
Report to:	Cabinet Council	Date of Meeting:	20 June 2013 27 June 2013
-------------------	--------------------	-------------------------	------------------------------

Subject: Local Plan for Sefton: Preferred Option Document

Report of: Director Built Environment **Wards Affected:** All

Is this a Key Decision? Yes **Is it included in the Forward Plan?**
Yes

Exempt/Confidential No

Purpose/Summary

To present to Members the Preferred Option Document, a key stage in the preparation of Sefton's Local Plan. The Document sets out issues and challenges facing Sefton and includes:

- a vision for Sefton planning ahead to 2030;
- a strategy for how Sefton's housing, business and other development needs can be met;
- a 'preferred' option indicating where these needs might be met including detailed site allocations;
- details of other options which have been considered and discounted;
- development management policies to help guide development and provide a policy framework for making decisions on planning applications; and
- details of the 12 week consultation.

This is an important corporate strategy document which is being developed within the statutory planning framework. The Preferred Option Document is a key stage in the process of adopting a Local Plan, which will in due course replace the Unitary Development Plan.

Recommendations

That Cabinet

1. recommends the Council to approve for consultation, the further evidence which supports the Preferred Option Document, as outlined in section 18 of the report;
2. recommends the Council to approve the approach to consultation on the Preferred Option Document, as outlined in section 20 of the report; and
3. recommends the Council to approve for consultation, the Preferred Option document, including a correction to the land proposed for development, south east of Hightown as set out in section 19 and the attached plan of the report.

That Council

1. approve for consultation, the further evidence which supports the Preferred Option Document, as outlined in section 18 of the report;
2. approve the approach to consultation on the Preferred Option Document, as outlined in section 20 of the report;
3. approve the Preferred Option Document for consultation, including a correction to the land proposed for development, south east of Hightown as set out in section 19

- and the attached plan of the report; and
4. grants delegated powers to the Head of Planning Services to make minor editorial changes to the Document before it is published, as referred to in section 20.7 of the report.

How does the decision contribute to the Council's Corporate Objectives?

	<u>Corporate Objective</u>	<u>Positive Impact</u>	<u>Neutral Impact</u>	<u>Negative Impact</u>
1	Creating a Learning Community	✓		
2	Jobs and Prosperity	✓		
3	Environmental Sustainability	✓		
4	Health and Well-Being	✓		
5	Children and Young People	✓		
6	Creating Safe Communities	✓		
7	Creating Inclusive Communities	✓		
8	Improving the Quality of Council Services and Strengthening Local Democracy	✓		

Reasons for the Recommendations:

To enable the Preferred Option Document and supporting evidence to be available for public consultation.

What will it cost and how will it be financed?

(A) Revenue Costs

It is estimated that the total costs associated with the production of the Document will not exceed £20,000. These include legal costs, costs of printing the Document, publicising the consultation and hiring venues for public events. This sum can be met from within the 2013/14 Planning Department's (Planning Policy) Revenue budget.

There will be further costs, expected to arise in 2014/15, arising from the next formal stage of producing a Publication draft followed by Submission and Examination. These will include the updating of evidence, further consultation, legal costs, printing and publicity, and for the examination. At this stage, it is expected that total estimated cost will be in the region of £300,000 for which an earmarked reserve has been created, but future reports will provide further detail.

(B) Capital Costs

None

Implications:

The following implications of this proposal have been considered and where there are specific implications, these are set out below:

Legal	Incorporated into report	
Human Resources	None	
Equality		
1.	No Equality Implication	<input type="checkbox"/>
2.	Equality Implications identified and mitigated	<input checked="" type="checkbox"/> See report at Annex A
3.	Equality Implication identified and risk remains	<input type="checkbox"/>

Impact on Service Delivery:

None

What consultations have taken place on the proposals and when?

The Head of Corporate Finance (FD2291/13) has been consulted and her comments have been incorporated into the report. The Head of Corporate Legal Services (LD1607/13) has been consulted and her comments have been incorporated into the report.

Are there any other options available for consideration?

The report considers three options which include different levels of development and growth. The report recommends a Preferred Option.

The Council is required to prepare and adopt a Local Plan. It will be necessary to have the Local Plan formally examined by a planning inspector. The Local Plan must meet statutory planning requirements and will be assessed for 'soundness'. The Preferred Option being presented in this report is considered to be the most appropriate option for Sefton when considering these various requirements.

Implementation Date for the Decision

Council meeting on 27th June 2013.

Contact Officer: Steve Matthews

Tel: 0151 934 3559

Email: steve.matthews@sefton.gov.uk

Background Papers:

National Planning Policy Framework [CLG, 2012]

Review of Sefton Housing Requirement [NLP, 2011]

[Updated] Review of Sefton's Housing Requirement [NLP, 2012]

2012 Strategic Housing Land Availability Assessment [SMBC, 2013]

Employment Land and Premises Study [BE Group, 2010; updated 2012]

Agricultural Land Study [ADAS, 2012]

Strategic Flood Risk Assessment [Capita Symonds, 2013]

Sequential Test Position Statement [Capita Symonds, 2013]

Consequences Study [NLP, 2013]

Green Belt Study [SMBC, 2013]

Port Masterplan [Peel Ports, 2011]
Health and Wellbeing Strategy [SMBC, 2013]
Economic Strategy [SMBC, 2012]
See www.sefton.gov.uk/planningstudies

Summary of report

The Preferred Option Document is one of the key stages in preparing a Local Plan for Sefton which looks ahead to 2030. The Document sets out the issues and challenges facing Sefton and outlines a vision, objectives and possible options to address these. It selects a Preferred Option as to how the Borough's main housing, business and other development needs will be met. It provides a suite of policies which will help to guide development over the period of the plan. It also includes detailed policies for assessing proposals and applications for development, as well as identifying and allocating sites for new development.

The Government is committed to sustainable development and economic growth, and the National Planning Policy Framework [the 'Framework'], published in 2012, gives clear direction to local authorities. Local planning authorities are expected to carry out objective assessments of their needs for housing, business and other needs, and then - through the Local Plan – provide for those needs.

Three options, or levels of development, have previously been identified. Following previous consultation and detailed analysis and assessment Option Two is selected as the Preferred Option. This Option would still mean that about half the total number of homes will be developed in our urban areas. This includes sites that are currently identified as 'urban greenspace' in our UDP. It will also mean that the proposed new business parks /employment sites along with the remaining half of the housing needed, would have to be located in the Green Belt. The boundary of the Green Belt would therefore be reviewed and updated to accommodate this.

This Preferred Option Document has been prepared following national guidance and with the benefit of extensive and robust evidence. Much of this evidence has been commissioned and prepared by independent consultants who are specialists in their field. Where studies have been prepared in-house they have been externally assessed. It also draws on the experience of other local authorities more advanced in the Local Plan process.

