

Report of Consultation Responses

A Local Plan for Sefton: Preferred Option

January 2014

Contents

1.	Introduction	1
Part 1		
2.	Overview of consultation	2
3.	Comments from Statutory Consultees and other organisations	6
4.	Summary of representations – Section A of the Local Plan	13
5.	Summary of representations – Section B of the Local Plan	21
6.	Summary of representations – Section C of the Local Plan	56
7.	Summary of representations – Section D of the Local Plan	65
8.	Summary of representations – Studies Supporting Local Plan	74
Part 2		
9.	Summary of representations – Proposed Development Sites General	77
10.	Summary of representations – Proposed Development Sites in Southport	82
11.	Summary of representations – Proposed Development Sites in Formby and Ince Blundell	98
12.	Summary of representations – Proposed Development Sites in Hightown, Crosby & Thornton	111
13.	Summary of representations – Proposed Development Sites in Maghull, Lydiate, Aintree & Melling	118
14.	Summary of representations – Proposed Development Sites in Bootle & Netherton	130
15.	Summary of representations – Alternative sites proposed	133
16.	Conclusions and next stages	139

Glossary

CIL	The Community Infrastructure Levy, which is a levy allowing Councils to raise funds from owners or developers of land who are carrying out new building projects in their area. CIL has a formal preparation process, set out in the CIL Regulations.
CLG / DCLG	[Department for] Communities and Local Government.
Core Strategy	A Core Strategy is a type of development plan. Earlier work relating to Sefton's Core Strategy has fed into the preparation of the Local Plan.
CPRE	The Campaign to Protect Rural England.
Defra /DEFRA	Department for Environment, Food and Rural Affairs.
dpa	Dwellings per annum – the number of dwellings each year
dph	Dwellings per hectare –the number of dwellings on each hectare of land
EIA	Environment Impact Assessment, which is an assessment of the likely significant effects that a proposed project may have on the environment, under the Environmental Impact Assessment Regulations.
Framework/ NPPF	The government's National Planning Policy Framework, which was published in March 2012.
FZ2 / Flood Zone 2	Flood Zones are defined by the Environment Agency. The area in Flood Zone 2 is at medium risk of river or tidal flooding – between 1 in 1000 years, and 1 in 100 years for river flooding and 1 in 200 years for tidal flooding, or 0.1% to 1% (0.5%) annual probability of flooding.
FZ3 / Flood Zone 3	Flood Zones are defined by the Environment Agency. The area in Flood Zone 3 is at highest risk of river or tidal flooding - more than 1 in 100 year risk for river flooding and 1 in 200 years for tidal flooding, or at least 1% (0.5%) annual probability of flooding.
HMRI	The Housing Market Renewal Initiative aimed to address housing market failure in parts of northern England. The HMRI area in south Sefton HMRI was part of the Merseyside New Heartlands HMRI area.
LCR	Liverpool City Region, which is the area covered by Halton, Liverpool, Knowsley, Sefton, St Helens and Wirral Councils.
LPA	Local Planning Authority. Sefton Council is the LPA in Sefton.
Main river	Main rivers are a statutory type of watercourse, defined by Defra. They are usually larger streams and rivers. The Environment Agency has flood defence powers for main rivers.
ONS	The Office for National Statistics.
Ordinary	All watercourses that are not main rivers are ordinary watercourses.

watercourse	The Council has some responsibilities for ordinary watercourses.
RAG report	The Council's RAG report, or 'Red, Amber, Green Assessment of Green Belt Sites' sets out the methodology for assessing which Green Belt sites to allocate in the Preferred Option of the Local Plan.
RSS	The Regional Spatial Strategy for the North West, which was approved in 2008 and revoked on 20 May 2013.
S106 / section 106	Refers to legal agreements – often known as s106 agreements or planning obligations - made under section 106 of the Town and Country Planning Act 1990 (as amended). They are a mechanism for mitigating the impact of development, to make a development proposal acceptable in planning terms – for example in relation to public green space or affordable housing provision. They may include 'commuted sum' payments – often known as 's106 monies'.
Section 123 list / Regulation 123 list	A 'Regulation / Section 123 list' is a published list of a Council's infrastructure spending priorities, for monies received from the Community Infrastructure Levy (CIL). It is required under Regulation 123 of the CIL Regulations.
SFRA	Strategic Flood Risk Assessment.
SHLAA	Strategic Housing Land Availability Assessment. This assesses how much urban land is suitable and available for housing development. Sefton's SHLAA is updated annually.
SHMA	Strategic Housing Market Assessment. The SHMA looks at affordable housing, and other housing needs in Sefton.
SSSI	Site of Special Scientific Interest, which is a nationally designated nature or geological site.
SuDS	Sustainable Drainage System. SuDS manage surface water sustainably, to reduce the rate and volume of surface water run-off from a site. SuDS have drainage and flood risk management benefits and may also achieve water quality, nature, amenity and recreation benefits.
UDP	Unitary Development Plan. The Sefton Unitary Development Plan was adopted in 2006. It will be replaced by the Local Plan.

