

Reasons for the Recommendations:

To ensure that comments made during the consultation on the Preferred Options are reported to members, to note the implications for preparing the next stage of the Local Plan, and to ensure full account is taken of the issues raised through consultation and responses received.

What will it cost and how will it be financed?

(A) Revenue Costs

Various studies are scheduled in order to update the evidence on which the next stage of the plan will be based, including a viability study. Any costs associated with the response to the consultation would 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 £200,000 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 checked="" type="checkbox"/>
2.	Equality Implications identified and mitigated	<input type="checkbox"/>
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 and ICT (FD2730/13) notes that the report indicates there are no direct financial implications for the Council as:

1. Any costs associated with the response to the consultation would be met from within the 2013/14 Planning Department’s (Planning Policy) Revenue budget.
2. Further costs, expected to arise in 2014/15 (estimated to be in the region of £200,000) can be met from an existing reserve, previously approved for the Local Plan.

The Head of Corporate Legal Services (LD2035/13) has been consulted and her comments have been incorporated into the report.

Are there any other options available for consideration?

The Council is required to prepare and adopt a Local Plan in accordance with the Planning and Compulsory Purchase Act 2004 and the National Planning Policy Framework

The report fulfils these requirements and there is no obvious alternative.

Implementation Date for the Decision

At the expiry of the call-in period after the Cabinet meeting.

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Background Papers:

Local Plan for Sefton: Preferred Option document. July 2013 :

<http://www.sefton.gov.uk/localplan>

Supporting evidence and studies, available on the website: www.sefton.gov.uk

Report to Consultation and Engagement Panel: November 2013

:<http://modgov.sefton.gov.uk/moderngov/ieListDocuments.aspx?CId=498&MId=7527&Ver=4>

1. Background

1.1 Consultation on the draft Local Plan for Sefton [Preferred Option document] commenced on 8th July 2013 and ran for 12 weeks until 27th September 2013.

1.2 The Report of Consultation is attached as an Annex to this report. It contains a summary of the representations received. Many of the comments raise quite complex issues.

1.3 The Report of Consultation therefore does NOT contain a response to the comments made. A detailed response to the comments will be prepared and made available when the next draft of the Plan is published which is due to be late summer 2014.

1.4 This committee report highlights a number of key themes emerging from the response to the consultation and the implications for preparing the next stage of the Plan, but it does not contain a summary of the issues raised during consultation.

2. Consultation

2.1 The approach to consultation was agreed by Sefton's Public Engagement and Consultation Panel which oversees major consultations carried out by public organisations in Sefton.

2.2 The consultation strategy was developed in discussion with other departments of the Council and outside organisations, including Corporate Communications, the Consultation and Engagement Team, Libraries Service, Sefton Council for Voluntary Services including the Young Advisors, and the Planning Advisory Service.

2.3 The consultation was publicised in the Champion Newspapers in the week commencing 8th July with a full cover colour 'wraparound', followed by weekly adverts to remind people of the consultation.

2.4 We wrote to, or e-mailed, approximately 3,000 people on our consultation database and distributed posters to raise awareness of the Local Plan. Information about the Local Plan consultation was also included on an e-mail sent out by One Vision Housing to those on the Affordable Housing waiting list.

2.5 Copies of the Local Plan documents were sent to all 13 Sefton Libraries for the duration of the consultation period and were available at the Council's offices in Magdalen House.

2.6 The Local Plan was featured on the Liverpool Echo home page throughout the consultation. The Council tweeted information (about the video, public events and consultation deadline) on 7 occasions during the consultation period.

2.7 The Local Plan was advertised on the Sefton website and was the top item on the front page for almost the entire 12 weeks of the consultation. A short video was commissioned to provide an overview of the Local Plan and a link to this was also on the Sefton home page.

2.8 An innovative pocket sized FAQ document was also produced.

Public events

2.9 Fifteen public events were held. These consisted of 10 events spread across the borough in July and August 2013, with the aim of getting widespread geographical coverage, and a further 5 events across the borough in September.

2.10 Display boards containing key information were provided at each of the events. The display was tailored to each part of the Borough, explaining the implications of the Local Plan for that area.

