p>These sites are Internationally and Nationally protected nature sites and have been ruled out from consideration for development in the Green Belt Study.</p>

Churchtown (S004, S004b)

In addition to the individual comments that relate to this area a petition was also submitted signed by 652 local residents. This stated that the residents strongly objected to proposed development in Green Belt in the Churchtown area, with particular reference on the impact on environment and traffic.



The most common concern from individual respondents (79%) related to traffic – especially congestion, access to and within Churchtown and the proposed sites and the poor state of the roads. Two thirds of all respondents specifically wanted the Green Belt protected. Over half of respondents (57% and 52% respectively) raised concerns about nature conservation and the impact on services and facilities [including drainage]. The table below sets out a summary of the concerns raised in relation to Churchtown.

Summary of comment – Churchtown (parcels S004, S004b)	Sefton’s Response
Traffic - inadequate access, congestion, poor public transport accessibility, pollution	
There would be major highway problems in this area with any additional development. A large development in the area would result in hundreds of new commuters using these roads and make existing	A poor local highway network is not necessarily a reason to prohibit new development but is an important factor to be considered in the type, level and phasing of development. A new development can

Summary of comment – Churchtown (parcels S004, S004b)	Sefton’s Response
<p>congestion in the local area even worse</p> <p>Many of roads are not suitable for large numbers of traffic, e.g. Moss Lane is narrow and has in parts only one footpath and deep ditches to the side, has ‘bad bends’, is dangerous and numerous accidents are likely to occur.</p> <p>Increased traffic would also lead to increased health (car exhaust fumes) and safety risks for pedestrians and residents.</p> <p>Emergency vehicles would find it difficult to access the site.</p> <p>Encourages car usage. The lack of local amenities and a bus route through the development areas will encourage car usage. The lack of public transport would adversely affect the ability to commute of those occupying the affordable housing.</p> <p>Any further development is both unthinkable and unjustified in such a congested area. Parking at the local shops would be a problem and business could be lost.</p> <p>A highways assessment would confirm the unsuitability of the local road networks for such a housing development.</p>	<p>sometimes include significant improvements to the highways infrastructure and can enable access to other forms of transport including public transport.</p> <p>Additional housing can make public transport services more viable.</p> <p>If it is proposed to take forward sites in the Green Belt, a detailed assessment would be carried out of the implications for the highways network. If this concludes that it would be too expensive or too difficult to improve the infrastructure, this would be a reason to remove a site from further consideration for development.</p>
Protect the Green Belt / will lead to urban sprawl / once lost can't be recovered	
<p>The proposed development will destroy forever Green Belt on the proposed development site and/or wider area – Green Belt that people enjoy. Southport's greenfield sites must be preserved for future generations.</p>	<p>We have a statutory duty to produce a Core Strategy and to include sufficient land for development. This has to be balanced with the need to protect the countryside from development.</p>
Nature conservation	
<p>The proposed development sites and/or wider area are valued and important habitats for wildlife - flora and fauna –should not be lost,</p>	<p>Comments on nature noted. The Council has a difficult challenge to both protect and manage nature, and also provide homes and jobs. We have a</p>

Summary of comment – Churchtown (parcels S004, S004b)	Sefton’s Response
<p>including:</p> <ul style="list-style-type: none"> • A wide range of birds, many of which rely on the sites for feeding. Includes many rare bird species that rest and feed on their journeys to and from Martin Mere. • A range of fish including roach, bream, perch and carp on The Three Pools Waterway. Need developers to guarantee that construction would not pollute the waterway. • Other animal species including Bats, Bees, Butterflies, Hares, Hedgehogs, Field mice, Foxes, insects, Rabbits, red and grey Squirrels, Stoats, Voles and Weasels. • Plant species including several species of lichen, an indication that the air is relatively unpolluted at present. <p>[Part of] The proposed development site and/or wider area is protected by Site of Local Biological Interest / Local Wildlife Site designations, which should be given more weight. Close to Martin Mere, a world-renowned ornithological site used by thousands of migrating birds every year, and that eco-system and its surrounding lands should not be developed.</p>	<p>legal duty to take account of biodiversity, and have recently approved an Ecological Framework which helps us to focus on protecting and enhancing key habitats and species, and creating new habitats. We will work with developers to help us do this. Any development would be expected to compensate for the loss of open areas by providing new greenspace and nature areas.</p> <p>If it were to be proposed to take forward sites in this location, appropriate surveys and assessments would need to be carried out, to determine the ecological importance of the sites. This could restrict the area that would be potentially suitable for development.</p> <p>The Council has asked its environmental advisors, the Merseyside Environmental Advisory Service, for advice on these issues.</p>
Impact on services + infrastructure - drainage / shops/ schools at capacity / lack of health services	
<p>The area surrounding this potential development site is already densely populated, and accordingly, the addition of 460 properties, or around 1600 residents would place a pressure on the roads and services in the area that it simply cannot accommodate.</p> <p>There is a lack of amenities in the area to cope with additional residents, such as shortage of local shops, schools, GPs, local hospital, dentists, water supply, utilities. No provisions are indicated on the Council's proposals. The areas facilities are already at saturation point.</p> <p>The inevitable potential numerous disruptions of gas and electricity</p>	<p>A poor local highway network and other infrastructure are not reasons to prevent new development but are important factors in the type, level and phasing of development. A new development can often include significant improvements to local infrastructure.</p> <p>In most cases improvements to local infrastructure would be provided/funded by the developer</p> <p>If further work proves that infrastructure improvements will be too expensive then this would be a reason to remove a site from further consideration for development.</p>

Summary of comment – Churchtown (parcels S004, S004b)	Sefton’s Response
<p>supplies over what would be many years is quite unacceptable. Are Sefton going to build a gas producing plant at the sewerage works at Crossens?</p>	<p>Regardless of whether Green Belt land is proposed for development or not we will have to prepare an Infrastructure Delivery Plan to show that our proposals are supported by adequate infrastructure. This will include how any infrastructure improvements will be funded and by whom. Agree that Community Infrastructure Levy will not be the only source of funding for infrastructure improvements.</p>
<p>Other</p>	
<p>Can you clarify whether the land behind 'the Grange' has been sold to a housing developer?</p> <p>Outline planning applications on said land refused in the past. If a hint of possible use of this land for building, the landowners could make an application again and if refused possible compensation and awards for, costs against the Council at a public enquiry. The previous local government resisted any development (including ribbon development) in this area.</p> <p>Instead of large-scale developers being used, a scheme could be put together using small local builders, thus helping the local Churchtown economy and employment. Small groups of houses designed specifically to the needs of people in Churchtown. No details as to how this development will benefit Churchtown and the local community.</p> <p>These days there are high demands for allotments (most of all have a waiting list) due to less land being suitable for the growing of varied produce. There is only one left on Blundell lane, which still has a large</p>	<p>We specifically did not assess land ownership as part of the Green Belt Study as it was felt an objective assessment was required in the first instance. If sites in the Green Belt are required we will need to consider which are available and look at land ownership. It is not intended to purchase land compulsorily. If the owner is not willing to sell, the site will not be taken forward for development.</p> <p>Government guidance says that the Green Belt boundary may be reviewed when a development plan is being prepared. Speculative applications for development in the Green Belt will be assessed against current policies and inappropriate development will be refused.</p> <p>No decision has been taken on whether development in Churchtown should be considered further. If it is proposed to take this site further, we would not be in a position to dictate who should develop it.</p> <p>Acknowledge there is a high demand for allotments. We do not propose any loss of allotments and would encourage additional allotments as part of any wider development proposals.</p>

Summary of comment – Churchtown (parcels S004, S004b)	Sefton’s Response
<p>waiting list.</p> <p>Will the new development actually be in Sefton or could it stretch in to Lancashire?</p> <p>Question some of the reasons for ruling out sites, such as a golf course. Has land close to expensive homes been ruled out?</p>	<p>Sefton can only plan for its own area. West Lancashire has just consulted on its Core Strategy Preferred Options [www.westlancs.gov.uk]. We work closely with our neighbours to make sure that our plans complement each other and that any development in our area does not add undue strain to infrastructure for an adjoining authority.</p> <p>Sites were ruled out due a number of reasons, such as important natural and heritage asset, high flood risk, importance to tourist economy [e.g. golf courses]. The value of existing property was not a reason for discounting sites.</p>
Protect agricultural land - once lost can't be recovered / food security / use land in non-agricultural use	
<p>The current land use for the area outlined in the proposal is mainly as farmland, which is of a good quality and a valuable asset that should be protected. Has there been a soil survey done for the legal classification of the land, because it is prime arable land?</p> <p>The Government is suggesting that this country needs to be more self-sufficient by growing more food thus cutting down our carbon footprint with fewer imports. How can we do this if planners are getting rid of prime green belt land?</p>	<p>The Council will be carrying out an agricultural land study in order to fully understand the quality of Sefton’s farmland, the soils and the importance of the agricultural economy in Sefton and nationally.</p> <p>Government guidance contained in PPS7: Sustainable Development in Rural Areas and the draft National Planning Policy Framework states that where the significant development of agricultural land is necessary, Local Planning Authorities should use, where possible, poorer quality agricultural land.</p>
Recreation / tourism	
<p>Churchtown old village is very attractive and popular among tourists. The development will be close to one of the best well known tourist attractions of Southport botanic gardens and the old railway. Increased traffic congestion after development will reduce the appeal of the area to tourists, and so reduce visitor numbers and tourism</p>	<p>Agree. Further work would need to be carried out to understand the existing and future capacity for the highways network and where future improvements may be required.</p>

Summary of comment – Churchtown (parcels S004, S004b)	Sefton’s Response
<p>spending in the local economy. Lots of Churchtown businesses rely on the tourist trade and their livelihoods could be affected negatively if this development goes ahead.</p> <p>The Old Links Golf Course employs people, has 500+ members including juniors, and allows schools & groups of disabled children to use their facilities. New housing in close proximity would mean costly changes to course design, and insurance, which may affect the appeal and long-term viability of the club, and could lead to its loss. Loss to local people and tourists. Development would cause visual, noise and air pollution to the Golf Course.</p> <p>The proposed site and/or wider area is important for local people and others, giving access to open countryside. The range of recreation and leisure activities includes walking, cycling, horse-riding, grazing and stables, Rights of Way, fishing, golf, game-shooting, allotments and enjoying nature. It is a safe, quiet and healthy natural environment, for all ages.</p>	<p>If any development were proposed adjacent to the golf course [or any other business adjacent to a proposed development site] we would work closely with the owners to ensure that the viability of the business is not affected by new development.</p> <p>Noted. If sites were to be developed, existing formal facilities such as Rights of Way and other paths, would be incorporated into green space provided as part of the development.</p>
Area prone to flooding	
<p>The proposed development site and/or wider area is in a flood risk area. It would be unwise to built here - the risk should not be ignored. E.g. Is</p> <ul style="list-style-type: none"> • In a flood plain / just outside a flood plain / next to a river • In a flood risk area / Flood Risk Warning / Alert area • Low-lying • In an area of artificial drainage. Sluice is a man-made facility to ensure continual drainage of a historic lake. Area is essentially a peat bog on a layer of wet clay • A stream [used to flow] through the middle of the site. <p>Development would strain the existing drainage systems and make</p>	<p>If this site were to be taken forward, further work including about surface water flood risk, would be required to show that flooding issues have been taken into account.</p> <p>There will be continuing talks with infrastructure and service providers, who include United Utilities (water and sewers).</p> <p>We follow government guidance and, together with the Environment Agency and United Utilities, carry out flood risk management. The government and the insurance industry are working to resolve issues of premiums in higher flood risk areas.</p>

Summary of comment – Churchtown (parcels S004, S004b)	Sefton's Response
<p>existing flooding /drainage problems worse (area affected, depth etc). There are other safer, low risk areas elsewhere suitable for housing.</p>	
<p>The Council's and/or Environment Agency's flood risk assessment of sites is incorrect / does not match their actual (intermittently flooded) state.</p> <p>The Council's Strategic Flood Risk Assessment (SFRA) [2009] shows virtually the whole of S004/4b to be in Flood Zone 3a. At a residents action meeting on August 4th, & since then, residents have found out that S004/4b is no longer in Flood Zone 3. How can this be, when the fields all flood each winter? What has changed? This change appears highly convenient for the Council. No explanations have been given, even where requested. Information available to the public regarding flood risk has been inconsistent and misleading and so the site should be withdrawn from consideration.</p>	<p>The Environmental Agency have updated (in 2010 and 2011) their Flood Maps which show the extents of river and tidal flooding. This has led to changes in the areas shown as high and medium risk of flooding, for example in this area. Recent surface water flood risk information includes Environment Agency maps and Sefton's Surface Water Management Plan. The views of the Environment Agency have been sought regarding the reasons for changes to the extent of flood zones.</p> <p>We have now updated the Strategic Flood Risk Assessment (SFRA) web-page http://www.sefton.gov.uk/sfra , and this now makes clear both that the SFRA is in need of review, and the main sources of up to date flood risk information.</p>
Disruption caused by building work /damage to property	
<p>Structural disturbance and damage to existing (piled) properties during building – due to unstable/ peat-based soil. Disturbance and damage from noise/vibrations from construction traffic and from putting in the piling for new homes. This has happened in the recent past due to previous developments. Will you compensate owners for any damage incurred to buildings/gardens that may occur due to the vehicles and increase in traffic along the road?</p>	<p>No decision has been taken on which sites would be proposed for development. If development were proposed in areas that have poor ground conditions then these issues would have to be considered. In general terms there are guidelines for construction works, including the impact on neighbouring properties.</p>
Quality of life / well-being	
<p>General poor drainage and marshland problems would make the proposed development site (beyond the sandy area) unhealthy for people with pulmonary problems or catarrh.</p> <p>Open waterway would be dangerous to children living in any new</p>	<p>Modern buildings are built to high specifications, including insulation, that make sure living conditions do not affect health.</p> <p>The danger posed by an open waterway is an issue that could be</p>

Summary of comment – Churchtown (parcels S004, S004b)	Sefton’s Response
<p>development.</p> <p>Construction due to development will bring dust and disruption to pensioners who rent allotments and live off the food they grow.</p>	<p>resolved through any detailed planning application.</p> <p>Conditions can be added to a planning application to reduce any disruption caused by construction. However, a certain level of disruption to local residents is inevitable during any construction scheme.</p>
Protect the environment (general)	
<p>The proposed site and/or wider area is an attractive landscape close people’s homes. Beautiful natural area of pasture, hedgerows and agricultural land. It is a pleasant transition from suburban housing into rural peace and tranquillity, which contributes to the setting of this part of Southport.</p> <p>The forest next to the proposed site has always been used for the breeding of pheasants and may mean there is some lead pollution within the land.</p>	<p>Noted. No landscape in Sefton is protected by a designation at a national, local or other level, and so quality of landscape would not be an over-riding constraint which would stop development. If any site within the Green Belt were to be taken forward for development, we would expect green space to be provided, and the boundary between buildings and the rural area to be sympathetic to the landscape character of the surrounding area.</p> <p>Comment noted. Any site that is potentially contaminated will require a remediation strategy to be completed prior to development.</p>
Disproportionate to the size/character of the settlement/already at capacity	
<p>Object to the disproportionate level of housing proposed to be built on greenbelt land in Churchtown. The size and density of the proposed housing scheme is totally out of scale and character to the settlement of Churchtown.</p> <p>Developing the land by Moss Lane would</p> <ul style="list-style-type: none"> • Result in 'urban sprawl', and would fall to maintain the integrity of the greenbelt. • Encroach on the hamlet on the West Lancashire side of Moss Lane. • Ruin a small attractive historic village and make it into just a suburb. 	<p>The Green Belt Study has identified all land in Sefton that we believe has some potential for development. Regardless of which option is chosen there is an opportunity to discount some sites and to distribute housing land more evenly. Nevertheless, as Southport is fairly constrained by the sea, nature designations, flood risk areas and a tight boundary with West Lancashire, the number of options in this area is limited. However, no decision has been made on whether any sites in the Green Belt should be developed and no Green Belt Land for release may be the preferred option.</p> <p>The draft Green Belt Study identified those areas that have to be kept open in order to keep adjoining settlements from merging (“essential</p>

Summary of comment – Churchtown (parcels S004, S004b)	Sefton’s Response
<ul style="list-style-type: none"> Loss of rural way of life. <p>No details as to how the character of the built environment of Churchtown will be protected and the new development will become part of that valuable mosaic.</p>	<p>gaps”). The gap required between settlements would depend on the size of the settlements, with hamlets only requiring a small gap [see Section Three for further detail on the Green Belt Study].</p> <p>Development proposals in any area would have to be sympathetic to the existing areas. We can manage this through detailed policies on design.</p>
Impact on historic environment	
<p>Immediately adjacent to the southern boundary of the site is a designated Conservation Area. Development of any size will inevitably have an impact on the Conservation Area.</p>	<p>The aim of conservation is to prevent those changes which would be harmful to the historic character or appearance of the area. The presence of a conservation area does not inhibit <u>all</u> change.</p>
Lack of consultation	
<p>It appears the only public arena for residents to discuss their concerns was a drop-in held in Christ Church, Lord Street, Southport or Ainsdale Village Hall. No meeting was held in Churchtown.</p>	<p>A public drop in event was held at St Patricks Church Hall, Churchtown, on 7 July 2011.</p>
Affordable housing - not needed / shouldn't mix tenures / need more	
<p>Will the homes be affordable? Does not fit the requirements of an economic site for the construction of affordable houses.</p> <p>Looking at the planned development area, perhaps this type of housing should be confined to the location already designated as social housing, i.e. build on the Recreation Ground at Russell Road and put the onus on the developer to provide a recreation area suitable for all the development, close by.</p> <p>Will Southport people be given first option or will they again go to families in South Sefton in order to ease their housing issues?</p>	<p>Our policy position is currently that all developments of more than 15 homes should provide 30% affordable housing, subject to economic viability. Southport has the highest total need for new affordable housing of any settlement in Sefton, and this will need to be considered through the Core Strategy.</p> <p>The Recreation Ground at Russell Road has been identified as having high recreational benefit for the local area and the recommendation is that this should be retained.</p> <p>Affordable homes provided through the planning system [section 106 arrangements] the Council exercises nomination rights in respect of social rented housing provided. We can make sure affordable homes</p>

Summary of comment – Churchtown (parcels S004, S004b)	Sefton’s Response
	are occupied by local people.
Positive / Supporting comment	
Why don’t you build on Moss Road?	The land at Moss Road, South east of Benthams Way, is in the borough of West Lancashire
Need to maintain gap/buffer between towns	
Hamlet just to the east of Three Pools way on Moss Lane not taken account of in methodology - i.e. development would lose gap between this settlement and Southport.	Although there are a number of houses immediately across the Sefton boundary, it is not considered that they constitute a hamlet.
Climate change / global warming	
Concerned that the amount of pollution caused by these new houses will contaminate water courses, litter the area and add to global warming.	Concern noted. However, modern buildings are built to high specifications with high-energy efficiency. Issues such as litter are not dealt with through the planning system.
Not a sustainable location for development	
<p>The development would only be linked to the urban environment by a small group of cottages. The development would create urban isolation with the Old Links Golf course acting as a buffer zone.</p> <p>There are more suitable development sites elsewhere in Sefton that are not affected by the local environmental issues (flooding/land movement), and they are likely to have better arterial road links.</p> <p>The proposed site and/or wider area is close to a Waste Water Treatment Works which can hardly be recommended since smells are not the most popular of risks to accept for a home.</p> <p>The poor, unstable ground conditions should be taken into account in the assessment of potential sites. “Essentially a peat bog on a layer of wet clay”. Existing roads, pavements, drains, houses, outbuildings, paths and hard surfaces in the locality already suffer from subsidence</p>	<p>Acknowledge that there are issues with a number of sites and that further work will be required to determine which would be most suitable if any Green Belt sites are proposed for development.</p> <p>If Green Belt land is needed for the Core Strategy preferred option we will seek to identify the most suitable land for development based on a whole range of factors which have been informed in a large part by the results of this consultation.</p> <p>It would be possible through a detailed planning application to provide a buffer between new housing development and ‘bad neighbour’ buildings/uses.</p> <p>In recent decades the development industry has found it viable to develop in areas with these or similar issues, (for example existing homes). Land conditions are one factor to be taken into account by developers when considering whether they wish to proceed to develop</p>

Summary of comment – Churchtown (parcels S004, S004b)	Sefton’s Response
<p>due to the unstable land. Recent houses need deep piling (e.g. 30m).</p> <p>Need for deep piling and/or expensive foundations – cost could be prohibitive.</p> <p>There is no employment in this part of Churchtown for those who would move into the area.</p>	<p>any particular site. However, if it is proposed to develop on land in the Green Belt in this area, we will look again at these issues, particularly in the context of climate change [and land drainage].</p> <p>The evidence behind the Core Strategy suggests that additional employment land is needed in the Southport area. If provided this would help diversify local employment opportunities for Southport and Churchtown residents. The Core Strategy would also have policies to improve access so that new residents could access existing employment opportunities without relying on the car.</p>

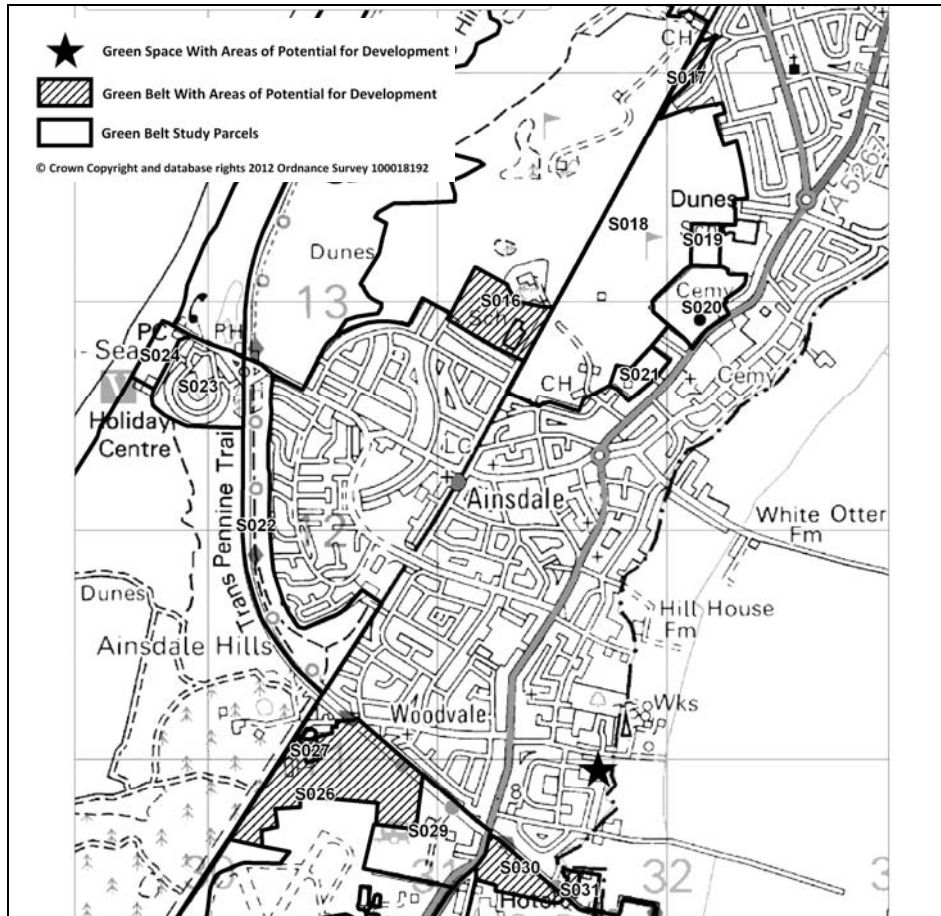
Southport East (S007, S008, S009)

6 individual responses were received to the identification of Green Belt parcels S007, S008 and S009 for potential development. Some comments supporting development of part or the entire site were also made, dealt with in section 5 of this report. The table below sets out a summary of the concerns raised in relation to Green Belt parcels to the east of Southport.

Summary of comment – Southport East (parcels S007, S008, S009)	Sefton’s Response
Other	
<p>It is understood that Sefton Council is committed to the long-term future of the Park and Ride site to the south of the railway at Foul Lane. The Park & Ride area should be probably discounted assuming that it continues in its present purpose</p> <p>The former tip site (S009) is only 11.35 ha and therefore would not deliver the required 25ha successor business park, in one, comprehensive development site.</p>	<p>Agree in part. Whilst the immediate future of the park and ride scheme has been secured, its long-term future may not be so certain. The draft Green Belt Study identifies that the site is used for a park and ride scheme and should only be considered for development should this use cease.</p> <p>Comment noted. The preference would be to provide one site of 25 hectares. However, the site was deemed suitable for business use and was retained in the study to provide options in the event other sites did not come forward.</p>
Nature conservation	
<p>No opposition to development as a Business Park but subject to an ecological assessment to identify the possible presence of protected species. (S008 and S009)</p>	<p>Comment noted and agreed. There is a legal requirement for Habitats Regulations Assessment, Strategic Environmental Assessment and Sustainability Assessment of the Plan.</p>
Traffic - inadequate access, congestion, poor public transport accessibility, pollution	
<p>Land to the south of Crowland Street, Blowick has particularly constrained accessibility due to restricted height of the rail over bridge at Butts Lane. Are the vehicular access problems to the site soluble?</p>	<p>There are acknowledged constraints with this site that would have to be resolved before it is developed. Further feasibility studies would have to be carried out to assess what improvements might be required and the likely costs of these. This information would determine whether the site can be progressed.</p>

Summary of comment – Southport East (parcels S007, S008, S009)	Sefton’s Response
<p>It is apparent that linkages generally between Southport and the strategic highway network via the A570 are severely constrained by the need to pass through residential and town centre areas at both Ormskirk and Maghull. Without opportunities to improve these linkages, the suitability of providing additional employment land to the east of Southport is questionable. Proposals for an Ormskirk bypass are very unlikely to come to fruition, as there is no prospect of any funding being made available whether at local, regional or national level. Accordingly the route cannot even be safeguarded, as there is no certainty of delivery ever taking place.</p>	<p>Whilst our studies have identified a need for a business park in the Southport area one of the key issues that will determine if this could be progressed is access. Further work will need to undertaken to assess whether the road network is a significant constraint and whether improvements can be made. An alternative site has been identified to the east of the Formby By pass as an alternative which has much better access to the motorway network.</p>
<p>Impact on services + infrastructure - drainage / shops/ schools at capacity / lack of health services</p>	
<p>The site (S009) is not as sustainable as others identified, namely it is not within 800m of a railway station, or 100m of a GP/health centre.</p>	<p>Comments noted. Whilst access to existing services and infrastructure is important, it is possible to improve local access.</p>
<p>Environment General</p>	
<p>The site (S009) is a former landfill, therefore presenting significant viability issues related to remediation costs.</p>	<p>Agree. Further work will have to undertaken on individual sites to assess if they are viable.</p>

Objections to Green Belt Sites Ainsdale and Hillside Area



This section of the Consultation Report looks at comments made to specific Green Belt sites [or parcels] in the Ainsdale and Hillside area during consultation.

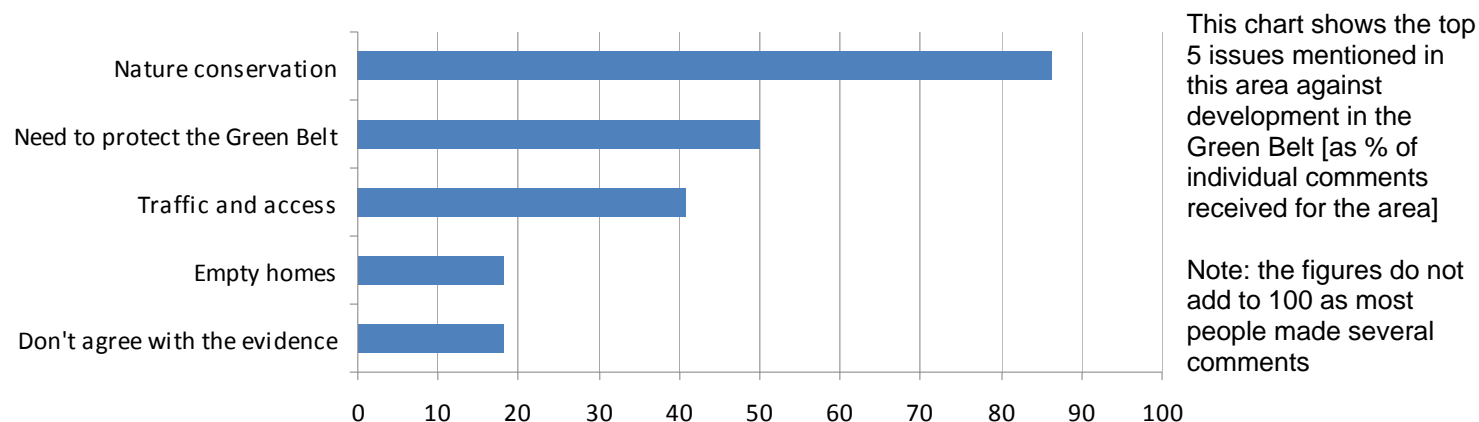
The Green Belt sites that were identified as having some potential for development in the Ainsdale and Hillside area are shown in the map to the left.

This section only includes comments that relate to Green Belt sites in Ainsdale and Hillside. Other more general comments on Green Belt sites are set out earlier in this report e.g. agricultural land, flood risk, vacant homes.

This section includes separate tables for the following areas of Ainsdale and Hillside

Lynton Road, Hillside	parcel S017
Ainsdale Hope	parcel S016
South of Ainsdale	parcels S026, S027, S030, S031

Lynton Road, Hillside (S017)



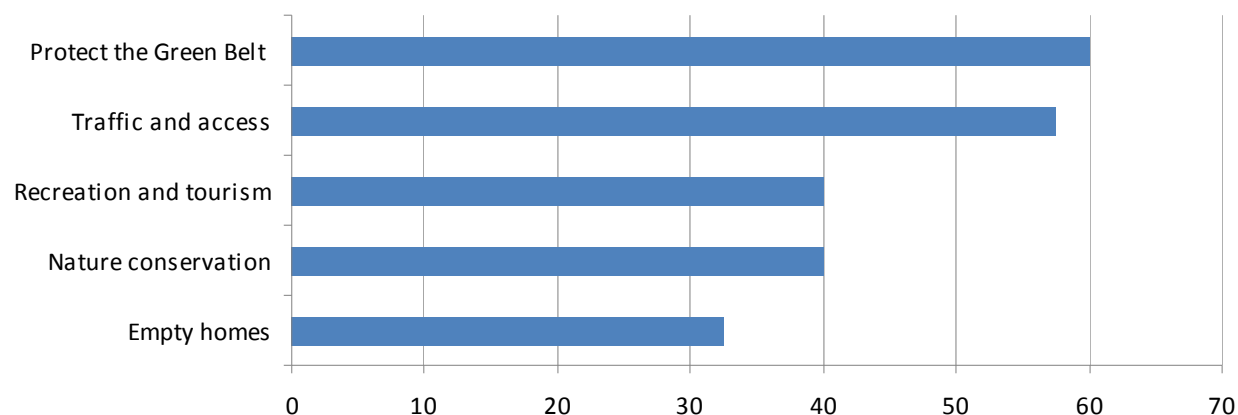
The most common concern from individual respondents (86%) related to nature conservation. Other key points related to the general need to protect the Green Belt and traffic and access issues with the site. The table below sets out a summary of the concerns raised in relation to Lynton Road.

Summary of comment – Lynton Road Hillside (parcels S017)	Sefton's Response
Nature conservation	
To continue to consider the potential for building houses on an area which is clearly identified as a Local Wildlife Site, part of which is a 'Site of Special Scientific Interest', is completely unsupportable.	Legislation and government guidance mean, in effect, that international, national and local designations have different levels of protection. This was reflected in the approach of the draft Green Belt Study. 'Parcels' [i.e. areas of land] which have international or national nature designations were ruled out at Stage 3 (i.e. not taken forward for further consideration). Local Wildlife Sites and Regionally Important Geological Sites are severely restrictive constraints (but would not entirely prohibit new development).

Summary of comment – Lynton Road Hillside (parcels S017)	Sefton’s Response
<p>A local wildlife sanctuary has developed naturally on the site and should be subject to an ecological survey for protected species prior to any development.</p> <p>The site supports a wide variety of wildlife, including birds and red squirrels. Natterjack toads/newts</p>	<p>There is a legal requirement for Habitats Regulations Assessment, Strategic Environmental Assessment and Sustainability Assessment of the Plan.</p> <p>Wildlife issues, including local designations, for parcels which may be development sites, are being looked at in more detail. We have asked the Council’s environmental advisors, the Merseyside Environmental Advisory Service, for their views on these issues.</p>
Traffic - inadequate access, congestion, poor public transport accessibility, pollution	
<p>Access to the site is inadequate, being too narrow, especially for emergency vehicles, delivery vehicles, waste wagons etc There would not be enough space to provide sufficient access/turning points for emergency services. Greatly increased levels of congestion in a confined area which in turn would create hazards for pedestrians and car drivers and more likelihood of accidents</p> <p>Houses along Lynton Road have a covenant in place to prevent the sale of houses/land for access.</p>	<p>Comment noted. Access to this site would be difficult and further work would be required to determine what options are available if this site were to be taken forward.</p> <p>Not aware of any local covenant to prevent sale of homes for access. This would inform the assessment of access [see point above]</p>
Impact on services + infrastructure - drainage / shops/ schools at capacity / lack of health services	
<p>Whilst there is a GP health nearby it is overstretched. Where is the accessible open space nearby?</p>	<p>The provision of health services is regularly monitored to make sure sufficient facilities are provided. There is accessible open spaces close to this site off Waterloo Road</p>
Area prone to flooding	
<p>Problems with flooding due to high water table</p>	<p>This site as not been identified as being within a high or medium risk flood risk area.</p>
Disproportionate to the size/character of the settlement/already at capacity	
<p>The site is so small. The number of homes proposed (47) is disgraceful and incompatible with the homes already built. It shows inconsideration for the residents already living there.</p>	<p>Calculations for housing numbers were done using a basic calculation of 30 homes per hectare but would be adjusted to take account of any local site characteristics if the site were to be taken forward for development.</p>

Summary of comment – Lynton Road Hillside (parcels S017)	Sefton’s Response
<p>Southport was one of the areas with the potential for most urban redevelopment so it seems illogical to pinpoint such a small parcel of land given the scope within that available to Sefton.</p>	<p>The Green Belt Study identified a range of sites from the very small to very large. Although identifying large sites has the advantage of meeting our supply in a few locations they may not all be available or may take a long time to develop. A number of smaller sites can significantly contribute to our housing numbers, can be developed quickly and provide smaller [often local] developers with commercial opportunities.</p>
Other	
<p>Land is too close to the railway. The railway is a dangerous environment and poses serious risks due to the volts traveling through the electrified rails. There is also the danger from moving trains. Any new homes would have problems from vibration from the trains. The land is used by the railway for servicing the Liverpool – Southport line and would not be available for development.</p> <p>The development would be close to the golf course and would be at danger from miss-hit golf balls</p> <p>Ugly power station at the rear of homes needs removing</p> <p>The land was formerly used as allotments</p>	<p>Any development proposals would be subject to the necessary safety requirements for building next to a rail line. Network Rail have proposed this site [and others next to rail lines] for development [see Section 5] which suggests they are comfortable with development adjacent to rail lines. Many existing homes are close to rail lines and this does not pose a problem.</p> <p>Any development can be designed to reduce any problems from noise and vibration and any danger from golf balls.</p> <p>It would be unlikely that the power station would be removed</p> <p>Comment noted</p>

Ainsdale Hope (S016)



This chart shows the top 5 issues mentioned in this area against development in the Green Belt [as % of individual comments received for the area]

Note: the figures do not add to 100 as most people made several comments

The most common concern from individual respondents was a general view to protect the Green Belt from development, including urban sprawl. Traffic and access issues were also key issues raised (58% of respondents) and nature conservation and the loss of a recreational area (40% of respondents each) also figured highly.

The table below sets out a summary of the concerns raised in relation to Ainsdale Hope.

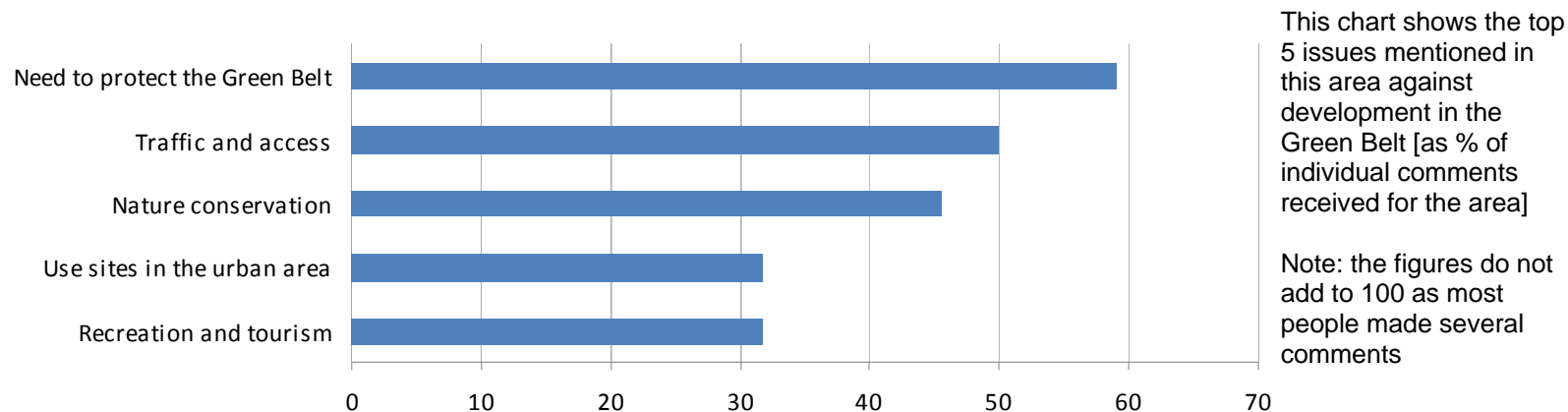
Summary of comment – Ainsdale Hope (parcel S016)	Sefton’s Response
Traffic - inadequate access, congestion, poor public transport accessibility, pollution	
Traffic on Station Road for local shopping is already congested and parking at saturation point. The centre could not cope with the increase in cars from an additional new homes.	Further work will need to be carried out to understand the existing and future capacity for the highways network and where future improvements may be required.
Inadequate vehicle access to site for so many homes. Pressure points would develop at the railway crossing and access to Shore Road.	
Access for emergency vehicles would be difficult due to the narrow	

Summary of comment – Ainsdale Hope (parcel S016)	Sefton’s Response
roads.	
Nature conservation	
<p>The site is bounded by sites that are protected for their nature value. These sites are home to a range of wildlife, including</p> <ul style="list-style-type: none"> • Natterjack Toads • Sand Lizards • Pygmy Shrews • Red Squirrels <p>Building on Ainsdale Hope would threaten the unique habitat of the dunes. This area should be allowed to be reclaimed for the wildlife that has already moved in.</p>	<p>Noted. Wildlife issues, including species and habitats referred to in environmental comments, are being considered further. We have asked the Council’s advisors, the Merseyside Environmental Advisory Service, for their views on these issues. If it is proposed to consider any sites further for development, appropriate surveys would need to be carried out to help make the final decision.</p>
Recreation / tourism	
<p>Building on Ainsdale Hope presents a lost opportunity for providing local people with a sports, recreation or education facility. Need to consider needs of existing residents before creating further built-up areas. At a time when obesity is an issue this site provides one of the few areas in Ainsdale that could provide a recreation facility. It is an area that could benefit the community as a landscaped park, which is needed in this area. This site could replace other recreation sites which are more suitable for homes e.g. Carr Lane Birkdale.</p>	<p>If any site within the Green Belt were to be taken forward for development developers would be expected to provide high quality, publicly accessible green space on part of the overall parcel, which should typically provide a range of benefits in relation to the following aspects: wildlife, landscape, flood risk management, visual /quality of life, climate change and recreation. If this site were to be considered further for development it could provide local facilities on part of the site.</p> <p>There are no plans to develop Carr Lane Recreation Grounds</p>
Impact on services + infrastructure - drainage / shops/ schools at capacity / lack of health services	
<p>If your proposal to build more houses in Ainsdale succeeds, where are the potential extra pupils to be educated? Local pupils already have to travel to Formby. Greenbank and Birkdale are single sex schools, surely we need to restore parental choice in the matter of their children’s education in the south of the town?</p> <p>The site is unsuitable for housing development as it will require major Infrastructure works to replace inadequate foul and top water drains, new water and gas mains. The road and pavements are also breaking</p>	<p>The population of Sefton is not expected to increase regardless of the option that is proposed and overall pupil numbers will likely continue to fall during the period covered by the Core Strategy. Nevertheless we monitor pupil numbers annually to make sure that local school capacity meets needs.</p> <p>In many cases a current deficiency in local infrastructure is not a reason to prohibit new development but is an important factor in the type, level and phasing of development. Development can often help</p>

Summary of comment – Ainsdale Hope (parcel S016)	Sefton’s Response
up and would need replacing	improve a deficiency in infrastructure and this will have to be set out clearly as a condition before development can proceed.
Impact on view / impact on property value	
If development were to go ahead consideration should be given the local residents regarding overlooking from new homes and construction work [noise, time etc]. The impact of developing Ainsdale Hope would be a less pleasant outlook and increased noise for immediate neighbours. There would be a drop in property value in the local area.	Conditions can be placed on a planning approval to reduce disturbance caused by construction work. There is existing guidance on the development of new housing to make sure that existing properties are not overlooked. Any new buildings would have to adhere to this guidance.
Disproportionate to the size/character of the settlement/already at capacity	
General detrimental impact on the village. Will alter nature of the area and would be of much greater density than the surrounding area, i.e. that bounded by Sandringham Road, Shore Road and Chatsworth Road. This would have a much greater impact than any small high-density in-fill developments. If development were to go ahead it should be designed to blend in with local environment and not to provide ‘luxury’ accommodation.	Careful design of a proposal can make sure that a development fits into the character of the local area.
Not a sustainable location for development	
The Ainsdale High school site is significantly higher than the surrounding homes and would have to be lowered to prevent any problems with drainage – this would make it expensive.	We will look again at these and related issues [see above regarding potential gas leakage], in any further consideration of particular sites.
Other	
<p>Churchtown residents have started a campaign against their proposed sites that is getting newspaper coverage; this should not influence officers in a way that could be detrimental to Ainsdale.</p> <p>It may be possible to move another local school to this site and use that newly vacated site for development of homes.</p> <p>What about the huge amount of money that was invested into the 'City</p>	<p>Agreed</p> <p>Comment noted. There are no plans to relocate any other local schools to this site and it is unlikely that this will happen during the plan period.</p> <p>If the former school buildings were in current use then that part of the</p>

Summary of comment – Ainsdale Hope (parcel S016)	Sefton's Response
<p>Learning Centre' that seems to have had very little use? Surely, some forward thinking needs to be applied to the situation that will develop with this increase in school pupil numbers in the years to come? Land adjacent to the sand dunes could be developed as a further educational facility along with the use of the Technology Centre already on site.</p> <p>Ainsdale High School had to be built on stilts because of ground contamination including gas. Methane leaks into the atmosphere and could cause an explosion if confined. There is an ancient property nearby [the Hawes] and this has also had to be built on stilts for safety.</p>	<p>site would not be considered for redevelopment. However, there are doubts about the long-term occupancy of the buildings and it is possible that this site would become available at some point in the near future.</p> <p>In recent decades the development industry has found it viable to develop in areas with these or similar issues. Land conditions are one factor to be taken into account by developers when considering whether they wish to develop any particular site. However, if it is proposed to develop on land in the Green Belt in this area, we will look again at this issue to ensure safety and viability.</p>

South Ainsdale (S026, S027, S031 check)



The most common reason residents in this area objected (59%) was that they would like to see the Green Belt protected from development. Other issues that were of concern to residents in this area were traffic and access (50%) and nature conservation (45%)

The table below sets out a summary of the concerns raised in relation to the sites south of Ainsdale.

Summary of comment – South Ainsdale (S026, S027, S031)	Sefton’s Response
Protect the Green Belt / will lead to urban sprawl / once lost can't be recovered	
Ainsdale’s green belt boundary is well defined and any additional development beyond this boundary would be a highly visible example of urban sprawl. There is no natural boundary and the sites at the south of Ainsdale could be encroached from other green belt land and overdeveloped. At the moment this is a relatively rural area as seen from the coast road, the railway and the nature paths in the pinewoods. It makes no sense to develop and destroy this sensitive area. The green belt has worked very well around Ainsdale to help keep the village status and this needs to continue in view of the	Agree in part. This area of Ainsdale does not have the same constraints that other land nearby has. It is therefore one of the few areas in the Southport area for potential development. If development were to go ahead a new strong boundary would have to be formed to make sure that development doesn’t encroach further into the countryside towards Formby.