Sefton is a constrained Borough due to its shape and location. It is also a Borough of contrasts – including significant areas of international importance and policy protection (such as the coast) – as well as areas of wealth and deprivation. These are some of the challenges which will need to be addressed in the Local Plan.

Due to the geography and shape of Sefton, along with past success at delivering much of our new development within the urban areas of the Borough, it is known that the urban land supply is finite and is coming under increasing pressure. This is a critical challenge for the Local Plan. We know that the Borough cannot meet all of its development needs within the urban areas of Sefton and that it will be necessary to release sites within the Green Belt in order to meet the government's policy challenge. Whilst this may be controversial, it is considered to be a necessary step if the Council is to achieve a sound Local Plan.

The strategic policy approach will ensure that development in the Green Belt will meet needs as far as possible where they arise. The aim is to have a proportionate distribution of development, as far as possible, when considering Sefton's constraints. Sites should be sustainable, they should be the least constrained, and there should be a sufficient supply to meet local needs. They also need to be able to be implemented. In

addition to this we will provide for mixed use sustainable development in appropriate locations.

Development will have to meet detailed policy requirements as set out in the Plan. It will have to provide new infrastructure where it is necessary – and should ensure that existing conditions (such as drainage) are not made worse.

Development can also bring opportunities to improve local infrastructure as well as supporting local services that become unsustainable – these include local shops and schools. The Local Plan also identifies significant opportunities for new development within our urban areas – around half of all new housing can still be accommodated within our urban areas.

Only those needs that cannot be met within the urban areas will be met in the Green Belt. This is particularly important for new economic development such as business parks and opportunities for job creation. As stated, there are no sites within the urban area to meet these needs and Green Belt release is essential to plan for economic growth and job creation.

In order to help form a view on the way forward, and bring together significant evidence already prepared, an independent Consequences Study was commissioned. This has assessed the impacts of each option on both Sefton and its adjoining authorities, from a social, economic and environmental perspective. Our neighbouring authorities do not support Option One [no release of Green Belt land], as this would put further pressure on them to accommodate more homes. West Lancashire and Knowsley are already planning to release Green Belt in their Local Plans to meet their own needs. They have previously told us that they cannot meet any of our needs for us.

The Government's Plannign Policy Framework states that the Green Belt should be protected from inappropriate development, but also that the Green Belt can be altered in exceptional circumstances – which includes when a Local Plan is being prepared.

The best way to protect Green Belt is to plan positively to meet needs, thereby identifying the most sustainable sites to contribute to our communities. By not planning to meet needs, the Green Belt will be less protected, and vulnerable to planning applications and appeals on sites which may be less sustainable. This would lead to Sefton losing control of which land in the Green Belt would be developed.

Option Two provides the best approach not only for meeting the Borough's needs up to 2030 for new homes and businesses, but for tackling a whole range of issues which are important to the future of Sefton. These include our approach to regeneration, health, infrastructure, design and climate change.

1. Introduction

- 1.1 We are required by the Government to have a Local Plan that looks forward at least 15 years from when the plan is approved. We have to plan for sustainable development to meet identified needs.
- 1.2 Following the Core Strategy Options consultation in 2011 the Preferred Option Document is the next stage in preparing Sefton's updated Local Plan. Following a change in the law in early 2012, the work we did as part of the Core Strategy is now being taken forward under the name of the Sefton Local Plan.
- 1.3 In November 2012, Members received a report providing an update on the further evidence which was being prepared to support this next stage of the Local Plan. Members were also advised that a Consequences Study was due to be carried out. This report updates Members and progresses the Preferred Option.

2. What is the Preferred Option Document?

- 2.1 The Preferred Option Document sets out the strategic and detailed policies to guide and control development in the borough for the next 15 years. It includes site allocations and expectations for development of those sites, for example the infrastructure which will be required. It is prepared in line with Government policy and advice.
- 2.2 This stage of the Local Plan is a further key opportunity to consult with our local community, statutory bodies and other interested organisations about the challenges and opportunities facing Sefton and our response to these. For convenience the Preferred Option Document will be referred to in this report as 'the Document'.
- 2.3 Figure 1 [next page] shows how this stage fits in to the overall process of preparing the Local Plan.
- 2.4 In summer 2011 a consultation was held on Options for the Core Strategy for Sefton. Since that consultation, the Government published the National Planning Policy Framework to simplify the planning system and to promote sustainable development and economic growth. This is a significant change and one that needs to be reflected in our Local Plan.

3. What does the National Planning Policy Framework mean for our approach to the Local Plan?

- 3.1 The Framework sets out the Government's national policy for planning. The Government is committed to sustainable development which it defines as positive growth – 'making economic, environmental and social progress for this and future generations'. It wants the planning system to help make this happen.
- 3.2 In particular The Framework [paragraph 152] states that:
"Local planning authorities should positively seek opportunities to meet the development needs of their area; local plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, or specific policies in this Framework indicate development should be restricted".

Figure 1 The Local Plan – stages of preparation

Timescale	Stage of Local Plan Preparation	Comments
2008 - 2009 Summer 2009	<p>Issues</p> <p>Public consultation on Issues</p>	<p>Information about this consultation can be found on the Local Plan web-site.</p>
2009 - 2012 Summer 2011	<p>Options</p> <p>Public consultation on Options</p>	<p>More information, including about the consultation and the Council's initial responses, can be found on the Local Plan web-site.</p>
2012 - 2013 Summer 2013	<p>Preferred Option</p> <p>Consultation on Preferred Option Document</p>	<p>We are now at this stage.</p> <p>This is the main opportunity to comment on the Local Plan.</p>
June – July 2014	<p>Publication</p> <p>Public consultation (Notification)</p>	<p>The Council's ability to make changes to the Local Plan is more limited at this consultation stage, and must only relate to whether the Plan is considered to be 'sound'.</p>
August – September 2014	<p>Submission</p> <p>Formal submission to the Secretary of State</p>	<p>Submission to the Secretary of State</p>
November 2014	<p>Examination</p> <p>Examination in Public</p>	<p>An independent Inspector will conduct the Examination.</p>
March/ April 2015	<p>Adoption</p>	<p>Council formally adopts the Local Plan, which replaces the Unitary Development Plan (2006).</p>

The core land-use planning principles which are set out in the Framework are summarised below. These are expected to form the basis of the Local Plan and decision-taking [paragraph 17].

3.3 Planning should (in summary):

- Proactively drive and support sustainable economic development to deliver the homes, business and other development needs of their area (including infrastructure);
- Seek to secure high quality design – to create attractive places where people live;
- Take account of the different roles and character of different areas, including protecting Green Belts;
- Promote mixed use developments and encourage multiple benefits from use of land – eg recreation, wildlife, flood risk mitigation;
- Support the transition to a low carbon future in a changing climate, taking full account of flood risk coastal change, and encourage the reuse of existing resources;
- Conserve heritage assets and enhance the natural environment – allocating land for development with lesser environmental value;
- Encourage reuse of land which has been previously developed;
- Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling; and
- Support local strategies to improve health social and cultural wellbeing.