1. Introduction

What is the purpose of the Report of Consultation?

This report is a summary of the comments made on the Preferred Option of the Sefton Local Plan. It is not the purpose of this Report to provide any responses to these comments. A response to comments will accompany the next stage of the Plan.

All comments received are known as 'representations', which includes comments supporting and objecting to the Plan, as well as general observations.

Just under 1,200 representations were received in total, some including detailed supporting studies. This Report is a summary of the representations and intends to convey the scope of the comments received. It is not possible to summarise all the points made in the representations within the scope of this Report. However, all comments will be taken into account in drafting the next stage of the Plan.

How is the Report organised?

The report is divided into two main sections:

Part 1 outlines the approach to consultation, and includes representations on the introductory section of the Plan, the policies, and the evidence supporting the Plan

Part 2 contains a summary of representations on the implications of the Plan for different parts of the Borough and representations received in relation to individual sites.

In both Parts 1 and 2, where a significant number of representations have been received on a particular topic or policy, they are recorded under the following headings to make them easier to follow.

- Organisations
- Landowners and developers
- MPs, political groups, local authorities, parish councils
- Residents' groups and individuals

Representations made by those in the first three categories listed above have generally been attributed by name. Individuals have not been named unless they are assumed to be commenting on behalf of others (such as MPs and councillors).

PART 1

2. Overview of consultation

The consultation took place over a 12 week period between 8th July and 27th September 2013

The approach to consultation 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.

A detailed consultation strategy and associated media campaign was developed with support from the Corporate Communications team to ensure a corporate approach to publicising the Plan.

The approach to consultation was agreed by the Public Engagement and Consultation Panel which advises on the approach to consultations carried out by the Council and other public services in Sefton.

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

We also 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.

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.

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.

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. An innovative pocket sized FAQ document was also produced.

Public events

15 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.

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

A booking system was used which allowed people to attend an event for an hour and to have an opportunity to speak one to one with a member of the planning team. This approach was recommended by the national Planning Advisory Service for three reasons:

- safety - to avoid potential difficulties of large numbers of people arriving at the same time
- to enable members of the public to be able to speak direct to members of the planning team, and
- to target the limited numbers of staff in the most effective way.



*Discussions with members of the Local Plan team
[Ainsdale Village Church hall]*

The booking system received some limited criticism in the press and from a number of residents. One or two people said they boycotted the events, claiming it was anti-democratic. However this approach to consultation worked well in many respects. Every single person who rang or e-mailed to make a booking or who turned up on the day without an appointment was given a slot at a time largely convenient to them.

There was positive feedback at most of the events, with many people saying that officers were very helpful and had explained information clearly.

In total around 600 people attended the public events. This compares to the last occasion where approximately 1,500 attended the drop-in events. This may be partly explained by the fact that many fewer sites were identified for development in the Preferred Option draft Plan. Some people may also have boycotted the events.

Three Youth events were organised with advice from Sefton Council for Voluntary Services (CVS). The material was prepared entirely by the Young Advisors with guidance from the Local Plan team. The events were publicised by the Young Advisors. Only the Bootle session had enough young people attending to make it worthwhile running the event. Part of the reason may have been the exceptionally hot weather in early July.

Given the low turnout, Sefton CVS, Children's Services and Planning Services arranged two additional events for September, in Bootle and Southport, which were better attended.

Sefton CVS and Sefton Council arranged two events for September for the Voluntary sector. Despite widespread attempts by Sefton CVS to publicise the events, one of the events had to be cancelled due to low numbers and only one event took place.

Anecdotal evidence suggests a high level of awareness of the consultation. Maghull Town Council carried out its own survey of 556 randomly chosen households, and 70% of these were aware of the Local Plan.