Summary of comment – South Ainsdale (S026, S027, S031)	Sefton’s Response
proximity to both Formby and Birkdale.	
Traffic - inadequate access, congestion, poor public transport accessibility, pollution	
<p>The Coastal Road is already very busy and dangerous and the proposal to add an additional 500+ new homes in the area would make this worse. There is no reference to this being widened or improved in any way. The Coast Road, adjacent to the railway bridge, is a difficult road to access during peak time traffic. Many accidents, including fatalities, have taken place on this stretch of the road. We already have long queues when events are on in Southport.</p> <p>Access is very difficult due to the land at Segars Farm as the Coastal Road, the Railway and the airfield surround it. This agricultural land adjacent to the farm house bounded is by Woodvale aerodrome and a railway line and should not be used for development.</p> <p>Moor Lane is a very poor quality road and is not suitable for increased traffic.</p> <p>Any further development in the area would place added strain on the surrounding residential roads.</p>	<p>Further work will need to be carried out understand the existing and future capacity for the highways network and where future improvements may be required.</p>
Nature conservation	
<p>The area is home to</p> <ul style="list-style-type: none"> • Red Squirrels • Natterjack Toads • Sand Lizards • Hedgehogs • Other protected species. <p>Concerns about local wildlife and the reduction of their habitat including some endangered and protected species. South of Moor Lane contains a lake, which is used by nesting swans.</p>	<p>Noted. The Council has a difficult challenge to both protect and manage nature, and also provide homes and jobs. We have a legal duty to take account of biodiversity, and have recently approved an Ecological Framework which helps us to focus on protecting and enhancing key habitats and species, and creating new habitats. We will work with developers to help us do this.</p> <p>If it were proposed to consider any sites further for development, appropriate surveys would need to be carried out to help make the</p>

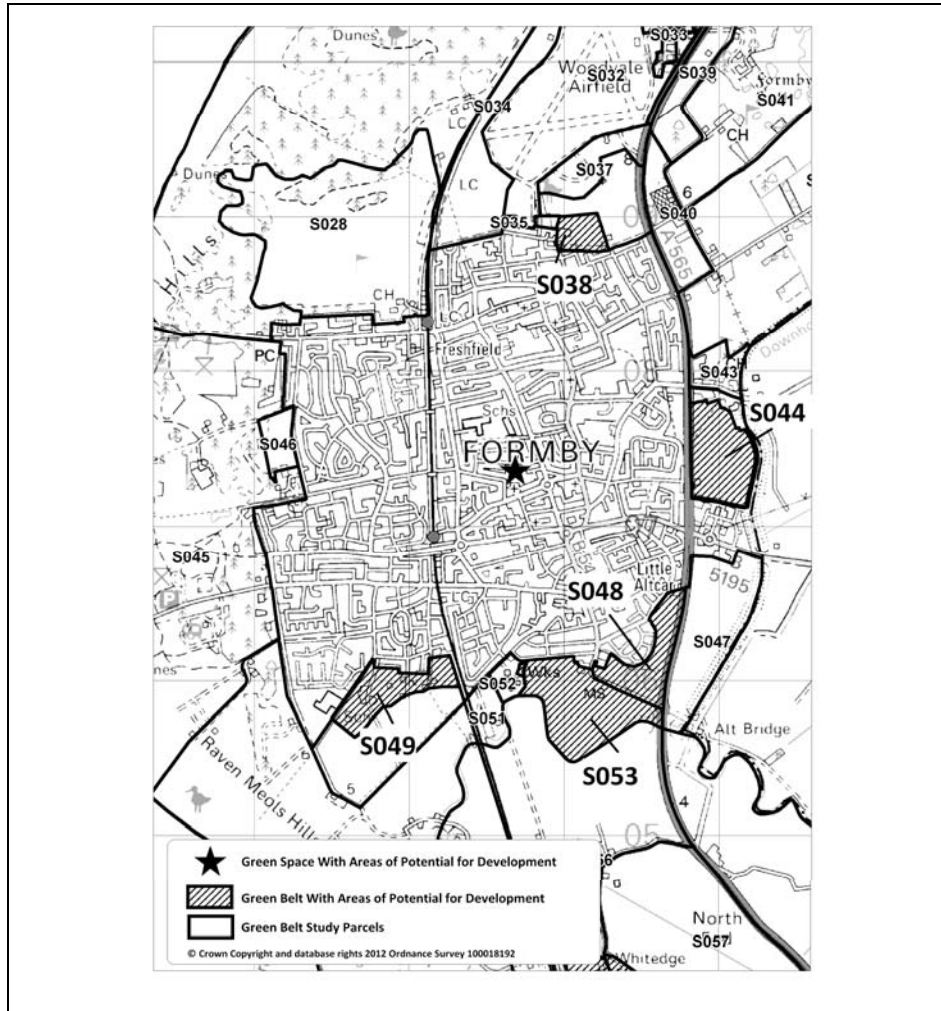
Summary of comment – South Ainsdale (S026, S027, S031)	Sefton's Response
<p>English Nature has a site adjacent to the areas proposed for development. This would be damaged by over developing and could ruin what is a tourist and natural attraction. Are you not aware the impact 500 homes would have?</p> <p>A local wildlife sanctuary has developed naturally on the caravan storage site and should be subject to an ecological survey prior to any development. The Willowbank Caravan site is Local wildlife area and should not be developed.</p> <p>The Dune and Coastal area is very attractive and there is so little greenbelt area left in Sefton that protected species would suffer from impingement and the amenity value for residents would be seriously reduced</p>	<p>final decision. There is a legal requirement for Habitats Regulations Assessment, Strategic Environmental Assessment and Sustainability Assessment of the Plan.</p> <p>We have asked the Council's environmental advisors, the Merseyside Environmental Advisory Service, for their views on these issues.</p>
Recreation / tourism	
<p>People use the land around Ainsdale for recreational purposes, such as walking, rambling and cycling. Moor Lane is also part of the well-known Cheshire Lines Cycle Path, which is being used more and more</p>	<p>Noted. If sites were to be developed paths would be incorporated into green space provided as part of the development.</p>
Quality of life / well-being	
<p>Moor Lane area is mostly an area where retired people live who chose the area as it provides peace and quiet. This would be lost if additional homes were developed.</p>	<p>Comment noted. We would always try to make sure that any new development blends in with existing homes so that the character of the area is not spoiled. We would involve local residents in the detail of any proposals to ensure this is the case.</p>
Protect agricultural land - once lost can't be recovered / food security / use land in non-agricultural use	

Summary of comment – South Ainsdale (S026, S027, S031)	Sefton’s Response
<p>We may need the farmland on the Coast Road and Moor Lane to produce food.</p> <p>The land identified off the coast road near Pinfold Lane is currently a farm. In terms of the economy and the green agenda this land would be better utilised for farming than for a housing estate, in comparison to other sites which may be lying dormant in urban areas for example.</p>	<p>We need to undertake further work to assess what impact development on agricultural land will have. See Section Three for further information.</p> <p>Government guidance contained in PPS7: Sustainable Development in Rural Areas and the draft National Planning Policy Framework states that where the significant development of agricultural land is necessary, Local Planning Authorities should use poorer quality agricultural land, except where this is inconsistent with other sustainability considerations or the Core Strategy’s growth strategy, and where poorer quality land is unavailable or unsuitable.</p>
Area prone to flooding	
<p>Segars Farm is on a flood plain any development here will cause problems for the new and existing buildings. Risk from flooding.</p>	<p>This site as not been identified as being within a high or medium risk flood risk area. However, small parts of the site are identified as at potential risk of groundwater flooding.</p> <p>If this site were to be taken forward, further work including about surface water flood risk, would be required to show that flooding issues have been taken into account.</p>
Impact on services + infrastructure - drainage / shops/ schools at capacity / lack of health services	
<p>The medical centre is more than 1 kilometre from the Segars Farm site and there is no Leisure Centre within 800 metres. Is the parcel adjacent to a primary route network?</p>	<p>The infrastructure study will be updated in light of comments received from residents and others. At this stage of the assessment information on service and infrastructure was provided for information only and did not influence the identification of potentially suitable sites.</p>
Impact on view / impact on property value	
<p>We bought the property near Segars Farm on the basis that this was a Green Belt area and that there was no possibility that this would be built on, so we are naturally very disappointed that this may not be the case.</p>	<p>Although the Green Belt designation provides a robust guard against development, Local Authorities do have the opportunity to review its designation in exceptional circumstances. It is considered that a shortage of available land in the urban area is an exceptional circumstance to consider a review of Sefton’s Green Belt.</p>

Summary of comment – South Ainsdale (S026, S027, S031)	Sefton's Response
<p>Visitors from the south mostly approach Southport from the Formby Bypass. Moor Lane gives a very pleasing welcome to the town because of the landscaped layout.</p>	<p>If any site within the Green Belt were to be taken forward for development, we would expect green space to be provided, and the boundary between buildings and the rural area to be sympathetic to the landscape character of the surrounding area.</p>
Need to maintain gap/buffer between towns	
<p>Freshfield/Formby and Ainsdale communities are very different and should not be merged, as surely this individuality is one of the aims of Green Belt planning.</p>	<p>Agree. We would seek to maintain a significant gap between Formby and Ainsdale.</p>
Increased carbon footprint	
<p>The carbon footprint for the area would 'rocket'.</p>	<p>New homes are built to very high standards in terms of energy efficiency.</p>
Other	
<p>South Ainsdale is a residential area and we do not need any industrial or office buildings nearby.</p> <p>These sites should only be considered when other more suitable sites have been developed.</p> <p>The Willowbank Caravan site is a registered holiday caravan site and should not be developed. The caravan park at S031 is a well-used site that has been in existence for many years. The caravans are not for letting but are family owned caravans.</p> <p>There is the possibility of potential damage to an existing business in this area i.e. the caravan holiday park that is situated next to the land identified. A housing estate built so close to the holiday park could affect their business, people may not wish to holiday in an area with views of a housing estate rather than of green fields.</p> <p>Part of the site south of Moor Park was a local park known as 'the Green'. This was apparently sold off without the knowledge of the</p>	<p>Agree. There are no proposals to locate any industrial or office buildings in this location.</p> <p>Agree. We will only consider development in the Green Belt if there are no other more suitable options.</p> <p>The Willowbank Caravan Park [site S029] or the caravan site off Moor Lane [part of S031] has not been identified for potential development in the Green Belt Study.</p> <p>This is a detailed consideration that will have to be resolved in discussion with the owners of the Caravan Park if and when the land adjacent is considered further for development. A well-designed housing scheme, with appropriate landscaping and planting, could reduce any impact a housing development may have.</p> <p>We specifically did not assess land ownership as part of the Green Belt Study as we wanted to identify the sites on their suitability in the</p>

Summary of comment – South Ainsdale (S026, S027, S031)	Sefton's Response
<p data-bbox="185 276 1032 308">Council – was this a similar situation to the sale of playing fields?</p> <p data-bbox="185 379 1077 641">Any development would affect the flight path for Woodvale Airfield. The building of houses on this land would not be possible unless Woodvale airfield was closed due to the danger of flight path access the main runway being too dangerous. We feel that the closing of Woodvale airfield would be a very big mistake as this airfield is still very active particularly for training of new pilots and although it is not going to be used for the police helicopter at the moment who knows what will be needed in the future.</p>	<p data-bbox="1126 276 1995 339">first instance. If sites in the Green Belt are required we will need to consider which are available and consider land ownership.</p> <p data-bbox="1126 379 2045 539">We are not aware of any covenant or restrictions on development close to Woodvale Airfield. We will have to adhere to any restrictions to the location and type of any development. We are also not aware of any plans for the closure of Woodvale airfield but are in contact with the MoD.</p>

Objections to Green Belt Sites Formby Area



This section of the Consultation Report looks at comments made to specific Green Belt sites [or 'parcels'] in the Formby area during consultation.

The Green Belt sites that were identified as having some potential for development in the Formby area are shown on the map to the left.

This section only includes comments that relate to Green Belt sites in Formby. Other more general comments on Green Belt sites are set out earlier in this report e.g. agricultural land, flood risk, vacant homes.

This section includes separate tables for the following areas of Formby, Little Altcar and Ince Blundell.

Formby overall	No parcel specified
North Formby	parcels S038
Formby East	parcels S044, S047
Formby South West	parcel S049
Formby South East and Little Altcar	parcel S048, S049
Ince Blundell	parcels S060, S062 and S064

Formby generally

The most common concern from individual respondents (62%) related to traffic – especially congestion and access to and within Formby. The next most important concern (56%) was the permanent, irreversible loss of the Green Belt, to urban sprawl. Considerable numbers of respondents (41%) were concerned about the under-capacity or serious lack of services and infrastructure. The same numbers (41%) were concerned about the high number of vacant properties or felt that empty homes should be brought back into use before Green Belt sites are developed; and around a third of respondents (32%) felt the same about brownfield sites within urban areas. More than a third of respondents (35%) raised issues relating to flooding.

Summary of Green Belt comment – Formby generally	Sefton’s Response
Traffic - inadequate access, congestion, poor public transport accessibility, pollution	
<p>Transport infrastructure cannot support further development, particularly connections to the Formby by-pass, from the west side of Formby (Harington ward) to the east side (Ravenmeols ward).</p>	<p>The adequacy of the road network to and within Formby has been raised by the most respondents. If it were proposed to develop land around Formby in the future, further work would be carried out to assess the capacity of the highway network and whether there is a need for any improvements. This would also identify any road-user and pedestrian safety issues.</p>
Protect the Green Belt / will lead to urban sprawl / once lost can't be recovered	
<p>The Green Belt around Formby fulfils locally many useful purposes and objectives:</p> <ul style="list-style-type: none"> • Restricts the sprawl of large built up areas, • Leaves a corridor between neighbouring communities, • Safeguards the countryside from encroachment, • Preserves the local character of settlements, • Encourage urban regeneration, by encouraging the recycling of derelict and other urban land rather than taking the easy option of using the Green Belt, • Provides a diverse habitat for the local flora and fauna. <p>Freshfield / Formby and Ainsdale communities are very different and should not be merged as surely this individuality is one of the aims of</p>	<p>No decisions have been taken about whether development will take place on the Green Belt. However, the Options paper suggests that this will be necessary if Sefton is to meet its future housing and employment needs, or decides to stabilise its population.</p> <p>The areas which have been identified as potential “developable areas” in the draft Green Belt Study would not reduce the gap so that nearby settlements merged. “Essential gaps” have also been identified, for retention as Green Belt, such as RAF Woodvale between Freshfield / Formby and Ainsdale.</p> <p>The Options paper states that the regeneration of Bootle, and the re-use of brownfield land and buildings will be priorities for the Core Strategy.</p>

Summary of Green Belt comment – Formby generally	Sefton’s Response
Green Belt planning. Formby, Hightown. Little Crosby and Crosby will merge.	The Council is committed to using the New Homes Bonus it receives for completing its proposals in the former Housing Market Renewal area in Bootle. (Nature issues are dealt with below).
Impact on services + infrastructure - drainage / shops/ schools at capacity / lack of health services	
Development of Green Belt sites would place further strain on existing services, for example: <ul style="list-style-type: none"> • Schools • Health services(doctor’s surgeries, dental surgeries) and emergency services, • Community facilities, • Sewerage systems, • water supply 	The Council is required to prepare an Infrastructure Plan alongside the development plan, to show that the latter can be implemented. The infrastructure and related issues raised here will be looked at again. There will be continuing talks with infrastructure and service providers, who include the Council’s education service; the health authority, United Utilities (water and sewers).
Flood risk	
The proposed development site and/or wider area is in a flood risk area or already floods. Further development will make these problems worse; for example flooding from surface water run off / urban flooding. Even with the recent refurbishment of the Altmouth Pumping Station, “they [the Environment Agency] cannot guarantee that in all circumstances that this land around Formby would not be subject to major flooding”.	If the Council decides to choose an option that requires some Green Belt release, these sites have been identified in the draft Green Belt Study as having potential for development. If these sites were to be taken forward, further work (including about surface water flood risk) would be required to show that flooding issues have been taken into account. The Council follows government guidance and, together with the Environment Agency and United Utilities, carries out flood risk management. The government and the insurance industry are working to resolve issues of premiums in higher flood risk areas.
Quality of life / well-being: Disproportionate to the size/character of the settlement/already at capacity	
Unacceptable erosion of rural character of Formby if new development is allowed. The National Trust welcomes the overall approach to Formby, although the Core Strategy needs to avoid excessive development which will put pressure on the sensitive coastal zone and erode Formby’s character.	Through planning policy and when considering planning applications, the Council aims to make sure that the design of new development is sympathetic to the character of the surroundings and is high quality. This is an essential part of sustainable development, in line with government guidance and Building Regulations.

Summary of Green Belt comment – Formby generally	Sefton’s Response
<p>Recent permissions/completions for housing development have been of poor form or do not relate well to the character of the area.</p>	
Nature conservation	
<p>Impact of development on flora, fauna, designated nature sites and protected species.</p> <p>The National Trust welcomes the overall approach to Formby, although need avoid excessive development which will put pressure on the sensitive coastal zone and erode Formby’s character.</p>	<p>The Council has a difficult challenge to both protect and manage nature, and also provide homes and jobs. We have a legal duty to take account of biodiversity, and have recently approved an Ecological Framework which helps us to focus on protecting and enhancing key habitats and species, and creating new habitats. We will work with developers to help us do this.</p> <p>None of the proposed locations around Formby are protected by international or national nature conservation designations, although some are locally designated or are priority habitats.</p> <p>If it were proposed to take forward sites around Formby, appropriate surveys and assessments would need to be carried out, to determine the ecological importance of these sites. This could restrict the area that would be potentially suitable for development.</p> <p>The Council has asked its environmental advisors, the Merseyside Environmental Advisory Service, for advice on these issues.</p>
Renewable Energy	
<p>Overall the National Trust is very supportive of renewable energy developments, but concerned that the one reference to wind turbine development in the whole consultation document specifically identifies land between Formby and Ince Blundell as an area to be considered (no other area specific references to any other renewable energy technologies either). Unclear why this has been specifically identified at this stage, especially in the absence of a Sefton-wide assessment of wind energy potential, landscape character or heritage resources</p>	<p>The approved Liverpool City Region (including Sefton) Renewable Energy Capacity Study (2011) is a strategic overview, and identifies this land as an area of least constraint for wind energy, subject to further assessment, including landscape. The Study also identifies a District heating Priority Zone at Kew, Southport.</p> <p>Landscape character information is set out in the 2003 Landscape Character Assessment Supplementary Planning Guidance Note.</p>

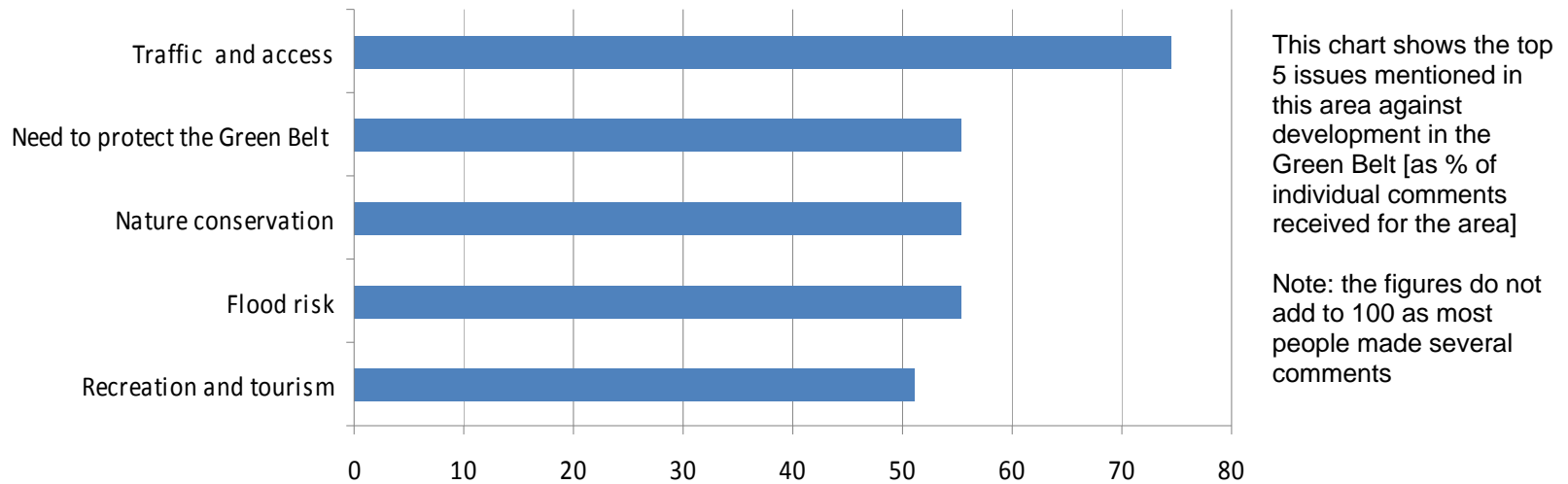
Land west of Formby (Green Belt parcel S045)

Although this area was not identified as being suitable for development, nevertheless, a few comments were received supporting its exclusion as a potential area where development might take place, if the Council decides that land in the Green Belt is released to meet future needs.

<p>The countryside to the west of the Formby bypass is precious and precarious. It protects the outstanding ecologies of the coast - creating the "island" for our red squirrels, for example - and it is at risk from leisure as well as residential developments. This is exactly the kind of area which Green Belt was designed to protect, where unrestrained ribbon development would destroy its unique character.</p>	<p>The area to the west of Formby was not considered as being potentially suitable for development in the draft Green Belt Study for a variety of reasons, including coastal erosion and its national and international nature conservation importance.</p>
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North Formby (parcel S036 Bowler’s Riding Club and parcel S038 - Land north Brackenway & Hawksworth Drive, Formby)

In addition to the individual comments that relate to this area a petition was also submitted signed by 92 local residents. This stated that the residents objected to the building of homes at the rear of Bracken Way.



The most common concern from individual respondents (74%) related to traffic – especially congestion and access to and within Formby. Over half of respondents (55% in each case) raised concerns about flooding, nature conservation and the permanent, irreversible loss of the Green Belt, to urban sprawl. Just over half (51%) were concerned about the impact on local recreation (including horse riding). More than a third of respondents (36%) were concerned about the high number of vacant properties or felt that empty homes should be brought back into use before Green Belt sites are developed, and the same number commented on the under-capacity or serious lack of services and infrastructure.

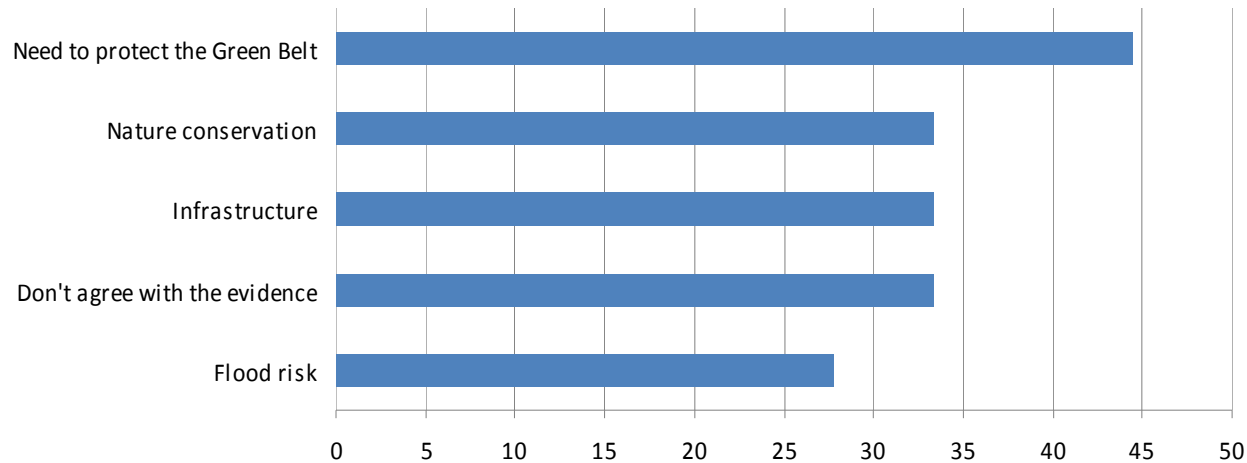
Summary of comment – North Formby parcel S036 (Bowler’s Riding Club)	Sefton’s Response
Development of Bowler’s Riding Stables, Formby would not have a significant impact on the openness of the Green Belt, but the site is an important recreational asset. The large buildings adjacent to part of S038 would minimise the impact of development on the openness of the Green Belt [Formby Civic Society].	The Council agrees. The use as riding stables was the reason this site was discarded from consideration as a potential developable area.

Summary of comment – North Formby parcel S038 (Land north of Brackenridge and Hawksworth Drive)	Sefton's Response
Traffic - inadequate access, congestion, poor public transport accessibility, pollution	
<p>Issues relating to access and congestion, for example:</p> <ul style="list-style-type: none"> • Issues of access to and from the Formby By-Pass. • Current problems on Paradise Lane (notably around Trinity St Peters Primary School at key times) and Bracken Way. • Deansgate Lane North (narrow road). • Pressures of joining Southport Road. <p>Access constraints for parcel S038 may result in it not being developable and therefore not deliverable. A Transport Impact Assessment is needed before this site is brought forward.</p>	<p>The adequacy of the road network to and within Formby has been raised by the most respondents. If it were to be proposed that land around Formby is to be developed in the future, further work would be carried out to assess the capacity of the highway network and whether there is a need for any improvements to be carried out. This would also identify any road-user and pedestrian safety issues.</p> <p>If the site were to be developed, further Transport Impact Assessment work would be required to show that transport issues have been taken into account.</p>
Flood risk	
<p>The proposed development site and/or wider area already floods or is at risk of flooding, and so should not be developed. Need Flood Risk Assessments (as part of Environmental Impact Assessments). The Flood and Water Management Act (2010) makes flooding issues even more important. For example:</p> <ul style="list-style-type: none"> • In flood plain/ widespread flooding on site and in area / flooding from drainage ditches / land drainage problems • Highway drainage flooding • Surface water problems. <p>The need to address flooding and drainage matters will mean that development of the site is not economically viable.</p> <p>Concern that the flood risk assessment for this site is incorrect, and hence that the site could support more dwellings than the 157 proposed.</p>	<p>If the Council decides to choose an option that requires some Green Belt release, the draft Green Belt Study identified this as a site where some development could take place. If this site were to be taken forward, further work (including about surface water flood risk) would be required to show that flooding issues have been taken into account.</p>
Nature	
Site is a designated Local Wildlife Site, which makes an important	The Council has a difficult challenge to both protect and manage nature,

Summary of comment – North Formby parcel S038 (Land north of Brackenridge and Hawksworth Drive)	Sefton's Response
<p>contribution to nature conservation, particularly to European protected species.</p> <p>Evidence of tree roosting bats, squirrels, birds of prey, amphibians, reptiles and migratory birds on the site.</p> <p>Formby Civic Society and the CPRE comment that they are not opposed to development in the western area defined in yellow [the possible 'developable area'], subject to an ecological assessment to identify the possible presence of protected species.</p> <p>Concern that there is a poor understanding of the ecological characteristics. The existing ecology designation is out of date.</p>	<p>and also provide homes and jobs. We have a legal duty to take account of biodiversity, and have recently approved an Ecological Framework which helps us to focus on protecting and enhancing key habitats and species, and creating new habitats. We will work with developers to help us do this.</p> <p>Wham Dyke Meadows is a local wildlife site and one of Sefton's key habitats. It is a heavily horse-grazed meadow (including water and flooded areas), with high plant diversity; reliant on the ditch system. If it were to be proposed to take forward the site, appropriate surveys and assessments would need to be carried out, to determine the ecological importance of the site. There is a legal requirement for Habitats Regulations Assessment, Strategic Environmental Assessment and Sustainability Assessment of the Plan. This could restrict the area that would be potentially suitable for development.</p> <p>The Council has asked its environmental advisors, the Merseyside Environmental Advisory Service, for advice on ecological issues.</p> <p>(See also the comments in relation to recreation issues, below)</p>
Protect the Green Belt / will lead to urban sprawl / once lost can't be recovered	
<p>Outward expansion of the built envelope to the north of Formby will erode the separation between Formby & neighbouring settlements.</p> <p>Site should be retained to prevent urban encroachment / sprawl.</p> <p>Reference to the planning history of the site, and of Formby in general, regarding decisions made in 1982 and earlier to restrict / prevent its development. Site should remain Green Belt - no reason to overturn the Council's approach in the 2006 Unitary Development Plan (UDP) and the views of the Inspector for UDP Public Inquiry.</p>	<p>No decisions have been taken about whether development will take place In the Green Belt. However, the Options paper suggests that this will be necessary if Sefton is to meet its future housing and employment needs, or decides to stabilise its population.</p> <p>If the site were to be taken forward, any new development would be similar in character to the existing settlement.</p> <p>The draft Green Belt Study identifies the setting of Conservation Areas / Heritage Assets as constraints on development. RAF Woodvale has no</p>

Summary of comment – North Formby parcel S038 (Land north of Brackenridge and Hawksworth Drive)	Sefton's Response
<p>Must consider the impact of development upon RAF Woodvale, in light of the government's Planning Policy Statement 5 'Planning for the Historic Environment' which refers to heritage assets which have no formal designation.</p>	<p>formal national or local heritage designations. It is currently identified in the Unitary Development Plan (2006) as a major developed site in the Green Belt where limited infill development is acceptable in principle (subject to certain conditions, none of which relate to heritage). Heritage considerations would need to be weighed against other considerations, if the site were to be brought forward for development.</p>
Recreation / tourism / equestrian-related jobs	
<p>Loss of the recreational benefits of the site, which include horses grazing, bridleways, horse-riding, partly related to the livery stables. These recreational uses (plus the livery stables) have important community, social and employment benefits.</p> <p>Lack of suitable sites for the relocation of grazing horses, and of the livery stables.</p> <p>Development may require removal of bridle paths, causing more horse riders to use carriageways, thereby introducing further potential for conflicts between horse riders and cars to the detriment of safety.</p> <p>Must consider the local employment and business benefits of the livery stables.</p>	<p>Horse-grazing is part of description of the Wham Dyke Meadows local wildlife designation which covers the site. If it were to be proposed to take forward the site, appropriate surveys and assessments would need to be carried out, to determine the ecological importance of the site, including the contribution of horses grazing. The Council has asked its environmental advisors, the Merseyside Environmental Advisory Service, for advice on ecological issues. (See also the comments in relation to nature issues, above).</p> <p>The livery stables are in parcel S036 (Bowlers Riding Stables & Riding School), and the draft Green Belt Study recommends that its redevelopment would result in the loss of an important recreational asset.</p> <p>If the site were to be developed, existing formal facilities such as Rights of Way (including bridleways) and paths would be incorporated into green space provided as part of the development.</p> <p>The local employment and business benefits of the livery stables are noted.</p>

Formby East (parcel S044 - Formby Moss, North of Formby Business Park)



This chart shows the top 5 issues mentioned in this area against development in the Green Belt [as % of individual comments received for the area]

Note: the figures do not add to 100 as most people made several comments

44 % of respondents were concerned that the Green Belt should be protected from irreversible loss through development. A third (33.3%) were concerned respectively about the impact on nature, lack of services and infrastructure and about the quality of the Council’s evidence. There were also comments about issues such as flooding and empty homes and loss of views. Generally more comments about this parcel (compared to other parcels) (78%) covered a range of other issues. There was also a higher proportion of comments supporting development of part or all of the site, relative to the number of comments. These comments supporting development of part or all of the site, mostly relating to employment development (in one case linked to the redevelopment of Mayflower Trading Estate for housing), are dealt with elsewhere in this report.

Summary of Objection – Formby East (parcel S044)	Sefton’s Response
<p>Nature</p> <p>Land immediately north of Formby Industrial Estate (including this parcel) are Formby Mosses and Downholland Mosses. These are designated local wildlife sites, with valuable habitats and species (Environment Agency & others):</p> <ul style="list-style-type: none"> Ditch network has good water vole populations which should be maintained and enhanced where possible. Reedbeds are a priority UK Biodiversity Action Plan (BAP) habitat. 	<p>The Council has a difficult challenge to both protect and manage nature, and also provide homes and jobs. We have a legal duty to take account of biodiversity, and have recently approved an Ecological Framework which helps us to focus on protecting and enhancing key habitats and species, and creating new habitats. We will work with developers to help us do this.</p>

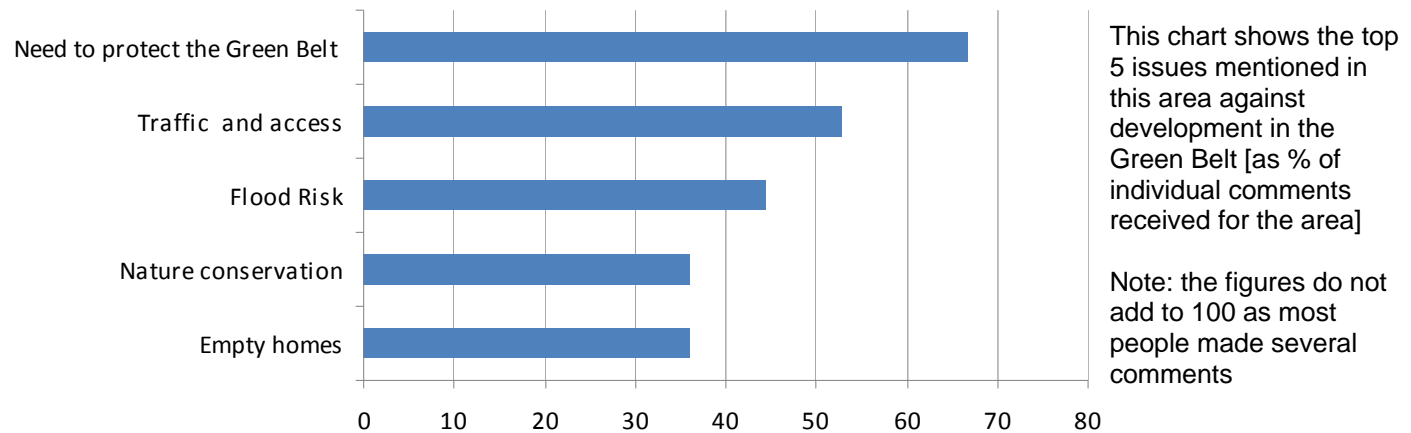
Summary of Objection – Formby East (parcel S044)	Sefton’s Response
<ul style="list-style-type: none"> • Downholland Brook (like the River Alt and its other tributaries) is an important wildlife corridor. • The agricultural land is an important feeding area for wintering birds. <p>Site could be developed (for a Business Park – Formby Civic Society) subject to appropriate ecological assessments. Appropriate mitigation would be required before any development commenced including a green / ecological buffer zone and network link (minimum of 5 metres) would likely be required, potentially affecting the deliverability of the site. (Environment Agency and Formby Civic Society). Any development within 8 metres of the foot of the Downholland Brook embankment would require Environment Agency consent under the North West Land Drainage Bylaws.</p>	<p>Formby Moss local wildlife site is a mix of pasture and arable fields lines with drains and areas of reed bed adjacent to the A565 Formby By-pass. Part of the site has been subject to land fill in the past. (Downholland Moss local wildlife site is in West Lancashire District).</p> <p>If it were proposed to take forward the site, appropriate surveys and assessments would need to be carried out, to determine the ecological importance of the site. This could, for example, restrict the area that would be potentially suitable for development. There is a legal requirement for Habitats Regulations Assessment, Strategic Environmental Assessment and Sustainability Assessment of the Plan.</p> <p>The Council has asked its environmental advisors, the Merseyside Environmental Advisory Service, for advice on ecological issues.</p>
Traffic – access, highway infrastructure and congestion	
<p>If designated for housing, this would lead to significant detrimental harm to highway infrastructure and highway safety.</p> <p>There is only poor access to the site (for example from Moss Side, to the north of parcel S044), and access issues could make the scheme undeliverable. Could the access issues could be overcome to allow the possible development of the site as a Business Park (Formby Civic Society, CPRE)?</p>	<p>If it were proposed that this parcel be developed in the future, further work would be carried out to assess the capacity of the highway network in the area, whether it needs to be improved, and site access, road and pedestrian safety and air pollution issues.</p>
Employment land and other issues	
<p>Formby Parish Council would like to see some development and enhancement of the existing Formby Business Park and its promotion to new high value business (good links once new link road to Switch Island built). Disappointed that priority is given to a new estate in Southport. Not adverse to (Formby & Ince Blundell Parish Councils) / do not oppose (Formby Civic Society, CPRE) some enlargement of the Park</p>	<p>The Council has to identify land for new employment uses in the longer term – 15 years. The site north of the existing Formby Industrial Estate is a possible site for employment development under Options 2 or 3.</p>

Summary of Objection – Formby East (parcel S044)	Sefton’s Response
<p>northwards, subject to detailed ecological considerations set out above.</p> <p>Mayflower Industrial Estate (off Liverpool Road) businesses should be able to relocate to the larger Business Park, to make the Mayflower Estate available for housing development (Formby and Ince Blundell Parish Councils).</p>	
<p>The land owners of the northern part of this site comment that they do not wish to release it for any use other than as farm land.</p> <p>Site includes curtilage of dwellings to Moss Side. Site boundaries should be redrawn as these areas will not be released.</p>	<p>Land-owners’ views are important, and land would only be brought forward for development with the landowner’s consent (the Council does not intend to purchase land compulsorily).</p> <p>Land parcels cover the whole of Sefton’s Green Belt, and so the homes (and curtilages) on Moss Side have been included because they are in the Green Belt. If the site were to be brought forward for development, the boundaries of any possible ‘developable area’ would be unlikely to include the residential curtilages.</p>
<p>Potential for flooding on the site.</p>	<p>If the Council decides to choose an option that requires some Green Belt release, the draft Green Belt Study identified this as a site where some development could take place. If this site were to be taken forward, further work, including about surface water flood risk, would be required to show that flooding issues have been taken into account.</p>

Formby East (parcel S047 - Land south of Formby Industrial Estate)

Summary of Objection – Formby East - (parcel S047)	Sefton’s Response
Protect the Green Belt – loss of essential gaps – environment generally	
<p>Area should remain Green Belt to preserve the openness of the southern approach to Formby, and for its amenity value (Formby Civic Society and CPRE).</p> <p>Oppose development - not well contained by the urban area, and so should have been ruled out as a possible development site in the draft Green Belt Study. However, agree that it would have greater detrimental impact on the openness of the Green Belt than parcel S044 (Formby Moss, North of Formby Business Park) (National Trust).</p>	<p>The draft Green Belt Study states that the area could be used for employment purposes, but also that this site would have a greater impact on the openness of the Green Belt than parcel S044.</p> <p>No landscape in Sefton has national, local or other landscape designations, and so landscape issues are not over-riding constraints which would stop development.</p>
Flood risk	
<p>The area should remain Green Belt as its high risk of flooding makes it unsuitable for any form of development (Formby Civic Society and CPRE).</p>	<p>The draft Green Belt Study notes that the area is not suitable for housing as part has a high risk of flooding, but that the area could be used for employment purposes.</p> <p>If this site were to be taken forward, further work including about surface water flood risk) would be required to show that flooding issues have been taken into account.</p>
Loss of agricultural land	
<p>The site should not be developed, due to its value as Grade 2 agricultural land (CPRE).</p>	<p>The draft Green Belt Study indicates that about 30% of the agricultural land in Sefton is classed as the ‘best and most versatile’ agricultural land which should be protected where there are choices. Most of the this site falls within this classification. Further work will be undertaken to find out the impact of development on the agricultural economy and individual farms.</p> <p>The Government’s view is that the UK is largely self- sufficient in terms of food security. It is not necessary for individual boroughs to be self-sufficient.</p>

Formby South West (Parcel S049, Land South of Barton Heys Road / Range High School,)



Two thirds of respondents (67%) did not want to see the permanent, irreversible loss of the Green Belt and gaps between settlements. More than half of respondents (53%) related to traffic – especially congestion and access to and within Formby. The next most important concern (44%) was flooding. Over a third of respondents (36%) were concerned about the impact of development on nature, and the same number felt that empty homes should be brought back into use before Green Belt sites are developed. A third of respondents cited the under-capacity or serious lack of services and infrastructure.

Summary of comment – Formby South West (parcel S049)	Sefton’s Response
Protect the Green Belt – loss of essential gaps – Character of Formby - environment generally	
If this site was released for development it would erode the separation between Formby and Hightown.	The areas which have been identified as potential “developable areas” in the draft Green Belt Study would not reduce the gap so that nearby settlements merged.
Site is not well contained, would represent an urban extension into the Green Belt to the detriment of its openness (CPRE and others).	The draft Green Belt Study states that this site relates fairly well to the surrounding urban area (is “partially contained”).
The draft Green Belt Study identifies land south of Altcar Lane as being in countryside use. The removal of this site from the Green Belt would,	National planning policy guidance and the draft National Planning Policy Framework both state that the use to which land in the

Summary of comment – Formby South West (parcel S049)	Sefton’s Response
<p>by definition, result in encroachment into the countryside and as such should not be removed from the Green Belt.</p> <p>Site is unique and open arable land with great connections to the openness of the Green Belt and links to the coast. Development of this site would erode this unique, open character, to the detriment of Sefton as a whole and to landscape quality (CPRE and others).</p> <p>Formby Civic Society comment that:</p> <ul style="list-style-type: none"> • The parcel and area has high scenic value for the many users of the Coastal Path and other paths • Its characteristic landscape contributes significantly to the openness of the green belt on the southern boundary of Formby • The area has significant landscape value. <p>Further residential development will erode the Village feeling to Formby.</p> <p>The National Trust comment that if site is to be considered further for housing, would need to make sure that this would not have a negative impact on the character and environment of Formby, and tranquillity of the Coast, especially in combination with development of any other proposed site. Should limit the west / south-west extent of the developable area to achieve this.</p>	<p>Green Belt is in is not a factor to be taken into account when its continued protection is being assessed. Hence no parcels were ruled out in the draft Green Belt Study because the land was in a countryside use.</p> <p>No landscape in Sefton has national, local or other landscape designations, and so landscape issues are not over-riding constraints which would stop development.</p> <p>Through planning policy and when considering planning applications, the Council aims to make sure that the design of new development is sympathetic to the character of the surroundings and is high quality. This is an essential part of sustainable development.</p>
Traffic – access, highway infrastructure and congestion	
<p>Impact on existing highway infrastructure (congestion and highway safety) through increased vehicles from residential development (more 500 homes). The road network around Formby is already strained (congestion), and further development will exacerbate this, for example:</p> <ul style="list-style-type: none"> • Congestion to/from Barton Heys Road / Jubilee Road / Andrews Lane • Pressures on railway crossing to Queens Road / Duke Street Bridge 	<p>If this site were to be developed in the future, further work would be carried out to assess the capacity of the highway network and whether there is a need for any improvements to be carried out. This would take into account access to the site, and would also identify road-user and pedestrian safety issues.</p>

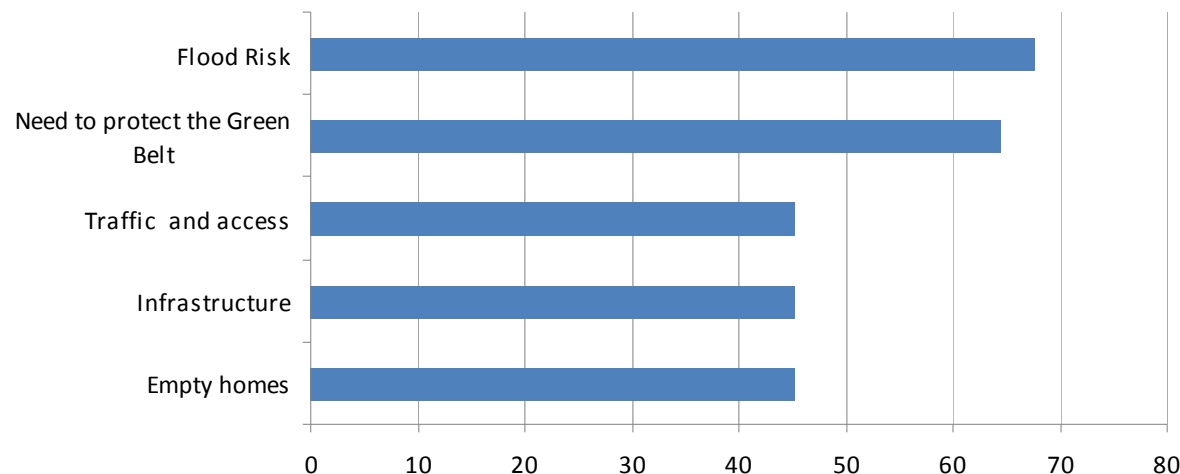
Summary of comment – Formby South West (parcel S049)	Sefton’s Response
<ul style="list-style-type: none"> • Conflicts with vehicular journeys to and from Range High School and St Luke’s Primary School, • No vehicular rail-crossings within Little Altcar, so proposals to build near to Range High School [parcel S049] would create bottle-necks at the Ravenmeols Road crossing and the Duke Street roundabout. • Constrained site access near Marsh Farm (from Jubilee Road/Barton Heys Road). Formby Civic Society concerned whether access difficulties could be overcome. <p>(Little Altcar Parish Council and others).</p>	
Flood risk	
<p>The proposed development site and/or wider area already floods or is at risk of flooding, and so should not be developed. Environmental changes would increase this flood risk. For example, site is in a flood risk area and is susceptible to flooding. Removal of the existing agricultural land drains, linked to development - would lead to water-logging / flooding of this site.</p> <p>Detrimental impact of any flood mitigation measures for this site on existing properties.</p> <p>The National Trust support the exclusion of flood risk areas from the proposed ‘developable area’ for parcel S049.</p>	<p>If this site were to be taken forward, further work (including about surface water flood risk) would be required to show that flooding issues have been taken into account.</p>
Nature	
<p>Impact of development adjacent to sites of nature conservation. Harm to ecology, protected species, birds - for example red squirrels, bats, water voles.</p> <p>Need an ecological survey (Formby Civic Society and CPRE) - evidence of a considerable water vole population in the drainage ditches on the southern part of the parcel, and their habitat should be protected from the harmful effects of development anywhere within the parcel.</p> <p>The National Trust comment that residential development of the</p>	<p>The Council has a difficult challenge to both protect and manage nature, and also provide homes and jobs. We have a legal duty to take account of biodiversity, and have recently approved an Ecological Framework which helps us to focus on protecting and enhancing key habitats and species, and creating new habitats. We will work with developers to help us do this.</p> <p>The parcel has no formal local, national or international nature conservation designations (although it borders land with these designations), and part is identified in the Ecological Framework</p>

Summary of comment – Formby South West (parcel S049)	Sefton's Response
<p>proposed scale in this location could result in increased pressure on a quiet and natural part of the coast. If the site is to be developed it should be phased from the east first. The west / south-west extent of the developable area should be limited, to protect, including visually, the coastal strip and designated nature reserves.</p>	<p>for possible habitat creation.</p> <p>If it were proposed to take forward the site, appropriate surveys and assessments would need to be carried out, to determine its ecological importance. This could, for example, restrict the area that would be potentially suitable for development, or indicate the potential to create suitable habitats. There is a legal requirement for Habitats Regulations Assessment, Strategic Environmental Assessment and Sustainability Assessment of the Plan.</p> <p>The Council has asked its environmental advisors, the Merseyside Environmental Advisory Service, for advice on ecological issues.</p>
Recreation and tourism	
<p>Any development would be at odds with Unitary Development Plan policies CPZ1 (Coastal Planning Zone) & CPZ4 (Coastal Park), which seek to restrict development in coastal locations and preclude development which would harm existing informal recreational uses, public access or the quiet enjoyment of the Coastal Park. Residential development could result in increased pressure on a quiet and natural part of the coast. If the site is to be developed it should be phased from the east first (National Trust).</p> <p>The proposed site is important to many users and for a range of recreation and leisure activities, including walking (Sefton Coastal Footpath, public Rights of Way and permissive routes, part of wider network). Loss of these recreational opportunities would be detrimental to the community. (Formby Civic Society and others).</p> <p>This site is adjacent to two public rights of way and has another which runs through it. The openness of the site and this part of the Green Belt is imperative to the character of the area from both the public rights of way and from trains passing the site. The use of the site for residential development would damage the recreational value of the area which is</p>	<p>If the site were to be developed, existing formal facilities such as Rights of Way and other paths would be retained and incorporated into green space provided as part of the development, so public access would be improved.</p>

Summary of comment – Formby South West (parcel S049)	Sefton's Response
enjoyed by many people.	
Loss of agricultural land	
Site has agricultural potential (CPRE). Development would impair the viability of Marsh Farm (one of only two Formby farms still producing asparagus) & lose its contribution to local food production (Formby Civic Society).	It is recognised that asparagus farming is uniquely part of the heritage of Formby and its surrounding area.
Other comments	
Not a sustainable location - site does not meet four of the Council's accessibility criteria (for example, not within 800 metres of a local centre). How were distances measured?	<p>Straight line distances were used. Site meets six of the ten accessibility criteria (for example it is within 5km of an employment area). However, these accessibility criteria were not part of the decision-making process in the draft Study.</p> <p>If it were proposed to take forward the site, more sophisticated mapping based on travel times would form part of the assessment of whether sites are in sustainable locations.</p>
Noise from the Altcar Training Camp to the south would be significantly detrimental to residents on this site.	Through planning policy and when considering planning applications, the Council aims to take account of amenity, and pollution and seek to maintain high environmental protection and management standards. This is in line with the standards for Building Regulations, and government guidance on sustainable development.
Site should not be developed. Planning permission for a golf course refused on appeal a decade ago – site should continue to be protected from development.	<p>While this past planning permission was refused (on appeal), the Council is now faced with a changed set of circumstances and hence a changed planning context.</p> <p>The Council must demonstrate at all times that a rolling 5 year supply of available and developable housing sites can be identified. This is now a challenging requirement, as many sites in the urban area have been developed over the past decade or more. The Council is not lightly proposing development in the Green Belt. We have always said that this is a last resort. But we are required to meet our identified future needs, and if the Council chooses Options Two or Three as its Preferred Option, this will</p>

Summary of comment – Formby South West (parcel S049)	Sefton's Response
	<p>require some development in the Green Belt.</p> <p>Through the Green Belt Study we have sought to identify those areas which will have least impact on the aims and purposes of land being included in the Green Belt; the Plan will determine the amount of land, and in which areas, this will take place.</p> <p>Government guidance requires the Council to review Green Belt boundaries only as part of its preparation of its Plan.</p>
<p>Archaeological assessments would be required. Formby is a Viking settlement, other archaeology includes the [Neolithic] footprints on the beach. Development could have a detrimental impact on Formby's heritage.</p>	<p>If it were proposed to take forward the site, appropriate surveys and assessments would need to be carried out, to determine its archaeological and heritage importance. This could, for example, restrict the area that would be potentially suitable for development.</p>

Formby South East and Little Altcar - parcels S048 (Land between Little Altcar & Formby Bypass/Liverpool Road) and S053 (Agricultural land between Altcar Lane & River Alt, Formby, including Loveday's Farm)



This chart shows the top 5 issues mentioned in this area against development in the Green Belt [as % of individual comments received for the area]

Note: the figures do not add to 100 as most people made several comments

Two thirds of respondents (67%) were concerned about flooding. 65% did not want to see the permanent, irreversible loss of the Green Belt and gaps between settlements. 45% of respondents were concerned about traffic congestion and access issues. The same number (45%) felt that empty homes should be brought back into use before Green Belt sites are developed, and 45% of respondents were concerned about the under-capacity or serious lack of services and infrastructure. Over a third of respondents (35%) were concerned about quality of life issues.