2.11 The aim of the consultation was to bring the Local Plan to the attention of as wide an audience as possible, within the constraints of the available staff and financial resources, and to provide opportunities for people to find out how they might be affected by the proposals contained in the Plan.

2.12 A survey of 556 randomly chosen households, undertaken by Maghull Town Council, concluded that 70% of respondents were aware of the Local Plan consultation.

2.13 Following our work with the Government's Planning Advisory Service, it was agreed that people be asked to book into the public events to enable them to have one-to-one discussions with members of the planning team and to make the most effective use of limited numbers of staff. This approach was criticised by a small number of people. However, the feedback to officers at the events was overwhelmingly positive as large numbers of people welcomed the opportunity to have a detailed and lengthy conversation with a planning officer. This enabled members of the public to gain a much more detailed level of understanding of key local concerns.

2.14 In total around 600 people attended the public events. Many expressed appreciation that they had the opportunity to speak individually to a member of the planning team.

2.15 Some people felt the consultation was a 'done deal', and that their views would not change anything. This highlights the tension between clear government guidance about what has to be done to produce a 'sound' Plan and strong local views about new development. Understandably the strongest views were often expressed by those people who live closest to proposed development sites.

2.16 At the conclusion of the consultation, a report was taken to the Public Engagement and Consultation Panel. The Panel was highly satisfied with the way the consultation was carried out and commented that it was comprehensive, professional and a success.

3. Overview of responses

3.1 Just under 1,200 representations were received in total. Around 570 of the total number of representations comprised an identical form signed by residents objecting to sites identified for housing development in Melling. The main concerns expressed about the Melling sites related to traffic, drainage and inadequate infrastructure.

There was also widespread scepticism about the housing requirement figures underpinning the Local Plan, and the need for any Green Belt release.

3.2 Two petitions were received against proposed sites in the Green Belt at Moss Lane, Churchtown [signed by 778 residents] and at Sandy Lane/ Lambshear Lane, Lydiate [signed by 892 residents].

3.3 In addition to comments from local people, a significant number of representations were received from developers and land owners (and their professional advisers). These included letters supporting the development of certain sites, including some not currently identified in the draft Local Plan.

3.4 A consistent theme in the developer / land owner representations was that Sefton's Local Plan is not ambitious enough to comply with Government planning policy, or to encourage economic growth. Many of these representations argued that the Local Plan would need to identify significantly more land than proposed in order to be found 'sound' by the Planning Inspectorate.

3.5 Adjoining local authorities generally supported the Preferred Option and welcomed the opportunity to comment on the draft Plan as part of the Duty to Co-operate. Statutory consultees generally supported the approach taken in the Preferred Option, and offered comments on matters of detail. Many other organisations welcomed the overall approach of the draft Plan and offered detailed comments in relation to their specific area of interest.

3.6 The remainder of this report summarises some of the key points raised and identifies key areas for further work or issues which should be addressed. For a full summary, please refer to the main Report of Consultation.

4. Comments on the introductory section of the Plan [Section A]

4.1 Some people thought that the Plan contained an undue emphasis on building houses and that this was being presented as the answer to everything. Others felt that it was inappropriate to encourage economic growth in Sefton as the borough with its high quality environment has always functioned as a 'dormitory' area from which people travelled to work in Liverpool and elsewhere. By contrast others expressed concern that the Plan would not meet Sefton's 'objectively assessed needs' for new homes and jobs. There was also support for the general approach of the Plan – there was a recognition of the major challenge of satisfying the Government's agenda for growth and protecting Sefton's valuable environment.

5. Section B of draft Plan: Sustainable Growth and Regeneration

5.1 This part of the Plan contains sections on the proposed development strategy, the suggested requirement for new homes and employment sites, and how and where these needs might be met. It also includes sections on town centres, transport and other infrastructure.

Spatial strategy

5.2 A variety of views was expressed about the proposed 'spatial strategy' of development [i.e. distribution across the Borough]. Some expressed a view that particular areas were taking an unfair proportion of new development. Others recognised the wide number of constraints in finding new sites.