3.4 Overall, Local Plans are expected to set out a positive vision for the future of their area, and meet objectively assessed needs.

4. Issues which the Local Plan ought to address

4.1 The Document sets out a number of issues which are well-documented through evidence, our partners' strategies, and consultation with local people and organisations. They include long-standing issues which all Boroughs face as well as pressures which are becoming increasingly important for Sefton such as:

- how can we reduce the causes of deprivation in order to improve health and raise the quality of life within Sefton's most deprived households?
- how can we develop skills and business growth to provide more jobs and reduce numbers of people who are not in education, employment or training?
- how do we provide for an anticipated growth in population and number of households in the borough, including providing more affordable housing?
- how do we accommodate and, if possible, slow down trends for an increasingly elderly population [e.g. providing homes and jobs for families and people of working age so they don't leave the Borough, as well as providing more appropriate homes and health care]?
- how do we enable the Port to grow whilst ensuring the harm to local amenity is reduced as much as possible?
- how can we make the best use of our resources and assets – including previously developed land, former industrial sites and vacant homes?

4.2 One issue poses particular challenges and requires a balance between meeting needs and the possible impact of development: given the lack of capacity within the urban area, how can we enable the Borough to grow and develop and meet

identified needs while protecting and enhancing the high quality environment of Sefton?

5. Responding to the issues

- 5.1 In planning for the future of Sefton we need to balance a number of competing priorities. We wish to protect the many different assets of the Borough including its high quality environment and its rich heritage. We also have a responsibility to cater for identified development needs and growth. We want to improve communities and create opportunities for our residents. We want to ensure new infrastructure is planned for and delivered through the development process.
- 5.2 'Sustainable growth' is about finding the balance between these different aspirations. We want to provide opportunities and choices for the people of Sefton, but in a way which best protects our special environment.
- 5.3 Protecting the environment at all costs would mean we would not provide enough homes and jobs for our residents. Focusing entirely on development and growth would harm Sefton's special environment. Yet we could not improve the situation for our communities and offer new opportunities without promoting a certain level of growth and development.
- 5.4 It is not a simple choice between protecting the environment on the one hand against enabling growth and development on the other.
- 5.5 Protecting Sefton's environment also includes a commitment to make the best use of Sefton's resources. There are many opportunities to redevelop land to provide new homes and land for jobs, together with new infrastructure, services and facilities.
- 5.6 The challenge is to meet the Borough's needs for development over the next 15 years while making the most of the opportunities which development provides to create the type of environment in which people want to live, work and visit.

6. What are Sefton's development needs?

- 6.1 We are progressing a Local Plan based upon wide ranging and robust evidence. We are committed to updating our evidence base when it is appropriate to do so. Indeed, over the past 12 months we have updated much of our evidence in order to best inform our Local Plan. In addition we have commissioned a Consequences Study to bring together an assessment of the various impacts of the Local Plan options. This is an unusual study – one that not many Local Planning Authorities have progressed – to will provide an additional layer of scrutiny and robustness to our work. It will enable Members to take account of the consequences of progressing with the relevant options, so as to enable any decisions to be properly informed.

Whilst we progress our Local Plan evidence may change over time. This may mean that we need to review some evidence at later stages. This is not unusual or unexpected, and is increasingly happening in other Local Plans. The Government requires local authorities to prepare proportionate evidence which is adequate, up to date and relevant. We have assessed our evidence and set out Sefton's various needs based on this below. For example, we know that we will need to

update our housing requirement following the publication of new population and household projections in 2014.

Requirement for new homes

- 6.2 Independent consultants, Nathaniel Lichfield and Partners [NLP], carried out an updated assessment of the housing requirement for Sefton in late 2012. Based on the most recent population and household projections available at that time NLP presented revised figures for an annual housing requirement for Sefton. The figure of 510 dwellings a year was their preferred assessment based on a more cautious view about future rates of migration into Sefton than that reflected in the ONS 2010-based population projections. This work was reported to Cabinet in December 2012.

What are the implications on this figure of the most recent household projections?

- 6.3 Interim household projections were published in April of this year. These suggest an annual requirement for Sefton of 399 dwellings a year. However there are a number of limitations with these projections:
- They are, as their title implies, only 'interim' and will be superseded by new 2012-based Household Projections which will be published in late 2014
 - They only look forward to 2021 and are therefore silent about the latter part of the local plan period 2021 to 2030
 - They do not take account of a planned comprehensive review of household formation rates which will be published next year and will look forward to 2031 and beyond
 - They do not make an allowance for vacant or second homes which would bring the figure of 399 up to about 420 homes a year.

- 6.4 In view of the limitations of these interim household projections we will review the borough's housing requirement afresh in 2014 when the next round of population and household projections are published. These will look forward for the whole of the period of the Local Plan.

- 6.5 The Government urges local authorities to complete their Local Plan preparation as quickly as possible. It would not be appropriate to delay the Plan to take account of these figures, particularly given the opportunity to address the implications of the comprehensive set of projections which will be available next year.

Requirement for land for business

- 6.6 The results of a study on Employment Land and Premises were also reported to Cabinet in December 2012. The study recognised that Sefton has by far the least employment land of any of the Merseyside authorities and it therefore needs to protect and increase this supply during the plan period. It therefore recommended that Sefton retain the Borough's main industrial estates and business parks in employment uses, but noted that a very limited number of small sites could be made available for housing, where it can be clearly demonstrated that a future employment use is no longer a reasonable prospect.
- 6.7 The Study concluded there was an outstanding requirement for a minimum of 31 hectares of land but also recommended that any new allocations made should exceed this requirement in order to:
- provide a degree of choice

- recognise that any lead in time to site delivery would be uncertain, and
- acknowledge that some identified supply would only be provided after 2031.

6.8 The Study recommended that two new business parks should be provided, one in North Sefton and one in South Sefton. It also recommended that land to the south of Crowland Street could deliver an industrial estate as an extension to the existing area. This site would meet general employment needs, and therefore provide a different offer and role to the other two business parks proposed.

Port of Liverpool

6.9 The Port of Liverpool has consulted on a Master Plan and its commitment to growth. Their ambitions also mean that extra employment land is required and this has also been taken account of in the amount of land identified.

Infrastructure

6.10 There is also an opportunity to meet some of our infrastructure needs through development. It is a fundamental tenet of national guidance that plan making should take full account of infrastructure requirement and planning. For many years key infrastructure has been able to be funded through government grant and regeneration initiatives like Housing Market Renewal. Development now offers a key opportunity to provide some key infrastructure which will benefit the borough e.g. new junction links to the M58, public transport improvements, and sustainable development through mixed use allocations.

7. Possible 'options' for meeting needs

7.1 The results of the latest housing and employment land studies provided the basis for the three options relating to different levels of development.