Summary of Comment Formby south east and Little Altcar (parcels S048 and S053)	Sefton's Response
Flood risk	
The proposed development sites and/or wider area are in a flood risk area or already flood, and so should not be developed. For example: <ul style="list-style-type: none"> • Surface water flooding and drainage problems (CPRE & others), • Low permeability of soil leading to possible surface water drainage problems, 	If the Council decides to choose an option that requires some Green Belt release, the draft Green Belt Study identified this as a site where some development could take place. If this site were to be taken forward, further work including about surface water flood risk) would be required to show that flooding issues have been

Summary of Comment Formby south east and Little Altcar (parcels S048 and S053)	Sefton's Response
<ul style="list-style-type: none"> • Area with high risk of flooding (Ince Blundell Parish Council and others), • Parcel S048 is subject to flooding (Formby Civic Society) • Concerns about reduced pumping capacity at Altmouth Pumping Station since its refurbishment, • The areas in Little Altcar by the River Alt put forward as possible development sites would not be suitable, as flood water drains to them. Development would increase the risk of flooding substantially (Little Altcar Parish Council). <p>Little Altcar Parish Council also concerned that the definition of 'flooding' has recently been changed so that 'surface water' is no longer recognised as an issue.</p>	<p>taken into account.</p> <p>The recent refurbishment of Altmouth Pumping Station has not reduced its effective pumping capacity.</p> <p>The definition of flooding has not changed recently, although the Environmental Agency have updated (in 2010 and 2011) their Flood Maps which show the extent of river and tidal flooding. This has led to changes in the areas shown as high and medium risk of flooding, for example to the east of the Formby Bypass. Recent surface water flood risk information includes Environment Agency maps and Sefton's Surface Water Management Plan.</p>
Protect the Green Belt – loss of essential gaps – Character of Formby And Little Altcar - Quality of life / well being - environment generally	
<p>Little Altcar Parish Council concerned that the “least-worst” Plan option would increase the number of homes in Little Altcar by almost 50%, the worst option by 1110 homes, replacing Little Altcar's green fields and farmland with new housing estates. 94% of Parish in Green Belt. “These proposals would mean quadrupling the number of households”.</p> <p>Little Altcar Parish Council believe that these proposals are undesirable, inappropriate and represent a substantial threat to the local environment and the quality of life of Little Altcar residents.</p> <p>The sites are essential to stop urban sprawl and should not be developed.</p> <p>For parcel S048, the area between Lunt's Lane and Liverpool Road should remain Green Belt to maintain the openness of the southern approach to Formby. However, development is acceptable on area south of Alt Road park and north of Lunt's Lane (Formby Civic Society</p>	<p>Option 1 would not involve release of land in the Green Belt, so development would be limited to sites within the urban area, and the Powerhouse site, which the Unitary Development Plan (2006) says is acceptable in principle . Options 2 and 3 would involve release of some land in the Green Belt.</p> <p>No decisions have been taken about whether development will take place on the Green Belt.</p> <p>The draft Green Belt Study states that both sites relate well to the urban area, for example in terms of the impact on the openness of the Green Belt in the area.</p> <p>If the Council decides to choose an option that requires some Green Belt release and these sites were to be taken forward, they would not create urban sprawl - the areas which have been identified as potential “developable areas” in the draft Green Belt</p>

Summary of Comment Formby south east and Little Altcar (parcels S048 and S053)	Sefton's Response
<p>and CPRE). The National Trust comment that if development on this site were to be considered further, would need to make sure that it would not result in a negative impact on the character and environment of Formby, especially in combination with any other proposed housing allocations.</p> <p>For parcel S053, Formby Civic Society oppose development beyond the OS SD 406 grid line, in order to preserve the openness of the southern approach to Formby, and to prevent excessive encroachment towards Hightown. The National Trust and CPRE object to development on S053. The site does not relate well to the urban areas - development would compromise the open character of the Green Belt (more so than the other sites identified for residential use in Formby). Due to the scale of proposed development, cumulative impacts with other proposals could have a significant impact on the environment and character of Formby.</p>	<p>Study would not reduce the gap so that nearby settlements merged.</p> <p>The Options paper states that developing in urban areas will remain a priority.</p> <p>If these sites within the Green Belt were to be taken forward for development, open space would be provided as part of the overall schemes. For parcel S048, the draft Green Belt Study also states that if the site were to be developed, the Alt Road park should be retained.</p>
Traffic – access, highway infrastructure and congestion, safety issues	
<p>The road network in and around Formby is already strained, and further development will make this worse, for example:</p> <ul style="list-style-type: none"> • Narrow, congested roads, traffic management problems on the Bypass and Formby area, • Development will increase Sefton's reputation as a commuter belt, thus adding more traffic to busy roads, • Access difficulties to parcel S048, in relation to existing roads,. • Increased traffic would make road/ pedestrian safety hazards worse, for example large numbers of children using/crossing Alt Road to get to playground – traffic calming may be needed, • Currently no vehicular rail-crossings within Little Altcar, so proposals to build near to Range High School [parcel S049] would create bottle-necks at the Ravenmeols Road crossing and the Duke Street roundabout. <p>(Little Altcar Parish Council and others).</p>	<p>The adequacy of the road network in and around Formby has been raised by a large number of respondents.</p> <p>If it were to be proposed that these sites were to be developed in the future, further work would be carried out to assess the capacity of the highway network and whether it needs to be improved. This would also identify any road and pedestrian safety issues.</p>

Summary of Comment Formby south east and Little Altcar (parcels S048 and S053)	Sefton's Response
If the new population will be elderly, job creation is less important than a robust public and private transport network.	The Council will raise public transport concerns with Merseytravel.
Nature	
<p>Concern about the impact on any development on ecology - flora and fauna; and through the potential loss of hedgerows, which should be prevented. More weight should be given to the importance of the local environment, and nature - sites contain unique flora and insect life as well as high bat, toad and even red squirrel populations (Little Altcar Parish Council).</p> <p>Object to proposed development on parcel S053 as it is an important grazing area for pink footed geese (which is listed as a reason for rejecting parcel S069 north of Crosby).(National Trust)</p>	<p>The Council has a difficult challenge to both protect and manage nature, and also provide homes and jobs. We have a legal duty to take account of biodiversity, and have recently approved an Ecological Framework which helps us to focus on protecting and enhancing key habitats and species, and creating new habitats. We will work with developers to help us do this.</p> <p>While none of the proposed sites are themselves protected by international, national or local nature conservation designations, pink-footed geese (if present here) are a species for which the Coast is internationally designated.</p> <p>If it were proposed to take forward these sites, appropriate surveys and assessments would need to be carried out (including for regarding pink-footed geese) to determine the ecological importance of the sites (including in relation to species important to the international sites). This could restrict the area that would be potentially suitable for development. There is a legal requirement for Habitats Regulations Assessment, Strategic Environmental Assessment and Sustainability Assessment of the Plan.</p> <p>The Council has asked its environmental advisors, the Merseyside Environmental Advisory Service, for advice on these issues.</p>
Employment land / industrial units do not guarantee jobs	
<p>Bringing new businesses into the area will add unhelpful competition to struggling shops and small traders.</p> <p>Business should be actively encouraged rather than just supported.</p>	Any extension to the north of the existing Formby Industrial Estate would be for office or industrial uses, and not town centre uses (retail / leisure / restaurants).

Summary of Comment Formby south east and Little Altcar (parcels S048 and S053)	Sefton's Response
<p>Empty shops in Formby would be revived from a reduction in council tax.</p> <p>Formby could be further developed with lower rent for businesses.</p> <p>Formby Trading Estate should be extended northwards to improve Sefton's competitiveness.</p>	<p>Neither rent reductions nor Council tax reduction are within the scope of the Core Strategy, and would need to be considered by the Council as part of its overall budgetary process.</p> <p>Rent levels are only within the Council's control where it is the landowner – this is not the case for much of Formby.</p>
Other issues	
<p>Little Altcar Parish Council consider that if social housing is dependent upon other properties being commercially successful, then unlikely that the housing market in Formby will support social housing provision - Formby has a static housing market with little prices fluctuation.</p>	<p>A more-detailed response to these issues is set to in Section Two of this Report.</p>

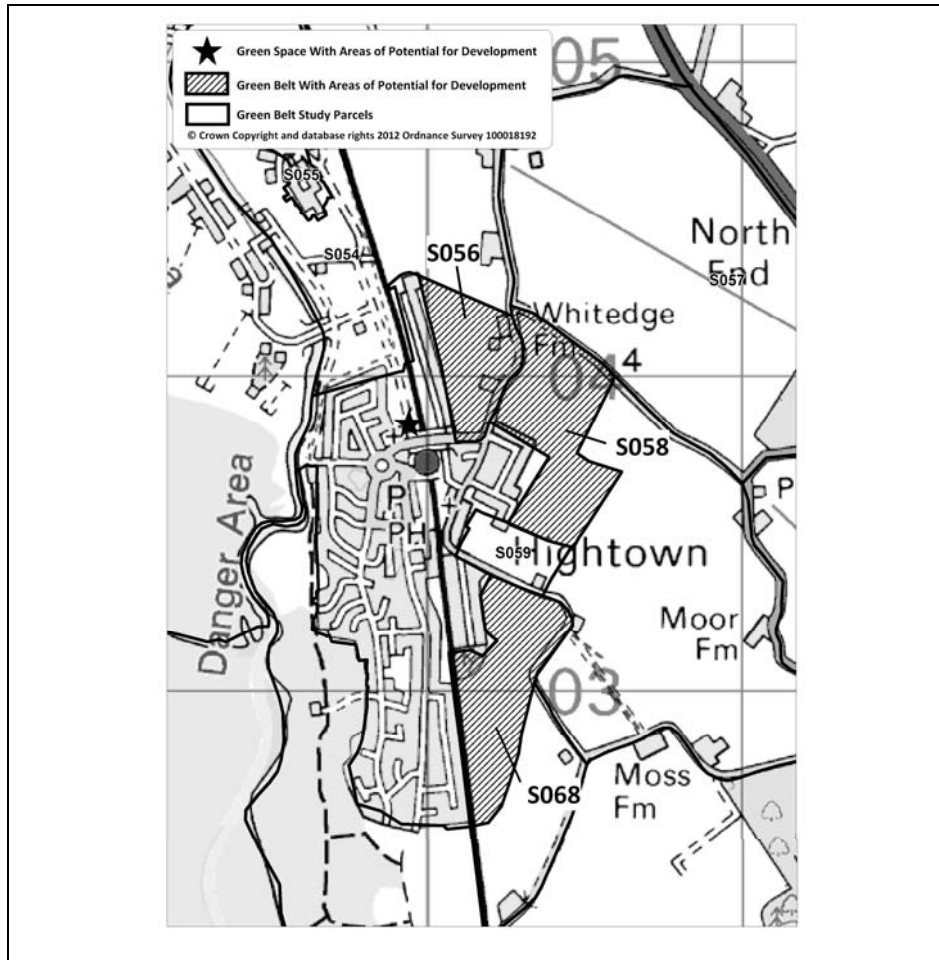
Ince Blundell – Green Belt parcels S060 (Land north of Ince Blundell & east of Formby bypass), S062 (Land between Ince Blundell & Formby Bypass) and S064 (Land east of Ince Blundell Village)

The draft Green Belt Study ruled out these parcels for possible development, stating that “The village lacks of facilities, is not well connected by public transport and is therefore not considered a suitable location for further development”. Nevertheless, some comments have been made about the parcels, and these are set out below.

Summary of Comment Ince Blundell (parcels S060, S062 and S064)	Sefton’s Response
<p>Development should not take place north of Ince Blundell (S060) as this would eliminate the gap between Ince Blundell and Formby.</p> <p>Parcel S060 should not be developed, for the reasons given in the draft Green Belt Study. Also it is grade two agricultural land which should not be used for development except in extreme circumstances (CPRE).</p>	<p>Although three areas were initially considered as being potentially suitable for development around the edge of Ince Blundell, this was subsequently not included in the Options paper, due to the lack of services and facilities which meant that Ince Blundell was not considered to be a sustainable location for further development.</p>
<p>Parcel S062 should not be developed, for the reasons given in the draft Green Belt Study (CPRE).</p>	
<p>The National Trust generally supports the decision to exclude development from around Ince Blundell, including parcels S060, S062 and S064.</p>	

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Objections to Green Belt Sites Hightown Area



This section of the Consultation Report looks at comments made to specific Green Belt sites [or parcels] in the Hightown area during consultation.

The Green Belt sites that were identified as having some potential for development in the Hightown area are shown in the map to the left.

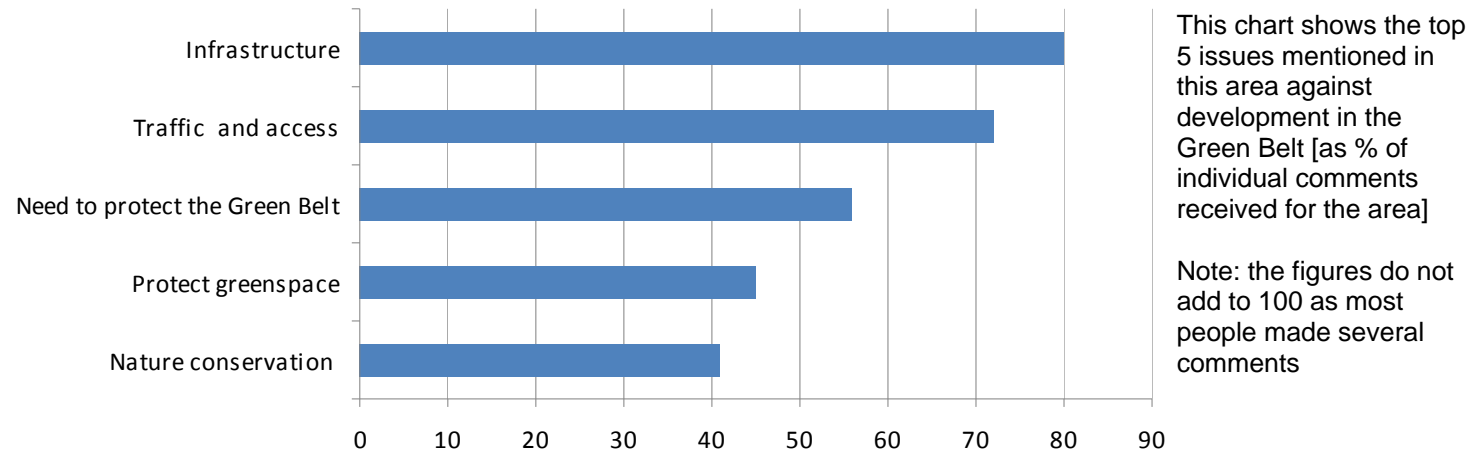
This section only includes comments that relate to Green Belt sites in Hightown. Other more general comments on Green Belt sites are set out earlier in this report e.g. agricultural land, flood risk, vacant homes.

This section includes separate tables for the following areas of Hightown

Hightown	S056, S058, S068
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Comments that relate to Kerslake Way [Range Road] Open Space are considered in Section six.

Hightown (S056, S058, S068)



The overwhelming majority of individual respondents (80%) expressed concern about the under-capacity or serious lack of services and infrastructure, especially the absence of schools but also lack of health services, shops, buses, shops and drainage (sewers). Traffic, congestion and access problems, to and within Hightown, was also a significant concern, for 72% of respondents. 56% of respondents felt that the Green Belt should not be developed and lost forever – the Green Belt protects small, unique [semi-]rural settlements such as Hightown against urban sprawl. 41% of respondents were concerned about the impact on local wildlife, especially given Hightown’s position on the Sefton Coast, next to sites of international and national nature conservation importance.

Summary of comment – Hightown (parcels S056,S058, S068)	Sefton’s Response
Impact on services + infrastructure – drainage / shops / schools at capacity / lack of health services	
Lack of/ inadequate services or infrastructure, and so Hightown is not an appropriate place for more development: <ul style="list-style-type: none"> Schools - there are no primary or secondary schools in Hightown. Currently children have difficulty getting places in schools in other settlements such as Formby and Crosby, 	The Council is required to prepare an Infrastructure Plan alongside the Plan, to show that the latter can be implemented. If it were to be proposed to take sites in this area forward for development, the infrastructure and related issues raised here will

Summary of comment – Hightown (parcels S056,S058, S068)	Sefton’s Response
<ul style="list-style-type: none"> • Health services (GP, dentists), shops, banks, services, facilities, amenities for children / young people, • Power, telephony, gas, local jobs, low water pressure, • Drainage (drains/sewers, foul sewers) already at full capacity. Foul sewer flooding / back flow of raw sewage /sewers blocked, for example in heavy rain. Effect on house and buildings insurance premiums. • Development to Hightown will placed added pressures on services to Formby & Crosby particularly the availability of school places. 	<p>be looked at again. There will be continuing talks with infrastructure and service providers, who include the Council’s education service; the health authority, United Utilities (water and sewers).</p>
Traffic – inadequate access, congestion, poor public transport accessibility, pollution	
<p>Only one (narrow & winding) main road in and out of Hightown, with dangerous junctions to other roads – congestion, emergency access especially if road blocked.</p> <p>Road network within Hightown could not cope with more traffic, e.g. congestion by station, junctions, heavy and large vehicles, cars, cyclists.</p> <p>Inadequate bus services, pedestrian safety issues.</p>	<p>The adequacy of the road network to and within Hightown has been raised by the majority of respondents. If it were to be proposed that land around Hightown is to be developed in the future, further work would be carried out to assess the capacity of the highway network and whether there is a need for any improvements to be carried out. This would also identify any road and pedestrian safety issues.</p> <p>The Council will raise public transport concerns with Merseytravel.</p>
Protect the Green Belt / will lead to urban sprawl / Once lost can’t be recovered - loss of essential gaps	
<p>Development will be against the Green Belt aim of stopping urban sprawl. Hightown would merge with Crosby to the south and Formby to the north and Ince Blundell to the east.</p> <p>The Green Belt around Hightown is the first barrier to the extension of the Liverpool conurbation. Without the Green Belt, Hightown, Formby, Ainsdale, Birkdale and Southport would have merged with Crosby, up to and around the Formby bypass, as characterless suburban sprawl. We do not want an urban sprawl from Southport to Liverpool.</p>	<p>This would not happen. The Options paper states that over 95% of our Green Belt would be retained under Options 2 and 3 to meet identified needs.</p> <p>The draft Green Belt Study does not propose that any of the main settlements would merge, and has identified ‘essential gaps’ between them which have to be kept open.</p>
<p>People buy houses in Hightown because of its sense of community, peace and quiet, low crime rates, rural character and surroundings, and</p>	<p>The Options paper indicated that development would not take place adjacent to any village such as Hightown unless we could</p>

Summary of comment – Hightown (parcels S056,S058, S068)	Sefton's Response
<p>quality of the surrounding landscape. Do not want the village to become urban sprawl. Unique character of the surroundings should be protected.</p> <p>Hightown has a rural atmosphere which should be preserved. If more development were allowed it would lose its character and individuality.</p>	<p>not identify sufficient land to meet our needs on the edge of the main urban areas. It also stated that if development were proposed in any village, it would not be out of proportion with the size of the existing village. The Council consulted on a number of sites around the edge of Hightown in order to learn whether there were any sites were more suitable for development than others.</p>
<p>No defensible boundaries to parcel S058 – any development would lead to incremental creep in the future.</p>	<p>If any site within the Green Belt were to be taken forward for development, a landscaped buffer could be provided at the edge of the development which would provide a clear boundary.</p>
<p>The Council for the Protection of Rural England (Sefton District Group) consider that for parcel S068 (Land between Hightown & Gorsey Lane & Sandy Lane) development should be restricted to the area north of the playing fields, in order to maintain the 'Essential Gap' between Hightown and Crosby.</p>	<p>Noted. The areas which have been identified as potential “developable areas” in the draft Green Belt Study would not reduce the gap so that nearby settlements merged.</p>
Nature	
<p>Development of the proposed sites near Hightown would damage the unique and outstanding ecologies of the coast. These coastal sites are protected by international, national and local nature conservation designations.</p> <p>The proposed development sites and/or wider area are valued and important habitats for wildlife - flora and fauna – which should not be lost. For example Natterjack toads and sand lizards, birds, such as owls, geese, and mammals such as red squirrels, foxes, hares, hedgehogs and other native British wildlife.</p> <p>Need accurate and meaningful habitat surveys/ Environmental Impact Assessments at the earliest stage.</p>	<p>Noted. The Council has a difficult challenge to both protect and manage nature, and also provide homes and jobs. We have a legal duty to take account of biodiversity, and have recently approved an Ecological Framework which helps us to focus on protecting and enhancing key habitats and species, and creating new habitats. We will work with developers to help us do this.</p> <p>If it were proposed to take forward these sites, appropriate surveys and assessments would need to be carried out, to determine the ecological importance of these sites. This could restrict the area that would be potentially suitable for development.</p> <p>There is a legal requirement for Habitats Regulations Assessment, Strategic Environmental Assessment and Sustainability Assessment of the Plan.</p>

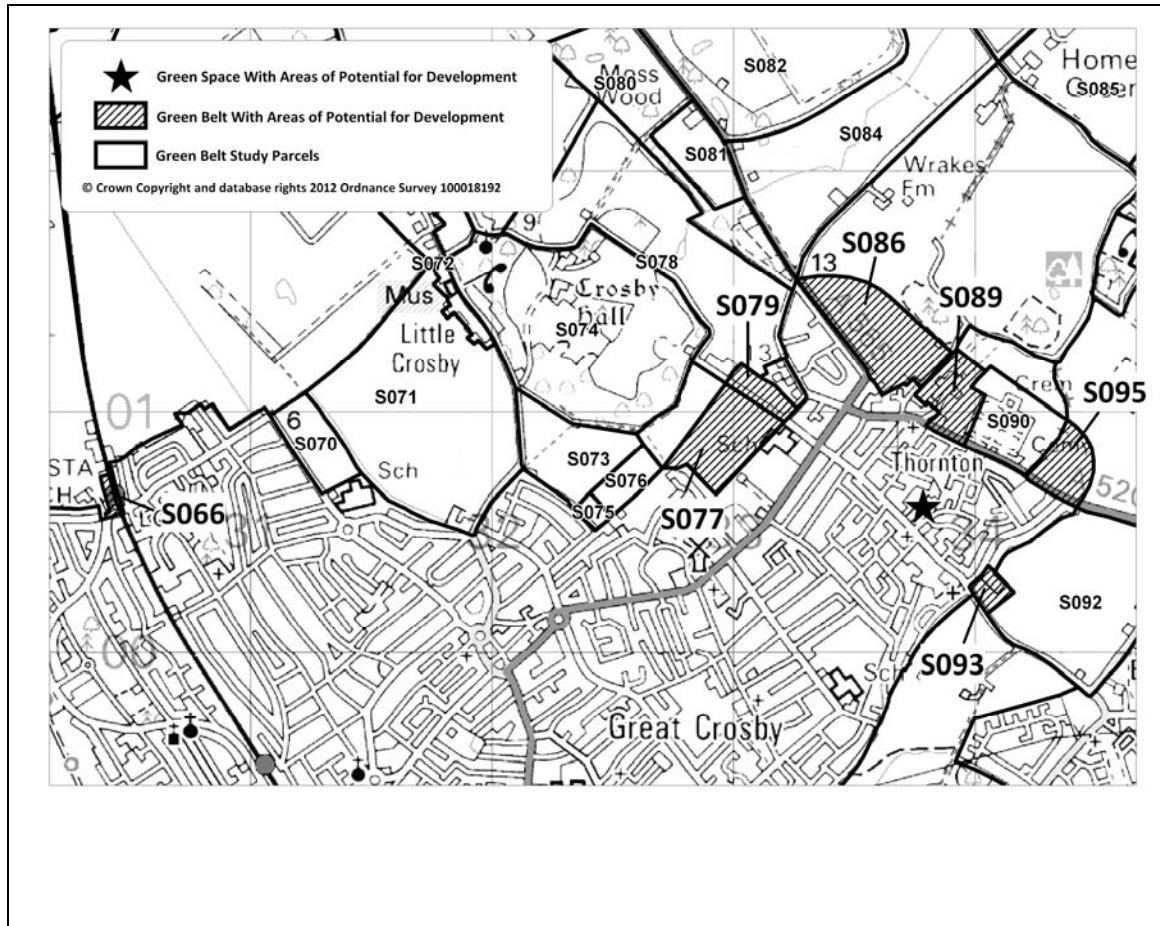
Summary of comment – Hightown (parcels S056,S058, S068)	Sefton's Response
<p>The Royal Society for the Protection of Birds (RSPB) consider that the sites around Hightown (S056, S058, S068) are within or near to the NW's regional farmland bird hotspot and should not be released from the Green Belt. Supports important populations of declining farmland birds, such as corn bunting, lapwing, grey partridge and tree sparrow — all UK Biodiversity Action Plan (BAP) species. Retention of the sites as Green Belt increases opportunities for positive management for these species (including grant availability).</p>	<p>Further discussions are needed with the RSPB to understand whether it is possible to do anything to compensate for the loss of these areas.</p>
<p>Disproportionate to the size / character of the settlement/already at capacity</p>	
<p>If any sites are brought forward, Sefton Council should commit to development not being more than 10% above the existing number of homes in Hightown.</p> <p>Hightown Parish Council summarise briefly the conclusions of a public meeting held on 6 June 2011. Residents felt that because of the unusual geography of the area any extension would act adversely on the community spirit in the village.</p>	<p>No decisions have yet been taken about whether any development will take place in the Green Belt (depending on which Option is identified as the Core Strategy's Preferred Option). Any new development would be similar in character to the existing settlement.</p>
<p>Impact on Historic Environment</p>	
<p>Much of Hightown was built in 1922 by the same developer in a unique style. Buildings built out of keeping with this style will ruin an architecturally unique area in Merseyside and the North West.</p>	<p>Through planning policy and when considering planning applications, the Council will aim to make sure that the design of new development is sympathetic to the character of the surroundings and is high quality. This is an essential part of sustainable development.</p>
<p>Impact on the environment generally</p>	
<p>More traffic and other noise and vibration, air pollution and other loss of residential amenity during construction and after any development.</p>	<p>A certain amount of noise and disturbance is inevitable during development.</p>

Summary of comment – Hightown (parcels S056,S058, S068)	Sefton's Response
Recreation / tourism	
<p>The proposed sites and/or wider area are important for a range of recreation and leisure activities, including walking and cycling (links to the Coastal Path) formal recreation (football, cricket, rugby etc), and children's play and horse-riding. Development will lead to an unacceptable loss of green space which is valued by the local community.</p>	<p>Noted. If sites were to be developed, existing formal facilities such as Rights of Way, other paths, and pitches would be incorporated into green space provided as part of the development.</p>
<p>Greater use of green spaces in Hightown should be encouraged. Should seek to increase, not eliminate, greenspace in and around the village</p>	<p>The Council and partners (e.g. Merseytravel) encourage use of public green space, and outdoor recreation such as cycling and walking, e.g. Coast Path leaflets.</p>
<p>The Council for the Protection of Rural England (Sefton District Group) consider that for parcel S059 (Land north of Sandy Lane, Hightown), the area to the north of Rose Cottage is detached from the built up area and should not be developed in isolation, so the parcel is not suitable for development. If it was to be developed, the sports club would need to be re-located, and the setting of Rose Cottage would need to be preserved.</p>	<p>Noted.</p>
Area prone to flooding and coastal erosion	
<p>The proposed development site and/or wider area is in a flood risk area or already floods, and so should not be developed. Has a risk assessment been carried out? Risk likely to get worse with climate change and rising sea levels. New hard-surfacing linked to development will also increase flood risk. For example:</p> <ul style="list-style-type: none"> • Area with 1 in 100 / 1 in 200 risk of river/ tidal flooding, fields around Hightown flood or are waterlogged frequently, notably much of the land to the east of the railway • Drainage ditches along fields and roads often full to capacity • Close to the river Alt and its surrounding entrance area into the Irish Sea, reduced pumping capacity at Altmouth Pumping Station • Below sea level (concern over standard of sea defences). Coastal 	<p>If these sites were to be taken forward, further work including about surface water flood risk) would be required to show that flooding issues have been taken into account.</p> <p>The recent refurbishment of Altmouth Pumping Station has not reduced its effective pumping capacity.</p> <p>Whilst there is erosion risk within 100 years, this is currently being managed by the recent dune restoration works.</p>

Summary of comment – Hightown (parcels S056,S058, S068)	Sefton's Response
<p>changes impact on sites in Hightown (coastal erosion, dune accretion etc). [Hightown Parish Council and others]</p> <ul style="list-style-type: none"> • Flooding of United Utilities storm and sewer drains. 	
<p>Increased sewage and drainage problems will affect house and buildings insurance premiums. Hightown is considered high risk for insurance purposes.</p>	<p>The Council follows government guidance and, together with the Environment Agency and United Utilities, manages flood risk. The government and the insurance industry are working to resolve issues of premiums in higher flood risk areas.</p>
Empty homes / vacant properties / number of houses for sale - Use sites in the urban area / brownfield sites	
<p>Development to Hightown will prejudice the regeneration projects and aims in the south of the Borough.</p>	<p>The Options paper states that the regeneration of Bootle, and the re-use of brownfield land and buildings, will be priorities for the Core Strategy.</p>

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Objections to Green Belt Sites Crosby and Thornton Area



This section of the Consultation Report looks at comments made to specific Green Belt sites [or parcels] in the Crosby and Thornton area during consultation.

The Green Belt sites that were identified as having some potential for development in the Crosby and Thornton area are shown in the map to the left.

This section only includes comments that relate to Green Belt sites in Crosby and Thornton. Other more general comments on Green Belt sites are set out earlier in this report e.g. agricultural land, flood risk, vacant homes.

This section includes separate tables for the following areas of Crosby and Thornton.

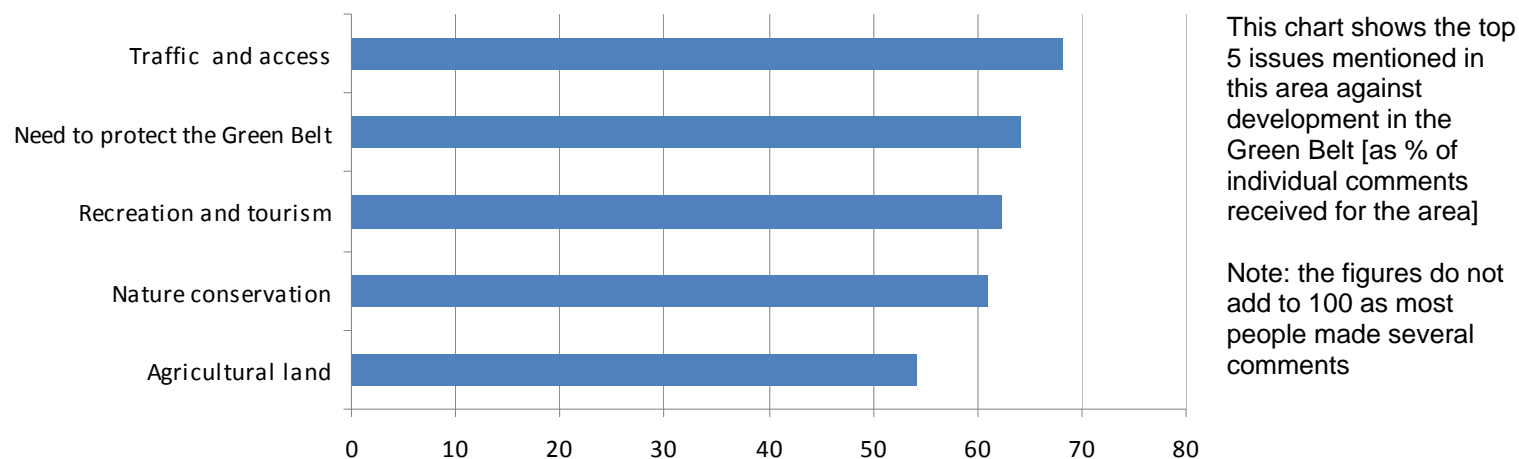
Crosby overall	No parcel specified
Hall Road	parcels S066
Crosby Moor Park	parcels S077, S079
Thornton	parcels S086, S089, S095

Comment on Crosby generally

Summary of Comment	Sefton's Response
<p>The Council has to accept that Crosby will not grow much more in size: it is a village, and perhaps has reached its natural size. It should not be allowed to encroach into open countryside towards Little Crosby. Development will be a "blot on the landscape". Thornton has already become part of Crosby, and does not bear any resemblance to the village it originally was.</p>	<p>If any further expansion of Crosby is proposed through the Core Strategy, the Council will seek to ensure that any areas that are developed have the least impact on the openness and extent of the Green Belt.</p>

Crosby Moor Park (S077, S078)

In addition to the individual comments that relate to this area a petition was also submitted signed by 1922 local residents. This stated that the residents opposed any proposals to build on Green Belt Land and the preservation of Little Crosby and Crosby/Thornton farmland. This also included reference to the need to retain access to the countryside, climate change, traffic and flood risk.



Most individual respondents (68%) were concerned about an increase in traffic, and the ability of the current road network to cope. 64% of respondents felt that the Green Belt should not be developed, as the land would be lost forever to development. Similar numbers (62%) were concerned about the loss of recreation and leisure opportunities and the harm to wildlife (for example pink-footed geese, red squirrels). Just over half of respondents (54%) believed that the loss of high quality agricultural land was not worth sacrificing for additional housing development. 42% of people feel that development would harm the environment generally. 40% of respondents thought that empty homes should be brought back into use before development in the Green Belt is even considered.

Summary of comment in Crosby Moor Park area (parcels S077, S078)	Sefton's Response
Traffic – inadequate access, congestion, poor public transport accessibility, pollution	
<p>The road network around Crosby is already strained, and further development will make this worse, for example:</p> <ul style="list-style-type: none"> • Widening of Virgin's Lane and resulting increase of traffic through Little Crosby • More pressures on Moor Lane area • Greater congestion around Holy Family High School – traffic from new development plus existing school traffic • The Thornton-Switch Island Link road will not help as traffic will still travel locally, for example from Southport to Crosby, Bootle and north Liverpool. <p>Increased air pollution linked to increased vehicle use. Area not well served by public transport.</p>	<p>The adequacy of the road network in and around Crosby has been raised by the majority of respondents.</p> <ul style="list-style-type: none"> • If land around Moor Park were proposed for development in the future, further work would be carried out to assess the capacity of the highway network and whether it needs to be improved. • This would cover implications of the Thornton-Switch Island Link road. • It would also identify any road and pedestrian safety and air pollution issues. <p>There will be continuing talks between the Council and Merseytravel about public transport issues.</p>
<p>The gap between Great Crosby, Little Crosby and Thornton and between Thornton and Crosby must be retained. This valuable farmland provides an essential gap between the two settlements. To build on the land would leave an inadequately small band between settlements. The gap is visually small and should be retained in its entirety. If the open ground between Moor Lane and the wall of the Little Crosby Estate can thus be reduced by more than two thirds at a stroke, what confidence can we have that the rest might not follow? The merger "gap" between the village of Little Crosby with neighbouring Crosby / Thornton is reduced to a bare 80 meters in width whereas the comparable Rimrose Valley Country Park merger gap is maintained at 210 meters minimum width. What is the difference between these two areas – why is one "essential" and the other not? The gap should be maintained at a minimum distance of 210 metres to comply with Government advice in PPG2 [Bill Esterson MP]</p>	<p>It is agreed that the area in the Green Belt between the northern edge of Crosby (Moor Park and Little Crosby village) is one of the narrowest parts of Sefton's Green Belt, with the narrowest part (along Little Crosby Road) being only about 530 metres wide. However, in terms of how it was assessed within the Green Belt study, the Council takes the view that the walled area of Crosby Hall should not be included in this calculation because the enclosed park area retains the open character of the Green Belt. It is therefore not considered to be part of the settlement for the purposes of including land in the Green Belt contained in national planning policy and the draft Green Belt Study. This is why the draft Green Belt Study says this area is only partly within an 'essential gap.'</p>

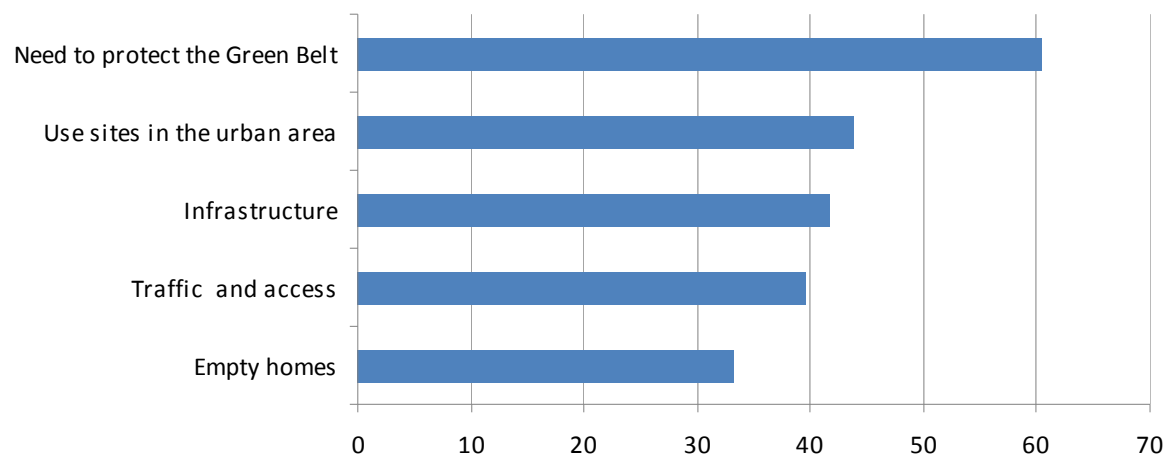
Summary of comment in Crosby Moor Park area (parcels S077, S078)	Sefton's Response
<p>The narrow strip left undeveloped between Little Crosby and Moor Lane (S077 and S078) would be a relatively gloomy place, of little use for cultivation and therefore overgrown and relished only by fly-tippers. Deleting the last open ground between Thornton and Crosby would turn a charming rural view into an unbroken characterless suburban sprawl, and should be quietly and prudently discarded as soon as possible. This is arbitrary development to meet a need that has not been properly researched.</p> <p>Developing S077 and S078 (land to the west and east of Virgin's Lane, Crosby) would effectively eradicate any strategic and essential gap between the settlements of Little Crosby and Crosby / Thornton forever.</p>	<p>Because the Crosby Hall parkland (Green Belt parcel S074) has been identified as an "essential gap", under the Green Belt Study methodology, we consider that the conclusion that the areas on either side of Virgin's Lane were only partly within an "essential gap" is justified.</p> <p>The Council cannot agree with the assertion that if land at Virgin's Lane is developed, the remaining area would no longer be cultivated or used for some other beneficial purpose, and would be prone to fly-tipping.</p>
Recreation / tourism	
<p>The proposed sites and/or wider area are important for a range of recreation and leisure activities, including walking (notably path next to Crosby Hall Wall, and wider loop from Chestnut Avenue to Virgins Lane) and cycling,</p> <p>Loss of access to open countryside,</p> <p>Development will lead to an unacceptable loss of green space which is valued by the local community.</p>	<p>Noted. If sites were to be developed, existing formal facilities such as Rights of Way, other paths, and pitches would be incorporated into green space provided as part of the development.</p>
Nature	
<p>Impact on flora, fauna and protected species as a result of development. Species cited include red squirrels, pink footed geese, great crested newt (in a shared pond fenced off from the rears of Nos 28 & 30 Chestnut Avenue), bat species to woodland areas.</p>	<p>Noted. The Council has a difficult challenge to both protect and manage nature, and also provide homes and jobs. We have a legal duty to take account of biodiversity, and have recently approved an Ecological Framework which helps us to focus on protecting and</p>

Summary of comment in Crosby Moor Park area (parcels S077, S078)	Sefton's Response
<p>Loss of hedgerows</p> <p>Concern over impact of development on Crosby Hall Local Wildlife Site.</p> <p>Environmental Impact Assessment needed to identify whether the need for development would outweigh the ecological/environmental benefits of sites.</p>	<p>enhancing key habitats and species, and creating new habitats. We will work with developers to help us do this.</p> <p>The Crosby Hall area is a key habitat in the Ecological Framework.</p> <p>If it were proposed to take forward these sites, appropriate surveys and assessments would need to be carried out, to determine the ecological importance of these sites. This could restrict the area that would be potentially suitable for development. There is a legal requirement for Habitats Regulations Assessment, Strategic Environmental Assessment and Sustainability Assessment of the Plan.</p> <p>The Council has asked its environmental advisors, the Merseyside Environmental Advisory Service, for advice on these issues.</p>
Impact on the environment generally	
<p>High density/character of development will be at odds with prevailing character of area.</p>	<p>This would be taken into account if these sites were to be taken forward for development.</p>
Impact on the historic environment	
<p>Building a new development immediately adjacent to Little Crosby Village and Hall is entirely unsympathetic to the historic nature and character of the area. Little Crosby Village and Hall consist of two adjoining Conservation Areas but must be regarded as the one single settlement. Future development on the sites would have a detrimental impact on the character of these important Conservation Areas. A gap between these two conservation areas and the built-up area of Crosby/Thornton needs to be maintained to protect the historic, rural setting of these areas. The area contains many other sites of historic significance. It is questioned if these heritage assets</p>	<p>The rural setting and wider rural context to Crosby Hall is important to its character. The Green Belt Study recognised that the land around the Hall provides a setting – further work to establish the nature of its significance would be needed before development in this area is considered further.</p> <p>Agree that development immediately adjacent to the Crosby Hall Conservation Area would be detrimental.</p> <p>The Crosby Hall estate and the Village have an historic</p>

Summary of comment in Crosby Moor Park area (parcels S077, S078)	Sefton's Response
<p>and their setting have been taken into consideration in the identification of these sites.</p>	<p>interrelationship. However the built form of the two areas is distinctly different. This has led to their status being regarded as differing in the broad assessment which has taken place thus far.</p> <p>Reduction of the gap between Crosby Hall and the settlement of Crosby/Thornton would result in a level of harm to the setting and context of the historic Crosby Hall estate. It is acknowledged that a detailed assessment of the setting of Little Crosby Hall and its grounds would be required before development in this area is considered further.</p>
<p>The proposed development will be completely out of character with Moor Park Conservation Area. Development should not ruin the setting of the conservation area or connect the conservation area to Little Crosby. New development adjacent to a conservation area, which would have a more permissive regime for planning consents, would compromise the integrity of the Conservation Area.</p>	<p>Moor Park has a strong suburban character. It was originally developed in open countryside, but was very quickly surrounded by the expansion of Crosby. The open countryside setting to the north of the area is beneficial to the area's attractiveness and open views across the cricket grounds to the wider area are recognised as having particular value. The development of Green Belt parcel S077 would have some impact on the Moor Park conservation area's character. Further assessment would be required to determine whether any development proposals would unduly harm the Moor Park [and Little Crosby] Conservation Areas</p>
<p>Adopted Supplementary Planning Guidance (SPG) Landscape Character Assessment of Sefton (2003) should form part of the evidence base for the Core Strategy and therefore the Green Belt Study.</p>	<p>The methodology to assess sites for development potential was developed in conjunction with the Local Authority Conservation Officer.</p>
<p>Gap between towns, character of the area, environment generally, loss of views</p>	
<p>Development would erode the separation between Little Crosby and Crosby/Thornton.</p> <p>Impact on character of the existing settlement.</p>	<p>The areas which have been identified as potential "developable areas" in the draft Green Belt Study would not reduce the gap to the extent that nearby settlements merge.</p> <p>Through planning policy and when considering planning</p>

Summary of comment in Crosby Moor Park area (parcels S077, S078)	Sefton's Response
<p>If houses are built to the scale and form of neighbouring properties (as stated within the consultation process), this will result in large scale executive properties, not the smaller or more affordable homes that are needed.</p> <p>Higher density homes would be out of character with the surrounding area.</p>	<p>applications, the Council aims to make sure that the design of new development is sympathetic to the character of the surroundings and is high quality. This is an essential part of sustainable development.</p>
<p>Would result in large scale removal and selling off of valuable topsoil (based on past local experience), and its replacement with hard-core more usually imported free (or free of tipping charges). Traffic, disturbance and environmental concerns about this.</p>	<p>Through planning policy and when considering planning applications, the Council takes account of amenity, and pollution and seeks to maintain high environmental protection and management standards.</p>
Flood risk and drainage infrastructure	
<p>The proposed development site and/or wider area already floods, and so should not be developed. Insufficient information presented by the Council to support development to these sites. New hard-surfacing linked to development will also increase flood risk. For example:</p> <ul style="list-style-type: none"> • Low lying site / high water table / land unsuitable for soak-away drains, • Lane / “regular flood problems” in and around Brook Road, Ince Road, Virgin’s Lane / to the east side of Virgin’s, • Sewers already at capacity / blocked gullies. • Existing or previous ponds or streams. 	<p>If this site were to be taken forward, further work (including about surface water flood risk) would be required to show that flooding issues have been taken into account.</p>

Thornton (North) (S086, S089, S095)



This chart shows the top 5 issues mentioned in this area against development in the Green Belt [as % of individual comments received for the area]

Note: the figures do not add to 100 as most people made several comments

The greatest concern – to 60% of respondents - is the permanent loss of Green Belt to development, and the associated urban sprawl. Linked to this, there was strong feeling that brownfield sites (44% of respondents) or empty homes (33%) should be developed before Green Belt sites are considered (for example on the former ‘Z’ blocks site in Netherton). 41% of respondents felt that infrastructure and services within Thornton and Crosby (such as schools, health and recreation facilities and shops) cannot cope with the pressure from more development, and 40% felt that local roads could not cope.