Need for new homes and possible sites

5.3 The theme which attracted most comment was the need for new homes and the sites identified to meet this need. Again the responses to this topic were polarised. On the one hand, individuals and residents' groups generally argued that the housing requirement was set too high, and that the evidence supporting this figure was suspect and out of date. They suggested that a lower housing requirement could be justified and that there was sufficient brownfield land and vacant homes in the built-up area which should be used for development before the Green Belt. Developers and their representatives, by contrast, typically argued the housing requirement was too low, and a significantly higher housing requirement figure would be necessary, and in some instances more land may need to be allocated. The Home Builders' Federation considered that the housing requirement proposed by Sefton was too low and referred to a number of aspects in which they felt that Government guidance for calculating the number of homes needed had not been followed.

Sites proposed in the Green Belt for development:

5.4 Section 3.1 above notes the number of representations received. In addition to expressing general concerns such as opposition to the principle of developing on land in the Green Belt or on high quality agricultural land, many individual representations raised issues about specific sites, including traffic & access, flood risk & drainage, lack of necessary infrastructure [in particular, school places, GPs, community facilities], change to the character of the area, effect on wildlife. Others questioned the suitability of certain sites for development.

5.5 In addition, developer / land owner representations often sought to support the inclusion of certain sites and others promoted additional sites for development. Many of these representations were accompanied by detailed studies relating to traffic, flood risk, ecology, agricultural land quality, noise and vibration. Members of the public also suggested sites which they considered suitable for development.

5.6 Representations from a number of developer interests and the Home Builders Federation further suggested the Council had not provided enough land to meet needs for homes and jobs. In particular they argued that the Preferred Option did not include 'safeguarded' land beyond the end of the plan period (as the Government require), that in calculating the number of homes needed the figure for 'backlog' and 'buffer' had been set too low, and that the supply of urban housing sites had been overestimated.

5.7 Representations from landowners / developers or objectors will mean a review of the principle of developing some sites, or the timing of when they might be able to be developed, or the density at which they might be developed. For instance the Ministry of Defence have objected to the development of land at Segars Farm, Ainsdale, because of the potential impact on the operation of Woodvale Airfield. The draft Plan proposed that this one site could accommodate over 500 dwellings.

5.8 Further work in relation to housing issues:

- the Strategic Housing Market Assessment [SHMA] is being updated and, following a stakeholder event, will be consulted on early in 2014
- a 2013 based Strategic Housing Land Availability Assessment [SHLAA] is being produced and will also be consulted on in early 2014; linked to this a new "Call for Sites" exercise will be undertaken to see if any 'new' urban sites can be identified

- further meetings will take place with landowners or their representatives on the sites already identified together with new meetings regarding sites being proposed through the Preferred Option consultation
- when the 2012 based population projections are published by the Office for National Statistics [expected April 2014], a new figure will be calculated for the number of homes needed in Sefton; this revised figure will also take account of the most recent information referred to in the first two bullet points above and other relevant issues arising from consultation, government guidance etc
- based on the updated housing figures, there will be an update of the total number and location of sites
- studies which have been submitted in support of or objecting to sites will be reviewed.

Employment land

5.9 In relation to the employment requirement, arguments were put forward that the Borough did not need to identify more land for employment as there were currently plenty of empty units/ land. Some representors made specific comments about the proposed employment sites. Others suggested that not enough land was proposed for employment/ jobs and also proposed additional sites. Prominent examples included land [17 hectares] south of Tesco at Formby, and a site promoted by Peel Holdings (70 hectares) between the M57 & M58 (close to Switch Island) for Port related warehousing distribution and manufacturing.

5.10 It was argued by the owner of the proposed site at Crowland Street in Southport, that this site, because of viability issues, may not be capable of delivering as much employment land as is assumed by the Local Plan. Additionally, the consortium promoting land to the east of Maghull argued for a smaller business park (15 ha rather than 25 ha net) than planned, with a larger number of dwellings as a result.

5.11 The Local Enterprise Partnership supports the broad approach of the Plan. They note that to realise the opportunities for growth and to create jobs for local people, it is vital that suitable land and facilities are made available to meet demand. They welcome the considered proposals being put forward to this end and the positive jobs and investment implications they engender.