Just under 1,200 individual representations on the draft Local Plan were received in total. Some included detailed supporting studies. Around 570 of these representations comprised an identical form signed by residents objecting to sites identified for housing development in Melling.

A review of the consultation was reported to the Public Engagement and Consultation Panel in November 2013. The Panel noted the various challenges associated with the consultation and agreed that overall the consultation had been very successful.

Representations on approach to consultation

The comments may be summarised under a number of headings:

Concern that decisions have been made already

- The Council consulted in 2011 and the result was a clear consensus against development on green field sites. This seems to have been ignored.
- Developers already have an option on some of the sites. This shows that it is a “done deal”.
- The Government is clearly pushing for all of this extra housing and therefore this housing is needed so why are you consulting us when it will happen anyway?
- Central Government diktats weigh more than local people’s opinions.
- The Local Plan is a vote-rigging exercise.
- Won’t follow people’s views. Whatever happened to Localism?

We have not been notified

- In 2011 people living near potential development sites were sent a letter. We weren’t on this occasion / We should have been sent a letter or a leaflet.
- We didn’t receive a copy of the Champion / it isn’t delivered around my area.
- This has been a secret consultation.
- Local people felt the need to send around leaflets and posters.
- Response forms should have been sent to every household.

Comments about the public events

- Undemocratic having to book a place. Not enough people can attend. Designed to cut down numbers.
- Excluded a large number of people from being involved in the process due to them wanting to be part of a wider audience.
- No event held in my area.
- I didn’t feel that my questions were answered adequately.
- The Local Plan events were very helpful and courteously staffed.
- Would have liked to have had public meetings.

Consultation not accessible

- Local Plan language too technical and hides too much information by being too wordy.
- The publicity material was misleading and inaccurate.
- Forms asking for site numbers and references not easy to understand.
- Not available to read in alternative languages or for people with limited eyesight.
- Newspaper advert misleading and inaccurate.

Youth consultation

- The consultation gave a welcome opportunity to get involved and give their opinions

- It helps young people understand what the Local Plan is about and was explained well.
- The sessions were informative and interactive.
- The main decisions have already been taken so why bother?
- The questions were designed to confuse with and were leading. Questions were simplistic with just yes and no with little opportunity for meaningful discussion and explanations given were vague.
- Sessions were boring.

Positive comments about the consultation process

There was positive verbal feedback at most of the events, with many people saying that members of the Local Plan team were very helpful and had explained information clearly.

Formal comments received referred to:

- Event gave an excellent opportunity for informed debate.
- Format of the event and the discussion was extremely helpful.
- Informative and courteously staffed exhibitions.
- Thank you for listening to our objections to the Local Plan at the event.
- Grateful for the opportunity provided by the current the consultation period to "have my say" about one of the proposals contained in the Preferred Option July 2013 document.

3. Comments from Statutory Consultees and other groups and organisations

This section is not designed to provide a full summary of the comments by each of the groups listed. It is intended to give a broad overview of the range of groups that made comments and the key issues that were raised. The detailed comments made by these groups are reported in the relevant section of this consultation report.

Statutory Consultees

Environment Agency made a number of detailed comments across the plan, primarily concentrating on flood risk and drainage issues, but also touching on the natural environment, pollution, climate change and biodiversity.

Natural England made comments on the Local Plan and Sustainability Appraisal in relation to their key areas of interest, i.e. biodiversity and geodiversity.

Highways Agency generally support Option Two but have some concerns that the strategic development sites may impact on the Strategic Road Network, particularly development in the Green Belt and at the Port of Liverpool.

Network Rail, in addition to promoting a couple of sites, made general comments on the potential impact of new development on their infrastructure and services. They suggest it is appropriate that developers fund any infrastructure improvements.

Merseytravel have no significant comments on the Plan but if the Council decides to release Green Belt sites for development they would urge the provision of good sustainable transport links.

United Utilities emphasised the need for continued close liaison between the Council and themselves to ensure development aspirations can be delivered without any delay. They made detailed comments on a number of policies that they have direct interest in.

Local Political Parties

Sefton Conservatives concerned about reliance on out-of-date census information; that consultation with residents and West Lancs has not been taken into account; the loss of agricultural land and infrastructure issues.

Sefton Liberal Democrats questioned reliance on 'incorrect' population predictions and questioned why housing requirement always seems to come out at around 500. They were concerned over lack of detailed working with West Lancashire. The plans would result in the loss of valued agricultural land and in the disproportionate growth of Maghull. More work was required to address infrastructure issues and were critical of the approach to consultation.