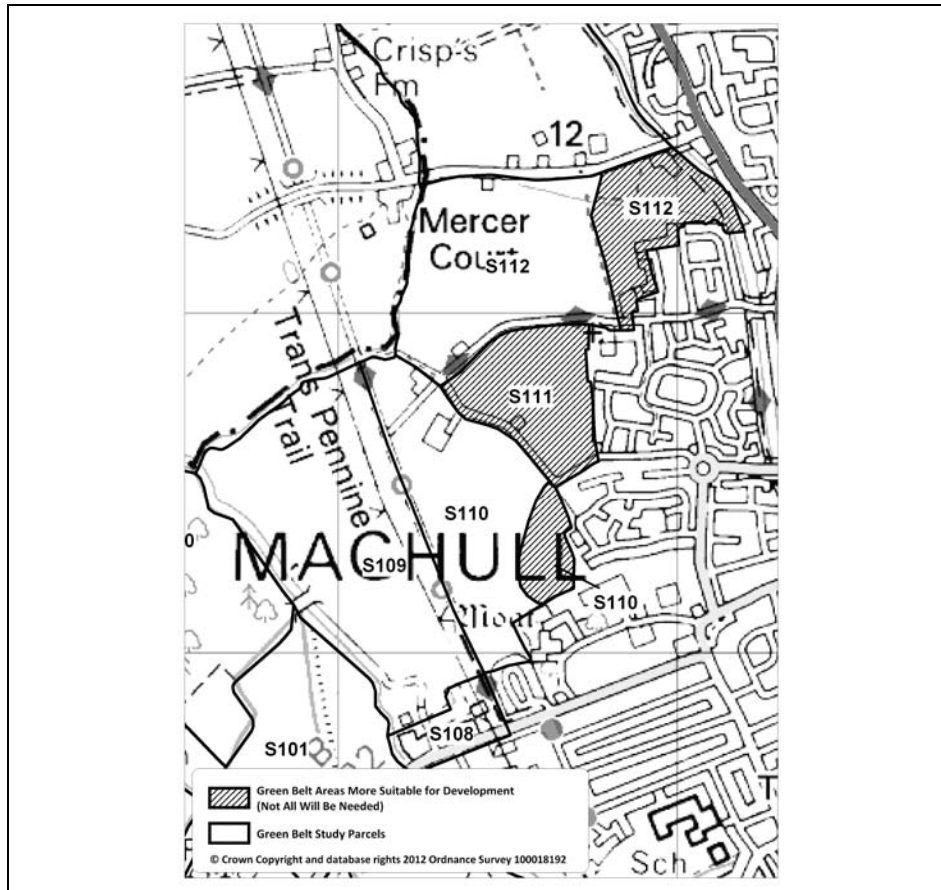
Summary of Green Belt Comment - Thornton (north) (parcels S086, S089, S095)	Sefton’s Response
Protect the Green Belt / will lead to urban sprawl / Once lost can’t be recovered	
Loss of land around the cemetery is short sighted; demand for plots is not going to go away,	No decisions have been taken about whether development will take place on the Green Belt. However, the Options paper suggests that this would be necessary if Sefton is to meet its future housing and employment needs, or decides to stabilise its population. The Options paper states that developing in urban areas will remain a

Summary of Green Belt Comment - Thornton (north) (parcels S086, S089, S095)	Sefton's Response
	priority.
When the Thornton – Switch Island Link road was proposed, local residents were assured that there would be no development between Southport Road and the new Link road (indeed that it would be planted to reduce noise).	The draft Green Belt Study was not able to take account of the road line in determining how much land could be released in the Green Belt in this area. If the Core Strategy requires land in this area to be developed and the Thornton to Switch Island Link has been built, the Council would take the road line into account in deciding whether more or less land in this area should be released from the Green Belt.
Green Belt parcels S086 + S089 (NE of Thornton) are the only open areas between Thornton and the centre of Liverpool	The Council agrees that land in the Green Belt on the edge of Thornton and Crosby are the first Green Belt areas north of the main 'Liverpool' urban area. However, on its own, this is not sufficient reason to rule any out of consideration as potential areas that could be developed if required. Other factors relating to how the use and character of the land contributes to the purposes of including land in the Green Belt (set out above) will be used to decide whether any are appropriate.
Impact on services + infrastructure – drainage / shops / schools at capacity / lack of health services	
Services within Crosby / Thornton cannot cope with greater numbers. Existing pressure on educational, recreational, retail, health etc facilities.	The Council is required to prepare an Infrastructure Plan alongside the development plan, to show that the latter can be implemented. The infrastructure and related issues raised here will be looked at again. There will be continuing talks with infrastructure and service providers, who include the Council's education service; the health authority, United Utilities (water and sewers).
Traffic – inadequate access, congestion, poor public transport accessibility, pollution	
Development in Thornton will negate any benefits that the Switch Island link road/Thornton relief road would bring to the area. Roads cannot accommodate even existing levels of traffic	If it were proposed to develop land around Thornton in the future, further work would be carried out to assess the capacity of the highway network in the area, and whether it needs to be improved. This would cover implications of the Thornton-Switch Island Link road. It would also identify any road and pedestrian safety and air

Summary of Green Belt Comment - Thornton (north) (parcels S086, S089, S095)	Sefton's Response
<p>Access issues on to country lanes – unable to support large volumes of traffic</p> <p>Increased noise and air pollution arising from increased vehicle trips.</p>	<p>pollution issues.</p>
Loss of agricultural land	
<p>Particular concern about parcel S086 (Southport Road),</p>	<p>The draft Green Belt Study indicates that about 30% of the agricultural land in Sefton is classed as the 'best and most versatile' agricultural land which should be protected where there are choices. Most of the agricultural land in the area north of Thornton falls within this classification. Further work will be undertaken to find out the impact of development on the agricultural economy and individual farms.</p> <p>The Government's view is that the UK is largely self-sufficient in terms of food security. It does not suggest that individual boroughs should be self-sufficient.</p>
Impact on character and size of Thornton, quality of life and environment generally	
<p>Development around Thornton Parish will destroy the character of the area.</p> <p>Thornton will be consumed by Crosby.</p> <p>If houses are built to the scale and form of neighbouring properties (as stated within the consultation process), this will result in large scale executive properties, not the smaller or more affordable homes that are needed.</p> <p>Development around Thornton Cemetery will harm the tranquillity and amenity of this site, to the detriment of the wider community.</p>	<p>Through planning policy and when considering planning applications, the Council aims to make sure that the design of new development is sympathetic to the character of the surroundings and is high quality. This is an essential part of sustainable development, in line with government guidance and Building Regulations.</p> <p>If development were to go ahead, the Council would make sure that the tranquillity of Thornton Cemetery would be protected.</p>

Summary of Green Belt Comment - Thornton (north) (parcels S086, S089, S095)	Sefton's Response
Area prone to flood risk	
<p>Inadequate drainage infrastructure in the area already. Existing properties already flood. Further development will make these existing problems worse and so should not take place.</p> <p>Parcel S078 (Virgin's Lane) is around 10ft lower than Virgin's Lane. Past attempts to raise land level have failed due to poor drainage, and flooding. So parcel S078 is unsuitable for development.</p>	<p>If this site were to be taken forward for development, further work including about surface water flood risk) would be required to show that flooding issues have been taken into account.</p>

Objections to Green Belt Sites Maghull West Area



This section of the Consultation Report looks at comments made to specific Green Belt sites [or parcels] in the Maghull West area during consultation.

The Green Belt sites that were identified as having some potential for development in the Maghull West area are shown in the map to the left.

This section only includes comments that relate to Green Belt sites in Maghull West. Other more general comments on Green Belt sites are set out earlier in this report e.g. agricultural land, flood risk, vacant homes.

This section includes separate tables for the following areas of Maghull West

Maghull West	S110, S111, S112
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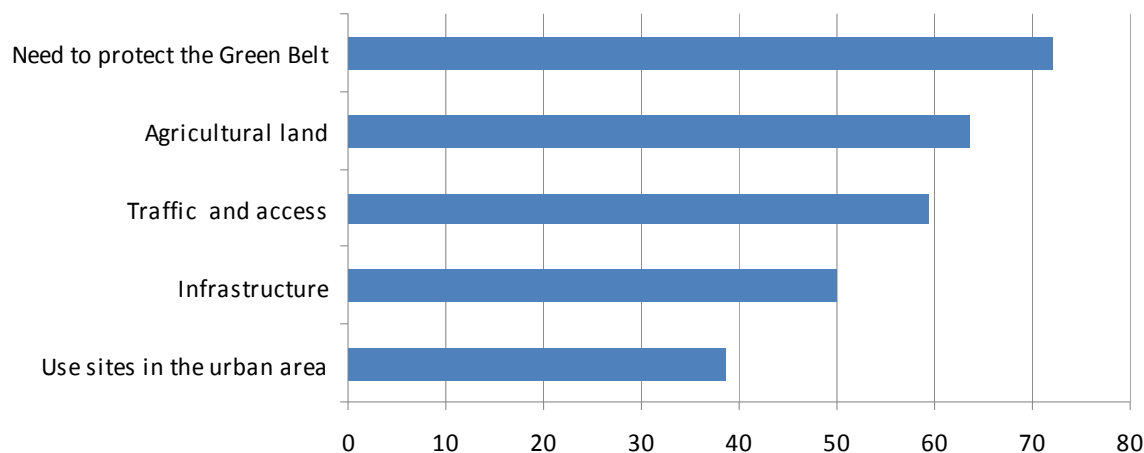
Sefton East Parishes Generally [Maghull, Lydiate, Melling and Aintree Area]

Across Sefton East Parishes, the over-whelming majority of comments were about the need to protect the Green Belt, including its openness, and to stop urban sprawl. People who responded to the consultation were generally concerned that the Council's proposals would lead to the various towns and villages in the area merging. They consider that these separate communities are what makes this part of Sefton distinctive from the rest of the area. Perhaps linked to this, many respondents felt that we should use sites in the urban areas and brownfield sites, rather than Green Belt land.

Loss of agricultural land was also a major concern (the second highest) across Sefton East Parishes - except in Aintree, Maghull East and Melling. In Aintree and Maghull East, access, traffic congestion and safety issues were the second-highest concern. They were also significant concerns in the rest of Sefton East Parishes. In Melling, the impact development would have on local services and facilities, and capacity concerns, were the second-highest issue raised. This includes services and facilities such as schools, health services, shops and drainage and sewerage infrastructure. Again, this was an important issue across most of the Sefton East area.

Quality of life was an important issue in Maghull East and Melling, and both flood risk and the view that the village is already at capacity were local concerns in Aintree.

Maghull West (Green Belt parcels S110, S111, S112)



This chart shows the top 5 issues mentioned in this area against development in the Green Belt [as % of individual comments received for the area]

Note: the figures do not add to 100 as most people made several comments

As well as individual responses, there were two petitions (containing 1367 and 422 signatures) opposing development in this part of the Green Belt, and one petition (containing 428 signatures) opposed to the loss of any Grade 1 or 2 agricultural land in the Maghull, Lydiate and Molyneux areas.

Over 70% of the individual respondents stated that the Green Belt should not be developed as this would lead to urban sprawl or because the loss of the Green Belt was irreversible. The next three most common reasons, mentioned by the majority of respondents were the loss of agricultural land (64%), traffic issues and poor access (60%), and the impact development would have on local services and facilities (50%). About a third of all respondents felt that we should use sites in the urban areas and brownfield sites (39%), or that we should re-use empty homes and vacant properties and pointed out the large number of houses for sale (33%).

Summary of representation- Maghull West (parcels S110, S111, S112)	Sefton's Response
Protect agricultural land - once lost can't be recovered / food security / use land in non-agricultural use	
Loss of agricultural land.	<p>The draft Green Belt Study indicates that about 30% of the agricultural land in Sefton is classed as the 'best and most versatile' agricultural land which should be protected where there are choices. Most of the area covered by these sites fall within this classification. Further work will be undertaken to find out the impact of development on the agricultural economy and individual farms.</p> <p>The Government's view is that the UK is largely self- sufficient in terms of food security. It is not necessary for individual boroughs to be self-sufficient.</p>
Traffic - inadequate access, congestion, poor public transport accessibility, pollution	
<p>The road network in the Maghull area is already strained and congested, and further development will make this worse, for example:</p> <ul style="list-style-type: none"> • Narrow, congested roads and lanes, narrow pavements on-street parking including near schools, • Safety issues from increased traffic where our children go to school & 	<p>The Council acknowledges that there are highway network issues in this area, including the narrow canal bridges, and congestion associated with the two primary schools located on Green Lane. Due to long term highway concerns, the Council intends to carry out some detailed transport modelling in Maghull and Formby. If this site were</p>

Summary of representation- Maghull West (parcels S110, S111, S112)	Sefton's Response
<p>play,</p> <ul style="list-style-type: none"> • “Woefully inadequate” canal crossings (Bells Lane and Green Lane are single track, weight restricted, sometimes open swing-bridges) – would lead to more traffic through the Green Park estate, more rush hour congestion and accidents, • Heavy industrial traffic involved during the construction of the proposed number of houses • Houses built on the area set aside for the access to phase 2 of the Green Lane estate (Melton Way, Empress Close and Green Lane). Green Park Estate was not built to take the heavy volume of traffic envisaged in the future. • Green Link sometimes like a racetrack; cars use it as a short cut. • Increased noise from increased traffic, • Poor gritting currently -more houses would make things worse. <p>Lack of a good bus service in and around the area (which is more than 2 kms from Maghull station). The additional cost of providing such services would be greater than supporting other areas in the town.</p>	<p>to be developed in the future, further work would be carried out to assess the capacity of the highway network and whether there is a need for any improvements to be carried out. This would take into account access to the site, and would also identify road-user and pedestrian safety issues.</p> <p>As part of any planning application submitted for development, whether in an urban or Green Belt location, the Council can require the developers to use a specified route during certain time periods within the construction period, in order to minimise the impact on existing residents.</p> <p>Gritting is not an issue which can be taken into account as part of preparing this Plan. The Council's gritting policy is published on the Council's website.</p> <p>The Council will raise public transport concerns with Merseytravel.</p>
Impact on services + infrastructure - drainage / shops/ schools at capacity / lack of health services	
<p>Doctors and Dentist list are already at full capacity. Post Office services will be woefully lacking. There is not the quantity of social sites and shopping facilities to cater for any increase in population in this area. The current area will not provide sufficient shopping facilities. The town centre is more than 800 metres from the site – the Green Belt Study is wrong.</p>	<p>The Council is required to prepare an Infrastructure Delivery Plan that sets out what additional infrastructure is required when development takes place. The majority of improvements will be secured through the Community Infrastructure Levy imposed on developers through the Core Strategy, and will therefore not have to be paid for by the Council. More development will also have implications on services provided by the Council and utility companies etc and their maintenance. In some cases this may make non-viable services viable, and could prevent some from closing. Any new infrastructure required will be provided as part of the development when it is needed.</p>

Summary of representation- Maghull West (parcels S110, S111, S112)	Sefton's Response
<p>Car parking in the locality is deplorably inadequate.</p> <p>More strain on our problematic and already over-utilised drainage systems near the River Alt flood plain.</p> <p>Our sewers are not very good as it is and the extra houses would not help. United Utilities had to build a detention tank at Hinchley Green to prevent flooding.</p> <p>Green Lane floods. There is only one grid. Your solution is to put up a "flooding" sign, so how can you expect this road to take more traffic? The verges and hedges are not maintained. The Council is cutting services, so why spread the load more thinly / waste more services by building more houses?</p>	<p>Investment in commercial services and facilities provided by the private sector such as shops may be currently curtailed by the recession. The Council can promote improvements to Maghull Town Centre through this Plan and, as a landowner, has a key role in determining what future development takes place on surplus land in the Centre. If the Council chooses an Option which includes building on land in the Green Belt, this will prevent the population from falling to levels that may affect the viability of existing services and new investment in the future.</p> <p>The Council has consulted both the Environment Agency and United Utilities about drainage issues in the area. The draft Green Belt Study identifies an area close to the Cheshire Lines which has a high risk of flooding and as therefore being unsuitable for development.</p> <p>If this site were to be taken forward, further work (including about surface water flood risk) would be required to show that flooding issues have been taken into account.</p>
<p>Use sites in the urban area / brownfield sites / Develop employment land for housing</p>	
<p>The Central Square in Maghull needs to be redeveloped and updated. I have no opposition to a sensible commercial use of the old library near Morrisons.</p> <p>Sheltered accommodation should be built on the site of the library and former Council offices in Maghull Town Centre.</p>	<p>Central Square is privately owned.</p> <p>The former library is a Council owned site that is now surplus to requirements.</p>

Summary of representation- Maghull West (parcels S110, S111, S112)	Sefton's Response
Recreation / tourism	
<p>The country fields are the biggest leisure amenity in the area, and provide access to the Trans-Pennine Trail.</p> <p>Hundreds of people / residents (more than 40 people per hour / 500 a day) use Green Lane, Bells Lane and the Cheshire Lines for walking / dog walking, jogging, cycling & horse riding, with stables and farms in a rural setting. Valuable recreational green space which should be maintained, and protected. It is essential we promote free exercise opportunities like those here, due to the high cost of travel and high unemployment rates.</p>	<p>Whilst some agricultural land would be lost if development were to take place in this area, if the site were to be developed, existing formal facilities such as Rights of Way, the Trans Pennine Trail and other paths would be retained and incorporated into green space provided as part of the development, so public access would be improved.</p>
Other	
<p>There is no access into the land west of South Meade (Green Belt parcel S110) as United Utilities have fenced the area off at Hinchley Green when they constructed an underground storage tank two years ago. Your maps are not up-to-date.</p> <p>Parcel number S111 as identified in the document attached appears to show my property being included in any potential development parcel. Is this diagram correct and if so how can this be?</p> <p>The fields have a historic setting. The Green Belt Study is wrong in saying the area doesn't have one.</p>	<p>The Council has not made any decisions yet about whether any land in the Green Belt should be developed. It will choose the Plan's Preferred Option later this year. If any site is proposed for development, it would be up to the developer to identify and provide a suitable means of access to the site. This could potentially be off the access road to the United Utilities compound, or elsewhere off South Meade, or from Green Lane.</p> <p>Although the whole of the parcel is identified as a potential developable area, this does not mean that any existing houses in the area would have to be demolished. The developer would decide whether to include or retain any buildings in their proposals.</p> <p>The fields do not form part of the setting of any historic building or structure.</p>
Protect the environment (general)	
<p>This is such a beautiful area.</p>	<p>If any site within the Green Belt were to be taken forward for development, the Council would expect the green space to be provided, and the boundary between buildings and the rural area to be sympathetic to the landscape character of the surrounding area.</p>

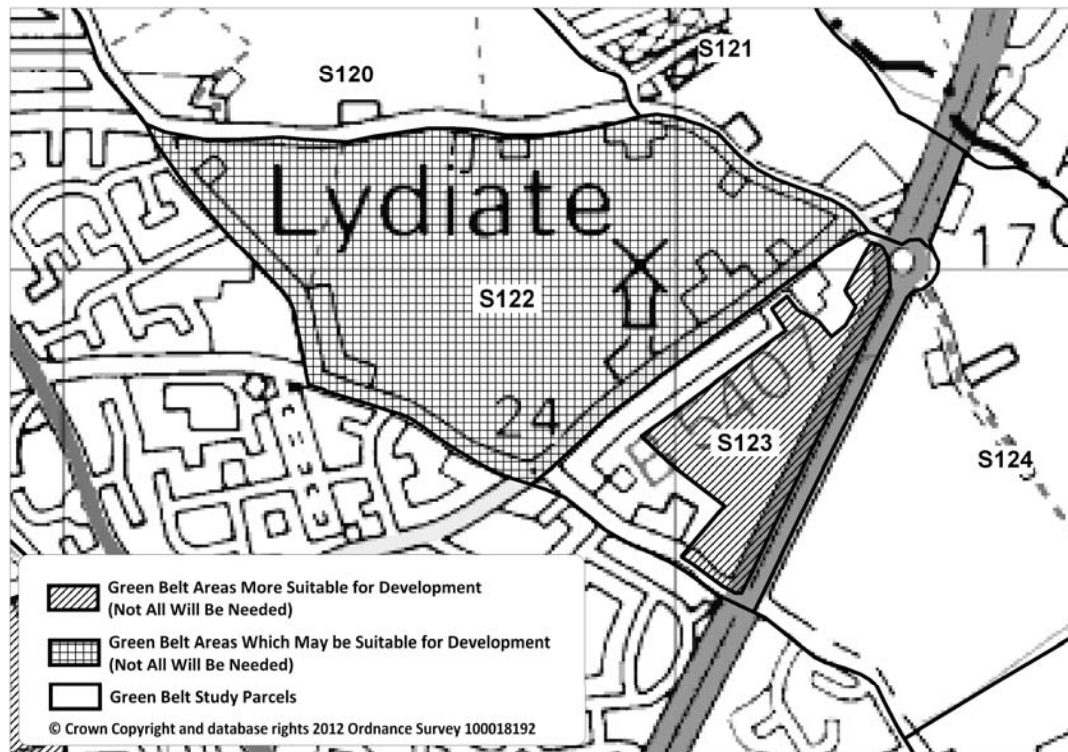
Summary of representation- Maghull West (parcels S110, S111, S112)	Sefton's Response
<p>We do not want to lose our canal bridges – they are our heritage.</p>	<p>Undesignated heritage assets are not guaranteed to be known to the Council. The comments received on sites in relation to undesignated heritage assets are very helpful, and will enable us to make more informed decisions.</p>
<p>Nature conservation</p>	
<p>There is lots of wildlife including rare birds, red squirrels, owls, foxes, rabbits, pheasants, bats, moths, butterflies, hedgehogs, newts, insects. Why do you want to ruin this crucial habitat? Have you informed the RSPB and other interested stakeholders?</p>	<p>The Council has a difficult challenge to both protect and manage nature, and also provide homes and jobs. We have a legal duty to take account of biodiversity, and have recently approved an Ecological Framework which helps us to focus on protecting and enhancing key habitats and species, and creating new habitats. We will work with developers to help us do this.</p> <p>The RSPB's response indicates that some Green Belt parcels, including the three on the western side of Maghull (Green Belt parcels S110, S111 and S112), are within or near to the NW's regional farmland bird hotspot.</p> <p>If it were proposed to take forward sites in this location, further discussions are needed with the RSPB and appropriate surveys and assessments would need to be carried out, to determine the ecological importance of these sites. This could restrict the area that would be potentially suitable for development.</p>
<p>Area prone to flooding</p>	
<p>The area sits in the River Alt Flood Plain. Householders are encouraged not to concrete over front gardens, to alleviate problems of a flood plain, but this plan will amplify these problems.</p> <p>Your flood plan for Green Belt parcel S110 (land west of South Meade) is wrong – the area has flooded for at least the last 25 years and the farmer</p>	<p>The flood risk data contained in the draft Green Belt Study is published by the Environment Agency, and covers tidal and river flooding. Since the draft Study was prepared, the Council has carried out an assessment of surface water risks.</p> <p>Most of the area is not identified as being at high or medium risk of flooding by the Environment Agency. The whole of Green Belt parcels</p>

Summary of representation- Maghull West (parcels S110, S111, S112)	Sefton's Response
<p>has recently installed new drainage to overcome these problems. United Utilities constructed an underground storage tank at Hinchley Green two years ago to relieve sewer flooding problems in the area. The drainage system has not been upgraded for many years and is already at full capacity. It would not cope with any increase in use.</p> <p>With the increased risk of flooding, why is agricultural land being built on when it has the ability to drain rain water away? There are pools of water on the land after heavy rain.</p> <p>What if the Canal bursts its banks again?</p>	<p>S110 and S111 (land west of South Meade and West Meade) and part of Green Belt parcel S112 (land north of Turnbridge Road) lie within an area with a potential risk of groundwater flooding.</p> <p>If this site were to be taken forward, further work (including about surface water and canal flood risk) would be required to show that flooding issues have been taken into account.</p>
Disproportionate to the size / character of the settlement / already at capacity	
<p>The Green Park Estate was granted planning permission by West Lancashire Council with strict planning controls to make it spacious and well balanced. Since then Sefton Council has slowly ruined it, for instance putting metal railings up and taking away the hedges that previously hid them. You have an urban mentality, and cannot change your mindset away from towns like Bootle, you need to plan in accordance with the area. The proposed density is three times that of our estate.</p> <p>The area would change from being rural to a new small town that lacks adequate services.</p> <p>Too many homes / flats have been built in Maghull and Lydiate. They are not affordable, although they were meant to be for first-time buyers.</p>	<p>The Council has assumed that sites in the Green Belt will be developed at around 30 dwellings per hectare. This is a typical suburban density, and is similar to the density of the Green Park estate. Under the Localism Act, developers are required to consult with local residents about their proposals and take views on board. The Council aims to make sure that the design of new development is sympathetic to the character of the surroundings and is high quality. This is an essential part of sustainable development.</p> <p>We are required, through the Infrastructure Delivery Plan that will form part of our overall Plan to indicate what infrastructure is required to accompany every development proposal, and to demonstrate when and by whom this will be provided.</p>
Detailed Core Strategy comments	
<p>There is no housing shortage in Maghull and Lydiate, and therefore no need to build more homes.</p>	<p>A more detailed response about housing need is set out in section 2.</p>
Disruption caused by building work /damage to property	
<p>Disruption and mess during any 5 year building plan. We have already had building work at the bottom of South Meade which caused much noise</p>	<p>The Council accepts that people will suffer some disruption when new development takes place. This is an unfortunate but inevitable</p>

Summary of representation- Maghull West (parcels S110, S111, S112)	Sefton's Response
and disruption. The house trembled when machinery went past. We had to put up a high fence to protect our privacy.	consequence.
Protect urban greenspace / once lost can't be recovered	
Most recreational land in Maghull has already vanished thanks to bad planning.	Current Council policy is to protect and enhance green space. The draft Green Space Study proposes to retain all urban greenspaces in Sefton East Parishes, except for the site including St George's Church which already includes buildings and hard-surfaces and where the draft recommendation is that we should consider removing some of these areas from the urban greenspace designation.
Affordable housing - not needed / shouldn't mix tenures / need more	
There is no demand for flats – half the flats built on Liverpool Road North in Lydiate are still empty.	It is acknowledged that the market for apartments is currently depressed.
Impact on regeneration of Bootle and or Central Southport	
<p>There are a number of existing housing estates and areas in Maghull particularly around the Ashworth area of Maghull that are in desperate need of regeneration.</p> <p>Maghull does not require regeneration like the urban areas. It needs improvements but building thousands of new homes will not lead to improvements for the residents.</p>	<p>Although it is not specified what improvements are needed in Maghull, the Council agrees that the town centre is in need of investment so that it can better serve its catchment area. The Council is working with the other landowners to secure further development in the centre.</p> <p>Land at Ashworth Hospital has recently been granted Outline Planning Permission for housing</p>
Not a sustainable location for development	
<p>There are no industries in Maghull other than farming. Regenerate other areas such as Bootle and Southport. They are more sustainable locations.</p> <p>If houses are needed in Southport, build there not in Maghull / Lydiate.</p> <p>There is a lack of a good bus service in and around the area, and the area</p>	<p>The Council agrees that there is little employment in Maghull. But it also anticipates that Maghull will remain a suburban area where most people commute to work outside the area where they live. This role has been endorsed by the views of people who have commented on the Core Strategy.</p> <p>The Council agrees that the area west of Maghull is more than 2</p>

Summary of representation- Maghull West (parcels S110, S111, S112)	Sefton's Response
is more than 2 kms from Maghull station.	kilometres from Maghull station, and bus services in the area are confined to Southport Road. However, the whole of the area is within 10 minutes walk of bus stops on Southport Road.
Detailed comments on the Green Belt Study	
<p>The distance to Maghull town centre is more than 800 metres.</p> <p>The fields have an historic setting. The Green Belt Study is wrong to say that they don't.</p> <p>What is the definition of a "narrow gap"?</p>	<p>The Council agrees that Maghull town centre is a 10 – 20 minutes walk from the areas identified as being potentially suitable for development, and from local shopping parades. The only exception to this is Green Belt parcel S112, where the land north of Turnbridge Lane is within 10 minutes walk of local shops on Southport Road.</p> <p>The fields west of Maghull do not form part of the setting of any listed building, Conservation Area or other designated or defined historic asset.</p> <p>A "narrow gap" is defined in the Green Belt Study as being wider than "essential gaps", but which are still sensitive to development. Potentially more development could be accommodated on the edge of an urban area without leading to neighbouring settlements merging. These gaps were generally more than 2 kilometres wide.</p>
Develop land north of Turnbridge Lane (Green Belt parcel S112) and choose Option Three. Acceptance of either Option One or Option Two would almost certainly necessitate a further strategic review to be started within 5 years when resources may still be limited. The UDP Inspector did not dispute the residential merit of part of this land and acknowledged that it had no agricultural or landscape merit and is a natural extension of the Turnbridge Road development.	This comment appear to have been submitted on behalf of the landowner. The fact that it is available has been noted, but will not be the only factor that is taken into account if the Council has to identify land in the Green Belt to meet its future needs under Options One or Two. Other factors, such as the capacity of the highway network or flood risk may mean that the land is not suitable for development.
A small development at South Meade (S111) could be built without creating urban sprawl.	This view was only put forward by one or two people, with the majority of local residents being against any further development in this area. However, if land in this area is required, there may be other considerations (risk of flooding, traffic etc) which will determine whether this is realistically a potential housing site.

Objections to Green Belt Sites Lydiate Area



This section of the Consultation Report looks at comments made to specific Green Belt sites [or parcels] in the Lydiate area during consultation.

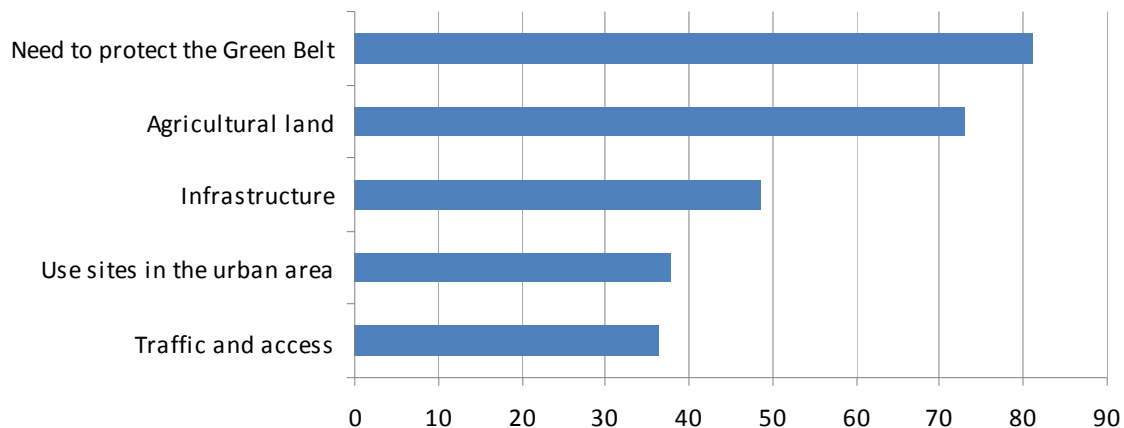
The Green Belt sites that were identified as having some potential for development in the Lydiate area are shown in the map to the left.

This section only includes comments that relate to Green Belt sites in Lydiate. Other more general comments on Green Belt sites are set out earlier in this report e.g. agricultural land, flood risk, vacant homes.

This section includes separate tables for the following areas of Lydiate

Lydiate	S122, S123
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Lydiate (Green Belt parcels S122 and S123)



This chart shows the top 5 issues mentioned in this area against development in the Green Belt [as % of individual comments received for the area]

Note: the figures do not add to 100 as most people made several comments

As well as individual comments there were over 17 standard letters opposing the development of farmland in Lydiate and a petition containing 388 signatures to preserve Lydiate farmland were received. At least 11 people signed an on-line petition against development in Lydiate.

More than 80% of respondents objected to development in the Green Belt, and 73% objected to the loss of agricultural land. Nearly 50% referred to the impact on services or the lack of suitable infrastructure. Around one third of respondents referred to traffic issues; felt that there were sufficient sites in the urban area to meet Sefton's future needs; felt development would impact on their quality of life; or referred to other issues.

Summary of Representation – Lydiate (parcels S122, S123)	Sefton's Response
Protect the Green Belt / will lead to urban sprawl / once lost can't be recovered / Need to maintain gap / buffer between towns	
The present clear boundary between Sefton and West Lancs, Lydiate and Aughton, Lydiate and Maghull must be maintained in order to keep communities alive.	The areas which have been identified as potential "developable areas" in the draft Green Belt Study would not reduce the gap so that nearby settlements merged.

Summary of Representation – Lydiate (parcels S122, S123)	Sefton’s Response
<p>These agricultural/semi-natural areas are an asset to the Sefton/Merseyside as a whole. Building on this farmland (Green Belt parcel S123 – land bounded by Kenyon’s Lane, Liverpool Road and Northway) would simply enlarge / merge the sprawling urban area of Maghull, through to Lydiate, through to the Lancashire/Merseyside border. The building up of this A59 gateway which is currently a scenic route into Merseyside would be a sad loss.</p>	<p>The draft Green Belt Study states that this site (s123) relates well to the surrounding urban area (is “well contained”).</p>
<p>Impact on services + infrastructure - drainage / shops/ schools at capacity / lack of health services</p>	
<p>Maghull and Lydiate infrastructure is already at breaking point. It would be very short sighted to just build more homes without significant additional investment in local services and transport. It is unlikely that all of the infrastructure needed can or will be provided. The burden will fall on the tax payer.</p> <p>We already pay Council Tax and a Parish Council precept for very limited transport and facilities.</p> <p>There is little capacity at the local schools. Children have to travel further to school. There is a lack of nurseries, baby centres, and things for teenagers to do. There aren’t enough doctors. The police station is only part-time. There is a distinct lack of parkland suitable for youngsters to play in.</p> <p>There is already congestion near our local shops. Many have closed. The town centre is out-dated and very shabby. There is only one supermarket which is totally inadequate to serve the existing population, so will not be able to support a larger population.</p> <p>There is a lack of investment in the Sefton Lane Industrial Estate.</p>	<p>The Council is required to produce an ‘Infrastructure Delivery Plan’ to accompany it Core Strategy which sets out what new infrastructure is needed to support the development, and when and by whom it will be provided. If development were to take place in the Green Belt, the developer would be required to provide any infrastructure that is not proposed by the Council (e.g. additional classrooms), utility providers (gas, water) and other service providers (e.g. local shops, doctor’s surgeries) etc.</p> <p>The developer would also have to ensure that the development is served by an adequate means of access, and that the highway network can cope with the additional traffic. The Council is working with these organisations so that it can find out what new infrastructure is needed.</p> <p>Further development in Maghull and Lydiate could support the provision and retention of local services and facilities. If no development takes place, the area’s population will decline and this could affect the viability of existing services.</p> <p>The Council has identified the Sefton Lane Industrial Estate in its Unitary Development Plan as an area needing upgrading and refurbishment. However, we have not been able to identify funding to carry out any improvements.</p>

Summary of Representation – Lydiate (parcels S122, S123)	Sefton’s Response
<p>About 40 properties on Liverpool Road (within Green Belt parcel S123) are on private, individual septic tanks. These must (under the Building Regulations 2000) discharge to a drainage field. The drainage field for our properties is the farmland located immediately to the rear of our homes (your Site Ref. 5123). I am concerned that developing this site will impact on the efficient and effective functioning of our tanks.</p>	<p>If development occurs near properties that are served by septic tanks, the developer has a legal duty to ensure that these can still continue to operate.</p>
Traffic - inadequate access, congestion, poor public transport accessibility, pollution	
<p>Maghull is divided by busy main roads, which presently encourages vehicles of every description to negotiate a road system that was never designed for the purpose, on their way to West Lancashire, Knowsley / M58 and North Sefton.</p> <p>The road network would struggle to cope with more traffic. More rat runs would be created. It will take us longer to drive in and out of our area.</p> <p>The country lanes are not suitable for more traffic.</p> <p>New development should be located close to schools, shops and transport links.</p>	<p>The Council acknowledges that there are some difficulties relating to the highway network in this area, including the narrow canal bridges, and congestion associated with the two primary schools located on Green Lane. If the Council wished to take forward any sites in the Maghull / Lydiate area, a detailed assessment would be needed of the implications for the highways network, what improvements might be required and whether it would be practicable to provide these.</p> <p>The Council will promote development in the most accessible locations available, or seek improvements to the bus and rail network to improve accessibility. Building the proposed Maghull North station would improve accessibility by rail to the north east part of Maghull.</p>
Quality of life / well-being	
<p>The proposed developments would have a major and negative impact on the quality of life in Lydiate and Maghull which have already, over the years, become semi urbanised.</p>	<p>The Council disagrees that the area is over-populated. Much of Maghull comprises a typical suburban area built at low – medium densities. New development would have to comply with the Council’s normal design requirements and, if there are issues such as traffic congestion, further work would be needed to see if these could be resolved before any further development would be allowed. This would apply equally to sites in the urban area as well as any in the Green Belt.</p>
Disproportionate to the size / character of the settlement / already at capacity	
<p>We had our share of development from the 1950’s – the 1980’s.</p> <p>Lydiate has changed over the past 40 years from an attractive rural area</p>	<p>The Council acknowledges that Maghull and Lydiate experienced a lot of development in the post-war era.</p>

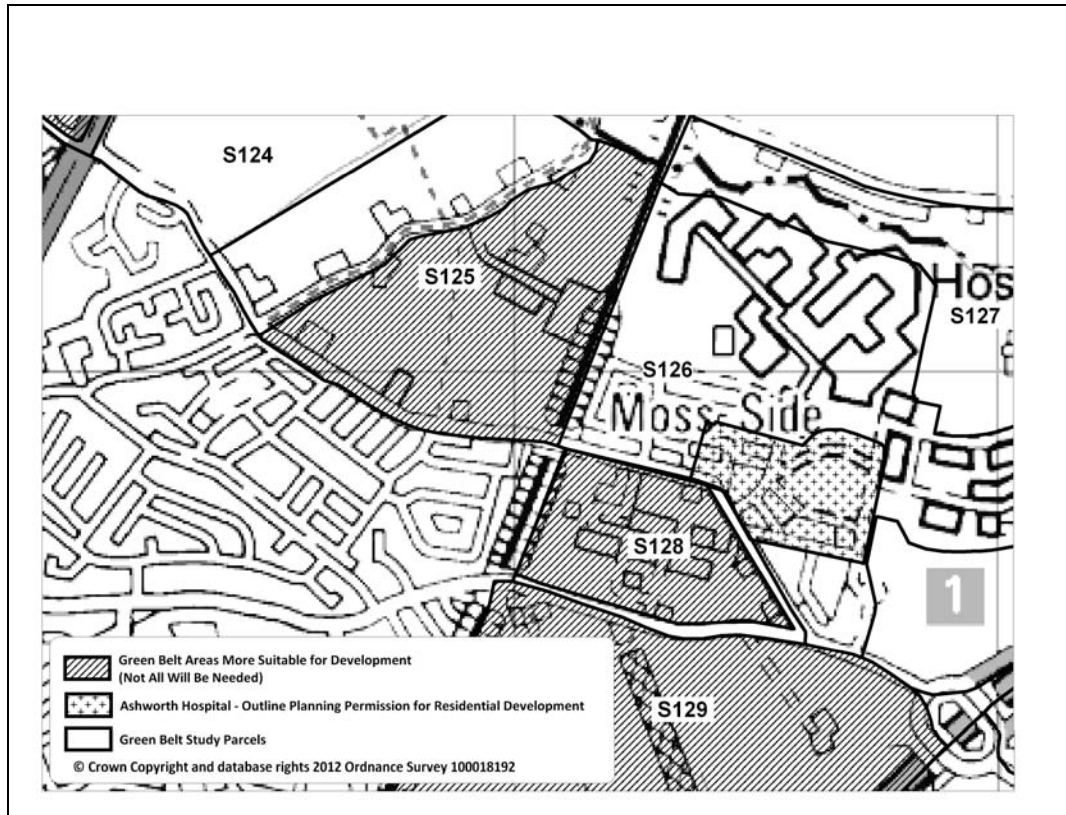
Summary of Representation – Lydiate (parcels S122, S123)	Sefton’s Response
<p>into a continuation of urban Maghull. It is important to preserve the identity of these hamlets. We need to preserve our traditional way of life. High density housing would not be in keeping with this semi-rural area.</p>	<p>If new development is proposed in the Lydiate area as part of the Core Strategy, it would be designed to a high standard, and would be similar in character to existing development in Lydiate.</p>
<p>Don't agree with the evidence / evidence is out of date / cost</p>	
<p>Lydiate is a small farming community, for whom would we be building new homes? Most of the young people leave, buy or rent homes closer to their place of work. The natural decline in the elderly population would, I think, balance out the need or demand for new build in this section of the community.</p>	<p>The Council’s response to comments on the technical studies (e.g. how many homes or how much employment land is needed) can be found in Section Two of this report.</p>
<p>Detailed Core Strategy comments</p>	
<p>As a resident of Maghull I am fully aware of the need to build homes for the future and that some of these homes will need to be built in Maghull and Lydiate. However, I do not think it is justified to build between 4000 and 6500 homes within this area as it would not only spoil the area but would put a burden upon the town’s infrastructure.</p> <p>The “Preservation of Lydiate farmland” petition puts forward two alternate Options. The first matches the unconstrained urban supply with past migration trends or the 2010 ONS projections, which would lead to an annual need of about 300 more homes a year, so there is no need to go into the Green Belt. The second proposes the reuse of the vacant dwelling stock in Sefton, which if brought back into use, would mean that again, there was no need to go into the Green Belt even if 480 homes were built each year. The Council should not rule out the “undeliverable” supply, or the role that vacant homes can make to meeting identified housing needs.</p>	<p>Although this is not mentioned in the Vision set out in the Core Strategy ‘Options’ paper, the Core Strategy objectives include:</p> <p>“10. To preserve and enhance Sefton’s natural land built environment; and</p> <p>11. To mitigate and adapt to the effects of climate change, to encourage re-use of resources, land and buildings and to reduce Sefton’s carbon footprint.”</p> <p>Both of these objectives include protecting the Green Belt from unnecessary development.</p> <p>There is no intention to build 4000 – 6500 homes in the Maghull / Lydiate area alone. No decisions have yet been taken about whether any development will take place in the Green Belt. However, the Options paper stated that this number of homes would need to be built in the Green Belt under Options Two and Three across the whole of Sefton.</p> <p>The Council is following national Green Belt policy contained in Planning Policy Guidance (PPG) note 2: Green Belts, and in the draft National Planning Policy Framework. Both state that Green Belt boundaries should only be reviewed when a Council is preparing its</p>

Summary of Representation – Lydiate (parcels S122, S123)	Sefton’s Response
	<p>Core Strategy / Local Plan.</p> <p>The comments on the number of houses required, and how many can be built in the urban area, are responded to in Section 2 above.</p> <p>The Council produces an Annual Monitoring Report which sets out how many houses have been built during the past year, and how many are needed to meet housing requirements.</p>
Protect the environment (general)	
<p>Let Lydiate remain a green and pleasant land. The planet needs to breathe and absorb the pollution produced by industry and traffic.</p> <p>Lydiate’s beautiful countryside should be retained.</p>	<p>If any site within the Green Belt were to be taken forward for development, the Council would expect the green space provided within or linked to the development, and the boundary between buildings and the rural area to be sympathetic to the landscape character of the surrounding area.</p>
Nature conservation	
<p>Skylarks are nesting in the field enveloped by Lambshear Lane, Sandy Lane and Moss Lane. There are lots of hedgehogs, bees, butterflies, birds (pheasants, buzzards, lapwings and oystercatchers) and insects etc. We regularly see bats flying. These will be lost from this area forever.</p>	<p>The Council has a difficult challenge to both protect and manage nature, and also provide homes and jobs. We have a legal duty to take account of biodiversity, and have recently approved an Ecological Framework which helps us to focus on protecting and enhancing key habitats and species, and creating new habitats. We will work with developers to help us do this.</p> <p>If it were proposed to take forward sites in this location, appropriate surveys and assessments would need to be carried out, to determine the ecological importance of these sites. This could restrict the area that would be potentially suitable for development.</p>
Recreation / tourism	
<p>The Green Belt is used by the whole community. There are lots of public paths. People use the area for recreation - running, jogging, cycling, horse riding, bird watching, dog walking etc. This is good for our quality of life and our health.</p>	<p>The areas that have been identified as potential “developable areas” are not areas used for recreational purposes, although they may contain footpaths. If the sites were to be developed, existing formal facilities such as Rights of Way and other paths, would be incorporated into</p>

Summary of Representation – Lydiate (parcels S122, S123)	Sefton’s Response
<p>The Sandy Lane playing fields should be retained as they are a public amenity.</p> <p>We don’t need a marina at Lydiate; there are unused moorings close by so this is not needed.</p> <p>There is a lack of green space in Lydiate and Maghull.</p>	<p>green space provided as part of the development. The draft Green Belt Study states that the Green Lane playing fields should be retained.</p> <p>The Core Strategy Options paper has not considered the need for a marina. In any case, it is noted that a recent appeal against the refusal of planning permission for a marina at Bells Lane was dismissed.</p> <p>Sefton’s Greenspace Strategy confirms that there is a lack of greenspace in Sefton’s East Parishes. If any large-scale development is permitted in this area, our normal planning standards contained in the Unitary Development Plan requires publicly accessible open space to be provided.</p>
Protect urban greenspace / once lost can’t be recovered	
<p>The play space on Sandy Lane must be retained.</p>	<p>There is no intention that areas that are currently in use as greenspaces should be developed. The draft Green Belt Study indicates that if Green Belt parcel S122 (land north of Lambshear Lane) is identified for future development, the Sandy Lane playing fields should either be retained or replaced elsewhere.</p>
Impact on the historic Environment	
<p>Although Sefton have stated that important historical areas will be protected from development, the Green Belt Study has not taken account of some of Lydiate’s historic assets.</p>	<p>The areas that have been taken into account by the methodology used to identify land with ‘potential’ have taken account of formally designated heritage assets [i.e. Conservation Areas and Historic Parks and Gardens].</p> <p>Undesignated heritage assets are not guaranteed to be known to the Local Authority. The comments received on sites in relation to undesignated heritage assets are very helpful, and will enable us to make more informed decisions.</p>
Area prone to flooding	

Summary of Representation – Lydiate (parcels S122, S123)	Sefton’s Response
<p>The Pilling Lane area floods. The rainwater drainage systems could not cope with more development. More areas will flood.</p> <p>The western part of Green Belt parcel 122 (land north of Lambshear Lane) floods every winter.</p> <p>The area is adjacent to an area with a high risk of flooding (Lydiate Brook). The northern part of the ‘Tyson’s Triangle’ area (Green Belt parcel S123) is already prone to flooding. Development would eliminate natural drainage, compounding the current problem.</p>	<p>Pilling Lane (Green Belt parcels S112 and S133) is not an area identified as where development might take place.</p> <p>The evidence indicates that small pockets within the site may be prone to surface water flooding, but that the areas involved are fairly restricted. If this site were to be taken forward, further work including about surface water flood risk, would be required to show that flooding issues have been taken into account.</p>
Forms ambiguous / wrongly worded / leading questions/ difficult to complete	
<p>You are not being clear about the possibilities. You have identified land in red, then have omitted the fact that if site behind Morton’s Dairies (Green Belt parcel S123) is chosen the field encompassing Moss Lane and Lambshear Lane will be up for development (Green Belt parcel S122). This is not clear in any of your documents and is only apparent when we have spoken to your council officers - many people will miss this.</p>	<p>The response to these comments about the questionnaire wording is included in Section One of this report.</p> <p>The draft Green Belt Study indicates that this area does not relate well to the urban area, but that this relationship would change if the adjoining Green Belt parcel S123 were to be developed. The plans for the Sefton East Parishes area used at the Maghull and Lydiate drop in events, and published on the Core Strategy webpage, indicate that the development of this site is more of a possibility should Green Belt parcel S123 be taken forward for development.</p>
Not a sustainable location for development	
<p>There are few jobs available in Lydiate and limited transport.</p>	<p>The Council agrees that there are limited employment opportunities, and Lydiate is not adjacent to the Liverpool – Ormskirk railway. Frequent bus services run along Southport Road and the A59, and much of the urban area is served by a medium-frequency bus service, although there are areas that are not well-served. The two Green Belt parcels in the north of Lydiate (Green Belt parcels S123 and S122) have the best accessibility to existing bus services in the area.</p>

Objections to Green Belt Sites Maghull North Area



This section of the Consultation Report looks at comments made to specific Green Belt sites [or parcels] in the Maghull North area during consultation.