5.12 As with the housing sites, studies were submitted by landowners/ developers to support the approach to sites they are proposing, and to provide more detail about the timing, phasing and supporting infrastructure.

5.13 Further work in relation to employment land issues:

- detailed submissions in support of sites already identified in principle as being suitable for development will be reviewed, together with submissions for sites which were not identified in the Preferred Option document.
- meetings will take place with landowners or their representatives on both the sites already identified together with sites proposed through the Preferred Option consultation
- The Liverpool City Region Local Enterprise Partnership has carried out a further study which looks at the need for Port related distribution floorspace across the whole of the Liverpool City Region and immediately beyond, and this may have additional implications for the demand and supply of

employment land provision across the sub region. This is due to be published in early 2014. The results of this will need to be considered in reviewing the requirement and locations for employment land in Sefton and elsewhere in the city region.

Regeneration and Town Centres

5.14 There was strong support for Crosby and Maghull Centres being identified as priorities for regeneration, with very strong support for taking urgent action in Crosby. More ambition was called for to find a means of regenerating contaminated sites which could then be used for housing and so reduce the need to use land in the Green Belt for development.

5.15 There was widespread recognition of the challenges facing town and local centres generally, with a variety of views expressed about how to plan for the future of centres and promote a wider range of uses in order to make them more attractive and to help them respond to change. There was a call to exploit the upper floors in town centres and vacant retail units to provide living accommodation

Infrastructure and Transport

5.16 Concerns were expressed that not enough work had been done to set out what infrastructure was needed to support the level of development proposed in the draft Plan. A repeated theme was the inability of the road system to cope with the level of development proposed, the impact of extra traffic on particular junctions and detailed issues relating to proposed access points.

5.17 There were many concerns about the presence of flood risk and the current inadequate drainage systems in many areas, and that further development would exacerbate these issues. There was a further concern as to whether what developers would be asked to do to manage flood risk would actually work and positively address problems raised.

5.18 There was also disquiet about the impact of proposed development on schools, GPs and dentists, local shopping facilities and green spaces. Doubts were expressed as to whether the required level of infrastructure could be afforded, or whether it could be guaranteed to be provided.

5.19 It was suggested that the Plan did not sufficiently embrace sustainable transport principles. Key transport themes were the support for more use of rail transport for goods to and from the Port, more clarity on the proposed access to the Port, and better rail and road connections to Southport.

5.20 Further work in relation to infrastructure and transport:

- the draft Infrastructure Delivery Plan will be completed and this will indicate all the infrastructure which is necessary to make sure sites proposed for development can be implemented satisfactorily
- a viability study is due to be commissioned in early 2014 to assess whether key development sites are economically viable; this will help to establish the level of any Community Infrastructure Levy (CIL) and the priority of infrastructure needed
- further transport work will be carried out for all sites where traffic and access has been identified as an issue; the traffic studies submitted by landowners or

developers in support of their site will be reviewed for all sites which are proposed to be included in the next draft of the Plan

- further discussions will be held with Merseytravel, Highways Agency and other relevant bodies about transport priorities.

6. Section C of draft Plan: Environment & Resources

6.1 There were many fewer representations to this part of the Plan, but the following summary provides a flavour of the scope of comments made:

Protection and enhancement of environmental assets

- Natural England welcome the recognition of the requirements of the National Planning Policy Framework, including the need to protect and enhance biodiversity, including designated sites, landscape and open space, water quality, air quality and to address climate change.
- concern about the potential contradiction between proposing to improve the environment, yet planning for the loss of Green Belt
- general welcome for the policy on 'green infrastructure' and its emphasis on multifunctional benefits such as benefits to health and biodiversity
- concern over the increased pressure of 10,000 households on the Coast's environmentally sensitive areas – new areas of Green Belt should be opened up for public use to reduce this pressure
- need for clearer policy approach to 'fracking'.