UKIP thought no Green Belt land should be built on until every square foot of brownfield land had been used. They also questioned the housing figures given that Sefton's population has decreased and asked where the additional residents would come from. They also questioned why homes were needed given the large number of properties for rent and vacant land and properties.

Sefton Green Party thought the Local Plan should be more creative and consider approaches such as car free environments, flexible use of homes, self build clubs. They

thought the Local Plan should set out safeguards to protect Sefton and its residents from any adverse impacts of 'fracking'

Southport Labour Group made detailed comments on issues such as design, 'local labour' policy, affordable housing, and protection and improvements of local centres.

Local Residents Groups

FRAGOFF questioned the annual housing requirement of 510 and stated this should be nearer the Department of Communities & Local Government figure of 399. They questioned the calculations for backlog and buffer and thought that if these were included the actual figure was 723 a year. They also questioned the validity of some of the supporting evidence, the consultation process, the loss of agricultural land, lack of infrastructure planning and the risk from building on areas susceptible to flooding.

ReClaim - your communities [a Bootle based residents' group] had significant concerns about the impact of the growth of the Port on Bootle and how increased freight will be managed. They questioned why the Local Plan is silent on the options for improved road access to the Port.

Churchtown Green Belt Action Group made detailed representations opposing the identification for development of land at Moss Lane, Churchtown. This included consideration of the impact on the openness of the countryside and landscape; loss of recreation and sport amenity; the impact on local conservation areas; the nature conservation value of the site; traffic and access issues; access to local services and facilities; and cross boundary issues. The Group submitted a petition signed by 778 residents.

Ainsdale Community Wildlife Trust submitted a business plan for the redevelopment of part of the site of the former Ainsdale High school and playing fields into a low dune nature reserve.

Melling Residents submitted 570 identical letters stating that the two proposed sites in Melling were unsuitable on the grounds of traffic flow/congestion; inadequate drainage systems and risk of flooding; and insufficient infrastructure.

A petition was submitted on behalf of **Lydiate Residents**, signed by 892 residents, setting out their opposition to building on any Green Belt, in particular the land bounded by Moss Lane, Sandy Lane, Lambshear Lane and Liverpool Road.

A Better Crosby made comments about Sefton's economy, the quality of place, the impact of an ageing population and on the future of Crosby centre.

Other Local Groups and Organisations

Liverpool City Region Local Enterprise Partnership welcomed the proposals and site allocations being put forward in the Local Plan to realise opportunities for growth and the creation of jobs for local people.

One Vision Housing was generally supportive of the Sefton Local Plan Option Two and the high level vision and objectives it sets out to achieve in 2015 – 2030.

Adactus Housing welcomed the proposals under the Local Plan to provide much needed additional housing in the Borough, particularly in relation to affordable housing.

CPRE: Sefton accepted that Sefton has to undertake a Local Plan and within that meet government requirements. They also accepted this may require the loss of some Green Belt Land but advocated a phased release of redesignated Green Belt land so that those sites which contribute most to the purposes of the Green Belt are developed only if/when improvement in market conditions causes them to be needed.

Friends of the Earth (Southport) believed the plan should be more innovative to really secure sustainable Sefton and not just a continuation of what has gone before. They also raised issues such as car-use, how health inequalities would be addressed, infrastructure, 'fracking' and the approach to development in the Green Belt.

Sefton Partnership for Older Citizens asked that full consideration be given in the Local Plan to the housing and transport needs of older citizens.

A number of local **primary and secondary school heads** supported the policy which seeks to restrict new hot food takeaways near secondary schools and large parks.

National Organisations

The Home Builders' Federation expressed significant concerns about the proposed housing requirement for Sefton. They recommended that a more growth oriented housing requirement be chosen, at least in excess of 696 homes each year, but probably higher to take account of the need for affordable homes and the aim to attract young families and provide more jobs. They also questioned the housing calculations, specifically in relation to the lack of safeguarded land, and the method for assessing 'buffer', vacancies, windfalls and backlog.

Defence Infrastructure Organisation [MOD] made representations in relation to the proposed development sites close to the RAF Woodvale. They objected to the allocation of land south of the Coastal Road, Ainsdale [site SR4.09] in the plan for development.

The National Trust acknowledged the case made that Sefton could not meet its housing and employment land requirements for the plan period without incursions into the Merseyside Green Belt. However they had reservations that this was not being done as part of a sub-regional Merseyside Green Belt review.