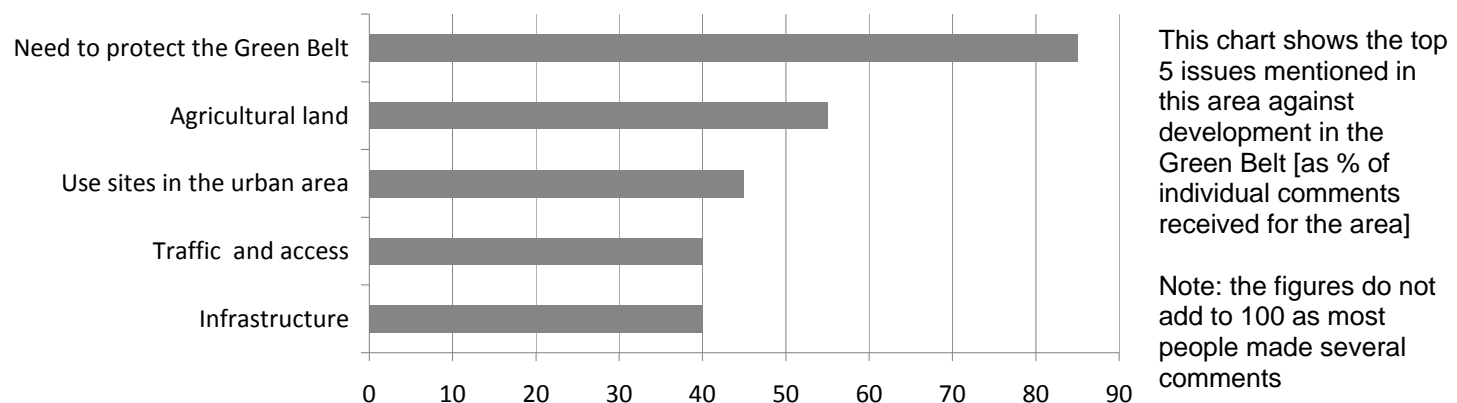
The Green Belt sites that were identified as having some potential for development in the Maghull North area are shown in the map to the left.

This section only includes comments that relate to Green Belt sites in Maghull North. Other more general comments on Green Belt sites are set out earlier in this report e.g. agricultural land, flood risk, vacant homes.

This section includes a separate table for Maghull North.

Maghull North	S125
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Maghull North (S125)



85% of individual respondents specifically stated that the Green Belt should not be developed. They felt that permanently removing this land from the Green Belt would lead to urban sprawl, and that any Green Belt release should be a last resort. The second biggest concern (55%) involved the loss of agricultural land, citing the comparative high quality as justification it should be kept. 45% of respondents believed there were better opportunities for brownfield regeneration or that this was of utmost primacy compared to the Green Belt. Over a third believed their quality of life would be adversely affected by any development in the Green Belt.

Comments are listed in the order of the number of times that they were made by people commenting on this site.

Summary of Representations–Maghull North (parcel S125)	Sefton’s Response
Protect agricultural land - once lost can’t be recovered	
Fuel crop production would be preferential to development. This is a more pressing concern than increasing housing supply	While the draft National Planning Policy Framework supports renewable and low carbon energy in general, it does not mention fuel crops specifically. By contrast, the draft Framework places great emphasis on the Government’s key housing objective of increasing significantly the delivery of new homes.

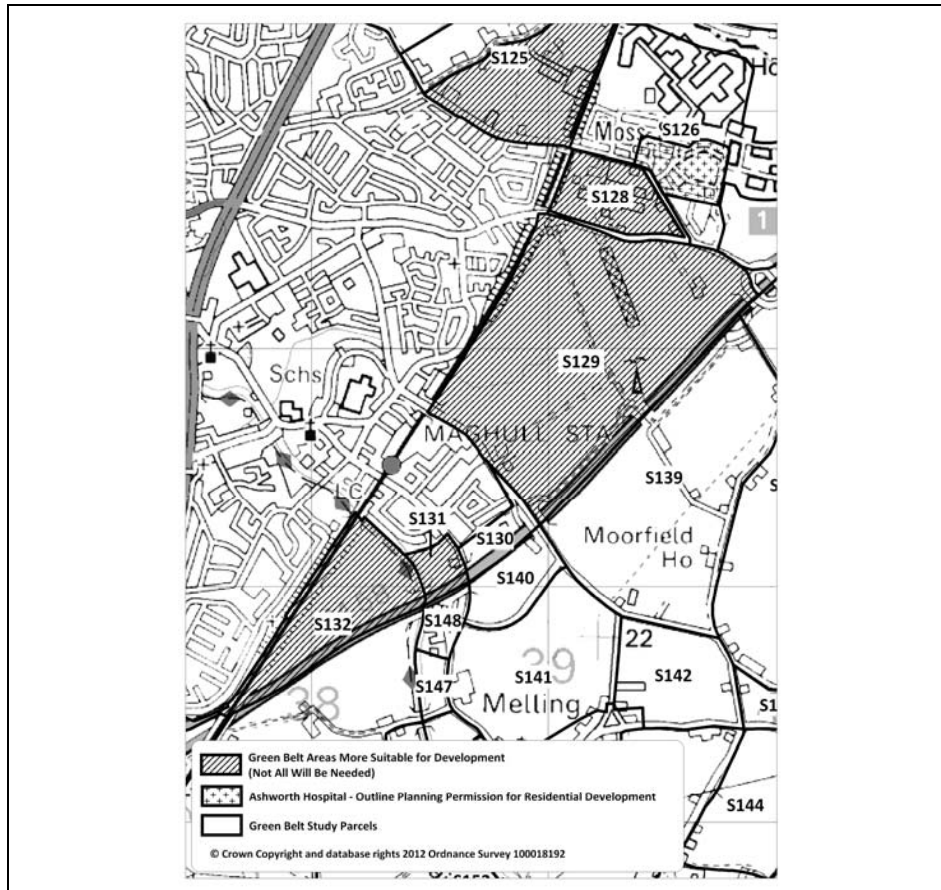
Summary of Representations–Maghull North (parcel S125)	Sefton’s Response
Use sites in the urban area / brownfield sites	
<p>Ashworth Hospital site would be ideal for housing not business, there are vacant lots on business parks within neighbouring areas</p> <p>Empty offices in Bootle could be suitable housing sites.</p> <p>Empty land and buildings within the Racecourse Road Industrial Estate should be redeveloped for housing.</p> <p>Redevelop Maghull Central Square and the former Library site</p>	<p>The Options paper states that the regeneration of Bootle, and the re-use of brownfield land and buildings, will be priorities for the Plan. The Council has resolved that any New Homes Bonus it receives will be used to complete the projects begun under the Housing Market Renewal Initiative.</p> <p>The Joint Employment Land and Premises Study indicates that Sefton does not have a surplus of employment land. If employment land is used for housing, it would have to be replaced with land in the Green Belt.</p> <p>Surplus land within the Ashworth East site has been given planning permission for housing and will be brought forward for development in about 2 to 3 years. The owners of the Ashworth South (former prison) site have indicated that it is likely to be available for housing in the near future.</p> <p>The Options paper identified Maghull town centre as an area in need of investment and where there is some scope for redevelopment. This could include limited housing development in appropriate locations.</p>
Traffic – inadequate access, congestion, poor public transport accessibility, pollution	
<p>The current road network is already struggling to cope, it will not be able to deal with additional strain.</p> <p>Roadworks in the area (the repair of Moss Lane sewer) caused considerable traffic upheaval</p> <p>Many of the roads in the area were never intended to take a high volume of traffic and are inappropriate to do so</p> <p>Increased traffic would result in increased accidents and pose a</p>	<p>The adequacy of the road network has been raised by the majority of Maghull and Lydiate residents who commented on the Plan. If land in this area is proposed to be developed in the future, further work would be undertaken to assess the capacity of the highway network and whether there is a need for any improvements to be carried out. This would also identify any road safety issues.</p>

Summary of Representations–Maghull North (parcel S125)	Sefton’s Response
<p>hazard to children.</p> <p>North Maghull train station should proceed urgently, especially considering increase in population</p> <p>There is an existing parking shortage in the town centre that will only be exacerbated.</p> <p>Sleeping policemen lead to rat-running, this causes unwanted traffic as well as unnecessary pollution and noise</p>	<p>Network Rail, Merseytravel and the Council are committed to providing this station as soon as sufficient funding has been identified. It is included in Merseytravel’s Infrastructure Delivery Plan to be provided in the medium to short term.</p> <p>Any new development proposed in the town centre would have to include appropriate parking provision in accordance with normal Council requirements.</p> <p>Traffic management is not a subject that can be included in the Plan, but all comments relating to this have been passed to the Council’s Traffic Services Manager.</p>
Nature conservation	
<p>The area holds a ‘broad spectrum’ of wildlife, development would harm this.</p> <p>Area is habitat for endangered species such as the Great Crested Newt and Hedge Sparrow.</p> <p>There is a comprehensive hedge network that is under threat and makes up a significant amount of habitat for wildlife.</p>	<p>The Council has a difficult challenge to both protect and manage nature, and also provide homes and jobs. We have a legal duty to take account of biodiversity, and have recently approved an Ecological Framework which helps us to focus on protecting and enhancing key habitats and species, and creating new habitats. We will work with developers to help us do this.</p> <p>The area is not protected for nature conservation reasons at a international, national or local level, and this is not one of the areas of Green Belt identified by the RSPB as a “farmland bird hotspot” where development should not take place. However, if it were proposed to take forward this site, appropriate surveys and assessments would need to be carried out, to determine the ecological importance of the site. This could restrict the area that would be potentially suitable for development.</p>
Other comments	
The area is under-funded compared to Southport and Maghull is being	Funding of existing services is not something which can be considered

Summary of Representations–Maghull North (parcel S125)	Sefton’s Response
<p>developed to pacify Southport residents</p> <p>Some of the intended land is contaminated from previous development e.g. Land at Ashworth Hospital, Park Lane</p> <p>Previous development of Maghull and Lydiate has led to a decline in our quality of life; further development will exacerbate this.</p>	<p>as part of the Plan. However, if new services are needed, we have to show what is required, when it will be provided, and by whom.</p> <p>This will have to be addressed as part of any planning application that is submitted for the redevelopment of this site. We have no reason to think that remediation costs are likely to be excessive or unviable.</p> <p>Whilst it is accepted that if development goes ahead in this area, there may be some impact on existing residents’ quality of life, we are required to ensure that new development is well–designed, and that the impact on nearby residents is kept within acceptable limits. There could also be enhancements to local services or the provision of new open space or better links to the countryside.</p>
Empty homes / vacant properties / number of houses for sale	
<p>Maghull has an ‘abundance’ of family homes available.</p>	<p>The Study which assessed future housing needs (the NLP Study) concluded that there was a need for more housing in the Sefton East Parishes area to meet the needs of this area.</p>
Disproportionate to the size / character of the settlement / already at capacity	
<p>Development of this scale would spoil Maghull’s ‘semi-rural’ environment, ruining its small town / village character</p>	<p>No decisions have yet been taken about whether any development will take place in the Green Belt. Any new development would be similar in character to the existing settlement.</p>
Recreation / tourism	
<p>Development would spoil footpath networks tranquillity and aesthetics as appreciated by joggers, horse riders, ramblers, etc.</p> <p>Green Belt acts as an important recreational facility for urban residents as well immediate neighbours</p>	<p>If the site were to be developed, existing formal facilities such as Rights of Way (including bridleways) and paths would be incorporated into green space provided as part of the development.</p>
Positive / Supporting comment	
<p>Any type of development on the prison site near Ashworth would be beneficial</p>	<p>The Ministry of Justice has indicated that this site is no longer required for a prison, and will be available for housing in the future.</p>

Summary of Representations–Maghull North (parcel S125)	Sefton’s Response
Area prone to flooding	
Moss Lane is susceptible to flooding	<p>Although Moss Lane is not in the Green Belt, small parts of Green Belt parcel S125 contains ponds and drains, and pockets have been identified as being susceptible to surface water flooding.</p> <p>If this site were to be taken forward, further work, including an assessment of surface water flood risk, would be required to show that flooding issues have been taken into account.</p>
Detailed comments on the draft Green Belt Study	
Stage 4 assessment is incorrect. The border of the “developable area” should follow Maghull Brook instead of Millbank Lane.	The basis for this recommendation was that land west of Millbank Lane would have a greater impact on the openness of the Green Belt, whereas land to the east relates better to the urban area and the adjacent Ashworth Hospital complex. No change is proposed as a result of this representation.

Objections to Green Belt Sites Maghull East Area



This section of the Consultation Report looks at comments made to specific Green Belt sites [or parcels] in the Maghull East area during consultation.

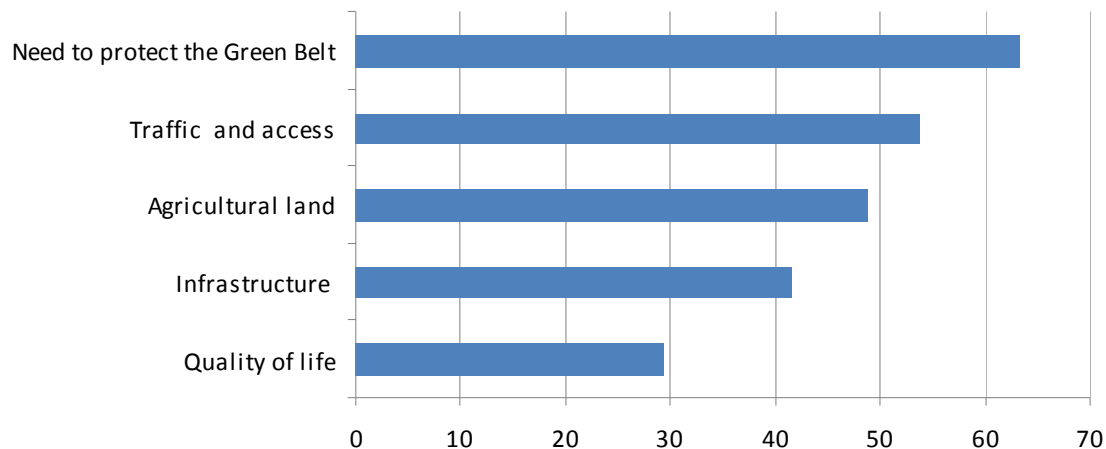
The Green Belt sites that were identified as having some potential for development in the Maghull East area are shown in the map to the left.

This section only includes comments that relate to Green Belt sites in Maghull East. Other more general comments on Green Belt sites are set out earlier in this report e.g. agricultural land, flood risk, vacant homes.

This section includes separate tables for the following areas of Maghull East

Maghull East	Parcels S129, S130, S131, S132
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Maghull East (S129, S130, S131, S132)



This chart shows the top 5 issues mentioned in this area against development in the Green Belt [as % of individual comments received for the area]

Note: the figures do not add to 100 as most people made several comments

The majority of individual respondents (63%) specifically stated that the Green Belt should not be developed. Many believe that development goes against the very nature of the Green Belt, and ignoring these principles to push through development is abhorrent. The increase in traffic and the ability of the current road network to cope is the second biggest concern with 53% of people citing this reason for opposing the development of Green Belt parcels in this area. 48% of people believed that the loss of high quality agricultural land was not worth sacrificing for additional housing development. 41% of respondents felt that infrastructure and services of the area are at critical mass already, and further development would push this over the edge unless significant investment is made.

Summary of Representation – Maghull East (parcels S129, S130, S131, S132)	Sefton’s Response
Protect the Green Belt / will lead to urban sprawl / once lost can't be recovered	
<p>The Green Belt land should not be used for any development at all</p> <p>This land has always been designated Green Belt and should remain so</p> <p>The whole point of the Green Belt is to protect open countryside</p>	<p>No decisions have been taken yet about whether development in the Green Belt will go ahead, or where. This is a decision that the Council will take later this year, once all the comments received in response to the options consultation have been considered, and any additional work to inform the Council’s choice of its Core Strategy’s Preferred Option has been completed.</p>

Summary of Representation – Maghull East (parcels S129, S130, S131, S132)	Sefton’s Response
<p>Option 1 is the only unobjectionable choice as it maintains the Green Belt</p> <p>There isn’t enough Green Belt land as is. We should be establishing more Green Belt not reducing it</p>	<p>All of the land outside the urban areas and larger villages are already identified as Green Belt. There is no scope to extend the Green Belt, because the non-Green Belt areas not areas which do not have to be kept permanently open. Most are already developed.</p>
<p>Traffic – inadequate access, congestion, poor public transport accessibility, pollution</p>	
<p>Developing Green Belt parcels S131, S132 (both south of Melling Lane and between the Liverpool – Ormskirk railway and the M58 motorway) will bring ‘chaos’ to narrow Melling Lane.</p> <p>The road network of the area already struggles to cope with traffic, and is often congested. Further traffic would increase the levels of congestion experienced.</p> <p>The level crossing is closed for 5 minutes at 15-minute intervals causing traffic to back up. Further traffic would be problematic</p> <p>People use Melling Lane to avoid the A59, this is especially notable at peak time for commuters.</p> <p>Running a local farming business is very difficult due to traffic. Additional traffic would make movement of machinery more difficult.</p>	<p>If it were proposed to develop land around Maghull in the future, further work would be carried out to assess the capacity of the highway network and whether there is a need for any improvements.</p>
<p>Protect the agricultural land – once lost can’t be recovered / food security / use land in non-agricultural land</p>	
<p>The loss of agricultural land is unacceptable when there is a growing UK population to maintain</p> <p>It is just as important to plan for food production as it for housing</p> <p>This land is some of the last agricultural land left in Maghull; once</p>	<p>Government guidance in the draft National Planning Policy Framework states that local authorities should take into account the economic and other benefits of the ‘best and most versatile’ agricultural land. Where development of such land is necessary, areas of poorer quality land should be used first, except where this would be inconsistent with other sustainability considerations or the Core Strategy’s growth</p>

Summary of Representation – Maghull East (parcels S129, S130, S131, S132)	Sefton’s Response
<p>gone we will lose this historic industry</p> <p>Land that is being used for farming should continue to be farmed.</p> <p>Grade 1 land is too valuable to use for housing. It should only be used for development in extreme circumstances</p> <p>Building on Grade 1 land is ‘against EU directives’</p>	<p>strategy, and where poorer quality land is unavailable or unsuitable. Further work is needed to get a clear view on the economic and other benefits of agricultural land in Sefton.</p>
Impact on services + infrastructure – drainage / shops / schools at capacity / lack of health services	
<p>Services are already strained and at capacity, they can not possibly take more users. It is short-sighted to build more homes without ‘SIGNIFICANT’ additional investment in local services</p> <p>600 more houses would stress the infrastructure of the area to ‘horrendous and totally unacceptable’ levels</p> <p>The sewerage system is already overloaded. 10 years ago planning permission was denied for housing due to inadequate sewage and drainage facilities, what has changed?</p> <p>Green Belt parcel S132 (land south of the Leeds Liverpool Canal, between the railway and the M58 motorway) is not within an acceptable distance to a station or school, this is unacceptable</p>	<p>The Council has prepared an assessment of service provision in Sefton. If new services are required to cater for new development, the Infrastructure Delivery Plan will set out what is needed, when and who will pay for it. United Utilities are aware of the potential need to upgrade the Melling Waste Water Treatment Works, and will include this in their Business Plan if development is going to take place in this area as part of the Core Strategy proposals.</p> <p>No decisions have yet been taken about whether any development in the Green Belt should be permitted. Green Belt parcel S132 is currently landlocked. If the land to the north of the Canal is identified for development, this could include a new road across the canal to serve Green Belt parcel S132. This would bring the parcel to within 800m of Maghull station.</p>
Other / detailed Core Strategy comments	
<p>Green Belt parcel S132 is unsuitable due to low lying topography compared to railway, motorway and canal</p>	<p>No decisions have yet been taken about whether any land in the Green Belt should be developed as part of the Core Strategy. Green Belt parcel S132 (south of the Leeds Liverpool Canal) is low-lying, and</p>

Summary of Representation – Maghull East (parcels S129, S130, S131, S132)	Sefton’s Response
<p>Complaints are not just those of “NIMBY’s”; friends and family who live elsewhere (Liverpool) are furious</p> <p>Development only favours developers, this will be at the expense of local residents and the environment</p> <p>At the proposed scale of development overpopulation will occur, and the associated ‘social problems’ with it</p> <p>If there is no suitable land for development, you can not keep on building.</p> <p>Stop immigration, this puts huge pressures for housing and other resources on our tiny island.</p>	<p>parts of the site are susceptible to groundwater and surface water flooding, the latter along Melling Brook and the railway. If these sites were to be taken forward, further work (including about surface water flood risk) would be required to show that flooding issues have been taken into account.</p> <p>The Council is required by Government to plan for growth. If we do not, we have to justify why we can’t. Although there is a lot of the ‘best and most versatile’ agricultural land in Sefton, Government advice contained in the draft National Planning Policy Framework is that this can be used for development where poorer quality land is unavailable or unsuitable. Further work is needed to better understand the economic and other impacts of developing on agricultural land.</p> <p>The Council is required to ensure that new housing is built to a high quality. If we decide that some new housing should be located in the Green Belt, It will be similar in character to nearby housing, and most (70%) of the new housing will be privately owned. There is no evidence to suggest that more development will lead to anti-social behaviour.</p> <p>Migration is factored into the Study that has assessed Sefton’s housing requirements (the NLP Study). This states that over the last 10 years, more people have left Sefton than have come to live here, and is part of the reason why Sefton’s population is declining.</p>

Summary of Representation – Maghull East (parcels S129, S130, S131, S132)	Sefton’s Response
Quality of life / well-being	
<p>Maghull is a pleasant place to live due to the proximity to Green Belt. This is one of the main reasons people chose to live there</p> <p>Development would radically change residents’ lifestyles</p> <p>Young children’s safety is at risk if traffic increases</p>	<p>If the Council decides that land is needed in this location for development, any new housing will be required to be of a high quality, will be similar in character to the existing housing, and will include the provision of open space. Access to the countryside will be maintained and improved.</p> <p>New roads serving any new developments will be designed to meet the latest road safety standards. Children’s safety should not be affected, as any planning application would need to demonstrate that a safe means of access is provided to the site.</p>
Disproportionate to the size / character of the settlement / already at capacity	
<p>Over the last forty years Maghull has grown and lost its identity. Developing the Green Belt would change the character, eradicating its semi-rural image and appearance, irrevocably and for the worst</p> <p>Maghull is a relatively small community and is big enough already</p> <p>‘Old’ Maghull has a sleepy feel and a real sense of community, new homes would be at odds and damage this</p> <p>Maghull has taken ‘more than its fair share’ in the role of developing Sefton</p>	<p>No decisions have yet been taken about where new development should take place, or if any new homes should be built in the Green Belt.</p> <p>Any new development built in the Green Belt would have to be designed to a high quality.</p>
Don’t agree with the evidence / evidence is out of date / cost	
<p>There is no major housing crisis in Maghull. The housing need should be questioned in light of low or declining population growth. Decisions should be taken in light of updated data from the 2011 census information</p> <p>Most people commute, thus there is no need for business</p>	<p>A full response to these issues is set out in Section Two of this report.</p> <p>The Joint Land and Employment Premises Study does not indicate that there is any need to provide any additional employment land in Maghull.</p>

Summary of Representation – Maghull East (parcels S129, S130, S131, S132)	Sefton’s Response
<p>development in the area.</p> <p>Putting forward Option 1 and conducting a Green Belt survey shows an inbuilt predisposition to rural development</p> <p>Environmental and social needs are of equal importance to economic ones. Additionally, the link between economic growth and amount of housing land available is a fallacy</p> <p>Green Belt parcel S131 (land between Poverty Lane and the Leeds Liverpool Canal) is not identified as urban green space in an attempt to gain more space for development</p> <p>Plans have not taken into account surface water flood maps</p> <p>Government advice contained in Planning Policy Guidance (PPG) 2: Green Belts has been misinterpreted to suit development</p>	<p>Government advice is that the Green Belt should only be reviewed when a Plan is being prepared, if there is insufficient land available in the urban area to meet identified housing needs during the plan period. Consequently, a draft Green Belt Study was carried out which assessed what land in Sefton’s Green Belt had to be kept permanently open. The Study does not mean that any or all the land that it identified as having some development potential would be developed. The Plan will determine how much land is needed and where this will be located. This will take account of the attributes and constraints affecting each Green Belt parcel, as well as the Plan’s overall strategy and the need to promote sustainable patterns of development.</p> <p>Green Belt parcel S131 is not classified as urban greenspace in the draft Green Belt Study. It is agricultural land. The bulk of the parcel on the opposite side of the road (Green Belt parcel S130) comprises the Balls Wood Park and Playing Fields which are owned by the Parish Council, and this has been excluded.</p> <p>Data relating to surface water flooding was not available when the draft Green Belt Study was carried out. However this information will be included in the final Study before it is approved.</p> <p>The Council disagrees that the draft Green Belt Study misinterprets Government policy on Green Belts. This states that detailed Green Belt boundaries should not be changed unless exceptional circumstances exist which necessitate such a revision. If the Council decides to meet identified future needs as its Core Strategy’s Preferred Option, this will require some development in the Green</p>

Summary of Representation – Maghull East (parcels S129, S130, S131, S132)	Sefton’s Response
<p>No consideration has been given to the impact development would have on a ‘grossly over-developed’ Maghull</p>	<p>Belt. Further guidance is provided in the draft National Planning Policy Framework, and the Green Belt Study will need to be amended to take this into account before the draft Study is approved.</p> <p>The draft Green Belt Study identifies more land that could be developed than would be required to meet needs. If the Council chooses a Preferred Option that requires some development in the Green Belt, further work will be undertaken, including further analysis of the comments raised by local people. This will recommend which if any areas should be identified for development, which should be ‘safeguarded’ to meet long term needs, and which will remain in the Green Belt.</p>
Nature conservation	
<p>These areas (Green Belt Parcels S129 – land east of Maghull, S131, land south of Melling Lane, and S132, land south of the Leeds Liverpool Canal) are near to the North West’s regional farmland bird hotspots and should not be released from Green Belt [RSPB].</p> <p>The area is full of a variety of wildlife that would be displaced should their habitat be destroyed</p> <p>Many farmland bird species are listed in the UK BAP as well as migrating Geese.</p> <p>Losing Green Belt land removes habitats for declining bird species and reduce availability of land for future conservation / remediation projects</p>	<p>Comments noted. The Council has a difficult challenge to both protect and manage nature, and also provide homes and jobs. We have a legal duty to take account of biodiversity, and have recently approved an Ecological Framework which helps us to focus on protecting and enhancing key habitats and species, and creating new habitats. We will work with developers to help us do this.</p> <p>If it were proposed to take forward sites in this location, further discussions are needed with the RSPB and appropriate surveys and assessments would need to be carried out, to determine the ecological importance of these sites. This could restrict the area that would be potentially suitable for development.</p> <p>There is a legal requirement for various appraisals of the Plan, including Habitats Regulations Assessment, Strategic Environmental Assessment and Sustainability Assessment.</p>

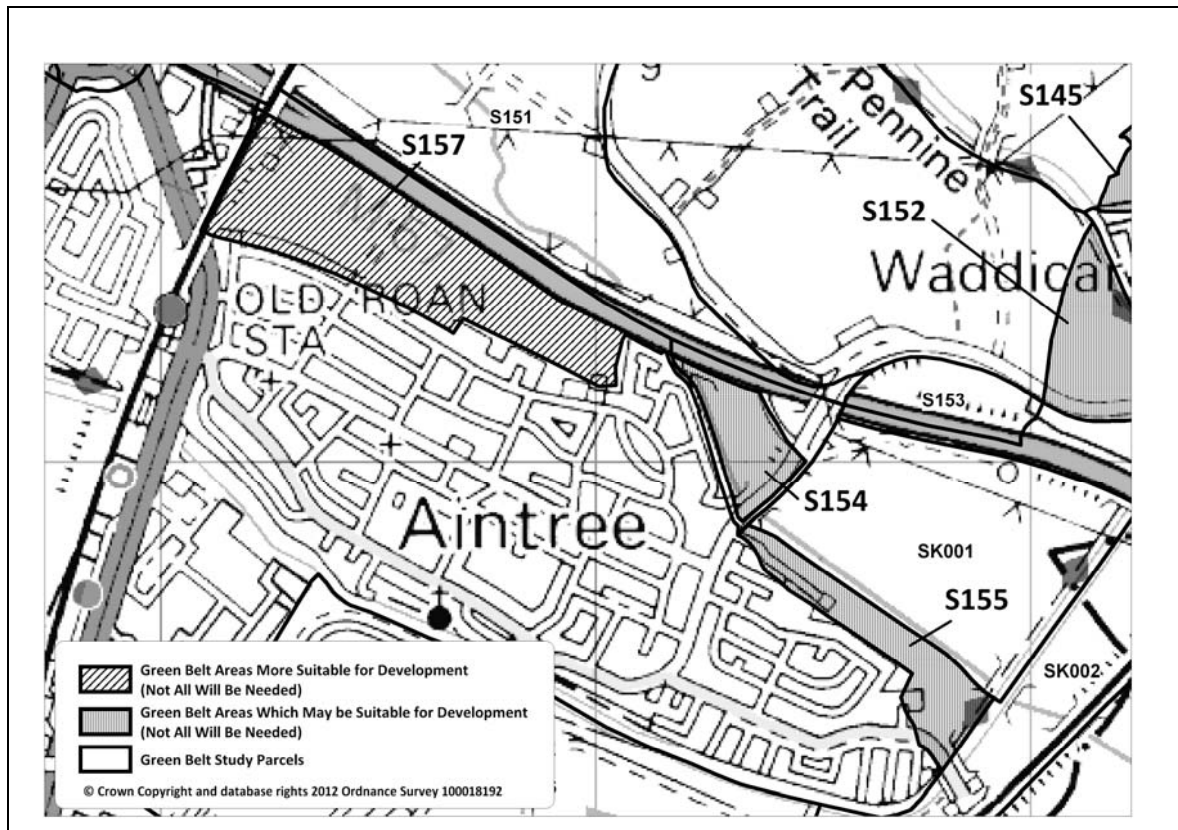
Summary of Representation – Maghull East (parcels S129, S130, S131, S132)	Sefton’s Response
Lack of consultation	
<p>Disappointment that the letter requesting views on the draft Green Belt Study received with only 3 weeks to respond. 3 weeks not enough time to digest information and respond.</p> <p>There should be a published timeframe in advance that shows the public when and for how long objections can be considered</p> <p>There has been very little consultation, especially considering the importance of the matter</p> <p>Many elderly in the area have not had their voices heard. Few have internet or can’t get out of their homes</p> <p>Are Sefton trying to keep this quiet? Plans are being ‘rail-road’ through to avoid opposition that would be vehement if more widely known</p>	<p>These points are responded to fully in Section two of this report. The Council listened to what people said about the lack of consultation last summer, and is considering what we can do differently at the next stage of public consultation, on the Preferred Option, at the end of the year, in order to reach more people. However, it has to strike a balance between what is effective and the cost.</p> <p>The Core Strategy webpage (www.sefton.gov.uk/corestrategy) is updated to provide information about future consultation events.</p>
Positive / supporting comment	
<p>Green Belt parcel S129 (land east of Maghull) could provide a natural extension to Maghull as the M58 motorway would form a robust boundary.</p> <p>Green Belt parcel S129 land is not the best and most versatile compared to other areas in Sefton</p> <p>Development of the prison site near Ashworth would be worthwhile</p>	<p>The draft Green Belt Study indicated that Green Belt parcel S129 was well-contained by the urban area and the motorway would ensure that adjoining parcels did not come under more pressure if the site were needed to meet future development needs.</p> <p>Information supplied as a result of the consultation shows that the land is not of as high quality (more Grade 2 agricultural land) than the data provided by National England. The Council acknowledges that it needs to carry out further work to assess the economic and other impacts of developing on ‘best and most versatile’ agricultural land as required by the draft National Planning Policy Framework.</p> <p>The owner of the ‘prison site (Green Belt parcel S128) has indicated</p>

Summary of Representation – Maghull East (parcels S129, S130, S131, S132)	Sefton’s Response
<p>‘Key worker housing’ and reasonably priced homes can have a positive impact on a community</p>	<p>that this site is now available as a potential housing site. When developed, this will reduce the need to identify other land in the Green Belt to meet established needs.</p> <p>Although there is a requirement to provide some ‘affordable housing’ as part of any development, there is no evidence to show that ‘key worker’ housing is needed.</p>
Impact on view / impact on property value	
<p>If Green Belt development took place the value of properties in the area would be reduced markedly.</p> <p>Should development take place and compensation not be offered due to declining values then the residents will take legal action as a collective</p> <p>The view is a main factor when people consider buying a property in the area</p>	<p>The loss of a view or property values are not normally issues that can be taken into account in preparing a Plan, unless there are any specific landscape or heritage designations.</p> <p>There is no legal provision or requirement for the Council to offer compensation when preparing a Plan for the area.</p>
It’s not in Sefton’s best interests / local community don’t want it	
<p>It is the duty of the Local Authority to listen to their citizens. The community are registering their dissent against development on the Green Belt</p> <p>This issue seems to be about developing ‘desirable’ areas rather than providing housing and employment</p>	<p>The Council has consulted on three Options so that we can get the community’s views. However, in producing the Plan, we also have to take into account Government requirements and evidence. These will all be used to help the Council choose the Plan’s Preferred Option later this year.</p> <p>The Council is required by Government to provide more housing, and enough employment land to meet identified needs. If we do not, we have to demonstrate why Sefton is so special that we cannot do this. The draft Green Belt Study was carried out in a systematic way to identify those areas that have most impact on the openness of the</p>

Summary of Representation – Maghull East (parcels S129, S130, S131, S132)	Sefton’s Response
	Green Belt, and these have been excluded from consideration. They are spread across Sefton on the edge of all the main settlements. The choice will be informed by any additional issues raised, including those raised by the local community during the Options consultation, and extra work that we will undertake as a result.
Protect the environment (general)	
<p>It is hoped that design would be considered. Architecture should compliment and reflect the existing character of the neighbourhood</p> <p>The Council are always pushing green policies and mantras yet they are planning an unecological move to build on the countryside</p>	<p>The Council aims to make sure that the design of new development is sympathetic to the character of the surroundings and is high quality. This is an essential part of sustainable development, in line with government guidance and Building Regulations.</p> <p>The Council intends to continue to protect the majority of the ‘green’ areas in Sefton. However, we are running out of developable land in the urban areas. We have therefore carried out the draft Green Belt Study to identify those areas which contribute least to the openness of the Green Belt, where development may be accommodated with least impact on the environment and in the most sustainable locations. If the Council chooses an option which includes some development in the Green Belt, it will only release the minimum amount of land required to meet its needs from the Green Belt.</p>
Disruption caused by building work / damage to property	
The build will be a great disruption for a number of years and will be very distressing throughout	There is always some disruption when development takes place. The Council will ensure that building works are restricted to agreed hours, to minimise any disruption.
Recreation / tourism	
<p>This is the first piece of open countryside available from Liverpool for recreation</p> <p>The area is well used by walkers, cyclists and runners</p>	Any existing recreation areas and rights of way will be retained and may be enhanced. New areas of green space would also be included in any new developments.

Summary of Representation – Maghull East (parcels S129, S130, S131, S132)	Sefton’s Response
Not a suitable location for development	
Maghull is already densely populated	Most of Maghull has been built at typical suburban densities of about 30 dwellings per hectare. Any new development would be similar in character to nearby housing.
Protect urban green space / once lost can’t be recovered	
Urban green space should not be developed Green space in and around Maghull has been developed year on year	‘Greenspace’ is a designation given to protected open land in the urban areas. It can include facilities such as parks and recreation areas. Where the latter exists on an area which is taken forward for development, the draft Green Belt Study has stated that existing Greenspaces should be retained or exceptionally be re-located if development takes place.

Objections to Green Belt Sites Aintree Area



This section of the Consultation Report looks at comments made to specific Green Belt sites [or parcels] in the Aintree area during consultation.

The Green Belt sites that were identified as having some potential for development in the Aintree area are shown in the map to the left.

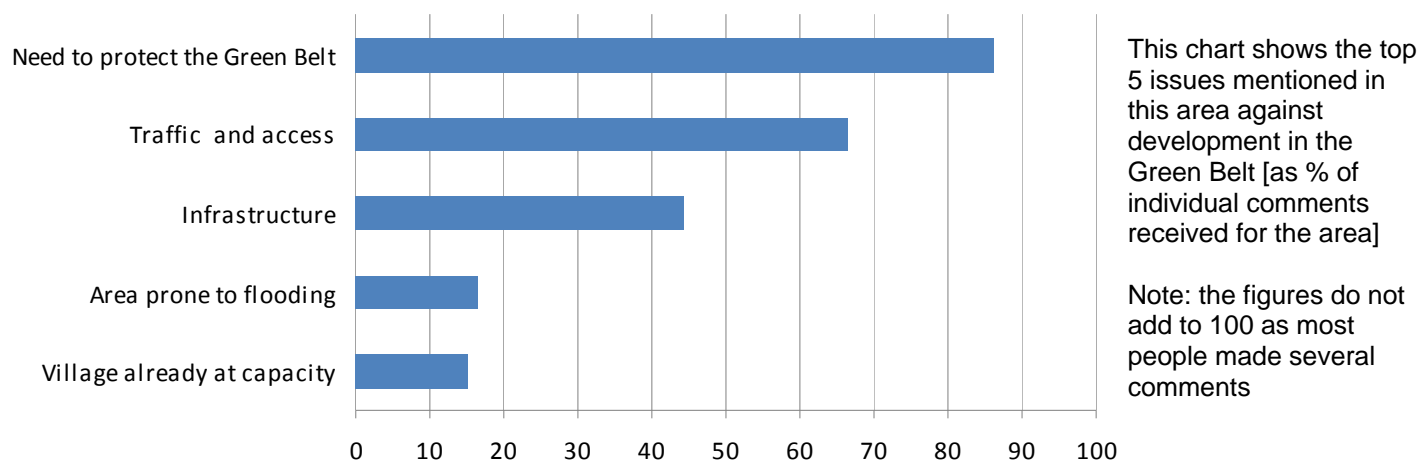
This section only includes comments that relate to Green Belt sites in Aintree. Other more general comments on Green Belt sites are set out earlier in this report e.g. agricultural land, flood risk, vacant homes.

This section includes separate tables for the following areas of Aintree

Aintree	S154, S155, S157
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Aintree S154, S155, S157

In addition to the individual comments that relate to this area a comments book was made available in Aintree library and signed by 223 local residents. The individual responses set out below include those made in the book during the consultation period. Other people signed a petition supporting Plan Option One ('urban containment').



The vast majority of people (86.3%) of people felt that the Green Belt must be protected in order to avoid sprawl and prevent it from becoming a town. Traffic was also a significant consideration with 66% of respondents believing the area's road network was unable to deal with further development as it was already at breaking point. 44% of people identified infrastructure and lack of services in the area as currently a problem; this would worsen if further development were to be permitted. Although people mentioned a wide range of other reasons supporting their objection to any development in the Aintree area, none was mentioned by more than 1/6 of all the people who commented.

Summary of Representation – Aintree (parcels S154, S155, S157)	Sefton's Response
Protect the Green Belt / would lead to urban sprawl / once lost can't be recovered	
Aintree Village is becoming a town, there is too much development surrounding the area as it is e.g. Motorway, Switch Island	No decisions have been taken about whether development would take place in the Green Belt. However, the Options paper suggests that

Summary of Representation – Aintree (parcels S154, S155, S157)	Sefton’s Response
	<p>this would be necessary if Sefton was to meet its future housing and employment needs, or stabilise its population.</p> <p>The Council has carried out a draft Green Belt Study which has assessed how essential it is that the different parts of the Green Belt are kept open. The Study concluded that land between Aintree and the M57 motorway was not essential to maintaining the openness of the Green Belt in the wider area, but further work that we intend to carry out may reveal that these areas are not suitable for other reasons e.g. flood risk, traffic grounds.</p>
Traffic – inadequate access, congestion, poor public transport accessibility, pollution	
<p>The road network already struggles to cope with traffic, often becoming congested. Further traffic would heighten the levels of congestion experienced.</p> <p>The Aintree Lane / Altway / A59 is a major crossroads and is often congested. It is difficult getting on to Ormskirk Road (A59) due to busy traffic on connecting roads such as Bradfield Avenue.</p> <p>Switch Island is ‘a nightmare’ to negotiate. Asda and the retail park have aggravated traffic congestion.</p> <p>Public transport in the area would be negatively affected. Service is already sporadic at best</p> <p>An extra ‘1000+’ cars would have a dramatic effect on people’s health due to noise and air pollution, particularly to the elderly</p> <p>Tesco HGV’s attempt three-point turns in Bradfield Road causing further congestion.</p>	<p>Two thirds of people who commented on the Plan Options paper and the draft Green Belt Study, mentioned the inadequacies of the road network in this area, and its inability to take more traffic. If the Council consider development is necessary in the Aintree area, further work would be undertaken to assess the impact of traffic generated by development on any Green Belt parcel or part of a parcel, and to determine whether any improvements could be carried out that would enable further development to go ahead without having an unacceptable effect on local roads.</p> <p>The comments about HGV’s turning is not something that the Plan could address, but these comments will be passed to the Traffic Services Manager for his attention.</p>

Summary of Representation – Aintree (parcels S154, S155, S157)	Sefton’s Response
Impact on services + infrastructure – drainage / shops / schools at capacity / lack of health services	
<p>Services are already strained and at capacity, they could not possibly take more users. There is no dentist, and there is a 2 week waiting period for GP appointments, the two Schools are full with class sizes of 30+.</p> <p>Other essential services (Police, Ambulance, Fire) are already stretched; geographically and financially</p> <p>There is a gas main running through northeast corner of Green Belt parcel S154.</p>	<p>The Council is required to produce an Infrastructure Delivery Plan that sets out what new infrastructure is required, when it would be provided and by whom. If this is not able to be provided by the infrastructure or service provider, then it would be paid for by the developer.</p> <p>If land is required for development and any services could not be kept within the site, the cost of realigning them would be paid for by any developer.</p>
Area prone to flooding	
<p>It is illogical to build on fields where flooding regularly occurs, this should be enough to avoid development.</p> <p>Existing surface water drains could not cope. Require upgrading to accommodate further development</p> <p>Subsidence is quite common</p> <p>No development should ever be allowed on floodplain land</p>	<p>Since the draft Green Belt Study was published, further work has been carried out on surface water and groundwater flooding. The Environment Agency has carried out further modelling relating to river flooding in the Maghull and Aintree areas. Any changes affecting these sites would be included in the Green Belt Study before it is finalised. All three Green Belt parcels in the Aintree area (S154, S155 and S157) are at risk of groundwater flooding, and parts are also affected by surface water flooding. In the case of the land north of Oriel Drive (S157), this would affect how much of the parcel could be developed, if land in Aintree needed to be developed as part of the Plan.</p> <p>If the sites were to be taken forward, further work, including about surface water flood risk, would be required to show that flooding issues have been taken into account.</p>
Disproportionate to the size/character of the settlement/already at capacity	
<p>The Aintree and Old Roan area is supposed to be a village, development would ruin this characteristic. Development would ‘bring down’ the area</p>	<p>No decisions have yet been taken about whether any development would take place in the Green Belt, and for what purpose. If it is, and land in this area is needed, the Council is required to ensure that new</p>

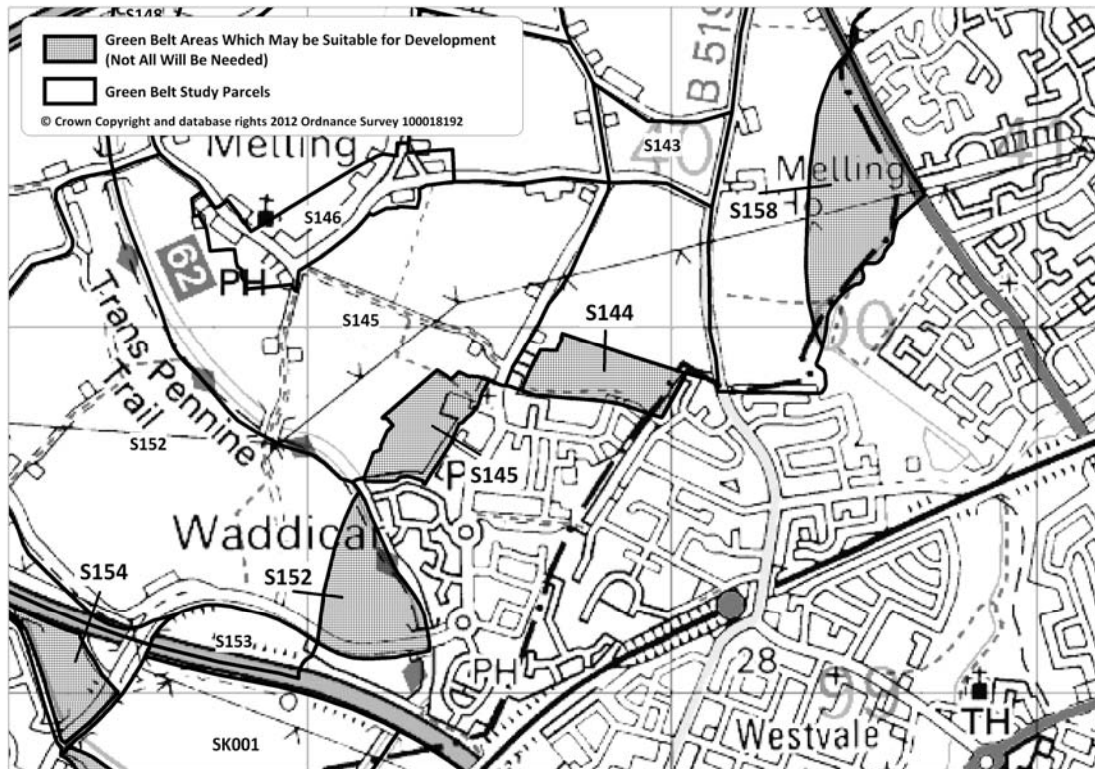
Summary of Representation – Aintree (parcels S154, S155, S157)	Sefton’s Response
<p>The area would become overpopulated. It is developed enough as is. Why does everything have to be developed?</p> <p>Design and layout must be sympathetic to the existing character of the village</p>	<p>development is well-designed and in keeping with the character of the existing housing in Aintree.</p> <p>As indicated above, it is most unlikely that the three potential developable areas identified in the draft Green Belt Study as having development potential would all be developed.</p>
Other	
<p>A buffer strip would be required next to the motorway in the case of an accident / spillage. Green space used to be an organic part of urban development, planning for them is ‘regression’.</p> <p>Mill Farm landowners have been refused planning permission numerous times due to access. When the council wants to use it this is suddenly no longer an issue</p> <p>Land would need to be raised for development to go ahead. This would cause huge disruption for local residents.</p>	<p>If development were to take place on land adjacent to the M57, the developer would have to provide open space, ensure that surface water run off from the site when developed did not exceed the run off before the site was developed. Parts of the sites are also at risk of flooding, so if these areas were avoided, it is likely that there would be an open buffer adjacent to the motorway, regardless of any road safety issues arising from being close to the motorway.</p> <p>Land at Mill Farm (Green Belt parcel S155) was refused planning permission in the past primarily because the land was in the Green Belt. The Council is now reviewing land in the Green Belt on the edge of its urban areas to see whether any could be developed to meet future housing needs. If the Council decides that it does need to develop some land in the Green Belt, further work would be undertaken to assess the ability of the highway network to take additional traffic and to identify any highway improvements needed. Any future developer would also have to submit a detailed Traffic Impact Assessment to demonstrate that a safe access could be provided to the required standards.</p> <p>If materials area need to be brought onto a site before development starts (e.g. to raise the land level) on site prior to development</p>

Summary of Representation – Aintree (parcels S154, S155, S157)	Sefton’s Response
<p>What are the health implications of living nearer to the Motorway and electricity pylons?</p> <p>Why has Firwood acquired the land at the swing bridge on Wango Lane? It appears they’re preparing the site. This consultation is just a legal formality, you have already made up your mind to develop</p> <p>Aintree Village is part of the ‘Big Society,’ the community has expressed its distaste and doesn’t want any development tin Aintree.</p>	<p>commencing, any developer would need to have their proposals approved by the Council to ensure that the fill materials they intend to use are suitable. It would not be acceptable to use hazardous waste.</p> <p>As indicated above, it is unlikely that any new houses would be built up to the motorway, due to the need to provide open space and sustainable drainage systems etc. However, should the area be identified for new housing, the impact would have to be assessed against the requirements set out in national planning policy (PPG24 “Planning and Noise” and the draft National Planning Policy Framework). The impact of noise on a development is certainly a relevant consideration. An air quality assessment would be needed to look at the impacts of the motorway on the development.</p> <p>The preparation of the Plan is not being led by developers and landowners. The Council has carried out a draft Green Belt Study in a systematic way as part of this process, so that we retain control over where and when new development will take place. Firwood Timber has not made any representations in respect of the land they own off Wango Lane (Green Belt parcel SK002), and none have been received in respect of Green Belt parcel S157 (land north of Oriel Drive).</p> <p>The community’s views would be taken into account. However, in choosing the Plan’s Preferred Option, we have to balance these with Government requirements to ‘plan for growth’, identified needs (the evidence) and environmental protection etc.</p>
Nature conservation	
<p>Have any wildlife surveys been carried out in the area? Wildlife sanctuaries in Green Belt parcels S154 (land west of Bulls Bridge Lane) and S157 (Land north of Oriel Drive) have developed naturally.</p>	<p>Noted. The Council has a difficult challenge to both protect and manage nature, and also provide homes and jobs. We have a legal duty to take account of biodiversity, and have recently approved an</p>

Summary of Representation – Aintree (parcels S154, S155, S157)	Sefton’s Response
<p>They should be surveyed for endangered species to avoid destruction of habitat.</p> <p>Green Belt parcel S154 is part of the Mersey Forest.</p>	<p>Ecological Framework which helps us to focus on protecting and enhancing key habitats and species, and creating new habitats. We will work with developers to help us do this.</p> <p>If it were proposed to take forward sites in this location, appropriate surveys and assessments would need to be carried out, to determine the ecological importance of these sites. This could restrict the area that would be potentially suitable for development. There is a legal requirement for Habitats Regulations Assessment, Strategic Environmental Assessment and Sustainability Assessment of the Plan.</p> <p>The whole of Sefton is within the Mersey Forest. The Forest Plan and its priorities are being updated, but this does not affect a site’s suitability for development. It could indicate the type of landscaping or tree-planting that would be appropriate if a site were to be identified for development.</p>
Disruption caused by building work / damage to property	
<p>The road surface on Bradfield Avenue has been damaged by lorries frequently passing up and down, further disruption would be unacceptable.</p> <p>The number of lorry loads (numbers vary between 5,000 – 40,000) to raise the site level 5 metres would be unbearable, not to mention the amount of construction traffic, noise and pollution</p>	<p>If the Council decides that it needs to identify land in the Green Belt for development as part of the Plan’s Preferred Option, and sites in the Aintree are chosen, the Council would specify when and which routes are used by construction traffic and would limit the working hours to avoid evenings, weekends and Bank Holidays, in order to minimise this impact on nearby residents.</p> <p>Further work is being undertaken to assess the implications of surface water and groundwater flood risk. For example, this could restrict the area that would be potentially suitable for development. If it is proposed to raise the land levels, the implications of bringing material onto the site would be taken into account when any future planning application is submitted.</p>

Summary of Representation – Aintree (parcels S154, S155, S157)	Sefton’s Response
Quality of life / well-being	
One would need more than double glazing to deaden the noise of the motorway.	
Don’t agree with the evidence / evidence is out of date / cost	
‘Flabbergasted’ that land with unsuitable neighbouring boundaries (motorway, supermarket, etc) and Grade 2 flood allocation has got through the Green Belt Assessment.	If land adjacent to such uses were to be proposed for development, appropriate buffers (e.g. trees, open space) would need to be incorporated.
Detailed Plan comments	
<p>Aintree contributes significantly to the Liverpool City region, how does the loss of Green Belt contribute?</p> <p>Maghull and Aintree only require 69 houses over 5 years (table 6.4, NLP Study). ‘Flooding’ Aintree with hundreds of houses is just a numbers game rather than addressing the issue of demand in Formby and Southport</p>	Table 6.4 of NLP Study sets out the number of new affordable houses that are needed in the Sefton East Parishes area. Total housing need would be significantly higher than this.
Need to maintain gap / buffer between towns	
The Green Belt between Aintree, Maghull, Melling and Kirkby provides an area of natural beauty and tranquillity that ensures Aintree remains a village	The M57 would provide a strong boundary between Aintree and Maghull, Melling and Kirkby, which would ensure that these settlements do not merge should any of the sites in Aintree be identified for development through the Plan. However, no decisions have yet been taken about whether any development in the Green Belt is needed; this would depend on which Option the Council chooses as its Preferred Option later this year.