Climate change and carbon reduction

- significant concern over the proposed 'Area of Search' for wind energy near Ince Blundell [covered in detail in the attached Report].
- Environment Agency welcome the inclusion of this strategic policy and related strategic objectives which reflect many of their priorities
- support for policy approach to flooding from Environment Agency, but concern from others on the impact of development on flood risk
- Plan is not ambitious enough regarding environmental sustainability, especially energy. Need real commitment to green energy and sustainability in any new developments (brownfield or greenbelt)
- Plan does not differentiate enough between those measures which address adaptation to inevitable climate change and those measures which seek to mitigate the scale of climate change
- General support for policy on energy and carbon reduction, but concerns from some that elements of it over-step the Government's approach to this topic.

6.2 Further work in relation to the environment and resources:

- Review key topic areas in the light of government guidance and current best practice
- Continue to assess the suitability of the Area of Search near Ince Blundell for wind energy
- Carry out an updated Habitats Regulations Assessment and develop further policy responses in relation to mitigation of ecological issues.

7. Section D of the draft Plan: Community

7.1 Overview of general comments

- concern by some that community and recreational needs had been neglected in the Plan
- there is a need to put health at the heart of the strategy
- support from a number of schools on the proposed restrictions on takeaways near to schools
- all the people of Sefton should have equality of access - can only be achieved by the provision of good comprehensive public transport coupled with innovative use of car availability such as car clubs, and the provision of secure and well maintained cycle and pedestrian routes.

7.2 Affordable housing & provision for travellers

- greater need for social rented housing across the borough and especially in Southport [suggest up to 40%]
- the affordable housing figure is too high because of viability (especially where a lot of infrastructure is required) and Sefton's poor track record of delivering such a high rate (more like 0 – 20%)
- affordable housing on Green Belt sites on the edge of the urban area will not be accessible by good and affordable public transport and will not have the jobs and services nearby and so are unsuitable for families on low incomes.
- significant issues are being raised by changes to housing benefits and the bedroom tax and Plan needs to address this
- if there is a current need for further sites for travellers it is considered that these should be identified now. Failure to do so could result in difficulties in reacting to unauthorised sites in inappropriate locations.

7.3 Further work on community issues

- review of the greenspace and recreation study
- develop evidence / approach to further integrating the wellbeing agenda into land use policies
- complete work on the Strategic Housing Market Assessment
- a viability study is due to be commissioned in early 2014 to assess whether key development sites, affordable housing / CIL contributions, etc are economically viable
- a Merseyside-wide study of the needs of gypsies and travellers is due to be completed in early 2014 identifying any need for additional pitches within Sefton; the implications for a site [or sites] will be incorporated in the revised Plan
- review key areas in light of government guidance and current best practice.

8. Next stages

8.1 The report identifies a number of areas where further work needs to be undertaken. This is not unexpected is part of the normal process of developing and finalising a Local Plan.

8.2 The Publication Draft version of the Local Plan is expected to be published for eight weeks' consultation during August – September 2014.

8.3 If there are no substantive changes to the plan following this consultation, the Plan will be submitted to the Secretary of State in October / November 2014, with an anticipated date for examination in early 2015.

9. **Conclusions**

9.1 The main response to the Preferred Option identified in the draft Plan was generally split between different development interests.

9.2 Some considered that Option 2 would not meet the Borough's needs and that more development and growth should be planned for.

9.3 Others, specifically local residents and environmental groups, felt that Option 2 promoted too much development and seemed to encourage development in the Green Belt over brownfield land.

9.4 This will continue to be a major discussion point as we take forward the Local Plan and one which ultimately the Local Plan inspector will have to consider and take a view on at the examination.

9.5 Government guidance makes it clear that they expect local planning authorities to meet the "objectively assessed needs" of their area. The continuing challenge in preparing the Publication Draft version of the Plan is to make sure that the approach to meeting the Borough's needs is supported by appropriate and up-to-date evidence.

9.6 The process is highly complex and carries significant risks (e.g. in terms of the requirement to prepare a 'sound' Plan), but it also offers huge opportunities for Sefton.

9.7 A large number of responses have been received to this consultation and they have provided a great amount of useful detail. It will be important to ensure that the relevant issues are considered carefully in the coming months and as the next stage of the Plan is prepared.

9.8 Overall it is considered that the consultation was a success and the Council offers its appreciation to all those who took the time and effort to contribute to this and to submit representations. These will help to shape the Publication Draft version of the Local Plan during 2014.