7.2 In December 2012, Cabinet approved the updated housing figures which help to define these options for the purposes of carrying out a 'Consequences Study'. These options are as follows:

Option One: 270 homes a year– 'urban containment' [i.e. meet all development needs within the built-up area]

Option Two: 510 homes a year + a new business park in both the north and the south of the Borough, and an extension to Crowland Street [Southport] industrial area – 'meeting identified needs'

Option Three: 700 homes a year + new employment areas as in Option Two – 'optimistic household growth'

It is important to note that the number of homes for options two and three above are dependent on achieving and maintaining a vacancy rate of 4% over the local plan period. The vacancy rate is currently just under 4.1%. The level of vacancies is affected by a variety of factors, including many beyond the local authority's control, but we will do all we can to get the figure down to or below 4%.

8. What did the Consequences Study conclude?

8.1 The purpose of the Consequences Study was to assess the likely implications of these options, both on Sefton and on adjoining authorities, from an economic, social and environmental perspective.

8.2 The Consequences Study is a detailed and complex piece of evidence. Conclusions are:

- Adjoining authorities support Option Two. They would not support Option One as it would put more pressure on them to meet additional needs for homes; already West Lancashire and Knowsley are having to identify land in the Green Belt to meet their own needs and would not wish to have to meet some of Sefton's unmet housing needs through further Green Belt release in their Boroughs.
- From an economic point of view, Options Two & Three would be preferred; only Liverpool of the adjoining authorities would potentially support Option Three on the basis that it could attract new people into the sub regional area and would increase its potential workforce; however, this advantage was countered with the threat of de-population from Liverpool as people move out into Sefton which would raise issues over the sustainability of Option Three from Liverpool's perspective.
- However the additional development for Option Three would not provide significantly more economic benefits when compared with Option Two as the amount of employment land does not vary.
- Options Two and Three would be expected to generate twice as many jobs as Option One [approx 3,350 and 3,800 for Options Two and Three as opposed to 1,700 for Option One].
- A similar situation is anticipated for GVA from direct investment, with Options Two and Three expected to generate approximately £110m and £120m as opposed to approximately £55m for Option One].
- From a social perspective, Options Two & Three would put more strain on existing resources [e.g. schools and medical services]; however, these options would also offer funding through development to improve and sustain local facilities
- From an environmental perspective, Option One would have least impact. Option Two would have more impact but there are opportunities for mitigation and compensation. Option Three would have greatest impact, and it would be more difficult to mitigate or compensate for. This is in relation to the greater amount of land which this Option would require in the Green Belt and its implications for land at risk of flooding, land protected by nature conservation designations, higher agricultural quality land, and the impact of increased traffic.
- Option One would mean there was very limited opportunity to deliver the affordable homes that Sefton needs, because we would be constrained by the existing urban housing supply and the lack of suitable and viable sites. Options Two and Three would enable significantly more affordable homes to be built, thereby meeting needs.
- Option One would involve no planned Green Belt release but would be highly likely to result in an unsound Local Plan. [Options Two and Three would result in limited Green Belt release – 3.2% and approximately 4% respectively].

8.3 The Consequences Study does not recommended any particular Option as this was not what it was commissioned to do. It has provided very useful information to assist the Council in choosing a Preferred Option

9. What is the recommended Preferred Option?

9.1 Option Two is strongly recommended as the Preferred Option. There are a number of key factors which support this recommendation:

- it represents the best balance between meeting needs, and protecting and enhancing the environment
- it meets the Government's commitment to growth and providing choice of homes and other economic development
- it will provide more opportunities for families and young people for both homes and jobs and will therefore help to accommodate and stem the current trend towards an increasingly ageing population
- it will enable many more affordable homes to be provided than under Option One, though not as many as under Option Three
- at a time of severe cutbacks in public sector funding, the allocation of land for new homes may help to keep some existing local services viable because more people will live in a particular area;
- it will also bring significant investment in new infrastructure which will have to be paid for through the development process
- this Option best matches past rates of development in the Borough - we have built an average of 470 dwellings in Sefton for the past 30 years
- It will identify the most sustainable green belt sites for development – having regard to local constraints such as flood risk and ecological designations
- It will ensure that best use is made of our assets – including land in the urban area and the Green Belt
- It will enable, as far as possible, a proportionate spread of development across the Borough – meeting needs in the main where they arise
- It will deliver a new urban extension, providing significant investment in local infrastructure, meeting needs in a sustainable mixed use development
- It will provide significant new local employment opportunities to help support and grow the economy
- It will protect the heritage and environments of Sefton with detailed polices requiring high design standards in new development
- It is considered to be a deliverable option.

9.2 Importantly, Option Two is a sustainable option in that it can be defended at a public examination.

10. Duty to Co-operate

10.1 The 2011 Localism Act introduced a 'Duty to Co-operate' with adjoining local authorities and other organisations. This means that we have to do all we possibly can to reach agreement with our neighbours in the future planning of our respective areas. Many aspects of our Plans will have implications reaching far beyond our own boundaries e.g. providing homes and land for jobs; in particular, providing homes close to a boundary could lead to an impact on the infrastructure of the adjoining authority e.g. roads, schools and other services.

10.2 Option Two has the unanimous support of our adjoining local authorities.

- 10.3 Option One would not be supported by any of our adjoining authorities. West Lancashire and Knowsley boroughs already have had to identify land in the Green Belt in their boroughs to meet their own needs.
- 10.4 All neighbouring authorities have expressed concern about Option Three because of the likely effect on their own boroughs - it would attract residents to Sefton from their authorities, and could lead to their population decline and allocated sites remaining undeveloped. There would also be an increase in traffic because of the likely increase in the number of people who would live in Sefton and work in these other authorities and, for West Lancashire, this Option would narrow a strategic gap in the Green Belt.
- 10.5 The Duty to Co-operate must be taken very seriously, not least because these Local Authorities can give evidence against Sefton at the examination stage.

11. Why have the two other options been discounted?

11.1 Option One

- this Option would not meet the needs of the borough, based on an objective assessment. It would fall some way short.
- it would not promote sustainable development and economic growth, as required by the Government's Framework
- while this Option may seem to protect the Green Belt from development, in reality this would not happen. The reason for this is that Sefton's readily available supply of 'deliverable' land for housing is below the five years' minimum required by the Government, and this would continue to deteriorate under an Option One approach. Failure to plan for a 'five year supply' would mean that proposals for development in the Green Belt could be challenged successfully at an appeal, even if Sefton were to refuse permission initially. We could therefore lose control over where new development was located – including in the Green Belt - benefits that could be gained for the local community may be lost.
- this Option would not be supported by any of our adjoining authorities. West Lancashire and Knowsley boroughs already have had to identify land in the Green Belt in their boroughs to meet their own needs. These Local Authorities can give evidence against Sefton at the examination stage.
- Option One would be extremely high risk, would fall short of meeting the needs of Sefton and would be highly likely to found unsound and thrown out at Examination
- It could result in us having to redo our Local Plan, involving significant cost to update our evidence. We are aware of a number of local authorities which have had their Plans found unsound and been asked to amend them at a late stage
- This Option would not meet the needs of our communities for homes and jobs. It would not address Sefton's key issues.