Objections to Green Belt Sites Melling and Waddicar Area



This section of the Consultation Report looks at comments made to specific Green Belt sites [or parcels] in the Melling and Waddicar area during consultation.

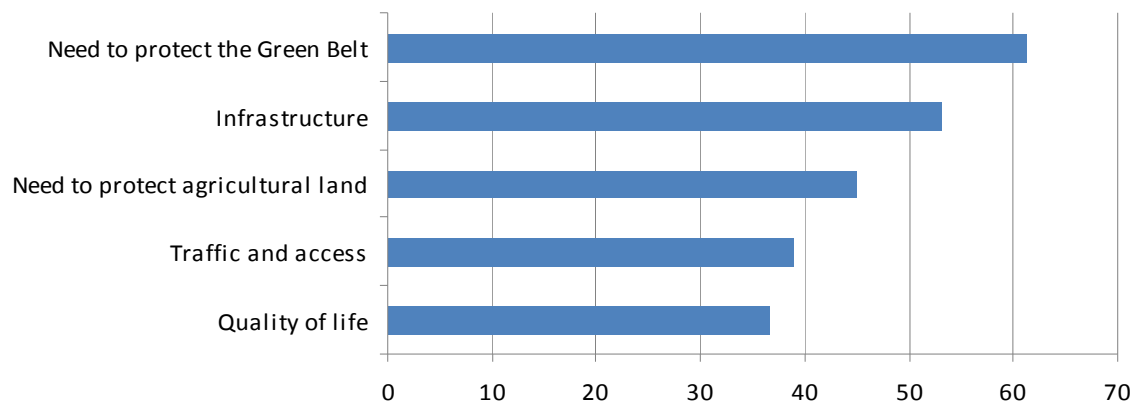
The Green Belt sites that were identified as having some potential for development in the Melling and Waddicar area are shown in the map to the left.

This section only includes comments that relate to Green Belt sites in Melling and Waddicar. Other more general comments on Green Belt sites are set out earlier in this report e.g. agricultural land, flood risk, vacant homes.

This section includes separate tables for the following areas of Melling and Waddicar

Melling and Waddicar	S144, S145, S150, S158
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Sites of the edge of Waddicar (Melling) S144, S145, S150, S158 and the “Melling Settlement Area”



This chart shows the top 5 issues mentioned in this area against development in the Green Belt [as % of individual comments received for the area]

Note: the figures do not add to 100 as most people made several comments

61% of people argued that the Green Belt was essential in restraining urban sprawl and that development should be a very last resort, if at all. Over half of respondents (53%) raised concerns about a lack of infrastructure to support an additional population with services at capacity. The loss of agricultural land was the third biggest concern for people, 44% said the loss of Grade 1 agricultural land would be irreversible and short-sighted in the face of growing population and food security concerns.

Summary of Representation – Waddicar (Melling) (parcels S144, S145, S150, S158 & Melling generally)	Sefton’s Response
Impact on services + infrastructure - drainage / shops/ schools at capacity / lack of health services	
<p>The existing infrastructure is not up to standard and would be unable to take more</p> <p>The GP’s surgery is over-subscribed, the primary school has to cope with a large area (including some children who live in Knowsley), the Post Office has no parking facilities and there is no secondary school</p>	<p>The Council has carried out an assessment of existing provision across Sefton in its draft Infrastructure Study. It is required to indicate what new infrastructure is needed to accompany any new development that will take place as a result of proposals in the Core Strategy, and set out who will provide this infrastructure and when.</p>

Summary of Representation – Waddicar (Melling) (parcels S144, S145, S150, S158 & Melling generally)	Sefton’s Response
<p>The new development “<i>The Village</i>” is still not adopted due to lack of adequate sewage and drainage facilities.</p>	<p>The Council and United Utilities are progressing the adoption of the roads and sewers in this area. The sewers have been ‘vested’ by United Utilities. The Council will adopt the roads once remedial works have been completed on Satinwood Drive.</p>
<p>Traffic - inadequate access, congestion, poor public transport accessibility, pollution</p>	
<p>Waddicar Lane can not be widened further.</p> <p>Over the last 40 years there has been a great increase in traffic. This has brought the associated environmental consequences with it</p> <p>There has already been a speed-related fatality; further traffic could increase the chance of a repeat of this.</p> <p>There is only one road in and one road out of Melling. Gaining access across the canal bridge would be dangerous, you need a clear way through for Emergency Services</p> <p>Public transport links are very poor within the area, with limited bus services and no train station</p>	<p>The adequacy of the road network in Sefton’s East Parishes area has been raised by the majority of residents in this part of Sefton who commented on the Core Strategy. It is also acknowledged that there is only one means of access into Melling from the south, which crosses both the Leeds Liverpool Canal and the M57. There are a variety of access points from the north and west, but there is no direct road access to Kirkby, even though the latter settlement abuts Melling’s eastern boundary. If it is proposed that land in this area should be developed in the future, further work will be undertaken to assess the capacity of the highway network, and to identify the scope for any improvements that may be needed. This would include road safety issues.</p> <p>Although Melling is not within 400 metres of a railway station, the main road through the village is on a medium frequency bus route.</p>
<p>Other / detailed Core Strategy comments</p>	
<p>The Scout hall is a widely used community facility; there are no other such facilities with the immediate area. It was built 7 years ago, funded by the Lottery. Destroying this would be a waste of resources and a detriment to the community.</p> <p>If the GP’s surgery is full, you cannot say that development is ok</p>	<p>There is no proposal to demolish the Scout Hall. The draft Green Belt Study shows the “developable area” in Green Belt parcel S144 as excluding the properties fronting Waddicar Lane. However, when the Green Belt Study is finalised, the agricultural area between Cauce Hall and the Presbytery on Waddicar Lane should be included in the “developable area”.</p> <p>If further development takes place, the Council is required to identify</p>

Summary of Representation – Waddicar (Melling) (parcels S144, S145, S150, S158 & Melling generally)	Sefton’s Response
<p>because there is one.</p> <p>Melling are ‘last on the list’ for improvements. It is a disgrace for Sefton to now expect the area to be ‘first for development’.</p>	<p>what additional infrastructure is needed in the area. It also has to state who will provide the infrastructure and when in its Infrastructure Delivery Plan. Local priorities for service delivery in the Melling area will be set in conjunction with the Local Area Partnerships and the Parish Plans.</p>
Disproportionate to the size/character of the settlement/already at capacity	
<p>Melling has been developed to capacity over the last 10 years, especially Waddicar Village. Further housing would ruin the village’s character</p> <p>The ‘sleepy’ nature of the village would be lost as it rapidly becomes a town</p>	<p>More than 400 new homes have been built in the Waddicar area between 1989 – 2009. The Options paper confirmed that new infrastructure has not been provided to support this growth in population.</p>
Recreation / tourism	
<p>Walkers often use the fields, the natural and farmed aspect are greatly prized</p>	<p>If any further development is proposed in this area, existing footpaths would be retained and incorporated into the development. New open space would also be provided or the existing Rainbow Park could be enlarged and upgraded.</p>
Social issues - anti social behaviour	
<ul style="list-style-type: none"> • Melling already has a ‘big crime problem.’ More houses means more crime 	<p>This is not inevitable. New development will be mainly private housing with 30% affordable housing. The development will be designed to a high standard incorporating ‘designing out crime’ criteria.</p>
Nature conservation	
<p>Residents in the area enjoy and respect the natural environment. It is devastating that it will be taken away</p>	<p>Comments noted. The Council has a difficult challenge to both protect and manage nature, and also provide homes and jobs. We have a legal duty to take account of biodiversity, and have recently approved an Ecological Framework which helps us to focus on protecting and enhancing key habitats and species, and creating new habitats. We will work with developers to help us do this.</p>
<p>A local Wildlife Sanctuary has developed on Green Belt parcel S145</p>	<p>None of the areas are designated as key habitats in the Ecological</p>

Summary of Representation – Waddicar (Melling) (parcels S144, S145, S150, S158 & Melling generally)	Sefton’s Response
(land south of Wadacre Farm). This land is known to be the habitat of Water Voles and should undergo an ecological survey prior to development	<p>Framework. However Green Belt parcel S145 has been identified by the RSPB as a potential ‘farmland bird hotspot’.</p> <p>If it were proposed to take forward sites in this location, further discussions are needed with the RSPB and appropriate surveys and assessments would need to be carried out, to determine the ecological importance of these sites. This could restrict the area that would be potentially suitable for development.</p>
Area prone to flooding	
Drainage has been a reoccurring problem for residents over the years	The area adjacent to the drainage ditches (‘Brooklea’) forming the western boundary of the area identified in the draft Green Belt Study as being potentially suitable for development has been identified as having a high risk of flooding. If these sites were to be taken forward, further work (including about surface water flood risk) would be required to show that flooding issues have been taken into account.
Employment land / industrial units do not guarantee jobs	
There is very little business economy within the area	The Council agrees. However, Melling is within 5 kilometres of nearby employment areas in Aintree and Netherton.
Need to maintain gap/buffer between towns	
There is genuine danger that the boundary between Melling and Kirkby will become undistinguishable	There is currently no physical gap between Melling (Waddicar) and Kirkby. There are no proposals to link Melling village with Waddicar.
Not a suitable site location for development	
Melling cannot take any more traffic, people or building within ‘at least a 10 mile radius’	Whilst there may be sound reasons for not permitting any further growth in Melling, the Council is not at a stage where it has decided whether to choose an option that includes development solely within the urban areas (Option One) as its Preferred Option, or one that allows some development in the Green Belt. The Council cannot rule out any development within a 10 mile radius of Melling.

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Section Five

Responses to Green Belt sites
– Comments in support



Section Five

Responses to Green Belt sites – Supports

This table contains a list of Green Belt sites suggested both by [a] individuals and [b] developers as being suitable for development.

An asterisk [*] shows which sites were identified in the draft Green Belt study as having some potential for development.

If the Council proposes an option which includes sites in the Green Belt, these comments, and any supporting information, will be considered.

[a] Comments in support of development made by individuals.

	Green Belt Site Supported [and summary of reason if provided]
	Golf courses and caravan parks
*	S004 – land south of Moss Lane, Southport Some general support
*	S007 - Land at Crowland Street / Butts Lane / “land east of Southport” Already adjacent to existing housing at least part could be used for new housing, as there appears to be more land identified for employment purposes than is needed.
*	S008 – Kew Park and Ride site Land at Crowland Street should be considered for residential development, not employment purposes.
	S015 – Land between the Royal Birkdale Golf Course and Waterloo Road
*	S016 – Ainsdale High School Some support citing current good access and infrastructure
	S023 – Land adjacent to Pontin’s, Ainsdale Land including Toad Hall / 1 – 4 Promenade, Ainsdale and Pontin’s Holiday Centre
	S029 – Willow Bank Caravan Park
*	S030, S031 – land to north and south of Plex Moss Lane, Ainsdale Supports the Council’s proposal for Green Belt parcel S030 (land south of Plex Moss Lane).
	S032 + S033 – Woodvale Airfield Support for development of site with existing uses relocated. Good road links.

*	S048 – Land near the children’s park on Alt Road, Formby could be developed for housing.
	Unspecified areas of land between Hightown and Formby
	S084 – Site of Park Wall Cottage, Park Wall Road, Ince Blundell
	S086 - Lunt and beyond towards Southport
	Ince Blundell Village Limited "infill" development in Ince Blundell village
	S092 – Land between Lydiate Lane and Edge Lane, and between Netherton and Thornton Support for small part of this site that is not in agricultural use (adjacent to Runnell’s Lane) as it is semi-derelict, no ecological value, would not “narrow the gap” between Thornton and Netherton and has excellent transport links.
	S094 – Rimrose Valley
*	S095 – Land SE of Thornton Crematorium The land between the crematorium and the Thornton – Switch Island link road could be developed.
	S105 - Jubilee Wood (land adjacent to the Northern Perimeter Road opposite the Buckley Hill playing fields / adjacent to Brickwall Lane) Unspecified land on the Northern Perimeter Road, Netherton
	S103 and S150 – “green areas” circling Switch Island
*	S110 - Land between the Cheshire Lines and Maghull A small development could be built at South Meade without creating urban sprawl.
*	S112 – Land between Maghull public footpath No. 3, Bell’s Lane, Green Lane and the Canal, Lydiate No agricultural or landscape merit and is a natural extension of the Turnbridge Road development.
*	S123 – Land west of Northway, Lydiate (Tyson’s Triangle) This triangular area contains poorer quality derelict land and empty greenhouses
	S126 – Ashworth Hospital (East) and S128 – Ashworth Hospital South / Kennet Prison site <ul style="list-style-type: none"> • Use land at Ashworth Hospital (Green Belt parcel S0126) / Kennet prison (Green Belt parcel is adequate land for development, using existing infrastructure. • Why not build a new Business Park on part of the Ashworth Site adjacent to the motorway network for ease of traffic flow and reducing large vehicles from the town roads and lanes?
	S153 – land south of Spencers Lane / north of the M57 motorway Plot of unused land - now overgrown wasteland at the end of a row of existing housing.

[b] Green Belt Sites – comments in support of development made by developers

	Green Belt Site Supported [and summary of reason if provided]
*	<p>S004 (a): Land at Blundell Lane, Southport Supports and welcomes the inclusion of this site in the Core Strategy assessment. Acknowledge that the development of the site may have a partial impact on the historic setting of the Conservation Area, however it is considered that, with mitigation, the impact will be wholly negligible. Suggest more research is required about the land to the rear of Bankfield Avenue to the south of Blundell Lane which has not been identified as a potential “developable area”, as consider that this area also has potential for development.</p>
*	<p>S004(b) – Land south of Moss Lane, Southport</p> <ul style="list-style-type: none"> • Support the identification of parcel 4b (land south of Moss Lane) as a potential Green Belt release. The land is relatively unconstrained and lies in a sustainable location. It is also well contained by existing landscape features, notably Moss Lane and the Three Pools Waterway, which could provide a new defensible Green Belt boundary.
	<p>S004 (NEW) – Land to the rear of Bankfield Lane, Southport</p> <ul style="list-style-type: none"> • Proposes the identification of a third area within Green Belt parcel S004 as being suitable for residential development. • Recognise that the site, like S004(a), is a Local Wildlife Site. Suggest that a detailed ecological survey is undertaken to see whether this site could be developed.
	<p>S006 – Southport Old Links Golf Course, Moss Lane, Southport</p> <ul style="list-style-type: none"> • Wildlife designation should not prevent this land being developed because other sites which are similarly designated have been taken forward. Development of this site could improve its ecology by creating a more diverse range of habitats. It relates very well to the urban area. • The existing golf course is capable of relocation either in whole or part onto nearby land • Could create high quality new development as part of wider strategic development around Churchtown.
*	<p>S007 - Land at Crowland Street / Butts Lane / “land east of Southport”</p> <ul style="list-style-type: none"> • Promoting the use of this site for employment purposes. • The site is well contained by the urban area, and its development will not lead to unrestricted urban sprawl. • There has been no recent agricultural use of the site; only part of the parcel is classified as Grade 1 agricultural land. The site is not within and is therefore not restricted by any other designation or within an established Flood Risk zone. • The site is highly accessible. • The site benefits from a significant degree of critical mass to support development. This would improve the appearance of the area through high quality design and green infrastructure. • The site is available for development within the short term. • Capability to overcome any potential constraints to development at the site.

*	<p>S017 – Land to the rear of Lynton Drive, Birkdale</p> <ul style="list-style-type: none"> • Promotes the identification of this site for housing. • They query the value of the site's nature conservation importance
*	<p>S026 – Land south of the Coastal Road, Ainsdale (Segars Farm)</p> <ul style="list-style-type: none"> • The site is well contained with permanent physical boundaries. RAF Woodvale will continue to prevent Ainsdale and Formby from merging. • The area abuts an existing residential area (Pinfold Lane) and the Willowbank Caravan Park. • It does not comprise the best and most versatile agricultural land • Its development would not affect the integrity of adjacent local or national nature sites.
*	<p>S038 – Land north of Brackenway / Hawksworth Drive</p> <p>Questions the risk of flooding in the area. Development would be modelled to ensure a reduction in the overall risk of flooding, including the provision of sustainable urban drainage techniques (SUDs).</p> <ul style="list-style-type: none"> • Development can deliver substantial ecological and environmental benefits without harm to the landscape or other environmental interests. • Considers that designation of the whole of the parcel as a Local Wildlife Site (in the UDP) is based on outdated ecological data, and the ecological value of the site has diminished. • The site as is classified as non-agricultural and partly as Grade 4 (poor quality) agricultural land.
*	<p>S044 – Formby Moss, land north of Formby Industrial Estate</p> <ul style="list-style-type: none"> • Support to develop the whole area to provide a Business Park with an area of 25 has. • Sustainable location in an area which is not environmentally sensitive, • Potential to provide local employment opportunities that would help reduce the high levels of commuting from Formby. • The land is of low-grade agricultural quality • Majority of the land is not subject to a significant or high risk of flooding.
*	<p>S049 – land south of Barton Heys Road, Formby</p> <ul style="list-style-type: none"> • Support its identification as a potential Green Belt release, but contend that it is 'well contained,' rather than 'partially contained' • Well located in relation to Formby railway station and other facilities • Is discreetly located away from key visual receptors, like traffic passing on the Formby Bypass, and is well screened from more distant views by strong intervening tree belts.
*	<p>S066 – Hall Road West Sidings</p> <ul style="list-style-type: none"> • Do not consider the site meets the 5 purposes of including land in the Green Belt, particularly since the site was previously

	developed, which gave the area a markedly built up and different character to the open Green Belt north of the site.
	<p>S092 – Land between Lydiate Lane and Edge Lane, Thornton and Netherton</p> <ul style="list-style-type: none"> • Site does not form part of an ‘essential gap’ • The area proposed for development is vacant and is subject to anti-social behaviour (fly-tipping etc).
*	<p>S093 – Rushton’s Nursery, Runnell’s Lane, Thornton</p> <ul style="list-style-type: none"> • The site is brownfield and the site is not affected by any major constraints. • It could be developed with minimum impact on the openness of the Green Belt. It is important that the most sustainable sites are allowed to come forward for development first
*	<p>S110 and S111 – Land west of Maghull</p> <ul style="list-style-type: none"> • The land is suitable, available and achievable • Will contribute to the creation of sustainable, mixed communities • It would also not impact on any identified landscape or conservation interest. • Acknowledgement that Green Lane is narrow, but access can be gained via other roads, and also consider Green Lane could be widened. • Questions the agricultural land classification of the land as Grade 1
*	<p>S112 – Land between Maghull public footpath No. 3, Bell’s Lane, Green Lane and the Canal, Lydiate</p> <ul style="list-style-type: none"> • This site has no agricultural or landscape merit, and forms a natural extension to Turnbridge Road. • The Inspector who considered objections into the Sefton Unitary Development Plan (UDP) “did not dispute the residential merit of this site, whilst the Strategic Housing Land Availability Assessment (SHLAA) undertaken in 2008 awarded this site the highest score of any site in Maghull and Lydiate.
*	<p>S122 – Land north of Lambshear Lane, Lydiate</p> <ul style="list-style-type: none"> • Support the development of the majority of the site with various studies to support the proposal, including landscape, planning and engineering appraisals and an assessment of the agricultural land quality which shows that only about 1/3 of the site contains Grade 1 agricultural land, with slightly more Grade 2 land. • Dispute the Council’s conclusion in the draft Green Belt Study that the adjoining parcel to the east (between Liverpool Road and the A59 Northway) would have less impact on the openness of the Green Belt. They disagree with the Council’s conclusions that, although the parcel abuts the urban area to the west and south, it could be considered to “round off” Lydiate in the same way as the adjoining parcel. They consider that Green Belt Parcel S123 to the east would be considerably more visible from the east (from the A59), and its size and shape would lead to a better and more diverse form of development which would sit better in the landscape.
*	<p>S125 – Maghull Smallholdings Estate</p> <p>In 1979 planning permission was granted for 46 dwellings and 25 garages on this site [5.311 acres of land in Park Lane], but due to the</p>

	land being in such a poor condition these dwellings were built lower down Park Lane. This should be classed as a Brown Field Site.
*	<p>S128 – Ashworth Hospital South, School Lane, Maghull</p> <ul style="list-style-type: none"> • No longer required for a prison • It is adjacent to the urban area, has its own access, is available and could accommodate a high density development with a proportion of affordable housing. • The site should be designated as a 'Major Developed Site' (MDS) within the Green Belt, like the rest of the Ashworth Hospital site. (Green Belt parcel S126).
*	<p>S129 – Land to the east of Maghull, between the railway and M58, and between School Lane and Poverty Lane</p> <ul style="list-style-type: none"> • Broadly concur with the Council's conclusions set out in the draft Green Belt Study • Disagrees with the assessment that the land comprises Grade 1 agricultural land. • The site could make a valuable contribution to meeting Sefton's future housing needs, and could provide about 2,000 dwellings on the site during the plan period. • It is a sustainable location being located adjacent to the Liverpool – Ormskirk railway, and would integrate well with Maghull. • The land has a low landscape value with few views into the site from the surrounding area, and is not affected by any constraints. • The M58 would make a natural and robust Green Belt boundary if the site were developed. • The site could accommodate employment uses and other local services and facilities
*	<p>S131 – Land bounded by Maghull, Melling Lane, the M57 and the Leeds-Liverpool Canal</p> <ul style="list-style-type: none"> • Agrees with the conclusion of the draft Green Belt Study, subject to the exact capacity of the site being determined following further detailed work.
	<p>S153 – land south of Spencer's Lane and north of the M57, Melling</p> <ul style="list-style-type: none"> • Site should be considered as a self-contained parcel as it would round off the settlement without unduly reducing the overall openness and broad extent of the gap. • It is not necessary to keep area permanently open
*	<p>S154 – Land west of Bull's Bridge Lane, Aintree</p> <ul style="list-style-type: none"> • Accept that the eastern part of the parcel is identified as Grade 1 (excellent quality) agricultural land, but this area comprises deeply sloping land which is difficult to farm effectively. • The parcel is severed by an access road, and also contains a considerable amount of filled material that was deposited when the M57 was built. • Accept that the area adjacent to the River Alt is identified by the EA as having a medium risk of flooding (Flood Zone 2). Suggest this area could be used to create an attractive riverside walk and linear ecological park, as well as including a maintenance easement. • The site is better defined by strong physical boundaries than the sites identified adjacent to Waddicar, which makes this area an

	<p>obvious and logical infill site. These would prevent any further outward expansion in any direction.</p> <ul style="list-style-type: none"> • There is an existing access to the site, unlike other sites in the area. • The land forms part of Aintree, and so is part of the main built up area of Sefton / the Merseyside conurbation. It is also closer to established infrastructure and services, and to the strategic road network and public transport.
*	<p>S155 – land adjacent to Wango Lane, Aintree</p> <ul style="list-style-type: none"> • The character and sustainability of the area nearest Wango Lane is such that this area should be identified for development. • It is not identified as being in an area at high risk of flooding, or containing high quality agricultural land • Is currently unused as such, it is prone to anti-social behaviour – fires and fly-tipping. • Its development would form a natural, well-contained completion to Aintree.
	<p>Outside Sefton</p> <ul style="list-style-type: none"> • The land behind off the A570 at Kew, bounded by Foul Lane, Pool Hey Lane and the railway line (most of which is in West Lancashire). • Great Altcar (West Lancashire) should be developed as a satellite town.

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Section Six

Greenspace Study

Comments on methodology and individual sites



Section Six

Green Space Study

Part 1 - overall assessment of comments to Green Space Study and overall comments on Green Space. Breakdown of key issues that were raised.

The issue of Greenspace was raised by over 400 people. Most respondents objected to the principle that Urban Greenspace might be used for development. Where people commented on the main response form, there are many instances where they have objected to development on both the Green Belt and on green spaces. It would appear that some of those commenting have confused Green Belt and Greenspace. However it is not possible to provide an analysis of how many this included as some may well have an objection on principle to development on both.

From the responses it is clear that the majority value urban green spaces and the variety of benefits that they bring to the built up area.

This section of the report includes comments on the greenspace study generally and on individual sites where responses have been made. It is not making final recommendations on the future of sites. The potential contribution of greenspace will be considered in the light of other studies and further information when the Council decide on its Preferred Option later in the year.

The Greenspace Study will be reviewed in the light of the comments received.

Below is a summary of the main points made.

Summary of Representation	Sefton's Response
Urban Greenspace is greatly valued by Sefton's communities for the following reasons: <ul style="list-style-type: none">• As a community resource enjoyed by all• The importance to the urban environment of having green areas,• Provides green corridors to link the urban and rural environment• Greenspace helps alleviate flooding through natural drainage,	We agree that Greenspace is important for all of the reasons stated. This is reflected in the study methodology.

<ul style="list-style-type: none"> • Provide havens for wildlife • Play areas for children and general recreation for everyone • Often used for formal and informal sports • Provides openness in an otherwise built up area • Helps to improve physical and mental health 	
The presumption that land is needed for development ignores the importance of open spaces.	We understand the importance of open space. The need for development and open space needs to be balanced.
Losing Greenspaces can cause an area to be overcrowded and result in social problems.	Noted. The Greenspace Study methodology acknowledges the importance of green space for balanced communities.
Building on Greenspaces can result in greater pressure on the existing transport network and on infrastructure and services,	<p>The Core Strategy will need to be supported by an Infrastructure Delivery Plan showing what infrastructure is required and how and who will deliver it.</p> <p>If development is proposed on a site or in an area, then a detailed assessment will be required on implications for the highways network.</p>
<p><u>Liverpool City Council</u></p> <p>No indicative number of dwellings is included that may come from Greenspaces.</p>	The purpose of the consultation was to consider the principle of development only.
<p><u>Mersey Forest</u></p> <p>Principle 4 recognises that not all urban land is suitable for development and the importance of retaining valued green spaces. However, the opportunity could be taken to reinforce the concept that all green space has some value.</p> <p>Both the Green Belt Study and draft Open Space Study make reference to the green infrastructure work at the sub-regional level. We support these efforts to ensure there is a broad compatibility.</p>	<p>Agreed.</p> <p>Noted.</p>
<p><u>National Trust</u></p> <p>National Trust considers that the study should be clear that it is</p>	Noted. Will change the title to <i>Urban Greenspace Study</i> and make a

<p>assessing urban greenspaces and not greenspace more generally. To avoid any confusion it would be sensible for the title to be "Sefton Draft Urban Greenspaces Study". It would also be helpful if it was made clearer that this Study is separate from the wider, adopted, Green Space Strategy (2008/9).</p> <p>National Trust welcomes the conclusions of the study that:</p> <ul style="list-style-type: none"> • Generally urban greenspaces in Sefton provide an important range of green infrastructure benefits and so should continue to be protected as key environmental assets for Sefton; and, • The overwhelming majority of urban greenspaces should be retained. 	<p>note to clarify the status of the document.</p> <p>Noted.</p>
<p><u>One Vision Housing</u></p> <p>The method of assessing whether Greenspace is retained appears reasonable; however, the assessment does not take into consideration the opportunity to protect adjacent Green Belt by releasing some areas of urban Greenspace. The study appears not to take a holistic approach to Greenspace / Green Belt protection / release.</p>	<p>Whilst it may be the case that the more houses built within the built up areas (including urban greenspace), the fewer will be needed in the Green Belt, it is not the purpose of the Greenspace Study to identify sites for development.</p>
<p><u>Sport England</u></p> <p>Object to sports and recreation sites being lost.</p> <ul style="list-style-type: none"> • Do not consider that the Greenspace Study methodology constitutes an assessment of the sites as required by Planning Policy Guidance Note 17 (PPG17) • Should not develop any sites that are or could be used for sports or recreation. • Sets out the Sport England exceptions where the development of sites would be acceptable. 	<p>The Greenspace Study is not intended to be a PPG17 study.</p> <p>Sports or recreation sites will only be allowed to be developed where they meet the Sport England 'exceptions' tests.</p>
<p><u>Home Builders Federation</u></p> <p>Concerned that the principle articulated here may turn into a blanket</p>	<p>We consider that the methodology and public consultation will provide</p>

<p>policy that could protect all green spaces within the area, regardless of any assessment as to their quality and/or value to the public.</p> <p>If the Council intends to protect certain green spaces then it should do so alongside preparing its Core Strategy. The draft NPPF advises that Local Green Spaces are designated when a plan is prepared or reviewed (paragraph 130) but should be subject to the conditions listed in paragraph 131.</p>	<p>an accurate guide to the quality of the greenspace sites and their value to the public.</p> <p>We do not feel this approach is necessarily the appropriate way of protecting all greenspace sites which should be retained.</p>
<p><u>British Waterways [BW]</u></p> <p>BW is concerned that the significance of the Leeds and Liverpool Canal corridor as a form of green space is not adequately reflected in the draft study. BW advises that the canal corridor should be assessed as one continuous area of green infrastructure that provides a green link between urban and rural areas.</p>	<p>Noted. The value of the Leeds and Liverpool Canal in contributing to meeting a whole range of social, economic and environmental challenges is accepted. We recognise that the canal has a wide range of Green Infrastructure benefits.</p>
<p><u>Environment Agency</u></p> <p>The flood risk benefits of greenspace should be expanded to include all types of flooding including surface water flooding.</p> <p>Appendix A Section 9, Wildlife and Landscape should be expanded to ensure presence of UK Biodiversity Action Plan and protected species are taken account of in the methodology.</p>	<p>We intend to update the draft Green Space Study to take account of new information, including that in the Sefton Surface Water Management Plan.</p> <p>This would require more detailed surveys that are only appropriate if sites are taken forward for development at the planning application stage. The views of our environmental advisors, Merseyside Environmental Advisory Service, have been sought.</p>
<p><u>Woodland Trust</u></p> <p>Support the use of existing green infrastructure studies in the North West and City Region. However, they have some detailed concerns over the methodology of the draft Green Space Study:</p> <ul style="list-style-type: none"> • Should focus on the potential benefits of green spaces rather than their current benefits - their potential for different and enhanced uses in the future. • For example, Woodland Trust's recent report 'Trees or Turf' shows 	<ul style="list-style-type: none"> • The draft Study states that its focus on current rather than potential benefits is "because many sites have the potential to offer many additional benefits - but usually only after substantive, and often costly, physical changes (including planting) and/or changes to their

<p>conclusively that selective conversion of short mown grass to woodland can deliver multiple benefits, including significantly reduced on-going management costs.</p> <ul style="list-style-type: none">• Woodland should be categorised separately from natural greenspace.• Should adopt an approach to greenspace and woodland provision based on measures of accessibility, such as the Natural England Access to Natural Greenspace Standard and the Woodland Trust's own Access to Woodland Standard.	<p>management regimes have been made". We consider that in this time of scarce resources, it remains appropriate to focus on existing rather than potential benefits. We support new tree planting linked to new development, on land it owns, and highway trees, and is a partner in The Mersey Forest.</p> <ul style="list-style-type: none">• The categories of green space used are based on those set out in government guidance, which has no separate woodland category.• The draft Green Space Study does look at accessibility, both to recreation space and accessible nature space (which includes woodland). This is based on Natural England's standard.
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Part 2 – Detailed results for each Green Space site. Analysis of key reasons why these sites are not suitable. Include petitions under relevant sites.

Southport

Lane north of Dobbies Centre, Benthams Way, Southport (G031_1)

Summary of Representation	Sefton's Response
<p>4 responses.</p> <ul style="list-style-type: none"> • Keep development to the other side of Benthams Way by business park. • Too much development in the area already. • Issue of congested roads. • Lack of school places, hospitals and general infrastructure. • The site has always been used as recreational land. • Area cannot take significant new development. • Should be allotments. 	<ul style="list-style-type: none"> • Noted. • Noted. • Noted. • If the site were brought forward for development, a developer would need to show that any deficiencies can be remedied. • Noted. • Noted. • Noted.
<p>Questions the scoring assessments.</p> <ul style="list-style-type: none"> • The study states few trees, whereas there are 30 to 40 existing trees as well as many that Dobbies have replanted. • Criteria seem to have been assessed as equal whereas they are not – fundamentally flawed. • Carried out independent analysis and concluded that piling will be too expensive to developers for the site to be viable. • The assessment focuses on the current, actual green infrastructure 	<ul style="list-style-type: none"> • The presence of the trees is noted. We will correct this when the study is reviewed. • The criteria have not been given equal weighting. Where there is an overriding reason to retain a site, the recommendation has reflected this. • Noted. • We acknowledge that most Greenspace have some potential.

<p>benefits of the urban greenspace, rather than the potential benefits each urban greenspace could offer.</p> <ul style="list-style-type: none"> • The study is too simplistic to make any informed decision and the Council seriously need to consider the engineering challenges and costs of developing on these green spaces before the Council make any further assumptions or conclusions. 	<ul style="list-style-type: none"> • Noted. It is not within the scope of the study to assess whether it is viable to develop sites.
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Land to the north of Dobbies, Benthams Way, Southport. (G031_2)

Summary of Representation	Sefton's Response
<p>Object to development on the site because</p> <ul style="list-style-type: none"> • There are lots of trees on the site that haven't been properly considered. • The site is prone to flooding. • This site has wildlife values including bats and owls. • The area can't take much more development. 	<ul style="list-style-type: none"> • The presence of the trees is noted. We will correct this when the study is reviewed. • Flood risk has been considered as part of the Greenspace Study methodology. The site is considered to be in an area of low flood risk. • The site is not designated as a protected wildlife site. If it is proposed to consider the site further for development, appropriate surveys would need to be carried out to help make the final decision. • Noted.

Land at Benthams Way, Stamford Road, Southport (G035_1) & Land formerly classed as Christ the King School, Benthams Way, Southport (G035_2)

Summary of Representation	Sefton's Response
<p>4 responses objecting to developing the Greenspace. Questions the scoring assessments.</p>	

<ul style="list-style-type: none"> • The study states few trees, where as there are 30 to 40 existing trees as well as many that Dobbies have replanted. • Criteria seem to have been assessed as equal where as they are not – fundamentally flawed. • Carried out independent analysis and concluded that piling and will be too expensive to developers for the site to be viable. • 'The assessment focuses on the current, actual green infrastructure benefits of the urban greenspace, rather than the potential benefits each urban greenspace could offer. • The study is too simplistic to make any informed decision and the Council seriously need to consider the engineer challenges and costs of developing on these green spaces before the Council make any further assumptions or conclusions. • The site is important for wildlife, particularly bats and water Voles. • Southport's main storm drains empty come out in this area and would therefore put new houses at risk of flooding. 	<ul style="list-style-type: none"> • The presence of the trees is noted. We will correct this when the study is reviewed. • The criteria have not been considered to be equal. Where there is an overriding reason to retain a site, the recommendation has reflected this. • Noted. • We acknowledge that most Greenspace have some potential. • Noted. It is not within the scope of the study to assess whether it is viable to develop sites. • The site is not designated as a protected wildlife site. If it is proposed to consider the site further for development, appropriate surveys would need to be carried out to help make the final decision. • Noted.
One support for developing part of the site.	Noted

Formby

Professional Development Centre, Park Road, Formby (G219)

Summary of Representation	Sefton's Response
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<p><u>Formby Civic Society</u></p> <p>Opposed to residential development. It should remain as urban green space or be used for allotments.</p>	<p>Noted.</p>
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Former Holy Trinity CE School, Lonsdale Road, Formby (G227)

Summary of Representation	Sefton's Response
<p><u>Formby Civic Society</u></p> <p>Priority should be given to the expansion of the Tennis Club northwards. Because of the importance of convenient parking to the commercial viability of Formby Village, we advocate that the greater part of the remaining land should be used to extend the Furnace Avenue car park westwards, but that a portion of the land should be made available as amenity space in the form of a garden with benches for use by shoppers. We do not believe any part of the area is appropriate for use as a children's playground.</p> <p>3 responses supporting some development from Formby residents who live adjacent to the site. One of them commented that they would support mixed development including housing and a small number of community based shops.</p>	<p>Noted.</p>

Freshfield Bowling Club, Timms Lane, Formby (G240)

Summary of Representation	Sefton's Response
<p><u>Formby Civic Society</u></p> <p>Opposed to residential development. Bowling Club should remain as urban green space or be used for allotments.</p> <p>One member of the public also commented that the site should be retained for social reasons.</p>	<p>Noted.</p>

Formby Swimming Pool, Dukes Way, Formby (G250 & G251)

Summary of Representation	Sefton's Response
<p><u>Formby Civic Society</u> Opposed to any residential development of these areas. They are of unique value and importance to the Formby. The Pool Trust is currently consulting Formby residents on future additional uses for the site.</p>	<p>The site still is still very open and well used. The Greenspace Study will be updated to reflect this and the recommendation altered accordingly.</p>

Crosby & Hightown

Land to the West of Victoria Park, Somerville Road, Waterloo. (G169_2)

This site received a large number of comments almost universally objecting to the development of the site which is very highly valued by the community. In addition to the individual comments that relate to this area a petition was also submitted signed by 483 local residents.

Summary of Representation	Sefton's Response
<p>The site should not be developed and should be retained for the community to use. In particular, the community would like it better maintained and support the land being used as a community garden. It also needs to be made publicly accessible.</p>	<p>Noted. The Greenspace Study will be amended to reflect the community interest in the site.</p>
<p>Site is a haven for wildlife. In particular, the site has been used by the Lesser Horseshoe Bat, a protected species.</p>	<p>The site is not designated as a protected wildlife site. If it were proposed to consider the site further for development, appropriate surveys would need to be carried out to help make the final decision.</p>
<p>Under the terms of the covenant that gifted the land to the local authority for public use, both housing and any other development were specially prohibited. In addition the Council benefits from a related annuity that has similar development prohibitions.</p>	<p>There does not seem to be any evidence that the deeds include such a covenant.</p>
<p>Friends of Victoria Park also ask that the Council actively support the establishment of the community park by Friends of Victoria Park.</p>	<p>Noted. The Council acknowledge the efforts and vision of the Friends of Victoria Park and are willing to support this initiative, though is not in a position to contribute to this financially.</p>
<p>There is only limited Greenspace in Waterloo and the site is important to the community.</p>	<p>Whilst there is a shortage of accessible Greenspace in the wider area, the site is next to Victoria Park and so the local area is not short of Greenspace.</p>
<p>The site acts as a barrier between the railway and the park and neighbouring housing.</p>	<p>Noted.</p>

The proximity to the railway makes the site inappropriate for housing.	Noted.
Need to protect the trees that are on-site.	We will investigate the quality of the trees on site when reviewing the Greenspace Study.
Would be better used as an allotment rather than a park.	Noted.
Lawton Road and Somerville Grove are already very busy with both a high volume of traffic and a lot of speeding cars.	Noted.
The site should be left just alone.	Noted.
Two submissions said that they would support some appropriate development on the site and this may improve the quality of the area.	Noted.

Thornton Primary School (G183)

Summary of Objection	Sefton's Response
2 responses from Thornton residents not living next to the site supporting development on the site as the school is now closed.	Noted.
<p>1 response from an adjoining property strongly opposing the loss of the Greenspace for development on the following grounds:</p> <ul style="list-style-type: none"> • The area is already too built up. • Queries whether more houses are needed because the school was closed due to falling pupil numbers. • Traffic that will be generated by the new housing and resulting air pollution. • Insufficient local doctors and dentists. 	<ul style="list-style-type: none"> • Noted. • Our studies indicate that more housing is required to meet changes in the population structure. (please see section 2 of this report for more details). • A transport assessment would be required to be submitted with any planning application to show how a development would be accessible to a variety of forms of transport. • The Core Strategy will need to be supported by an Infrastructure Delivery Plan showing what infrastructure is required and how and who will deliver it.

Hightown Children's Park, Thornbeck Avenue, Hightown. (G191)

Summary of Representation	Sefton's Response
Support for the retention of the park.	Noted.

Range Lane/Kerslake Way (G192)

The site attracted a very significant amount of opposition to any development. We received a petition [signed by 576 residents] as well as many letters. The consultation has highlighted that the site is highly valued by local residents.

Summary of Representation	Sefton's Response
Concerns about the detailed methodology of the draft Green Space Study, e.g. the weight given to particular issues.	Noted.
Only one (narrow & winding) main road in and out of Hightown, with dangerous junctions to other roads – congestion, emergency access especially if road blocked. Road network within Hightown could not cope with more traffic, e.g. congestion by station, junctions, heavy and large vehicles, cars, cyclists. Inadequate bus services. Restricted [road] access and access problems in the vicinity of the Army Camp site (G192) - heavy and large vehicles, cars, and cyclists.	If a planning application were to be submitted to develop the site, it would be required to include a Transport Assessment that must show how the site can safely be accessed.
More noise, vibration and air pollution would result if the site were developed.	Noted.
Concern that the site is close to the mouth of the River Alt and may be subject to some flood risk.	Flood risk has been considered as part of the Greenspace Study methodology. The site is considered to be in an area of low flood risk.
Increased sewage and drainage problems will affect house and buildings insurance premiums. Hightown is considered high risk for insurance purposes.	Insurance companies and premiums are outside the direct control of the Council. If planning permission were sought for this site, it would have to be demonstrated that it could deal satisfactorily with any drainage and sewerage.
Lack of/ inadequate schools, shops, banks, services, amenities for children / young people, power, telephony, gas. Low water pressure. Poor drainage. Local drainage system & infrastructure (drains/sewers, foul sewers) already at full capacity and would not cope with increased pressure from	Noted.