Canal and River Trust [formerly British Waterways] was concerned that the Preferred Option report did not adequately reflect the significance of the Leeds and Liverpool Canal in terms of defining the identity of the Borough or of the potential role of the waterway in meeting the aims and objectives of the Local Plan. They provided comments on a number of sections/policies of the plan which could address this.

Sport England opposed the identification of any playing field for development unless a replacement is provided or there is evidence to show it is surplus.

The Theatres Trust would like the plan to make more specific reference within certain policies to cultural infrastructure.

Mersey Forest made specific comments in relation to their role in green infrastructure and would like recognition in the plan of the partnership role they have in the sub-region in providing this role.

The Woodland Trust made a number of detailed policy comments including the role woodland creation can have in alleviation of flooding, improvement in water quality, carbon offsetting, wildlife habitat and improving places where people live.

Neighbouring Local Authorities

Knowsley fully supported the choice of Option Two and the promise to be part of a future sub-regional review of the Green Belt. Supported removal of Green Belt site adjacent to Kirkby for homes [a site identified in the Options document in 2011].

Liverpool supported the spatial strategy set out in the Preferred Option and the growth of the port

West Lancs broadly supported Option 2. They largely supported identified Green Belt sites as long as regard is given to the effect on residents of West Lancashire. Concerned with sites identified adjacent to Lydiate and that their development would 'close the gap' to Aughton.

Wirral did not think the Sefton Local Plan would have any significant implications for them. They stressed they have not committed to a sub-regional review of the Merseyside Green Belt.

Parish Councils

Formby questioned the housing figures the Local Plan rely on and that these don't match their experience of the village. Supported the identification of employment land to the east of the Bypass.

Hightown questioned the housing requirement, and expressed concerns about impact of housing in village on traffic and schools. Would like to see a higher affordable housing requirement [50%] but didn't accept a need in Hightown.

Ince Blundell supported the identification of their village as 'inset' within the Green Belt. Opposed the identification of land near the village as an 'area of search' for wind turbines.

Lydiate opposed the identification of sites adjacent to the village as they felt this would alter the character of the village. They were also concerned about the loss of agricultural land and questioned the figures that support the housing requirement.

Maghull submitted the results of the local survey. 556 households completed the survey of which 70% were already aware of the Local Plan. 53% opposed the Local Plan; 6% were in favour and 25% supported with reservation. People were concerned that new homes would not be supported by new services and infrastructure.

Melling acknowledged that development was needed but had concerns that development would not be preceded by infrastructure improvements.

Sefton had concerns that the plans would impact on services and infrastructure in the area and were worried about local traffic and access issues.

Parish councils in West Lancashire

Aughton were concerned that the open gap between Aughton & Lydiate would be reduced if the Lydiate sites were developed.

Halsall were concerned about the impact on the local environment and traffic if sites near them were developed.

Scarisbrick expressed concerns about the growth of Southport and the impact on local traffic.

Event co-ordinated by Council for Voluntary Services on 11th September 2013

Key issues raised

- Housing and jobs were seen as vital areas for the organisations, in terms of supporting their client groups effectively.
- Building new homes in out of town developments, was criticised as a poor option to revitalising town centres and bringing vacant homes into use.
- Out of town retail and business parks were considered to have negative drawbacks in terms of accessibility for less mobile residents.
- Range and vitality of local and town centres were viewed as very important although it was recognised that there were practical difficulties in achieving this.
- Concern over Insufficient school places in Sefton in the future, particularly in areas where new homes were proposed to be built.
- Whilst a legal necessity to have a Local Plan covering a 15 year time period, it is very difficult for a number of reasons and creates a huge challenge for the plan and for people wanting to get involved in the process.

Youth Consultation

A number of events were designed to be appropriate to younger people and to seek their views on the topics covered by the draft Local Plan. These events were co-ordinated and run by the Sefton CVS Young Advisors.

9th July: Maghull Parish Hall, St Andrew's church, Maghull

10th July: Lincare Mission, Bootle

24th September: SPACE, Marsh Lane, Bootle

25th September: Meols Cop Youth Centre, Southport

An event planned in Southport on 16th July did not go ahead.

Summary of comments made at these events

- Homes and the Countryside

Whilst there was support for people having homes to live in, there was a considerable amount of support for protecting the countryside due to the importance for wildlife. There was a smaller number of people who felt that people needed homes.