11.2 Option Three

- this Option would provide more homes and jobs, but at a level which is not considered to be justified by current projections of population and household growth, or past levels of building houses in Sefton

- more land in the Green Belt would be required than has been currently identified; this would be concentrated in Lydiate and Formby due to a lack of suitable sites in the rest of the Borough
- it would provide even more affordable homes than Option Two, but this benefit is not considered to outweigh the likely harm to the environment
- it would enable an even greater contribution towards improving infrastructure through development, but again officers do not consider these benefits would be justified because of the likely impact on the environment.

11.3 Variation of Option Two

As outlined in section 6.5 above, authorities are advised to complete their plans as quickly as possible to make sure they are up-to-date. Within this overall approach there is the opportunity to review any aspect of the Plan in the light of new evidence. Given that the recent projections are interim and that comprehensive, population and household projections will be available in 2014, it is recommended that the housing requirement be reassessed once that information is available next year.

12. **The Preferred Option Document identifies land in the Green Belt for development – isn't this contrary to the Government's Framework ?**

- 12.1 Whilst the Framework says that one of its land-use planning principles is to protect the Green Belt, this needs to be read in context of the rest of the Framework. Paragraphs 83 and 84 of the Framework also says that: "Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan... Local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences of sustainable development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt....".
- 12.2 There is not enough land in the urban area to comply with other requirements of the Framework – in particular the requirements of paragraph 156 which requires Local Plans to deliver the homes and jobs needed in the area, based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area (paragraph 158). The Council is reviewing its Local Plan so this is the right time to review the current Green Belt boundary so that the Local Plan can demonstrate how future needs will be met.
- 12.3 The Framework also requires local planning authorities when defining Green Belt boundaries to
- "where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period", and
 - "satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period" [paragraph 85].
- 12.4 Once it is established that the Green Belt boundaries have to be reviewed, the Government requires local authorities to look ahead not only for the period of the Plan, but well beyond this. No figure is given but a period of a further 10 years has been suggested as appropriate, so there will be no need to carry out a further review for some considerable time. The Framework makes clear that the

safeguarded land would not be allocated for development at the present time, but would require a future Local Plan review to propose the development of these areas.

- 12.5 We do not propose to identify such safeguarded land in our Local Plan [if we did, it would be required to accommodate an additional 5,000 dwellings]. That is not because it is thought that the exercise is not appropriate but rather that we consider that it would be appropriate at an agreed date to carry out a sub-regional review of Green Belt across Merseyside to address this issue. This approach is consistent with what our neighbours (including West Lancashire whose Local Plan was recently examined) are proposing.

13. Are there other ways of meeting needs without having to use land in the Green Belt?

- 13.1 A number of possible ways of doing this are regularly suggested such as using more brownfield land, reusing vacant homes, increasing densities of development or building on more green spaces within the urban area, and asking neighbouring authorities if they can meet some of our needs. We have considered all of these issues and our approach in the Preferred Option Document incorporates many of these approaches.
- 13.2 The potential to increase the number of homes from these sources is addressed in Chapter 6, “ Meeting Sefton’s needs – what are the options?” . They have been examined in some detail, and have been taken account of in our calculations. However, none of these alternatives is able to provide nearly enough dwellings to make up the shortfall. None offers a realistic alternative to providing for needs for development in the Green Belt. However, it is worth highlighting a few of these.

Vacant homes

- 13.3 One of the objectives of the Document is “to encourage best use of .. land and buildings”. The current percentage of vacant homes in Sefton is just under 4.1%, lower than the figure for the North West. The annual requirement of 510 dwellings under Option Two assumes a vacancy rate of 4%. The Council is working actively to reduce the number of vacant homes, and has a strategy to help achieve this, but vacant homes are often owned privately and the Council’s ability to intervene is limited. In addition, there is a need to have some vacant homes (normally about 3%) in order for the housing market to function effectively so that people are able to move house. Our policy approach is to reduce the number of homes needed each year by aiming to keep the vacancy rate at 4% or below.

Brownfield land

- 13.4 We have undertaken a Study to assess how much housing can be accommodated in the urban area. Whilst almost 5,000 new homes could be accommodated on brownfield and other appropriate sites, this would not be enough to meet Sefton’s housing needs in the years ahead.

Use of green spaces in the built-up area

- 13.5 We have identified a small number of surplus greenspaces which could be developed in the urban areas, with capacity for around 650 dwellings. These sites will be consulted on alongside other proposed development sites. However, the

vast majority of Sefton's urban greenspaces are not appropriate for development and will continue to be protected.

Five years' supply of housing land

- 13.6 The availability of sites is important because local planning authorities are expected to maintain a five year supply of 'deliverable' sites for housing. This is measured against strict criteria, including that the site is available now and is viable. Sefton has around a 3.4 years' supply of housing sites. This is a further reason why Sefton needs to be able to identify extra land so we can get back to a five years' supply. The chosen Local Plan option must address this. As long as it does not, we will be vulnerable at planning appeal. The Local Plan will address this issue and allow Sefton to return to a defensible five year supply - along with the longer term supply over the whole plan period.

14. What factors have been used to decide where to locate development?

- 14.1 This is referred to in the policy on 'Housing Allocations and Phasing' in the Preferred Option Document. The Document includes the following objectives:
- to support urban regeneration
 - to encourage the best use of resources and assets
 - to meet the diverse needs for homes, jobs, services and facilities as far as possible close to where the needs arise.
- 14.2 A study has been carried out to identify suitable sites within the built-up area [the Strategic Housing Land Availability Assessment]. Traditionally Bootle and Southport have accommodated most of the development on sites within their built-up area. These are now beginning to run out of suitable land, but the majority of potential sites in the built-up area still lie within Bootle and Southport.
- 14.3 Much of the land in Sefton's Green Belt is affected by one or more limitations which determine how suitable it is for development. These limitations include nature conservation, flood risk, heritage and high quality agricultural land.
- 14.4 A study assessed all land in the Green Belt for their importance in supporting the purposes of including land in the Green Belt and on the need to promote sustainable patterns of development [Framework, paragraphs 80 & 84]. From a short-list of areas, the study identified those with fewest limitations, or where the limitations could be overcome. The methodology used for this study and the conclusions reached were assessed independently. The sites have also been subject to a Sustainability Appraisal and to a Habitats Regulations Assessment. The purpose of this Assessment is to identify any likely effects of developing the sites on the integrity of international important nature sites.
- 14.5 Some parts of the borough are more constrained than others. The built-up part of Southport extends right up to the boundary with West Lancashire in many places. Land west of Formby is protected by international conservation designations and is subject to coastal erosion. Bootle has no Green Belt to extend into and the land between Netherton, Aintree and Maghull needs to be kept open in order to prevent these settlements from merging into one another. The land around Maghull, Lydiate and Waddicar has fewest limitations, but this is where the quality of agricultural land is highest.