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Summary of Representation	Sefton's Response
new development.	
Affordable/social housing will cause social pressures, e.g. site isolated from places of work, services and amenities.	Noted.
The acts as a natural buffer between house and the railway.	Noted.
People buy houses in Hightown because of its sense of community, peace and quiet, low crime rates, rural character, surroundings, and quality of the surrounding landscape.	Noted.
The site is a valued and important habitat for wildlife - flora and fauna – which should not be lost. Need accurate and meaningful habitat surveys and Environmental Impact Assessments.	The site is not designated as a protected wildlife site. If it is proposed to consider the site further for development, appropriate surveys would need to be carried out to help make the final decision.
Development will lead to an unacceptable loss of green space which is valued by the local community. Residents have previously expressed a strong opposition to development. Strongly oppose any re-designation of the site other than as urban greenspace.	Noted.
The site is important for a range of recreation and leisure activities, including walking and cycling (links to the Coastal Path) and children's play	Noted.
This is the only green urban space in Hightown and it should not be identified for potential housing development.	There is another greenspace in Hightown – the play area on Thornbeck Avenue.
Greater use of green spaces in Hightown should be encouraged.	Noted.
Subsidence of properties elsewhere in Hightown.	Noted.
Clark Planning Consultants Ltd agree with the draft recommendation (for the site) with regard to the development of the site, contribution to local housing need. Considers that the provision of formal links through the site, together with an enhanced habitat area could improve the greenspace. If a proper and knowledgeable assessment of the site and its circumstances were carried out then its value as urban greenspace	Noted.

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Summary of Representation	Sefton's Response
would be greatly diminished. No formal agreement between the land owner and the general public to use any part of the land, so access should not be described as permissive. Formal access is only allowed to the MOD and the landowner.	
A small number of supporting comments that if housing is needed then it is a better site than developing in the Green Belt.	Noted. ←
Some people said that if the site is to be developed then it should be accommodation for the elderly.	Noted. ←

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Maghull, Aintree, Melling and Lydiate

Land at Damfield Lane, Maghull. (G279)

Summary of Representation	Sefton's Response
Totally against building on Greenspace because: <ul style="list-style-type: none"> • It would spoil one of the nicest areas of Maghull. • There isn't the infrastructure (including transport infrastructure) for the development. 	<ul style="list-style-type: none"> • Noted. • If it were proposed to take this site forward for development a transport assessment would be required to be submitted with any planning application to show how a development would be accessible to a variety of forms of transport. • The Core Strategy will need to be supported by an Infrastructure Delivery Plan showing what infrastructure is required and how and who will deliver it.

Bootle & Netherton

Site of Former Bootle Stadium, Maguire Avenue, Bootle (G002) The consultation showed overwhelming opposition to developing the site from the community. As well as the comments a petition was received [signed by 691 people] against developing the site. We had a meeting with local residents at Bedford Road Community Centre where their community reiterated their opposition to development on the site.

Summary of Representation	Sefton's Response
The Bootle Stadium site should continue to be designated as a 'Green Space'; thus enabling it to still be used by local residents and other community groups for recreational and sporting purposes only. Support was expressed at the meeting at the Bedford Road Community Centre for the Community taking a lead in managing the site.	Noted. In principle, we support the site being used for sport and recreation with more community involvement. The situation will be reviewed in the medium term to see if this arrangement is satisfactory. The lack of adequate changing room facilities will need to be addressed as we are unable to provide these.
Many residents and users of the Bootle Stadium site remain unaware of Sefton Councils proposed changes. A much wider spread information drop should have been distributed by the council, which set out very clearly how the core strategy could potentially impact on the local area.	We notified all residents living next to the site. (please see section 1 for the Publicity Strategy) However we acknowledge that fewer people than expected heard directly about the consultation. This will be addressed for our next consultation.
The stadium site helps contribute towards the character of the area. Developing the site may result in a fall in house prices.	Noted.
The site is used for a wide variety of community events and have and formal and informal play. The site is a large part in the area's cultural heritage.	Noted.
The Southport Road area is a heavily used road and congested. The Bootle Stadium 'Green Field' acts as a Green Lung. Stuart Road and Southport Road are already dangerous and will become more so if the site is developed.	Noted.
Bootle Stadium is the only formal sports site in the area. Derby Park is a park and not suitable for formal sports. The Trojans Baseball team and number of football teams use the site for informal recreation.	Noted. The use for formal sports was not known when the draft study was produced. The recommendation will be amended accordingly.
The Bootle Stadium site is one of the most well known and iconic sites in the baseball community and the loss of this site would be a blow to the sport and the club and would set a bad precedent.	When the Greenspace Study is reviewed it will be updated to reflect the site's formal sports usage.
Residents and users of the Bootle stadium site are aware of the new leisure facilities at Litherland and Netherton. Local people want to continue to access local amenities within walking distance for them and their children.	Noted.
At the time when Britain is about to host the Olympics and when we	Noted. The Greenspace Study recognises the importance of sport and

have increasing levels of obesity we need to encourage sports and not sell off sporting sites.	recreation to health.
The land at Bootle Stadium was given to the people of Bootle for the people of Bootle to be used for recreation. This is stipulated in the deeds.	This has been checked and there is no evidence of a covenant in the deeds requiring the site to be used for recreation.
Concerns that there has been a long term "agenda" to sell off the site to make money. Many don't accept that the stadium should ever have been sold.	This is not the case.
The reason given that the site cannot be used for officially for football "due to no changing facilities the site can not be used" is not valid as there are no changing facilities on Stuart Road field opposite yet this is still in use.	Noted.
Against using the site for allotments	Noted.

Former Thomas Gray Infants School (G029)

Summary of Representation	Sefton's Response
2 responses. Object to housing development on the site because: <ul style="list-style-type: none"> • The area is already too overcrowded. • Gray Street is like a motorway with lots of speeding traffic day and night. • The police are already often being asked to deal with lots of trouble in the area. 	<ul style="list-style-type: none"> • The greenspace study has noted that the area has a high population density. • Noted. • Noted.

Former School of the Good Shepherd. Sterrix lane, Litherland (G108)

Summary of Representation	Sefton's Response
3 responses. Object to development on the site for the following reasons: <ul style="list-style-type: none"> • The area has already seen a lot of the Greenspaces in the area 	<ul style="list-style-type: none"> • Noted.

<p>developed and this greenspace is highly valued.</p> <ul style="list-style-type: none"> • The Greenspace helps with local air quality. • Development would result in a good habitat for birds and animals being lost. <ul style="list-style-type: none"> • The Greenspace is visually important in a built up area. • Some of the trees are very old and irreplaceable. • • Acts as a barrier between the houses and the cemetery. • Do not want more vehicles in the area. Sterrix Lane is already very busy. 	<ul style="list-style-type: none"> • Noted. • The site is not designated as a protected wildlife site. If it is proposed to consider the site further for development, appropriate surveys would be carried out to assess the wildlife value of the site and to help make the final decision. • Noted. • We will investigate the quality of the trees on site when reviewing the Greenspace Study. • Noted. • Noted.
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Former St Raymonds Primary School, Harrops Croft, Netherton (G127)

A large number of comments on the site. We also had a meeting with the residents association. Whilst most would like the site to not be developed, there are mixed views. Many residents want to see wider issues with the area including Killen Green Park and the former “Z blocks” site dealt with. In addition to the individual comments that relate to this area a petition was also submitted signed by 138 local residents against any proposal to use this site as an allotment.

Summary of Representation	Sefton’s Response
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<p>Rumours had circulated that the site was being considered for an allotment. A petition was received opposing allotments on the site.</p> <p>Need to keep the green areas within the estate.</p> <p>Killen Green park needs to be an improvement in on-site security and in facilities including lighting. It also needs play areas for children.</p> <p>Could include a bowling green and some 5 aside facilities on site.</p> <p>Need to redevelop the Z blocks and Little Barn Hey sites rather than the St Raymonds site. Some suggestions that these should be bungalows.</p> <p>Some felt that the sheltered accommodation or bungalows would be most appropriate for the St Raymonds if the site were to be developed.</p> <p>Support for development from the Archdiocese who own part of the site.</p>	<p>Noted. It is not intended to use the site as an allotment.</p> <p>Noted.</p> <p>The Council stopped maintaining the Killen Green Park bowling green in 2010/11 due to budget constraints so a new bowling green is unlikely to be viable in the foreseeable future. However some development might be able to pay for improvements.</p> <p>We will consider this representation when updating the greenspace study.</p>
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Former Beach Road Primary Playing Fields, Ranelagh Avenue, Litherland (G131)

There has been significant opposition to developing the site. It is clear that the local community highly value the site.

Summary of Representation	Sefton's Response
The suggestion that the site may be suitable for development attracted very strong opposition from the local community.	The support for retaining the site as a Greenspace is noted.
The playing fields are needed as a place for children to play, for dog walking, sports and leisure. The site is safe and well used by the local community unlike Hatton Hill Park and the Rimrose Valley which are not overlooked by residents and have a history of crime and anti-social behaviour.	Noted. The Greenspace study will be amended to acknowledge that the site is well used [even though there is no formal access].
Increase in traffic in the area.	Noted.
There has been lots of new housing and the Tesco development in recent years. The area is therefore feeling overcrowded and its character is changing.	Noted.
The only access to the site is down Ranelagh Avenue. This is unsuitable for any through traffic and the too narrow for service and	Noted.

emergency vehicles.	
Would result in a loss of value for existing houses around the site.	Noted.
One of the main stipulations in the pupils at Beach Road School moving to William Gladstone was that this site remained as a Greenspace with children to play on.	Noted.
The site was donated by Lewis's clothing and was meant to be used as a Greenspace or returned to the company.	There does not seem to be any evidence that the deeds include such a covenant.
<p>Query accuracy of the Greenspace Study with regard to the following:</p> <ul style="list-style-type: none"> • Site not in an area of poor health. • The trees on the site are mature and help contribute towards mitigating climate change. • Public Right of Way on site. 	<ul style="list-style-type: none"> • The data used by the greenspace study is incorrect for this site. The study will be amended accordingly. • Noted. • There is a public right of way at the southern end of the site. There is no plan to alter this.
Sewers often need to be unblocked and cannot cope with existing use. The areas couldn't handle more housing.	The Core Strategy will need to be supported by an Infrastructure Delivery Plan showing what infrastructure is required and how and who will provide it.

Part 3 – Separate section on reps that are promoting Green Space sites for development.

The Council will consider these representations when updating the greenspace study.

Southport

- Land Between Preston New Road and Rathmore Crescent, Southport (G312)
- Land between Rathmore Crescent and Lexton Drive, Southport (G314)
- Russell Road Recreation Ground, Southport. (G324)
- Birkdale school for the partially hearing Selworthy Road, Birkdale (G341)
- Carr Lane Recreation Ground, Birkdale (G346)
- Cherry Road Playground, Ainsdale. (G355)
- St John's Stone RC Primary School, Meadow Lane, Ainsdale. (G356)
- Land Between Lexton Drive and Balmoral Drive, Southport (G360)

Formby

- Land at Smithy Green (G031)
- Land to the East of Bill's Lane (G221)
- Dobbs Gutter Playing Fields (G229)

Crosby

- The Coastguard Station, Blundellsands (G420)

Maghull, Aintree, Melling and Lydiate

- Damfield Lane off the A59 near Maricourt High School G278 (SW)
- Parkhaven Trust land off Deyes Lane, Maghull G278 (NE)
- Parkhaven Trust land off Green Lane. Maghull G280 (NE)
- Parkhaven Trust land off an existing private road leading to Sefton Lane, Maghull G280 (SW)
- Land to the east of Maghull Station (G284)

Bootle and Netherton

- Marsh Lane Play Area, Bootle. (G024)

- St Joan of Arc School, Rimrose Road, Bootle. (G034)
- Seaforth Road Open Space (G036)
- Deepdale Park & Youth Training Centre (G037)
- St George of England School, Bootle. (G044)
- Land on Beach Road, Rimrose Valley, (G047)
- Littlewoods Sports Ground, Dunnings Bridge Road, (G058)
- Adult Training Centre, Dunnings Bridge Road (G060)
- St Wilfrid's School, Orrell Road, Bootle. (G078)
- Seaforth Triangle (G089)
- Broad Hey Open Space (G104)
- Bootle High School (G115)

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List of Annexes

A - A summary of the comments received on the consultation process

B - List of petitions and other collated responses received during Core Strategy Options Consultation

C - Brownfield sites suggested as suitable for development

D - Detailed Comments about the Studies that support the Core Strategy

E - Comments received from neighbouring local authorities, parish councils, statutory consultees and other interest groups

Annex A

A summary of the comments received on the consultation process

Summary of Comment about the consultation process	Sefton's Response
<p>The publicity was inadequate as</p> <ul style="list-style-type: none"> • Every household should have been written to directly, as it affects everyone. Many people don't get or don't read free papers and don't read the website or posters. • The decision to write to a few people is also not in accordance with Sefton's Consultation Strategy or Statement of Community Involvement (SCI) and therefore failed in its legal duty. • Most residents were unaware of the drop-in events. • The consultation process seemed to be designed to be clandestine. • Local businesses should have been consulted better. • Found out through other residents and not from the Council directly. 	<p>Please see the approach to consultation above.</p> <p>We acknowledge that the publicity did not reach as many people as we had originally thought we would. However we still had a large response.</p> <p>The approach used was approved by the Public Engagement and Consultation Panel.</p> <p>We will take into account criticisms made of the publicity for the next round of consultation.</p>
<p>The Council should have used a more modern approach using more social media.</p>	<p>Agreed. We did put notices on the Active Sefton Facebook and Twitter pages. We investigated advertising on Facebook but the cost in relation to the target audience was not considered value for money.</p> <p>Subsequent to the Consultation being completed, the Council has set up a Twitter page. Any future consultation will make greater use of Twitter.</p>
<p>Comments on costs included:</p> <ul style="list-style-type: none"> • The cost of notifying all residents about the process is not a good enough reason for not notifying everyone. • The consultation is too expensive and a waste of money. 	<p>There is always a balance to be struck between the costs of carrying out consultation so that everyone affected can have their chance to have their say and cost, especially when the Council is having to</p>

Summary of Comment about the consultation process	Sefton's Response
	make major savings.
Having a letter addressed to The Owner/Occupier is not good enough as many people assume that is junk mail. Why not use Council Tax records to write to us. Why not send out something with the Council Tax Bills.	Council Tax records cannot be shared within the Council due to the data Protection Act. It would be too expensive to address letters to individuals. We have previously sent out consultation material with the Council tax bills. Some people felt that it was a waste of tax payers money. However we intend to include something in the 2012 Council tax mailing which asks people to let us have their contact details if they wish to be kept informed of later stages of the Core Strategy.
The Mott McDonald Survey was a waste of time and money. (This refers to the focus groups which were held y Mott McDonald on the Council's behalf.	The Mott McDonald Survey was carried out to provide representative view from residents across the Borough. Members of the groups were drawn from the Sefton Citizens Panel.
The questionnaire was full of leading questions and did not allow me to make the comments that I wanted to make for example "No development on the Green Belt at all". The questionnaires were also difficult to understand.	The questionnaires did clearly say that we will take into account all comments received in writing and not just questionnaires. The questionnaires also included an "Additional Comments" section to allow any other comments to be made. However we acknowledge that a number of people found the form confusing and not easy to use. We will take this criticism received into account when designing future response forms.
Difficult to access the documents for people who do not have a computer, especially if they are unable to access Council buildings.	When people contacted us letting us know that they were unable to access some of the information we did post a summary leaflet to them
Why were so few copies of the response form left in the libraries? The event I attended ran out of consultation forms/leaflets.	We replenished the stocks as soon as we became aware that there was a shortage. We ran out of printed leaflets and forms. We ordered more but these did not arrive before we ran out of the original stock.
The Core Strategy information and that available on the Sefton	The Core Strategy Options Paper was backed up by a number of

Summary of Comment about the consultation process	Sefton's Response
<p>website is overwhelmingly formal and hard to understand due to the complex nature and verbose wording throughout. There should be a good quality, short, easier to understand version.</p> <p>The Core Strategy process is not truly accessible to residents who have difficulty expressing themselves either through language barriers / additional needs / literacy issues or the elderly?</p>	<p>studies. We acknowledge that much of the evidence is quite technical and complex. We did produce both a 4 page leaflet that was available in both a paper form and on-line that summarised the Options Paper and a Frequently Asked Questions paper that tried to answer many of people's common queries simply.</p> <p>We acknowledge that we can always improve our communication methods and will try to make it easier to understand next time.</p>
<p>The forms might be better explained. For example the difference between Green Belt and Green Space is not explained on the response form and you need to trawl the web to find out.</p>	<p>Noted. Future consultations will make these distinctions clearer.</p>
<p>Want an independent review into how we progress the Consultation.</p>	<p>The consultation process has been reviewed by the Consultation Panel. The Core Strategy is also examined by an independent Inspector who will also review the Council's approach to consultation.</p> <p>When the Core Strategy goes for its Examination in Public (EiP) by the Planning Inspectorate, it will again be examined for its soundness.</p>
<p>The public not given enough time to make their responses especially given the large amount of studies and documents to consider.</p> <p>The consultation period ran into the holiday period.</p> <p>Request further and wider consultation before any decisions are made.</p>	<p>The consultation period was 12 weeks long. The statutory minimum is 6 weeks and the Council's Statement of Community Involvement (SCI) states that we will consult for a minimum of 8 weeks. The longer consultation period was agreed after discussion with the Consultation Panel. This was in recognition of the difficult issues and the large amount of material being consulted upon. Whilst some of it ran in to the holidays, most of the consultation was outside of the holiday period.</p> <p>The next stage is the Preferred Option and this will be subject to wider consultation.</p>

Summary of Comment about the consultation process	Sefton's Response
<p>Unable to complete the consultation form on-line due to the system not allowing it /limit to the number of words that I could use / the website was down when I tried to use it.</p>	<p>Regrettably there was a short period of time where the forms were not working correctly. We rectified the problem as soon we were informed of the problem.</p> <p>There were a few occasions during the consultation period when the Council's web page went down. But this was only for short periods of time.</p> <p>We apologise for any inconvenience caused by these unavoidable technical issues.</p>
<p>It is only acceptable to consult for opinions about things that people can influence. Consulting about something that has already been decided and cannot, or will not, be changed is obstructive, and open to challenge.</p> <p>Consultation is simply a statutory exercise and the responses will be put on the shelf and ignored.</p>	<p>The consultation has been carried out to allow people to be able to make their opinions known. When making decisions the Council and the Planning Inspectorate must take into account:</p> <ul style="list-style-type: none"> • Consultation responses, • Existing evidence (including studies); and, • National Planning Policy.
<p>Why are the council moving ahead with this consultation at "high speed" when the coalition government have recently published a draft National Planning policy Framework. From the consultation document it reports that there is a shifting emphasis away from reporting to Whitehall and onto reporting to local people.</p>	<p>The Localism Bill and the National Planning Framework are both expected to come into full force during the preparation of the Core Strategy. These will be fully considered and changes to regulations and policies will be taken into account as and when they come into force.</p>
<p>Staff tried to influence members of the public that they had to accept some form of Green Belt development and this was misleading.</p>	<p>The staff at consultation events attempted to present information to members of the public in a balanced and neutral manner.</p>
<p>The planning department refused to come to a local event.</p>	<p>We tried to attend as many events as possible during the consultation period but there were occasions when we were unable to attend due to limited staff being available. On some days during the 12 week consultation, staff were involved with 3 or more events.</p>
<p>There was no public consultation event held in my area. T</p>	<p>We held events in most areas. These are listed at the top of section 1.</p>

Summary of Comment about the consultation process	Sefton's Response
<p>The timing of the event was not convenient.</p>	<p>Due to staffing resources we were unable to hold any additional events.</p> <p>Most of the events were held from mid-afternoon until early/mid evening. This was considered to be the time suitable for the greatest number of people.</p>
<p>Having attended a drop-in event I looked at the posters which I considered to be biased in favour of Option 3, as Option 3 had far more information.</p>	<p>The posters used in the Consultation were used in order to be able to explain the implications of each Option. The aim was to present them in a way that was intended to be neutral.</p>

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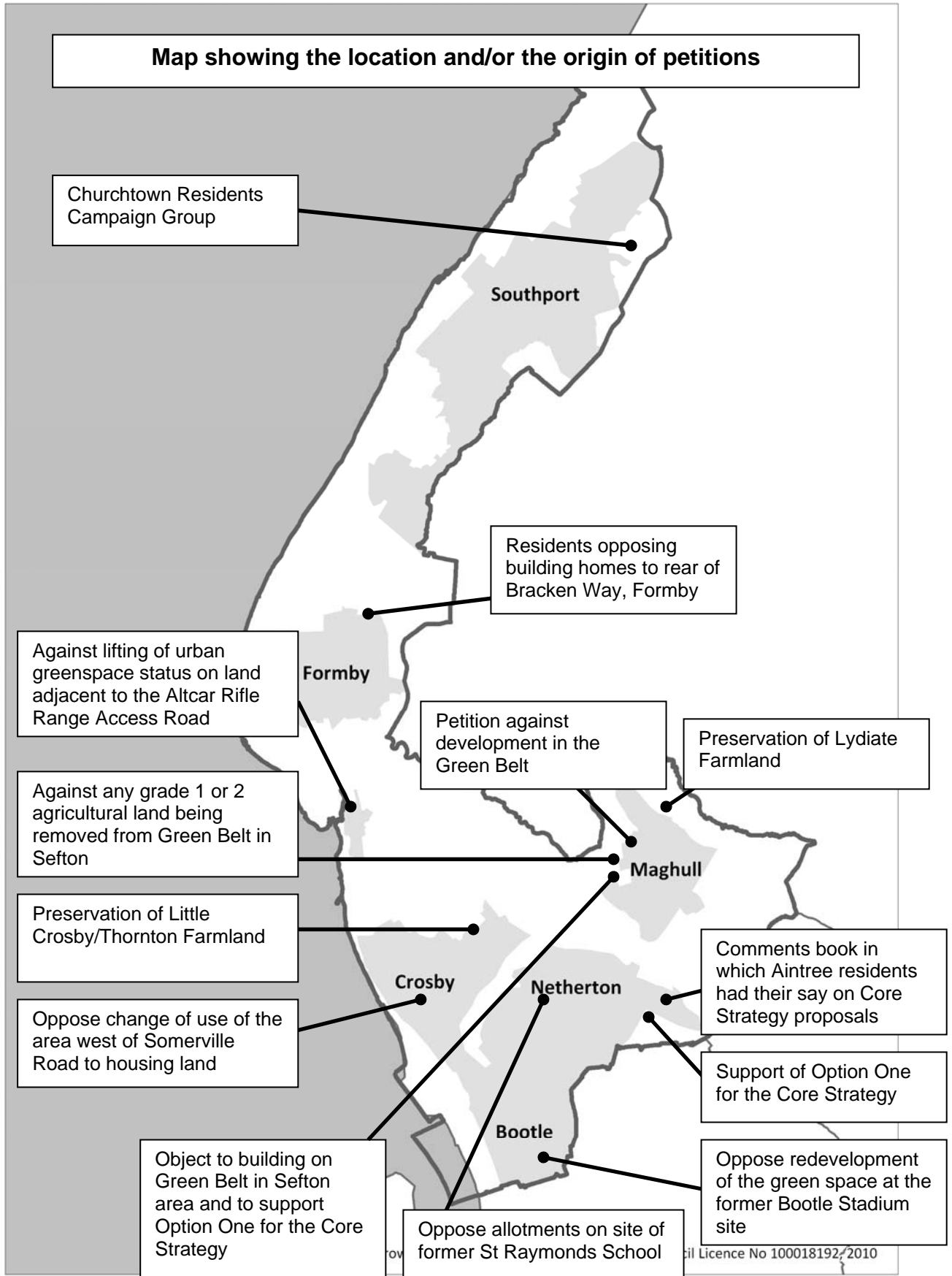
Annex B Petitions received during Consultation

Map showing the location and/or the origin of the petition follows table

Petition/Response	Submitted by	Number of Signatures	Notes
Petition opposing building of 157 houses at rear of Bracken Way, Formby	Mr PG Wiencke	92	
Petition from Churchtown Residents Campaign Group	Martyn Sayer	652	
Preservation of Lydiate Farmland	Eric Haworth	388	
Petition for the Preservation of Little Crosby/Thornton Farmland	Bill Esterson MP Cllr Steve McGinnity	1922	
Petition against any grade 1 or 2 agricultural land being removed from Green Belt in Sefton	Maghull, Lydiate & Molyneux Branch Liberal Democrats	428	
Petition to object to building on Green Belt in Sefton area and to support Option One (Urban Containment) for the Core Strategy	Elizabeth Thompson	422	Online petition. Many people submitted individual comments which have been also treated as individual submissions
Comments book to allow residents of Aintree to have their say on how the Core Strategy would affect their village		223	Comments book placed in Aintree library. Many residents wrote individual comments which have been treated as individual submissions
Petition in support of Option One (Urban Containment) for the Core Strategy		394	
Petition against the lifting of Urban Green Space Status on land adjacent to the Altcar Rifle Range Access Road, which backs onto Mark Road and Hester Close	Keith Grant Bob Daniels Debbie Roberts	576	

Petition/Response	Submitted by	Number of Signatures	Notes
Petition against development in the Green Belt	Colin Reader	1367	
Petition to oppose any redevelopment of the Green Space at the former Bootle Stadium Site, Maguire Avenue for future housing or industrial use		691	
Petition to oppose the change of use of the area West of Somerville Road (adj Victoria Park) from green space to housing land.	Stan Hesketh	483	Residents would wish this site to be incorporated into Victoria Park for use as a Waterloo Community Garden.
Petition to oppose allotments on site of former St Raymonds School	S Flynn	138	
		7776	

Map showing the location and/or the origin of petitions



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Annex C

Brownfield sites suggested as suitable for development

The following table includes a list of brownfield [i.e. previously developed] sites suggested by people that could be suitable for housing development.

It does not include sites in the Green Belt or Greenspace sites, which are included in Section Five and Six of this report respectively.

The Council regularly update its housing supply information. The information provided on potential brownfield sites will assist in the next review of housing supply.

Sites
Any brownfield sites
Any location within Sefton in Bootle / Crosby / Litherland / Maghull / Formby will always have possible sites in built up areas
243 ha of previously developed land identified in Figure 20 of the MIS / MEAS State of the Environment Report for Merseyside (July 2011)
Any disused industrial sites
Redundant business parks
Empty warehouses in Sefton
Old factories
Many properties designated as commercial that could easily be converted into residential properties
Commercial units
Some of the undeveloped areas (brownfield sites) that have been highlighted during local consultancy meetings
Brownfield sites which may require decontamination
Local high streets in our towns which boast high numbers of vacant shops/retail units which can be brought back into use
Retail properties that become vacant due to the on-going economic crisis
Above shops
There are more than enough empty office blocks and building which could be used for apartments
Larger properties should be converted to flats
Large unoccupied homes
Run down areas across the borough

Old poor housing
Vacant petrol stations and pubs throughout Sefton
Caravan sites
Closed schools
Land in Sefton after high rise flats demolished
Vacant land adjacent to Liverpool/Southport train line
Southport, Bootle and Maghull
Within the next few years there will be a number of school and industrial sites which will no longer be in use.
Southport
Empty homes in Southport
Large Victorian buildings
Southport fairground ("Pleasureland")
Land adjacent to "Pleasureland", Southport
Derelict house on the corner of Tudor Road, Ainsdale
Derelict house on Osbourne Road, Ainsdale
What about changing the use of the buildings which are idle in the centre of Southport? We have too many shops, but small dwellings might meet the needs of elderly people who don't drive.
Eastbank & Tulketh Streets are virtually deserted.
Empty shops including disused supermarket on Tulketh Street, Southport
The former Morrison's, Tulketh St, Southport
Old Waitrose Store, Tulketh Street
Land adjacent to Southport railway station
LH side going north along Cambridge Road between Park Crescent and Hesketh Road, Southport
Land between Knob Hall Lane and Longacre, Southport
Land between Radnor Drive and Cambridge Road, Southport
Land off Little Lane from Bankfield Lane, Southport
Cambridge Road, Southport
Rear of 68 Brook Street, Southport
Aughton Road and Upper Aughton Road [vacant shops and vacant cleared plot of land], Southport
Site of Howards, 19-21 Station Road, Ainsdale

Around the site of the now empty records office in Churchtown
Land near Railex, Crossens Way, Southport
There are many smaller sites within Southport (see estate agents)
Small industrial units throughout Birkdale and Southport
Industrial backland sites in Southport
Numerous employment sites in Southport are partially closed and in the middle of housing estates. This is unacceptable and would benefit from in fill development.
Phillips site, Balmoral Drive, Southport
Dorman factory, Crossens
The old Mullards factory site, Balmoral Drive, Southport
The factory on Bankfield Lane, Southport
Blowick Gasometer; Southport
The area around the old gasometer, Southport
Land to the south east of High Park around old gas tower area
Empty units on Kew retail park, Southport
Land on the periphery of Southport
Land at the eastern end of Southport
Blythe (Southport) Business Park, Southport
Formby village
Formby village has so many vacant lots - too expensive & should be looked into
Former Marks & Spencer shop, Chapel Lane, Formby town centre
Former Shell Garage on Liverpool Road in Formby which has permission to be reused as a garage and convenience store, but which would have been better used for housing.
Mayflower industrial estate by Royal Hotel, Liverpool Road, Formby
Formby Industrial Estate, Stephenson Way, Formby
Formby - industrial area near Tesco
The industrial estate at Formby for jobs
Flats opposite Tesco, Formby
Timms Lane, Formby
Argomeols Road, Formby

Land at bottom of Formby Station Hill (Kirklake Service Station, 2 Kirklake Road)
Sites in and around Crosby village.
Sites in Crosby centre
Redevelop Central Building in Crosby with apartments as was on original site.
Littlewoods site, Kershaw Avenue, Crosby
Old Vernons site
Lydiate Lane, Thornton
Old St Johns Church, St Johns Road, Waterloo
Old roofing supplier, 39a St Johns Road, Waterloo
Land on corner of South Road and Marine Terrace, Waterloo
There is a boarded up house on Albert Road, Waterloo
Empty business premises, Waterloo
Sandy Lane, Seaforth
Vine House, Seaforth
Seaforth
North Maghull
Old library, Stafford Moreton Centre., Maghull
The old library and youth centre Maghull
Old Maghull library and offices, Maghull town centre
Bryant House, Maghull town centre
The old furniture shop on Liverpool Road North, Maghull
Vacant garage and showrooms at 100 Liverpool Road North
Demolish flats on Sefton Lane, Maghull
Green areas surrounding Switch Island
Aintree area around Ormskirk Road
British Legion, Ormskirk Road, Old Roan
Paradox site, Ormskirk Road, Aintree
Hayes Drive, Melling [2 vacant homes]

Hugh Baird Annex, Church Rd, Litherland
Liverpool Arms PH, 77 Gorse Lane, Litherland
Demolished buildings and garages in Litherland
St Wilfred's School, Litherland
West of Sefton Moss Road to Broad Hey [G104] Land adjacent to Bootle Golf Course
Land surrounding Netherton should be reconsidered for development The Northern Perimeter Road area in Netherton / Thornton.
The brownfield sites in parts of Netherton
The land adjacent to the Northern Perimeter Road and Brickwall Lane (Jubilee Woods)
Netherton Way (behind Giro), Netherton Behind Santander (Girobank) off Bridle Road
Former factory sites near Park Hotel, Netherton
Dunnings Bridge Road has a lot of disused warehouses wasting space.
Along Dunnings Bridge Road between Switch Island and the docks
The site on Dunning Bridge Road that is cleared and derelict Excess land at site of Peerless Edible Oils refinery site, Dunnings Bridge Road.
Part of the old Rolls Royce factory, Atlantic Park, Netherton Atlantic Business Park, Dunnings Bridge Rd, Netherton Dunnings Bridge Road near 'Atlantic Park' complex
Heysham Road has a lot of derelict land. Corner of Heysham Road and Dunningsbridge Road The "Metal Box" factory is moving soon.
Business Park were the Royal Mail is situated (Trinity Way); few businesses on this site.
Vacant land in Bridle Road area
Cleared 'Z' blocks sites, Netherton / Buckley Hill
Aintree Triangle (Liverpool/Sefton boundary)
Develop new housing along the Leeds Liverpool Canal

Employment sites in south Sefton
Many old brownfield sites in Bootle and Netherton e.g. The large site on Hawthorne Road next to the Sefton Cleansing Dept premises and the former Peoples garage site
All south Sefton brownfield sites and empty shops
South Sefton is deprived and run down with housing and commercial areas that could and should be developed.
Bootle
The brownfield sites in Hawthorne Road, Bootle
Hawthorne Rd / Aintree Rd, Bootle
The Peoples' site
Old Vactite site, Linacre Lane / Hawthorne Road, Bootle
Unspecified brownfield sites around Litherland and Bootle
Brownland development opportunities in Bootle
Former engineering works and laundry at Akenside street, Bootle
The Johnsons works, Stanley Road, Bootle
Around Bootle Town Centre and close to rail links
High rise flats around Bootle
Empty properties on Balliol Road including empty offices
Vacant blocks of offices on Bootle.
There appears to be a surfeit of office accommodation in Bootle
The Sefton docks up to Seaforth port.
Bootle - docklands. Large areas of empty units/spaces.
There is an abundance of land around the Bootle docks area that been out of use for many years e.g. Derby Road
Site of St Joan of Arc Church and school, Bootle
Areas in Bootle near railway
Retail areas in Bootle Strand, Bootle

Annex D Detailed Comments about the Studies

This annex includes comments made about studies and other documents:

- Evidence in studies generally
- Housing and Employment Studies:
 - NLP Study – Total housing requirement ('Housing needs' study)
 - Strategic Housing Land Availability Assessment (SHLAA) – housing land supply
 - Strategic Housing Market Assessment (SHMA) – affordable housing need
 - Joint Employment Land & Premises Scheme (JELPS) – How much land / buildings needed for business
- Draft Sustainability Appraisal
- Draft Infrastructure Study
- Detailed (Green Belt) Boundary Review.

General Comments on the Evidence in studies generally

General Comments on the Evidence in studies generally	
Summary of Response Issue	Sefton's Response
Much of the evidence has been produced by consultants, at high cost.	Evidence has only been commissioned for highly specialist and technical areas of work where Planning Officers did not have the required expertise.
15 Years is too far ahead to plan for reliably. The evidence will inevitably become out-of-date during this period.	National Planning Guidance requires that Core Strategies plan ahead for 15 years. However, the evidence will need to be updated during this period, and the Core Strategy will be amended if necessary as new information emerges.
The Council needs to continually monitor the situation using up-to-date evidence and advice	Agreed.
Localism should allow greater Council autonomy, able to set their own housing targets	The 3 Options that were consulted set out 3 potential housing targets for Sefton based on local circumstances.

Housing Requirement Study - Nathaniel Lichfield & Partners

In addition to the responses set out below, the Council has also asked Nathaniel Lichfield & Partners to provide a response to detailed issues that were raised during the consultation. This response will soon be available in hard copy (at the Council's offices) or to download from the website.

NLP Study – Total housing requirement	
Summary of Comment	Sefton's Response
There is no need for more housing in Sefton	The need for housing in Sefton has been independently assessed by Nathaniel Lichfield and Partners. The findings of this Study indicated a need for around 480 new homes per annum to meet needs over the duration of the Core Strategy.
The DCLG Household Growth Projections (344 dwellings per annum) should be used as the basis for calculating housing need instead	The DCLG projections are based on recent historic trends and relate to population forecasts produced by the Office for National Statistics (ONS). Whilst they are an important indicator, they are not as attuned to local circumstances as the NLP Study, and in some instances reflect national rather than local trends and statistics. Importantly, they also do not necessarily take account of the need for affordable housing, or allow for any pent up (i.e. 'backlog') market housing needs that may be present at the base-date of the projections.
The demographic / statistical information used to inform the Study is out of date.	The majority of the demographic and statistical information used by Nathaniel Lichfield is base-dated to either 2008 or 2009. At the time the study was produced (2011), this was the most up-to-date information available, and for some of the figures this remains the case. Office for National Statistics local demographic information typically has a time lag of 1.5 - 2 years. Therefore this information is still in many cases the most up-to-date information available. It will be reviewed once the 2011 Census results are available in July 2012.
Why are more houses needed when Sefton has a declining population?	Although the population of Sefton has fallen in recent years this has not resulted in a drop in need for new homes.

NLP Study – Total housing requirement	
Summary of Comment	Sefton's Response
	<p>The main reason is that the number of people living under the same roof is declining because families are getting smaller and more people are choosing to live alone. The decrease in household size is caused by people living longer, greater personal wealth and people choosing or having to live on their own. This trend towards smaller households is well established; in 1981 the average number of people living in a Sefton household was 2.8. Now it is 2.3, and is predicted to fall further. This is a national trend.</p> <p>This has also been evidenced by historic trends. For example since 1981 the population of Sefton has fallen by 26,800 people, despite the fact that 14,004 houses have been built since then.</p> <p>There is also a need for different types of housing in Sefton. For example, there is a need for more affordable housing, particularly in Southport and Formby. Furthermore, as life expectancy continues to increase there will be a need to provide more specialist elderly persons housing in the years ahead e.g. extra care housing and other 'supported' housing. There is also a need for more family housing.</p>
There are not enough employment opportunities locally to support this many new homes	The need for new homes does not automatically lead to an increased need for jobs, particularly if this is driven by smaller household sizes and an ageing population. For example, all 3 of the Core Strategy Options assume that the size of the working age population will decline.
Detailed sub-area analysis should have been carried out as part of the Study.	<p>Nathaniel Lichfield & Partners suggested that the sub-area projection work would not be statistically reliable. This was for a number of reasons, including:</p> <ul style="list-style-type: none"> • Many of the statistics used in the Nathaniel Lichfield analysis are produced by the Office for National Statistics - these statistics

NLP Study – Total housing requirement	
Summary of Comment	Sefton's Response
	<p>are often not available below the local authority level.</p> <ul style="list-style-type: none"> • Importantly, there is no reliable information on migration flows below the local authority level. This is a key component of the analysis. • In general, we were also advised that the smaller the area of analysis, the greater the range of statistical error in the data.
There is no evidence that Option 1 would lead to a smaller working age population	The working age population (or 'labour force') has been falling for many years as a result of demographic changes, including an ageing population. The demographic modelling undertaken by Nathaniel Lichfield implies that as younger age groups are the most likely to either leave or enter the Borough, a declining population is most likely to affect people in these age groups.
Can housing needs be reliably forecast over the medium to long term (to 2028)?	As with any demographic modelling forecast, the further ahead it looks, the less reliable / predictable the results / data becomes. Whilst the analysis is based on the most up-to-date demographic and statistical information available, it will need to be updated over time as new information emerges.
The Study does not take into account the environmental impact of its recommendations	The Study is mainly a demographic analysis. However, the suggested disaggregation of housing need by settlement (Section 6 of the report) considers the "extent of constraints" – including environmental constraints - in each area of the Borough.
The recommended figure of 480 homes per annum is almost exactly the same as the historic rate of building from the last 30 years.	The recommended figure of 480 homes per annum is derived through a demographic analysis. Any correlation with historic build-out rates is coincidental.
Other local authorities have reduced their housing targets following the abolition of Regional Spatial Strategies. Sefton should do the same.	A number of local authorities have sought to either reduce or increase their housing target following the government's announcement that they intend to revoke Regional Spatial Strategies. Any approach that is

NLP Study – Total housing requirement										
Summary of Comment	Sefton's Response									
	decided upon will need to be justified with regard to both local circumstances, and national planning guidance, and will be tested at respective examinations in public.									
It is not clear how the requirement for 8,850 dwellings over the Core Strategy period has been derived	<p>The figure of 8,850 homes to 2028 is derived as follows:</p> <table border="1" data-bbox="1155 488 2087 663"> <tbody> <tr> <td>NLP requirement 2010-2027</td> <td>8,160 (480 per annum)</td> </tr> <tr> <td>NLP requirement 2027-28</td> <td>329</td> </tr> <tr> <td>Backlog of under-provision since 2003</td> <td>359</td> </tr> <tr> <td>Total:</td> <td>8,848</td> </tr> </tbody> </table> <p>The figure of 480 per annum is an annual average that applies to the period 2010-2027. NLP also provided a figure for the years 2027-2032, which averaged at 329 per annum (this figure is applied to the final year of the analysis [2027-28]). The total figure also takes account of backlog of under-provision since 2003.</p>		NLP requirement 2010-2027	8,160 (480 per annum)	NLP requirement 2027-28	329	Backlog of under-provision since 2003	359	Total:	8,848
NLP requirement 2010-2027	8,160 (480 per annum)									
NLP requirement 2027-28	329									
Backlog of under-provision since 2003	359									
Total:	8,848									
NLP have not had any discussions with locally active house builders about the delivery of this number of homes	It is true that NLP did not enter into a dialogue with the house building industry (and this was not part of their brief). However, as a planning authority we have regular meetings with locally active house builders and housing associations (through our 'Housing Market Partnership'). At no stage has the issue of deliverability been raised, and many house builders have in fact supported the even higher housing targets set out under Option 3.									
The findings of the Study need to be updated once the results of the 2011 census are known	Agreed.									
The NLP Study was commissioned to the same brief and modelled the same data as the 2008 SHMA.	This is not correct. The SHMA and the NLP Study were commissioned based on completely different briefs, and have separate purposes. The NLP Study is not an update of the earlier SHMA, and addresses different issues. It is also based on different statistical information.									

NLP Study – Total housing requirement	
Summary of Comment	Sefton's Response
The projected future levels of out-migration, mortality, and births will mean that fewer new homes will be required.	These demographic factors have been modelled and assessed through the Nathaniel Lichfield Study.
The Study shows that young people aged 18-23 are most likely to migrate out of Sefton. This has resulted in a declining average household size (as people's children move away from homes) but will not create a need for more housing in Sefton, as these people have left the area.	Whilst people between the ages of 18-30 are the group most likely to migrate out of Sefton, similarly, people in this age group are also the most likely to migrate into the borough. As average household sizes decline nationally, this will inevitably create an additional need for housing even if the population stays the same or moderately declines.
An assumption should be built into setting the housing target that vacancy rates will be reduced over time.	If the vacancy rate is brought down in the future, this will be factored into any study updates that are undertaken.
Not since 2002/03 have 480 homes per annum been built in Sefton	Only twice since 2000 has Sefton constructed fewer than 480 homes per annum (gross). The reason the 'net' figure has often been below 480 is because every property that is demolished acts as a 'minus 1' to the figures. Over the last decade, regeneration initiatives in Bootle have resulted in large-scale programmes of demolitions (peaking at 279 properties in 2008-09). This exceptional period of demolitions (which is unlikely to be repeated) is one of the main reasons 'net' housing completions have been largely below 480 per annum. Also, between 2003 and 2008 the Council had a 'Housing Restraint Policy' in place (in-line with then government guidance), which reduced local house building during this period.
Option 2 would result in Sefton losing 18,500 economically active people from its labour force and 10,745 jobs that they occupy. We do not consider that this genuinely represents 'meeting identified needs'.	All 3 options would result in a reduction in size of the working age population. This would largely be due to the effects of an ageing population and the increase in retirement-age residents this would bring.
Option 3 is based on current population levels and trends and is therefore a more robust and reliable figure to base future housing provision on. Paragraph 39 of the 'SHMA Overview' states that 'there is evidence that demand exists to support more than 500 new dwellings per year within Sefton,' stating that it is 'inappropriate to pursue more due to the current	Option 3 implies a stable population, which would be a departure from the historic population trends seen in Sefton (where the population has been declining for over 20 years). The SHMA analysis is survey based and therefore not directly comparable to the Housing Requirement Study carried out by Nathaniel Lichfield & Partners. It was also produced at a time when the Regional

NLP Study – Total housing requirement	
Summary of Comment	Sefton's Response
<p>market climate.' The level of housing delivery over the Core Strategy should not be based upon the current 'depressed' market climate, as this will not deliver sufficient housing when the market improves.</p>	<p>Spatial Strategy was 'a given', and the SHMA specifically defers to the RSS figure.</p>

Strategic Housing Land Availability Assessment (SHLAA) – housing land supply

Strategic Housing Land Availability Assessment (SHLAA) – housing land supply	
Summary of Comment	Sefton's Response
More brownfield sites will become available over time	It is true that over time new sites will become available. As new sites emerge they will be included in our Strategic Housing Land Availability Assessment updates.
No account has been taken of vacant homes	We have received clear guidance from the Department for Communities and Local Government that vacant homes brought back into use cannot be offset against the housing target. We have also received legal advice that this is the case.
There is enough brownfield land available to accommodate all of Sefton's housing needs	The SHLAA has made an assessment of housing land supply in Sefton. This found that there is insufficient land to meet long-term housing needs. However, the SHLAA study will regularly updated, and this will allow any new sites that emerge to be taken into account.
The 20% discount that is applied to identified sites should be either reduced or removed altogether	<p>The consultants who produced the original 2008 SHLAA suggested the 20% discount in order to provide a realistic assessment of supply. Subsequent updates to both Sefton's, West Lancs', and Knowsley's SHLAA have retained this discount. Similarly, other local authorities apply a level of discount to their supplies. However, we are currently updating our SHLAA and will review whether this level of discount is still appropriate.</p> <p>In general, the discount factor is in place to take account of a number of circumstances, including:</p> <ul style="list-style-type: none"> • Sites either not being developed, or being developed for other uses such as offices, shops, etc • Sites with planning permission for flats (or other high-density housing) being replaced by new permissions for lower density housing. • Government grants are now unlikely to be available to secure

Strategic Housing Land Availability Assessment (SHLAA) – housing land supply	
Summary of Comment	Sefton's Response
	<p>development on problematic sites.</p> <ul style="list-style-type: none"> • Unforeseen circumstances such as ground problems, land contamination, drainage problems, access problems, complex land ownerships, legal covenants, unknown or changed owner intentions, etc.
The 2010 SHLAA update contains 900 fewer homes than the 2008 Study	This is incorrect. The current RSS housing requirement to deliver 500 homes per annum is an annualised target. Therefore over a 2-year period the identified capacity would be expected to decline around 1000 dwellings (assuming no new sites were identified). Whilst it is true that some sites identified as suitable in the 2008 study were taken out of the 2010 Study (legitimately so), a larger number of new sites were introduced into the supply.
Many sites have been removed from the study on a questionable basis, including contaminated or potentially contaminated land.	Very few sites were excluded solely on the basis of contamination or possible contamination (the sole exception is Bootle gasworks – a registered part 2a site under the Environmental Protection Act). The vast majority were also excluded on other grounds, for example they were in active business use, with no planning history or known interest in developing the site. In this respect, we have followed central government guidance on producing these assessments.
More Council-owned land should be identified for development	A large number of surplus council owned sites are contained within the SHLAA, and we are actively exploring with our Estates Team whether other sites can be released for housing. However, where sites are needed for the day-to-day operation of Council services they cannot be sold for development. Additionally, the Council, compared to other Local Authorities, does not have a large landholding.
A standard density of 45 dwelling per hectare should be used	We are not aware of any locally active house builders that use 45 dwellings per hectare as a standard density for new development.

Strategic Housing Land Availability Assessment (SHLAA) – housing land supply	
Summary of Comment	Sefton's Response
	Typical sub-urban housing densities are around 30 dwellings per hectare for family housing, and this has been confirmed by local house builders.
The SHLAA should not make an allowance for 'backlog' against the RSS target	Recent experience elsewhere indicates that if we do not do this, it is one among a number of reasons that our plan would be in danger of being found unsound.
An allowance for windfalls should be included in the 11-15 year supply, as per government guidance	We will consider whether there is sufficient support for this approach in forthcoming updates to our SHLAA
Urban Greenspaces identified as potentially suitable for development in the draft Urban Greenspace study should be brought into the SHLAA	Once the Urban Greenspace Study is finalised, suitable sites will be brought into future updates of the SHLAA.
The SHLAA should make an allowance for flatted and other high density forms of development to become more viable during the later years of the Core Strategy.	Some sites (particularly in town centres) would only be suitable for flats/apartments. These sites have generally been placed in later plan periods (such as 6-10 and 11-15 years) to allow for the recovery of the apartment market. However it is difficult to predict when (or if) the apartment market will recover. It is clear that the outlook for the apartment market is difficult in the short to medium term, and there are no certainties beyond this.