- 14.6 The Document identifies land as being suitable for new homes, both within the built-up area and within the Green Belt. It also identifies reserve sites in the Green Belt in case some sites prove not to be suitable ['Housing Allocations and Phasing' policy]. This approach is necessary because Inspectors at other examinations into Local Plans have required a 5% buffer in order to ensure a realistic prospect of achieving a planned supply and to ensure choice and competition in the market.
- 14.7 The Document also indicates sites in the Green Belt considered suitable for new business parks. These comprise one for the south of the borough [east of Maghull], one in the north [an extension of the existing Formby Industrial Estate, east of Formby], and an extension to the Crowland Street, Southport, industrial area [see the section on 'Sustainable Growth and Regeneration']. Two of these three sites will have a mixed use allocation and be developed with supporting residential development – thereby ensuring new development is sustainable. These sites will be required to deliver appropriate mitigation and infrastructure. The site to the east of Maghull for example will form a new urban extension with requirements to significantly invest in local infrastructure including new motorway access, improved local highways, public transport improvements, environmental improvements and support for local facilities and services as appropriate.
- 14.8 The sites in the north of the Borough have been identified as being suitable for business use in the Employment Land and Premises study undertaken by specialist property and economic development consultants BE Group. They have also identified a need for a business park in the south of the borough but they did not propose a specific site. The land to the east of Maghull has been identified to develop a mixed housing and employment site with significant investment in infrastructure in the local area.
- 14.9 In summary, our strategic policy approach will ensure that development in the Green Belt will meet needs as far as possible where they arise. Our aim is to have as far as possible a proportionate distribution across the Borough taking account of the following: that sites should be sustainable, that they should be the least constrained, and that there is a sufficiently good spread to meet local needs and to ensure they will be able to be implemented. The site allocations also take account of the presence of constraints and the opportunity to provide mixed use sustainable development with the benefits of investment in new infrastructure.
- 15. During the consultation on Options in 2011, many people opposed development in the Green Belt – what account has been taken of their views?**
- 15.1 The views of local people are important, but they must be balanced with Government requirements, precedents created by the decisions and advice of Inspectors of Local Plans, and the evidence of what the Borough needs in the long term. Despite significant objection to any development in the green belt - there was also some support for development and growth.
- 15.2 The Government makes it clear in the Framework that it is committed to sustainable development and to securing economic growth. Local Plans are

encouraged to “... identify strategic sites, for local and inward investment ... and to meet anticipated needs over the plan period” [Framework, paragraph 21].

15.3 Independent employment land, housing studies and other studies come to very clear conclusions. The realistic needs of the Borough over the period of the Local Plan cannot be met without reviewing the boundary of the Green Belt.

15.4 However, many of the sites in the Green Belt which were identified as being potentially suitable at the Options stage are no longer proposed for development. It was always anticipated that some sites might not be suitable for a variety of reasons, e.g.

- it would be too difficult to overcome some of the constraints affecting some sites e.g. flood risk, nature designations
- some landowners have decided they do not want their sites to be considered for development.
- we need to consider impacts on communities of allocated sites –a proliferation of many sites in a small area could be undeliverable and potentially unacceptable.

16. How can the environmental impact of development in the Green Belt be kept to a minimum?

16.1 Where there are specific impacts on identified sites e.g. affect on nature conservation or flood risk, these can generally be overcome. Loss of habitat can be mitigated or the habitat can be re-created in the near vicinity by way of compensation. Some types of flood risk can be solved within the site through, for example, leaving part of the site open. This space can then provide a number of functions, including recreation, nature area and drainage.

16.2 Concern has been expressed about the loss of high quality [‘best and most versatile’] agricultural land - once it is developed, it is lost forever. It is not possible to be precise about what proportion of the land proposed for development under Option Two is high quality [‘best and most versatile’], as detailed surveys are not available for every site. Sometimes the survey concludes that sites are a mix of higher and lower quality. Where the surveys indicate a mix of quality, we have assumed that all of it is the higher quality. A maximum of 84% of land selected for Option Two is best and most versatile. However, the total land identified for Green Belt development under Option Two represents 3.7% of the agricultural land in the Borough.

16.3 This is a small proportion of the total in Sefton, and in the context of high quality agricultural land at a regional and national level is very small indeed. This loss must also be weighed against the fact that Sefton is required to meet its needs. The Framework says that where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality. Because of the distribution of the best and most versatile agricultural land in Sefton (most of the eastern area), it is inevitable that some of the higher quality land will have to be developed.

16.4 Since the Framework has been in place, there have been a number of public inquiries where the protection of agricultural land has been given significantly less

weight than meeting housing needs. This is a material factor that we must consider.

16.5 The Consequences Study evaluated the environmental impacts and concluded that under this option they could often be mitigated or compensated for and, where this was not possible, on balance the benefits of development outweighed the harm.

17. The Preferred Option Document is about more than meeting needs for homes and business. What are the other key messages?

17.1 Section 4 above listed a number of issues which the Document addresses. The Document aims to provide a policy response to these issues. The Local Plan is limited in what it can achieve and will be most effective when it is part of a co-ordinated approach, promoting responses which are consistent with strategies prepared by the Council's partners.

17.2 Regeneration is a key theme, and a section of the Document is titled "Sustainable Growth and Regeneration". There is generally much less funding to achieve changes in our borough so there is greater need to work alongside development partners to try to bring about change. The Document notes, for example, how the growth of the Port can help to bring investment and jobs in some of our most deprived communities. However, the Document is also clear that growth of the Port can only be supported when it does not cause unacceptable harm to the local environment.

17.3 The Borough has an increasingly ageing population which presents particular issues including making sure there is appropriate accommodation and health care. Option Two would help to stem this continuing trend by providing more choice of homes and jobs which will encourage families and young people to live and work in Sefton.

17.4 The Borough needs new and improved infrastructure. Lack of public funding means less investment in infrastructure. Option Two would bring additional investment including new motorway links, a new rail station, new business parks, improved drainage, and investment in schools, recreation and nature areas, and footpath and cycling links. An Infrastructure Delivery Plan will be prepared for the next stage of the Local Plan. This will set out the Borough's priorities for infrastructure and what kind of development in which parts of the Borough might be able to contribute towards this.

17.5 The difference in health between different [and sometimes neighbouring] parts of the Borough has long been a concern. The Document contains a section called 'People and Places' which comprises policies on air quality, access to homes, jobs, facilities and services on foot and by bike as well as by car, opportunities for recreation and access to green spaces linked to health and wellbeing objectives. The benefits to many people's health can be improved by having a greater choice of homes, more affordable homes, greater prospects of a job and access to openspaces and leisure. Option Two will provide more opportunities for this.

17.6 We want to provide attractive places for people to live, work in and visit. The Document sets out an approach to design to make sure that development is

designed to a high standard. Our policy approach also seeks to preserve important heritage assets in the borough.

- 17.7 Sefton has an outstanding environment which has been referred to regularly in this report. Our policies aim to protect this and to ensure that on the few occasions where there may be no alternative sites for development, any damage to habitat or species can be mitigated or compensated for by providing alternative habitat close by. Opportunities to designate Nature Improvement Areas will be sought to provide areas where this alternative habitat can be provided. This will help to make sure that the amount and quality of Sefton's natural habitat will be at least as good in the future as it is now.
- 17.8 Our approach to urban greenspace needs to change to reflect national planning policy. Much of our public open space (such as parks, playing fields, sports club sites and allotments) will continue to be protected in both urban and rural areas. However we will protect fewer amenity green spaces (e.g. highway verges). A revised approach to urban school and college sites and care institutions intends to allow more development whilst retaining the key characteristics of the sites as far as possible, and more development on site where this use has ceased. Almost all former private urban greenspaces will now be part of the primarily residential area.
- 17.9 Town and local centres nationally are under pressure with the downturn in the economy and in particular with the rise of internet shopping. The Document proposes a more flexible approach to uses in our centres, while protecting key parts of our town centres in retail use.
- 17.10 Climate change is a major issue for all local authorities. The Local Plan tries to address this in a number of ways e.g.
- directing development away from areas of flood risk
 - ensuring development is accessible by means of transport other than the private car,
 - encouraging the reuse of existing resources such as land and buildings, and
 - encouraging energy efficiency and the use of renewable energy in new developments.
- 17.11 Overall, it is considered that the Preferred Option represents a sustainable balance of uses which best meets the needs of the Borough looking ahead to 2030. The view is taken that this Option also makes the best use of the opportunities and resources available to the Borough.

18. Studies and evidence

- 18.1 A number of studies provide background information which has been taken into account in selecting the Preferred Option. Where studies have been prepared in-house they have been externally assessed.
- 18.2 Green Belt study and Methodology for Selecting Green Belt sites. A draft Green Belt Study was carried out in 2011 and this was the basis on which sites were included in the Options Paper consultation as having potential for development. This was externally validated by a company called Envision. This study has been updated and, together with information from other studies, has been used to

select sites which are included in the Preferred Option. Discussions took place with landowners to check whether their sites were genuinely available for development and to enable the Council to gauge where and how many homes could be built each year.

- 18.3 The capacity on these sites was more than 10,000 homes, and well above the number required for Option Two, even allowing for a 5% buffer. A 'traffic light' assessment was then undertaken, both on the sites consulted on at the Options stage as well as on a small number of additional areas submitted by landowners or developers during the Options consultation. It was concluded that most sites were not suitable for development, but a few were added in. Like the Green Belt Study methodology, the methodology for assessing the Green Belt sites for inclusion in the Preferred Option was independently checked by AMEC, consultants appointed by the Government's Planning Advisory Service for this purpose.
- 18.4 An assessment was carried out for each area using a number of criteria. Each was rated 'red' [not suitable for development], 'amber' [possibly suitable if an issue could be overcome or where further information was required], and 'green' [any issue would not preclude development and could be dealt with at planning application stage]. Not all criteria have the same weight. The rating used in this methodology is not the sole reason for selecting sites but is one important aspect.
- 18.5 The Strategic Flood Risk Assessment (2013) (SFRA) and Sequential Test Position Statement 2013. These documents have been prepared in line with government advice. They have been used to help select sites which are suitable for development and to help the Council write Local Plan policies to manage flood risk.
- 18.6 Government advice is that only river and tidal flood risk should affect the location of development sites, but that all flood risk from all sources should be taken into account when looking at the design of development or where exactly it is built within the site.
- 18.7 The Sequential Test Position Statement 2013 applies the sequential test to potential development sites in Sefton, using the most up-to-date information in Sefton's SFRA.
- 18.8 Sustainability Appraisal. This is an overall assessment of the Plan, its aims, vision and policies against a wide range of sustainability objectives, to assess the overall impact of the plan on the sustainability of Sefton. The Sustainability Appraisal highlights some of the implications of the possible options in relation to wider sustainability objectives and, together with many other pieces of evidence, will help the Council in making coming to a recommendation on which should be the Preferred Option.
- 18.9 Consequences Study. This has been referred to throughout the report and has helped to highlight the impacts of the various Options, from an economic, social and environmental perspective, not only on Sefton but on its adjoining authorities. The Consequences Study does not recommend any particular Option as this

was not what it was commissioned to do. However, it has provided very useful information to assist the Council in choosing a Preferred Option.

19. Minor change to proposed site at Hightown

- 19.1 The plan which was available at the meeting of the Overview and Scrutiny Committee on 28th May identified one site for development south east of Hightown. This plan needs to be replaced with the correct plan which is appended at the end of this report.

20. Consultation

- 20.1 There will be 12 weeks of consultation beginning on 8th July. Two reports have been taken to the Public Engagement and Consultation Panel outlining our approach to consultation. We have worked with the national Planning Advisory Service in reviewing our approach to this consultation. In addition we have worked with a group of senior officers from across the Council. We have also held meetings with a number of key residents' groups to discuss our planned approach and seek feedback on it. [Our 12 week consultation is significantly more than what we are required to do – six weeks is considered to be good practice, though the Council's own Statement of Community Involvement has a standard of eight weeks].
- 20.2 We plan a multi pronged approach to the consultation with widespread media coverage. We are planning a 'wraparound' of the Champion paper, and that this will be delivered even to those homes which do not normally receive the Champion, thereby achieving full Borough coverage.
- 20.3 There will be a series of public events in the early part of the consultation at 10 venues well spread across the Borough. This will be followed up in September with five further events, to provide opportunities for those who missed the first round of consultation. Attendance at these events will have to be booked beforehand, so we are able to manage numbers in relation to the staff available. This will mean that those who attend will have a chance to discuss their views with a member of the planning team, and also to make sure that the limited staff resources are used most efficiently. This approach was suggested by the Government's Planning Advisory Service representative.
- 20.4 The Council web-site will be kept up-to-date [e.g. with answers to frequently asked questions], and we will use the Council's Twitter feed. There will also be events in September geared at special interest groups [e.g. those covered by Sefton Council for Voluntary Services].
- 20.5 We will prepare a response form to encourage people to record their views and send them to the Council. We will compile a Report of Consultation and report back to Planning Committee and Cabinet in due course.
- 20.6 The Preferred Option document is quite technical in places and must address some complex topics. However, it is important to try to communicate these issues clearly. We will prepare material for the public events which are easy to understand and we aim to make the web-site straightforward for people to use.