Strategic Housing Market Assessment (SHMA) – affordable housing need

Strategic Housing Market Assessment (SHMA) – affordable housing need	
Summary of Comment	Sefton's Response
Why is mainly family accommodation required when households are becoming smaller?	<p>Whilst in the future there will be more single people and more small households, not all of these people will necessarily need smaller homes, such as flats or apartments. This has been confirmed by our Strategic Housing Market Assessment, which stated:</p> <p><i>“...the average household size in Sefton is projected to decrease in the future. This does not however mean that the new housing required is going to be smaller than the stock of housing that exists currently... there are requirements for two, three and four bedroom market dwellings in Sefton.”</i></p> <p>The reasons for this include:</p> <p><i>“Households consider that they need extra rooms to accommodate guests, carers, study, hobbies and work from home. Therefore very few one bedroom dwellings should be added to the stock, even for single person households, as they are not flexible enough.”</i></p> <p>[Strategic Housing Market Assessment (2008) (page 340/341, para 37.14)]</p> <p>It is also important to provide more family housing to retain young people and families (and avoid them having to look elsewhere) who provide the majority of Sefton's workforce. If these people were to leave because of insufficient housing, then this could harm the local economy and businesses.</p>
The SHMA is out-of-date, and is based on out-of-date Practice	The SHMA is base-dated to 2008, and was partially updated to 2010.

Strategic Housing Market Assessment (SHMA) – affordable housing need	
Summary of Comment	Sefton's Response
Guidance.	The SHMA has lifetime of about 5 years. Fordham Research has confirmed that the assessment of affordable housing need is still realistic and robust.
The Nathaniel Lichfield Study is an update to the SHMA	The Nathaniel Lichfield Study is not an update of the SHMA and the 2 studies largely assess different topics.

Joint Employment Land & Premises Scheme (JELPS) – How much land / buildings needed for business

Joint Employment Land & Premises Scheme (JELPS) – How much land / buildings needed for business	
Summary of Comment	Sefton's Response
The JELPS only requires Sefton to identify an additional 7.66 ha of land. This small shortfall may have been extinguished by the current severe recession.	<p>Some representations mis-read the findings of the JELPS and interpreted these as identifying only a relatively small shortfall of 7.66 ha. To clarify, the JELPs recommended that Sefton had a shortfall of 40.01 ha of employment land (although in fairness this is not presented in an entirely clear way in the study report). This 40.01 ha comprised as follows:</p> <p>Total supply of land 70.73 ha 'Realistic' supply: 57.36 ha (minus losses to other uses)</p> <p>Land required to 2026 (inc 20% buffer): 65.02 ha</p> <p>= New land requirement: 7.66 ha</p> <p>+ 5.34 ha Undersupply based on 7.5 percent vacancy rate for industrial property</p> <p>+ 20.25 Land lost to Newheartlands HMR</p>

Joint Employment Land & Premises Scheme (JELPS) – How much land / buildings needed for business	
Summary of Comment	Sefton's Response
	<p>+ 6.47 Proposed De-allocations from Employment Areas Assessment</p> <p>+ 0.29 Proposed De-allocations from CFS Assessment</p> <p>= 40.01 total requirement</p>
<p>Not all designated employment areas should be protected. Many could be used to develop new housing on. The effects of the current economic situation are not adequately taken into account by the JELPS.</p>	<p>In addition to the above, there are a number of other factors that would mitigate against the release of employment land for housing. These are summarised below:</p> <ul style="list-style-type: none"> • The JELPS does not take into account the proposed expansion of the Port. We have been advised that this is likely to significantly increase demand for employment land in south Sefton for port related uses. • The JELPs states that Sefton has sufficient employment land to meet demand to 2026. However the Core Strategy will have to look beyond 2026. • Sefton has less than half as much employment land of any other Merseyside authority. In north Sefton, this supply shortage is already significant. • In north Sefton, the shortage of supply is already reaching a critical level. In south Sefton, there has been very little interest in developing employment sites for housing over a period of more than 10 years (which included a major housing boom). This is probably due to known contamination on many sites, low value residential markets in Bootle and Netherton (where the vast majority of the employment land is located), and difficult multiple

Joint Employment Land & Premises Scheme (JELPS) – How much land / buildings needed for business	
Summary of Comment	Sefton's Response
	<p>ownerships. In this context, it is difficult to see where additional land could be identified that would have a realistic prospect of delivering housing.</p>
<p>If the 53 ha of land identified as having potential for remodelling / regeneration were developed, more employment land could be released for housing.</p>	<p>The JELPS identifies these sites as potential opportunities for redevelopment / remodelling. However, most of these sites are in active use and/or in multiple private ownerships. Whilst it is hoped that many of these can be redeveloped and remodelled (and this will be encouraged), there is no certainty that this will happen on every site. We can therefore not assume that all of the identified opportunities will come forward as development sites.</p>
<p>A 20% 'buffer' should not be added onto the requirement for new employment land.</p>	<p>BE Group (the authors of the Study) included the 'buffer' in order to comply with the requirements of the government's Employment Land Review guidance. This requires such studies to allow scope for churn and to offer range and choice. The Employment Land Review guidance has not been updated since the JELPS was published.</p>
<p>Many people in Sefton work in Liverpool, Southport, West Lancashire and Preston. Travel links to the above places from Formby (and other towns in Sefton) are good. There are greater employment opportunities in the larger conurbations as opposed to the smaller towns in Sefton such as Formby, Maghull and Crosby that are essentially dormitory towns.</p> <p>Provision for the development of businesses can be developed upon existing brownfield sites both in Sefton and elsewhere in Merseyside. There are many sites on existing local retail parks and shopping parades that are vacant that can be used for the development of small businesses and the creation of jobs.</p>	<p>It is correct that a significant number of people commute to work outside of Sefton (particularly to Liverpool). However, 46% of Sefton residents also work in Sefton (2001 census) and others travel into Sefton to work. There is therefore a clear need to maintain an employment base in a situation where Sefton has far less employment land than any other local authority in Greater Merseyside. Additionally, the firm evidence is that the most disadvantaged people in need of jobs require employment opportunities to be made available locally as they cannot afford nor are able to travel very far for work.</p> <p>Retail parks in Sefton would be very unlikely to convert to employment uses as retail values are significantly higher than for office / industrial.</p>

Joint Employment Land & Premises Scheme (JELPS) – How much land / buildings needed for business	
Summary of Comment	Sefton's Response
	Shopping parades often provide important local facilities, particularly to those who do not own a car. Whilst some parades may be surplus to requirements, these are often more suited to either small-scale retail or housing development.
The Council should be more flexible in their approach to when the identified Business Park successor should be released for development. This should be before the existing Southport Business Park has been fully developed. The current approach is not flexible enough to take account of market changes and the possibility that demand has moved away from the existing Business Park.	No decision has yet been taken on whether a successor business park will be identified in north Sefton. Any proposal to do so would be subject to further consultation, at which point timescales / phasing would be considered.
Peel Ports is seeking to incorporate the Regent Road/Derby Road corridor (amounting to some 43 acres) into the operational Port area, as part of port expansion plans. The decanting of businesses from this area would add an additional requirement to the employment land needs arising in Sefton. This would need to be considered as part of the Core Strategy	It is acknowledged that the Proposed expansion of the Port will have knock on effects for employment land requirements in Sefton. This will need to be factored into our assumptions moving forward.

Sustainability Appraisal/ Strategic Environmental Assessment

This table looks at comments that were made specifically to the Sustainability Appraisal [which incorporates a Strategic Environmental Assessment]. However, many people made comments on a range of issues that would have implications for sustainability. These comments are considered in the relevant section of the Consultation Report but will be used to update and improve later editions of the sustainability work.

Sustainability Appraisal/ Strategic Environmental Assessment	
Summary of Comment	Sefton's Response
The Core Strategy Options or the draft Green Belt Study don't appear to have been subject to an environmental appraisal or a Strategic Environmental Assessment	An initial sustainability appraisal of the Core Strategy Options was completed and made available for consultation purposes. This followed the appraisal framework that had previously been agreed [in 2007? Check]. The sustainability appraisal framework has been designed so that the requirements of the Strategic Environmental Assessment are also met. The comments received during this consultation, including those not specifically to the appraisal, will help inform the next stages of the appraisal process. The intention is that as the detail of the Core Strategy is worked up, the appraisal work is similarly progressed. A more detailed appraisal will be carried out on the preferred option and made available for consultation alongside the preferred options document.
Clarification is sought as to whether any numerical targets can be formulated for sustainable transport. We would welcome any dialogue which may be possible in this direction or upon related sustainable transport issues which would overlap with strategic highway considerations (Highways Agency)	Comment noted and agreed. We would be keen to work with partners to develop the sustainability appraisal, including indicators, to make sure it provides a robust framework for testing our plans.
Sustainability Objective 14 - Reduce the risk from flooding - Primarily, the identification of new development sites in the borough should comply with 'Development Principle 10' of the Core Strategy Options Paper - requiring that a sequential approach is adopted (lowest risk sites first). However, the appraisal draft does not yet seem to discuss or endorse this requirement. Instead the draft comments currently concentrate on the issues of	Comment noted and agreed. The draft Green Belt Study considered the flood risk of sites and ruled out sites in the highest flood zones. At the next stage of the appraisal process we will make sure that due weight is given to flood zones in the choose of sites if required for the preferred option.

Sustainability Appraisal/ Strategic Environmental Assessment	
Summary of Comment	Sefton's Response
<p>additional surface water run-off (through increased levels of impermeability) and additional strains on existing infrastructure (sewer incapacity). While these concerns will exist, we confirm that for the vast majority of development situations it currently deals with - an acceptable engineering solution usually exists to ensure that flood risks are not exacerbated as a consequence of new development. The use of SuDS-type schemes enable greenfield run-off rates to be adhered to, flows to be balanced on the site itself and ensure that flood risk - both to the development site itself and existing development elsewhere in the catchment is not adversely impacted. Where concerns over the impact on existing infrastructure exist, then asset improvement/ renewal/developer financial contribution can ensure that any increased risk is avoided. (Environment Agency)</p>	
<p>Water Framework Directive - We would take this opportunity to remind your Council of the requirements of the Water Framework Directive. Regulation 17 of the Water Environment (WFD)(E&W) Regulations 2003 places a duty on each public body including Local Planning Authorities to 'have regard to' River Basin Management Plans. Under the Water Framework Directive there should be 'no deterioration' to waterbodies and seek improvements, including de-culverting, morphology of the watercourse as well as objectives to improve chemical and ecological quality. We would resist proposals that could lead to deterioration of water bodies, without sufficient justification and possibly mitigation. Local strategies may identify actions that improve the water environment, for example through urban regeneration or conservation projects. Typical water body improvements might include restoring 'natural' rivers, overcoming barriers to fish movement or providing sustainable drainage systems. We therefore feel a high level assessment of impacts on water bodies</p>	<p>Comment noted and agreed. Will make sure this point is picked up in the next stage of the appraisal process.</p>

Sustainability Appraisal/ Strategic Environmental Assessment	
Summary of Comment	Sefton's Response
should be part of any sustainability appraisal and included in the Sustainability Report. (Environment Agency)	
<p>Natural England provided a number of detailed comments on Sustainability Appraisal Scoping Report in 2009. We generally support the findings of the appraisal of the three Core Strategy options. However, further consideration needs to be given to potential effects of developing brownfield sites that may have developed valuable biodiversity interest.</p> <p>Under Objectives 17 and 20, while we agree that overall Sefton's population is unlikely to increase over the Plan period, to conclude at this stage that there will be no significant impacts on the Sefton coast from any of the options fails to take account existing levels of recreational access and the capacity of the coastal areas to meet current demand without demonstrable harm. Assessments by neighbouring authorities in the Merseyside area have identified recreational access pressures as an issue for coastal areas (Natural England)</p>	<p>Support welcomed. We will consider the potential effects of developing brownfield sites on their biodiversity value.</p> <p>Comment noted. Agree that further detailed analysis will be needed to measure the impact on Sefton's coast as a result of the Core Strategy. This is likely to be considered partly through the Habitats Regulations Assessment process.</p>
We will test the whole process for breach of EU directives, e.g among others citing City and District Council of St Albans v Secretary of State for Communities & Local Government (2009) EWHC 1280 (Admin). Whereby the RSS was set aside because of a failure to comply with EU directive and Environmental Assessment Regulations. Similarly, R (on the application of Baker) v Bath & North East Somerset Council (2009) EWHC 595 (Admin). Whereby grants of planning permission were quashed for breach of EU directives.	The Council is fully aware of the need to comply with the EU Strategic Environmental Assessment Directive.

Habitat Regulations Assessment process	
Summary of Comment	Sefton's response
<p>Natural England have welcomed the Habitats Regulations Assessment (HRA), and have made detailed comments about the HRA methodology, for example the need to take into account the impact of development in Sefton on international nature sites outside Sefton, and sites which have significant ecological links with land in the plan area, for example, land used by migratory birds which also use Sefton's international sites.</p>	<p>The on-going HRA process for the Plan, and other studies and assessments, take these issues into account. The Habitats Regulations assessment process follows 'good practice.'</p>

Infrastructure Study

This table looks at comments that were made specifically to the draft Infrastructure Study. However, many people made comments to the Core Strategy Options Paper and on individual sites in relation to infrastructure. These comments are considered in the relevant section of the Consultation Report but will be used to update and improve later editions of the Infrastructure Study.

Infrastructure Study	
Summary of Comment	Sefton's Response
<p>Various comments on mapping inconsistencies and errors within the draft Infrastructure Study. In particular some residents identified facilities or services that have since closed.</p>	<p>The infrastructure study will be updated in light of comments received from residents and others.</p>
<p>Concerned that the Draft Infrastructure Study does not include a specific assessment of the Leeds and Liverpool Canal. The document identifies Green Infrastructure, including the canal, as one form of infrastructure, and states that this is covered by other studies including the Green Space Study. However, it is not entirely clear whether it is the intention that Green Infrastructure will be incorporated within the Infrastructure Delivery Plan and ultimately the charging schedule for the Community Infrastructure Levy. It is essential that the Infrastructure Study be revised to include a full, detailed assessment of the condition of the full length of the canal, including the towpath, accesses to it and other waterway infrastructure. British Waterways would be keen to provide the necessary information to assist in this as much as possible.</p> <p>The Leeds and Liverpool Canal is mentioned under Physical Infrastructure (4) — Transport as a walking and cycling route. However, this section should be expanded to refer to the route and length of the canal towpath, the links provided to other walking and cycling routes and any stretches that are also designated Cycle Routes. It is unclear why the route of the canal towpath is not indicated on Map 23 and this should be rectified. In addition to the</p>	<p>Comments noted. The Infrastructure Delivery Plan will include all types of infrastructure that will be required for the Core Strategy to be realised. This will form the basis of identifying infrastructure that will be funded or part funded through the Community Infrastructure Levy or other funding.</p> <p>At the next update of the Infrastructure Study we will include further information on infrastructure in Sefton and will take the comments on board in regards the canal.</p>

Infrastructure Study	
Summary of Comment	Sefton's Response
towpath as a walking and cycling route, the canal itself should be assessed as a form of Green Infrastructure providing multiple functions and benefits (British Waterways)	
The draft Infrastructure Study (baseline section) cites one of the main aims of LTP3, but then does not really highlight reference to the need for improvements to the connectivity of public transport services generally (and as identified elsewhere). Question is raised as to whether a broader ranging approach can be adopted for local city transport, with inclusion of renewable energy opportunities, encouragement possibly for a future network of electric car charging points, leasing/carshare initiatives (Highways Agency)	Comment noted. Further detail on infrastructure is to be added to the ongoing infrastructure work. This will include information on infrastructure as provided in this response.
Paragraph 1.3 We note that this initial study is meant to be a snapshot of the range of infrastructure at the present time and identifies any shortfalls. We also note that as your Council progresses the Core Strategy, this information will be updated as required. At this stage we feel that further work will be required to identify some issues (specifically flood risk including surface water flooding) and how to address them in a sustainable manner. We are, of course, willing to discuss this with your Council (Environment Agency)	Comment and support noted. As the Infrastructure work progresses we will be happy to continue to work with infrastructure providers to make sure our plans are fully supported and reflect the most up-to-date information possible.
Paragraph 1.4 As part of the Community Infrastructure Levy, we are able to provide a list of flood management schemes that have, in some form, been discussed/reviewed within the Sefton area. We would be happy to discuss this in more detail with your Council as the Infrastructure Plan progresses (Environment Agency)	Comment noted. We would be happy to share information to further improve the infrastructure work.
Paragraph 4.34 We welcome that the study identifies that other large schemes, such as Liverpool Waters, will need to be considered with regards to the Mersey Estuary Pollution Alleviation Scheme (MEPAS), and Sandon	Comment noted. An update of the infrastructure work will reflect any improvements to waste water treatment and other infrastructure.

Infrastructure Study	
Summary of Comment	Sefton's Response
<p>Dock (Liverpool Waste Water Treatment Works). It should be noted that United Utilities Plc (UU) have submitted a planning application to Liverpool Council. This is largely as part of a commitment by UU to improve treatment for the area. You may wish to consider this as part of the study, should it be granted approval (Environment Agency)</p>	
<p>Paragraph 4.35 The results of the Infrastructure Study should inform the final Infrastructure Delivery Plan. Significant growth across the area, including Sefton and Liverpool, could impact both MEPAS and the capability of Sandon Dock to treat receiving effluent. United Utilities should be consulted to discuss this in greater depth (Environment Agency)</p>	<p>Comment noted. We will regularly keep in touch with infrastructure providers in Sefton [and the wider area through work with our neighbours] so that the Infrastructure Delivery Plan meets the needs of the Council, its residents, business and infrastructure providers.</p>
<p>Paragraph 4.43 We welcome that the Strategic Flood Risk Assessment (SFRA) is due to be updated. Should this paragraph read 2011/2012? Depending on site allocations there may be a requirement to undertake a level 2 SFRA, which should look at specific flood risks in more detail, informing future developments (Environment Agency)</p>	<p>The report should have said 2011/12, however on reflection this is more likely to be during 2012/13.</p> <p>Acknowledge the need to undertake a level 2 SFRA to inform Core Strategy and allocations.</p>
<p>Paragraphs 4.45-4.55 These paragraphs discuss the flood defence assets within the Borough as identified in the Strategic Flood Risk Assessment (SFRA) and the Environment Agency's National Flood and Coastal Defence Database (NFCDD). The study should also refer to the policies identified within the Liverpool Bay and Ribble Estuary Shoreline Management Plans (SMPs) to ensure that they can be accounted for in the next revisions of land use plans in order to help manage the risks from flooding and coastal erosion (Environment Agency)</p>	<p>Comment noted. Shoreline Management Plans will be assessed in the next update of the infrastructure work.</p>
<p>Paragraph 4.51 — 4.55 These paragraphs discuss assets currently operated by the Environment Agency. It should be noted that we can never give any</p>	<p>Comment noted.</p>

Infrastructure Study	
Summary of Comment	Sefton's Response
guarantee that we will continue to operate our assets in the future (Environment Agency)	
<p>Paragraphs 4.56 — 4.59</p> <p>The flood risk sequential test should be undertaken for any development proposed in flood zone 2 or 3. It should be noted that some forms of development are considered by PP525 as inappropriate for development in flood zone 3a and 3b. This will be informed by your SFRA (Environment Agency)</p>	<p>Comment noted. Further work on the sequential test will be done as part of a level 2 SFRA.</p>
<p>Paragraph 4.67</p> <p>The report indicates that many areas in Sefton have experienced surface water flooding. This may mean that new development proposals might need to be supported by, and informed by, the results of a site specific Flood Risk Assessment (FRA). Furthermore, appropriate planning policies seeking a reduction in surface water runoff, potentially established by your SFRA, SWMP and Core Strategy, would ensure a significant reduction in surface water runoff. This could potentially alleviate flooding issues and provide greater capacity for foul effluent disposal (Environment Agency)</p>	<p>Comment noted. See points above regarding level 2 SFRA</p> <p>It is intended that infrastructure be reinforced by appropriate policies in the development plan, as well as through the development management process. Other Council strategies (e.g.) the Local Flood Risk Management Strategy, Flood and Coastal Erosion Risk Management Forward Plan 2011-12 – see http://modgov.sefton.gov.uk/moderngov/documents/s34250/FD%20-%200955%20Way%20Forward%20Report%202011%202.pdf, and the recent approval of the Liverpool City Region Ecological Framework also plays a part in this – see http://www.sefton.gov.uk/ecologicalframework .</p>
<p>Paragraph 4.68 states that "all development proposals in areas with surface water issues - whether within the urban area or in the Green Belt - must be accompanied by a Flood Risk Assessment". Reference should be made to studies that have identified surface water flooding issues, including the SFRA and especially the Surface Water Management Plan. Local knowledge may also provide anecdotal information (Environment Agency)</p>	<p>Comment noted and agreed.</p>
<p>Paragraph 4.69 discusses the new responsibilities of the SuDS Approval Board (SABS) in assessing the surface water drainage arrangements for new development and existing development. This is</p>	<p>Comment noted. An update of the infrastructure work will reflect the additional responsibilities of the Council as set out.</p>

Infrastructure Study	
Summary of Comment	Sefton's Response
<p>yet to be enacted under the Floods & Water Management Act, 2010. Additional responsibility for the consenting of works affecting ordinary watercourses is also due to fall within the remit of the Local Authority. The Local Authority may therefore wish to include this in their Infrastructure Plan to ensure that proposed works on ordinary watercourses do not increase flood risk in the locality, and also that consented works do not result in environmental degradation of the associated waterbody. This is in line with the guiding principles of the Water Framework Directive (Environment Agency)</p>	
<p>Paragraph 4.73 discusses the precautions for new development in areas at risk of groundwater flooding and states that "as a precautionary measure, basements or flood levels below ground level would not usually be permitted". Should this read: "as a precautionary measure, basements or floor levels below ground level would not usually be permitted"? (Environment Agency)</p>	<p>Yes. Correction will be made</p>
<p>Paragraph 4.74 From a planning perspective, and depending on site allocations, a level 2 SFRA might be required to look at other forms of flooding (Environment Agency)</p>	<p>Comment noted.</p>
<p>Further Comments The results of the Surface Water Management Plan will be a key document to inform this study, including the potential impact to existing and proposed infrastructure and development. Depending on the findings, there might be a requirement to try to reduce surface water flooding. Improvements to receptors of surface water, such as watercourses (including those culverted) and sewer infrastructure might be required prior to any development taking place. De-culverting should seriously be considered where it would provide a positive benefit in reducing flood risk. Any such works should meet the requirements of the Water Framework Directive (Environment Agency)</p>	<p>Comments noted. The update of the Infrastructure Study will consider these issues to assess whether any improvements to infrastructure is required.</p>

Infrastructure Study	
Summary of Comment	Sefton's Response
<p>The Mobile Phone Operators understand the Council's desire to plan for future infrastructure requirements to support future development as identified in the Local development Framework. Unfortunately it is not possible for any operator to give a clear indication of what their infrastructure requirements are likely to be in 5, 10, 15 or 20 years time (Mono Consultants)</p>	<p>Comment noted.</p>
<p>Natural England has no specific comments on this report. We have made various comments in relation to greenspace and green infrastructure elsewhere in this response. However, in Section 2 — Policy background, the Study will also need to take into account guidance set out in the recently published Draft National Planning Policy Framework (Natural England)</p>	<p>Comment noted and agreed.</p>
<p>The Port of Liverpool's exclusion from the Draft Infrastructure Study is somewhat concerning given that the Port is a major infrastructure asset and freight hub, handling approximately 32 million tonnes of cargo per annum. This should be addressed in later drafts of the document (Peel Ports)</p>	<p>Comment noted. The draft infrastructure concentrated on local infrastructure that helps a local area function as a neighbourhood. It did not look at employment or major strategic infrastructure. The Merseyside authorities are currently collaborating on a sub-regional infrastructure study which will consider infrastructure at the Merseyside level. This will include the Port and will help inform Sefton's Infrastructure Delivery Plan.</p>

Detailed Green Belt Boundary Review

Detailed Green Belt Boundary Review	
Summary of Comment	Sefton's Response
<p>Land at 73 Southport Road.</p> <p>The land was originally planned as an extension to Southport Road. The land was prepared with hardcore and drains as a main road.</p> <p>The land soil is only 5cm thick and cannot support plant life other than grass. Then site is not part of the adjoining farm and should not be included within the Green Belt.</p> <p>The site is suitable for housing.</p>	<p>These comments will be considered when the Council review the Detailed Boundary Review.</p>
<p>Land at the corner of Glebe End and Brickwall Lane, Sefton Village.</p> <p>The site should be considered for housing and changed from Green Belt to PRA. The DBR recommends that it is all designated as Green Belt.</p>	<p>These comments will be considered when the Council review the Detailed Boundary Review.</p>
<p>Land at Spencers Lane, Melling.</p> <p>The site is at the end of a row of houses and backs onto the M57 motorway. The site is used at the moment for a bus depot /storage yard. Part of the site is in Primarily Residential Area (PRA and part is designated as Green Belt. The part designated as PRA has been included within the SHLAA as being suitable for housing.</p> <p>The submission contends that whole site should be treated as one site and as a logical rounding off of that part of the village.</p>	<p>These comments will be considered when the Council review the Detailed Boundary Review.</p>
<p>Land at Victoria Road, Formby – Land at Formby Ladies Golf Club.</p> <p>The submission suggests that the new boundary as proposed in the</p>	<p>These comments will be considered when the Council review the Detailed Boundary Review.</p>

Detailed Green Belt Boundary Review	
Summary of Comment	Sefton's Response
<p>DBR is not the most suitable boundary. An alternative boundary that makes better use of land use on the ground has been suggested.</p>	
<p>Land at Lynton Drive – Submission from Network Rail considers that the site does not fulfil any of the five purposes for inclusion within the Green Belt.</p> <p>The railway makes a far more logical boundary.</p> <p>Questions the designation as a “Local Wildlife site”.</p>	<p>These comments will be considered when the Council review the Detailed Boundary Review.</p>
<p>Land at Hall Road Station – Submission from Network Rail considers that the site does not fulfil any of the five purposes for inclusion within the Green Belt.</p> <p>The character of the land is more in common with the built up area than the Green Belt</p>	<p>These comments will be considered when the Council review the Detailed Boundary Review.</p>

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Annex E Comments received from neighbouring authorities, parish councils, statutory consultees and other interest groups

Below is a summary of the comments received from neighbouring local authorities, parish councils, statutory consultees and other interest groups. This table is provided to give an outline of the comments received from these groups rather than an in-depth account of the full representation. **The detailed comments are included and addressed in each of the relevant sections throughout this consultation report.**

This list is not meant to be exhaustive and in particular we received many comments [and petitions] from local residents groups. These are also included throughout this consultation report in the relevant section.

In addition to the groups set out below, we have also consulted with and discussed our plans with a number of other groups who did not submit representations during the consultation period. These groups include infrastructure providers, such as **United Utilities** and **National Grid**, emergency services, such as the **police** and **fire service**, and local providers such as **Sefton NHS** and **Sefton education**.

We will continue to discuss our plans as they develop with many of these groups to make sure they are compatible with their strategies and are fully supported by services and infrastructure.

Neighbouring Authorities

Neighbouring Authorities

Liverpool

Commented primarily on the Core Strategy Options Paper and the evidence based that underpinned these options. Comments included:

- The Core Strategy contained little on cross-boundary issues such as the link between strategies of adjoining authorities
- Given the cross boundary links, Sefton does not necessarily need to meet its housing requirements in Sefton alone.
- Sefton's analysis of housing supply is a cautious one with no allowance for windfalls or on greenspace, a high discounting factor and low housing density assumptions.
- Would like to see all ways to maximize urban land for development and bringing back into use vacant homes
- Qualified support for Option Two providing the above points are addressed

Wirral

Expressed concerns that the potential release of land within the Merseyside Green Belt, following an isolated partial review, could have a

Neighbouring Authorities

negative impact on the implementation of the wider strategy of urban regeneration across Merseyside as a whole which has, to date, been a key element of the agreed wider spatial strategy.

Knowsley

Overall agreement with the findings of the Core Strategy Options Paper and supported the 'vast majority of the content'. Some of the key points made were:

- Do not oppose the principle of Green belt release within Sefton to meet our long-term development requirements
- Support Option Two as 'the right Option for Sefton' but would welcome further investigation of the potential population loss this would result in
- In the event Sefton pursues Option One Knowsley would like further analysis of the potential cross boundary impacts for them
- Concern on the identification of Green Belt parcel S158 in particular for affordable homes, the impact on delivering Council services, impact on regeneration schemes in the vicinity in Knowsley, and concerns over existing Highway capacity and safety.

West Lancashire

Expressed the importance of co-ordinating of neighbouring authorities to ensure that only the most sustainable development comes forward. Made no comment on the general concepts of the Core Strategy Paper or which Option should be chosen but including the following comments:

- Sefton should consider need to limit urban sprawl and protect strategic gaps between settlements.
- Development in Sefton should not compromise flood risk or infrastructure on the West Lancashire side of the boundary.
- Pleased that the plans make no reference to expanding any Sefton settlements across the border into West Lancashire and would like this clarified in future editions of the plan.
- Note reference to transport and infrastructure in the plans and would welcome further work between authorities to find ways these can be improved.

Parish Councils

Parish Councils

Lydiate

Commented that the feedback from local residents in their parish was clearly to not develop Green Belt. In particular they raised the following concerns:

- The importance of retaining all high quality agricultural land, regardless whether it is currently used for growing food
- That the reasons for refusing the canal marina in Lydiate are still pertinent for resisting housing development in the area
- That the consultation events were not publicised to the wider Lydiate residents enough
- That the village nature of Lydiate needs to be retained and not lost through encroachment into the Green Belt
- Unconvinced of the arguments that Lydiate of Sefton East Parishes needs more homes, particularly in the present recession
- If sites at Ashworth are developed for housing that there is even less of a requirement in the Sefton East area for homes
- That the Parish Council remains unconvinced that sufficient evidence has been provided to justify development in the Green Belt.

Ince Blundell

Asked general question on the need to plan for such a long period given the current uncertainties with the economy and housing market. Suggested working towards five year timescales with reviews put in place. Other more specific points included:

- Concern that an increase in new homes will not be supported by improvements to services and infrastructure, in particular school places
- Questioned the ability of 480 homes per year being built as planning permission for only 190 homes were approved last year.
- The need for the large number of vacant homes to be addressed.
- Agreement that Ince Blundell isn't a suitable location for a large number of new homes but that some limited infill within the village may be appropriate if agreed under neighbourhood planning.
- Acknowledge the need for economic development in Sefton and suggest that the present Formby Trading Estate might be extended northwards into the Green Belt.
- Land that has been subject to flooding, such as south of Altcar Lane in Formby, should be discounted from further consideration.
- There may be suitable locations for development, including the site of the Powerhouse.
- Inconsistency between presentations before and during the consultation period.
- The Core Strategy should be delayed to take account of the Localism Bill and the draft National Planning Framework.
- An appropriate gap is maintained between Little Altcar/Formby and Hightown.

Parish Councils

- The Preferred Option for the Formby, Little Altcar, Hightown and Ince Blundell Paris areas is Option One.

Formby

Reiterated the importance and role of the Green Belt and the Government's recent reaffirmation of its commitment to maintaining it. Other points included in the submission included:

- The housing market is currently very slow and with the economic downturn it questionable to see how the reality matches the conclusions of the NLP study.
- Recommend that Option One be the preferred option for the Core Strategy.
- Note concerns with infrastructure and request that a full study is carried out to make sure any deficiencies are improved
- Concerns over surface water flooding in the Formby area.
- Would like to see the enhancement of Formby Business Park and would not be against its expansion northwards. This could be a location for current businesses on Mayflower Industrial Estate to be located and this site used for homes.
- Support the overwhelming view of local residents against any development of the Green Belt around Formby.
- That the Formby Parish Plan be incorporated in the final Core Strategy.

Melling

Registered their objection to development in the Green Belt around Melling with particular reference to:

- Lack of infrastructure in the village to cope with additional development
- Concern with existing drainage problems caused by past developments
- The need to protect agricultural land.

Little Altcar

Outlined their concern on the Core Strategy Options paper and its impact on Little Altcar in relation to:

- The scale of the proposals in relation to Little Altcar
- Flooding and surface water issues
- Infrastructure problems
- The amount of traffic new development would bring

Parish Councils

- The impact on the local environment, including nature
- The lack of school places and other facilities in the community
- Whether Formby would be a suitable location for social housing, particularly considering the current housing downturn

Aintree Village

Strongly opposed to building on green belt/agricultural land in the parish of Aintree Village due to such issues as

- Potential flooding
- Impossibility of access
- The inappropriately located land which would cause innumerable construction vehicles to drive through residential streets for long periods etc
- Pressure on health and educational facilities etc

Aintree Village residents strongly oppose the building proposals and the Parish Council calls for the four parcels of such land, in and adjacent to the parish of Aintree Village, to be removed from the strategy.

Thornton

Set out their aim to defend the Green belt and that Option One would be the only option that would satisfy this aim. In addition raised issues with:

- Insufficient work to identify unoccupied properties and how these can be brought back into use.
- Inflexibility of the Core Strategy to deal with changes that are likely to occur during its time period.

Hightown

In general the large majority of residents are against any increase in housing numbers due to problems of: -

- Access to the village - only one way in and out
- Few but the basic services
- No schools so all go elsewhere with poor choice and no priority
- No parking spaces available in the village centre or station areas
- Unusual geography of the area any extension would act adversely on the community spirit in the village

Sefton Area Partnership of Local Councils

Parish Councils

Asked the Council to recognise the Core Strategy and the individual Parish and Community Plans are part and parcel of the same work and that a commitment is given in the final document to that end.

Other Statutory Consultees

Other Statutory Consultees

British Waterways

British Waterways is concerned that the Core Strategy Options Paper does not adequately reflect the significance of the Leeds and Liverpool Canal in terms of defining the heritage and identity of the Borough or in terms of the potential role of the canal in meeting the aims and objectives of the Core Strategy. Detailed comments provided on the aims of the Core Strategy to strengthen the role of the Leeds and Liverpool canal
Detailed comments provided on the draft Green Space Study and draft Infrastructure Study.

Highways Agency

Highways Agency made a number of detailed comments to the Core Strategy Options and background documents. These comments include:

- Southport's links to the motorway network
- The importance of guiding housing and employment allocations to areas adjacent to the transport modes
- The importance of the traffic near the Port of Liverpool and that the Core Strategy should take account of the findings of the Access to the Port of Liverpool Study
- Whether the Core Strategy should set targets for sustainable transport methods
- The need for the draft Infrastructure Study to expand upon improvement connectivity to public transport and whether a broader approach can be taken to include sustainability opportunities
- The feasibility of a park and ride scheme for the Dunningsbridge Road corridor

The Coal Authority

No specific comments to make on the Core Strategy Options Paper.

Merseytravel

Merseytravel made a number of specific comments on the Core Strategy and draft Infrastructure Plan in regards to transport. These include:

Other Statutory Consultees

- The strategic direction of the Core Strategy should be a balanced and sustainable development approach towards integrating land use and transport, regeneration and economic development, social inclusion and help tackle climate change.
- The Core Strategy should be fully interlinked with the Local Transport Plan (3)
- Development should be sustainable.
- Policies in the LDF should not conflict and ensure an integrated approach to sustainable transport objectives.
- Employment and retail development needs to be in sustainable locations and ensure they are accessible [or can be made accessible] by sustainable travel modes.
- Any Green Belt development should only occur where good public transport exists or can be achieved.
- Homes should not be provided in isolation. Other issues are of equal importance such as health, education and shops and facilities.
- The Core Strategy should emphasise the importance of promoting public transport and other sustainable transport methods as an import action to deliver its objectives.
- With the emerging localism agenda it is becoming increasingly important to engage with communities on important projects and developments.
- Land that may be suitable for transport development should not be lost to housing.
- The identification of strategic sites should be focussed on accessible locations and existing settlements.
- In terms of the spatial options identified we feel that Option 1 would be most appropriate as they focus development onto existing main settlements eg Bootle, Crosby, Maghull, Formby and Southport etc which are more accessible than the more outlying areas but with limited expansion into Green Belt to meet future needs.
- The potential of Sefton's coast, Southport and Aintree Racecourse should be maximised with sustainable access a priority
- The Leeds and Liverpool canal is an important asset that could serve as attractive walking and cycling routes
- Whilst new bus routes are more flexible, there are costs implications.
- The taxi sector can make an important contribution towards accessibility, in particular in Sefton's most disadvantaged areas and for disadvantaged groups.
- Support in the Core Strategy should be given for the Station Travel Plans that have been developed.
- Sefton should work with partners to encourage improvements to the Port of Liverpool's environmental capabilities, look at becoming a hub for renewable energy and green business. The port could look at best practise e.g. Hamburg at ways it can grow in a sustainable way
- Transport infrastructure schemes (list provided) should be considered for inclusion as part of any future Community Infrastructure Levy.

Environment Agency

Other Statutory Consultees

Detailed comments on the Core Strategy Options Paper, including suggestions to improve the document in relation to:

- Nature conservation
- Sustainable development
- The environment and Climate Change
- Use of brownfield sites
- Flood risk
- infrastructure improvements

No specific opinion on the preferred option, but the following observations were made on the options:

- Option is likely to be more sustainable given that this will concentrate development on brownfield land which will more likely have existing infrastructure
- If options 2 or 3 are progressed then SuDs should be considered to mitigate loss of permeable land.
- Appropriate mitigation would be required before any development commenced on areas of natural value under any the options

Detailed comments on the Water Framework Directive and the SFRA

Detailed comments on the Sustainability Appraisal, draft Infrastructure Study, draft Green Belt Study and draft Greenspace Study

Natural England

Made comments on the Core Strategy Options Paper, draft Green Belt Study, draft Green Space Study, draft Sustainability Appraisal of the Core Strategy Options and the draft Infrastructure Study. The key points raised included:

- The need to look at nature sites outside the Core Strategy area to assess impact on these
- Pleased with the emphasis on green infrastructure but would also like to see greater emphasis being placed on the value and importance of the landscape and townscape
- Welcome the focus on regeneration but would like to see solutions to inequalities, including the role the natural environment can play in this
- Need to explore the role renewable energy technologies can play in mitigating climate change
- Need to make the vision less generic and more obviously Sefton focussed
- Major development should avoid environmental assets such as protected landscapes, habitats, sites, species and floodplains, and should promote sustainable travel patterns.
- A number of specific points to strengthen the Core Strategy objectives and principles
- Heavily qualified support for Option Two with a requirement that further work is undertaken to assess impacts on natural and sustainability assets

Other Statutory Consultees

- Need to take account of emerging National Planning Policy Framework in plans

English Heritage

Broad comments on the need for the Core Strategy to identify critical elements of the natural, built and historic environment and how these can be form the basis of high quality design. Drew attention to Parish and Neighbourhood Plans and the role these can play in community led planning.

Other Interest Groups

Other Interest Groups

RSPB

Set out a list of sites in the Green Belt [those that were identified as possible development sites] that they say should not be released for development. This is because losing this land not only starts to reduce the area of habitat for declining birds species, but it also reduces the available area for the deployment of positive conservation management. Sites included are S056, S058, S068, S110, S111, S112, S129, S145, S152, S158.

Merseyforest

Made detailed comments to the Core Strategy objectives and principles with emphasis on green infrastructure, carbon reduction and tree planting. Also made specific comments on the Greenspace Study.

The Woodlands Trust

Made detailed comments on the Core Strategy Options paper include:

- The role which a healthy natural environment can play in tackling health inequalities, climate change and accessibility
- The need to give absolute protection to all irreplaceable semi-natural habitats and in particular ancient woodland.
- The need for the Core Strategy to contain targets for woodland creation.
- Would like to see in the Core Strategy a recognition of the role of trees and woodland in mitigating carbon emissions
- There needs to be recognition of the role of woodland in improving water quality and alleviating flooding, as well as the role of street trees in countering the urban heat island effect.
- It is important to buffer, extend and relink semi natural habitats (and provide stepping stones in the landscape) to allow species an opportunity to move and adapt to climate change.
- Should consider the potential benefits of greenspaces rather than just the current benefits
- Would like to see woodland categorised separately from natural greenspace and adopt an approach to greenspace and woodland provision based on accessibility.

National Trust

Other Interest Groups

Detailed Core Strategy comments particularly in relation to:

- Protection and enhancement of Sefton's natural assets (including coast, woodland, green infrastructure etc)
- Would like to see a more positive and proactive approach in the Core Strategy to improving environmental quality
- Would like to see other ways climate change can be mitigated, such as through sustainable design and construction
- Careful consideration within the vision and objectives of an integrated approach to sustainable development

On the options the Trust generally supported Option Two but required closer assessment of housing densities, efficient use of land, carefully phased development and reducing the need to travel. Concern was also expressed that this option may place undue pressure on recreational areas, particularly in the Formby area, and that individual settlements may lose their individual character.

The National Trust agrees to the overall the approach of the Green Belt Study. However, it is noted that the criteria have not included any overt landscape character measures or heritage considerations. In particular had some concerns to how Listed Buildings and Conservation Areas have been considered in the study. As landowners around the Formby area the Trust provided detailed comments to the Green Belt sites around Formby with emphasis on the impact of the openness of the Green Belt.

Some minor comments to the greenspace study including that it should be called the **urban** greenspace study.

OneVision Housing

Agreed that the strategy is broadly appropriate but may benefit from a shorter, overarching vision that provides clear direction and is easily identifiable for residents and stakeholders.

Would like to see the regeneration of Southport Town Centre to increase its desirability for residents. Also provided comments in relation to the location of employment land and that we should cross boundary were links exist.

General agreement with approach to urban greenspace with detailed comments on particular sites.

Support Option Two but would want to ensure any new development includes mixed tenure homes and not just high value homes.

Mobile Operators Association

Set out that they tend to work to a much shorter timescales than planning and so its difficult to predict infrastructure requirements for 5, 10 or 20 years time. However, they set out their commitment to keeping the Local Authority informed of their annual rollout plans and to working were possible with Local Planning Authority.

Sport England

Other Interest Groups

Made comment to the Greenspace Study including objection to sports and recreation sites being lost.

- Do not consider that the Greenspace Study methodology constitutes an assessment of the sites as required by Planning Policy Guidance Note 17 (PPG17)
- Should not develop any sites that are or could be used for sports or recreation.
- Sets out the Sport England exceptions where the development of sites would be acceptable.

Comments to the Core Strategy Paper include:

- The profile should include all sports facilities across the borough and not just the high profile facilities.
- Would welcome explicit reference to sport and recreation in the issues section.
- We would point out that from a sports perspective it is not just green spaces which need to be considered for protection but also built facilities for sport such as sports halls swimming pools etc.
- No opinion offered on the three options

Comments to the draft Green Belt Study

- Strongly recommend that the actual or potential use of the site for sport and recreation should be considered as one of the site constraints.

Home Builders Federation

Detailed comments to the Core Strategy Paper including

- Clarification sought on the timescales the Core Strategy will cover
- A single objective for all types of housing and not separate out affordable housing
- Question the 'brownfield' first principle given the short supply of housing land in the urban area.
- Concerns that there is blanket protection on greenspaces and employment land without due consideration of other uses being explored
- Support for Option Three as this provides the most appropriate range of housing opportunities for Sefton and particularly to make up backlog.
- Strongly support rationale and approach to Green Belt Study

Theatres Trust

Concern that cultural facilities do not have specific mention in the Core Strategy or Infrastructure Study and set out how these can play an important role in the vibrancy of town centres.

Other Interest Groups

National Federation of Gypsy Liaison Groups

Made comments on the need to identify sites for Gypsy and Traveller accommodation in line with the Gypsy and Traveller Accommodation Assessment (GTAA) and national guidance.

Formby Civic Society

Detailed comments to the Core Strategy Options paper including:

- Reluctant support for OptionTwo provided that there is strenuous work to ensure alternative policies for providing homes without the need for building on green field sites.
- Strong support for efforts to bring back vacant homes back into use
- The Core Strategy to provide policies to specify minimum standards of construction, accommodation and of external amenity space for new homes.
- That any Green Belt release is subject to a clear phasing policy and this be clear in the Core Strategy and the need for Green Belt land renewed annually
- That the NLP study should be updated using the 2011 census information as soon as this becomes available
- That the Council set its own demanding target for development on brownfield land
- That community infrastructure levy be set at levels commensurate with the planning gain for sites, i.e. so infrastructure on green field sites can be provided
- That a range of housing types is provided to be the needs of all of Sefton's residents

Provided detailed comments to draft Green Belt and Greenspace studies in relation to Formby sites.

Ministry of Justice

Support Option Two for the Core Strategy and would promote the former Ashworth Hospital South, School Lane, Maghull [S128] for housing development.

Sefton CPRE

Critical of the procedure that has been followed in the Options Paper consultation – the draft Green Belt Study is relevant only if Option 2 or Option 3 were to be adopted

Consider that the Council should listen to the overwhelming wishes of the electorate as articulated in all the public meetings and media cover

Other Interest Groups

during the consultation – a distinct lack of support for development on the Green Belt

Detailed comments about the Council's evidence and assumptions, such as the number of new homes needed.

Consider that Sefton should establish its own target for the development of brown field sites, due to the land constraints within Sefton Borough.

Priority and support needs to be given to the redevelopment of empty property, for example:

- Bringing long unoccupied houses into beneficial occupation,
- Review the Empty Properties Strategy,
- Give high priority to refurbishment of property that has been declared obsolete but has yet to be demolished as a result of the now defunct Housing Market Renewal programme.

Look again at any industrial sites that have been vacant for at least ten years, and consider redefining some for housing development.

Minimum standards of construction should be specified in the Plan. This would make smaller accommodation more attractive to / meet the needs of older people.

There should be no re-development and change of use from food production on any grade 1 or 2 agricultural land 2.

That no Green Belt land be released before all alternatives have been exhausted, and that if it ever to be released any decisions are measured against the original core purposes for the creation of Green Belts.

That Planning Committee must retain full control over any inappropriate planning application on Green Belt.

Specific comments to each Green Belt site

Merseyside Naturalists' Association

Concern over development in Green Belt and on agricultural land, specifically in Crosby/Thornton area. Would prefer focus to be on bringing back into use underused land and buildings in the urban area first.

Other Interest Groups

Sefton Congregation of Jehovah's Witnesses

Would seek polices incorporated within the Core Strategy that allocate/designate use of land for community [including places of worship] which will assist recognised faith groups to obtain places of worship.

British Baseball Federation

Concern over the potential to redevelop the land adjacent to the former Bootle Stadium for homes and the loss of the current baseball pitch.

Southport Green Party

Detailed comments to the Core Strategy Options paper with many suggestions on the vision, aims and objectives, including:

- Providing new homes in a sustainable manner
- Maximising reuse of existing housing stock
- Importance of natural environment
- Need to mitigate against climate change
- Improving access by public transport, cycling and walking
- The need to move away from the car-centric approach
- The use of community and sustainable infrastructure
- The role the third sector can play in reducing worklessness
- The need to mixed living and working communities and not have isolate employment areas
- The acceptance that improving health can't be achieved through just the Core Strategy but needs to be part of a wider process
- Crime and the fear of crime

A Better Crosby

- Detailed comments to the Core Strategy Options Paper including:
- The paper currently seems too housing focussed and should look at quality of place as being the driving force behind the strategy.
- Questions whether the assumptions behind the housing data have taken account of the recent economic downturn.
- Believe there should be a clear 'Golden Thread'- an overarching, positive vision statement that sets an exciting target for the next 15 years.

Other Interest Groups

- Preferred option would be a version of Option One which focuses on quality of place and sustainability, reconsiders housing need /space required, and has less risk of not being approved by inspectors.