20.7 There is scope to make some of the policies and the explanations in the Document read more simply without changing their meaning. The document can also be presented in a way which makes it easier for people to read and understand. Authority is requested to make such minor editorial changes before the document is printed.

21. Next stages

- 21.1 The Publication version of the Local Plan will be prepared during 2014. The Publication draft will take account of updated information such as:
- the results of a housing study, due to be commissioned shortly, which will include a revised assessment of the number of affordable homes which we need, as our current study [Strategic Market Housing Assessment] is becoming dated.
 - the results of a study of the needs of gypsies and travellers; this study has been commissioned jointly by the Merseyside authorities. This will help us know how many pitches should be provided for gypsies and travellers in Sefton and a site [or sites] will be included in the Publication draft of the Plan
- 21.2 There will be a further statutory six weeks of consultation after which the draft Local Plan is submitted to the Secretary of State for public examination. At this stage comments can only be made on matters relating to the 'soundness' of the Plan. The examination is planned for late 2014.

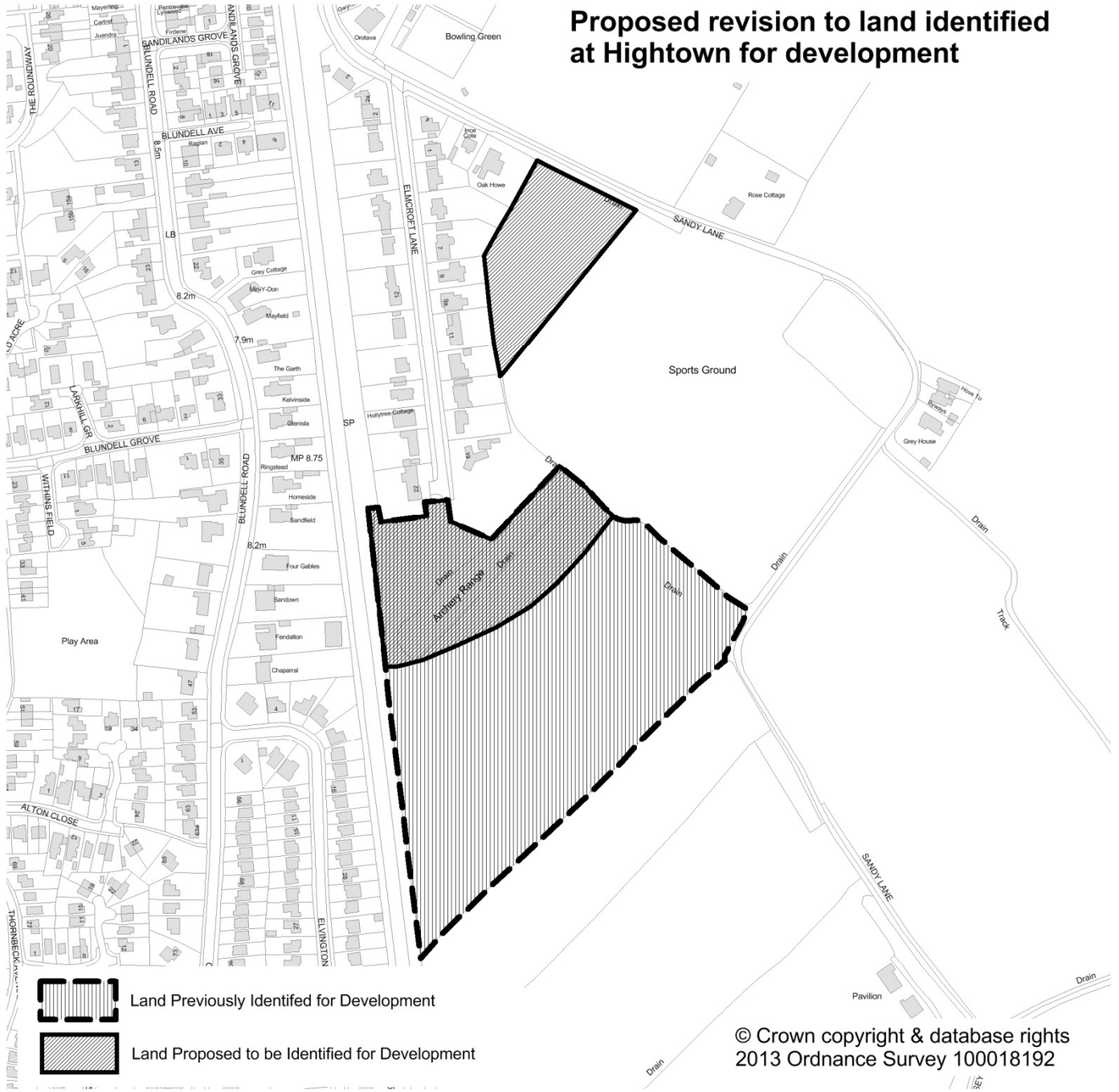
22. Conclusions



- 22.1 The Preferred Option Document is an important stage in the preparation of the Local Plan for Sefton. The Government's support for sustainable development and for economic growth is clear.
- 22.2 There can often be potential conflict between development and the benefits which flow from it, including the likely environmental impact for the Borough. However, to choose Option One and not to identify land in the Green Belt for development would ultimately not protect the Green Belt. Sefton has a duty to provide land to meet its needs. If it does not provide this land, sites in the Green Belt could be released for development in any case. This would not happen through the co-ordinated approach of the Local Plan, but piecemeal through individual applications for development. These may not be in the most sustainable locations or on sites that would contribute most positively to existing communities.
- 22.3 Although Option Three would provide more homes and jobs, this level is not considered to be justified by current projections of population and household growth, or past levels of building houses in Sefton. Most neighbouring authorities have expressed concern about this option. Although it would enable an even greater contribution towards improving infrastructure through development, officers do not consider these benefits would be justified because of the likely impact on the environment.
- 22.4 Option Two is recommended as the best option for Sefton - it fits with the government's policy approach, and also addresses most of the Borough's needs whilst still protecting much of the environmental quality of the Borough. Sefton will benefit from the fact that this Option promotes economic growth and provides for a range of homes jobs and infrastructure which will encourage more families and

younger people to live and work in Sefton. This option will strike a balance between promoting growth and protecting the most important environmental assets. Neighbouring authorities support this option too. This factor is important as Sefton has a legal duty to co-operate with adjoining authorities as well as with other organisations.

- 22.5 Option Two helps us address many of the issues and challenges facing Sefton which are described in the Document. It offers most opportunities for achieving quality sustainable development which responds sensitively to Sefton's valued environments. It will promote appropriate investment in the future of Sefton and in its assets, for residents and businesses alike. It also represents the Option which is most likely to be found sound by an Inspector at a future examination of our Local Plan.

Proposed revision to land identified at Hightown for development



-  Land Previously Identified for Development
-  Land Proposed to be Identified for Development

© Crown copyright & database rights
2013 Ordnance Survey 100018192