- Affordable Housing

There were again mixed views on whether developers should provide 30% affordable housing with developments. The majority felt that affordable housing is a real issue and that more was needed, particularly for families with children. Some commented that more than 30% was needed.

There were some however who felt that if people want a house they should work harder and get a good job.

- Jobs and Employment v Countryside

Many commented that land in the countryside should not be developed for business parks. There are plenty of existing business parks with lots of empty space. Whilst jobs are needed, the countryside is not the place as it will damage the environment.

There was also some support given to the need for jobs and there was therefore a minority who felt that jobs are needed.

- Regeneration of deprived areas

Support for bringing empty shops and buildings into use. It will help improve the appearance of poor and deprived areas. Better than building on the countryside.

- Empty Housing

Vast amounts of empty housing and derelict areas. There is no need to build in the Green Belt or countryside.

- Agricultural land

Agricultural land needs protecting from development. We need to be able to grow food for the future. Also if we keep building on 3% of our agricultural land then eventually we will have none left. Need to consider the livelihoods of farmers and rural communities.

- Takeaways

The policy restricting takeaways was not greatly supported. Whilst some people felt that it would be important to keep children's weight down, many felt that whether people wanted to go to use a takeaway was up to them. Takeaways are convenient and many people don't have time to cook.

- Transport and access

The importance of public transport was widely recognised. Many young people are reliant on buses and trains to get to youth centres, schools, recreational activities and shops. It was also recognised that public transport is very important for elderly and less mobile citizens.

- Flooding and drainage

Support for not building on areas most at risk of flooding.

- Leisure and recreation and facilities

A real need to protect local facilities like swimming baths and other youth and leisure centres. Churches are also important to protect for local communities. Need improvements to existing leisure centres.

- Natural Environment

A theme that came out strongly is that young people want to see planning in Sefton focus strongly on protecting the natural environment both from pollution and development.

- Historic Buildings

Historic buildings are very important and need to be protected for future generations.

- Renewable energy and environment sustainability

Whilst some support in principle for electric cars and solar panels, there are concerns that they are expensive and the money would be better used for other things.

4. Summary of representations – Section A of the Local Plan

Section A of the Local Plan includes the following chapters:

- Chapter 1 Introduction and context
- Chapter 2 Profile of Sefton
- Chapter 3 Key issues
- Chapter 4 Sefton in 2030 –our vision for Sefton
- Chapter 5 Objectives of Sefton’s Local Plan
- Chapter 6 Meeting Sefton’s needs – what are the options?
- Chapter 7 How to use the Plan

Where there is a significant number of representations, they are recorded under the following headings to make them easier to follow. In **Section A**, this approach is only used in reporting the General comments, immediately below.

- Organisations
- Landowners and developers
- MPs, political groups, local authorities and parish councils
- Residents’ groups and individuals

General comments

Organisations

National Trust: the policies of the plan should seek to protect, and where appropriate enhance, the environmental and heritage assets of the Borough as a whole.

Canal and River Trust: the draft Plan does not adequately reflect the significance of the Leeds & Liverpool Canal in terms of defining the identity of the Borough or the potential role of the waterway in meeting the aims and objectives of the Local Plan. The canal has the potential to play a significant role in the physical regeneration of Bootle, Netherton and Litherland. The waterway can be used to tackle deprivation through community involvement resulting in improvements to health and well-being. The canal towpath should play an important role in widening travel choices. The canal forms a significant part of the history of Sefton and should be fully recognised as a leisure, tourism and heritage asset.

A Better Crosby: shorten and simplify the Plan so it is more user friendly.

Landowners and developers

Bellway: Support the acknowledgement in your Plan that it sets out a broad strategy that encompasses not only the delivery of new homes but also economic development, and that these two are linked. The Consequences Study makes this clear: your Plan is to accommodate a level of growth, not decline, over the next 15 or so years.

Bellway: Timetable (Fig 1) - given the need, within your housing strategy, to secure the planned release from Green Belt of land in order to deliver your housing requirement, it is important to progress your Local Plan as efficiently as possible and not delay the next stage until August/September 2014.

Mobile Operators’ Association: This is a very proactive approach to forward planning.

Andrew Cunningham Building Design: The plan should be more positively worded to encourage growth. The use of phrases like 'very exceptional circumstances' will discourage development that will provide employment, and private and affordable housing.

Home Builders Federation: Unclear how the discussions with neighbouring local authorities have influenced the preparation of the plan. Government guidance states that 'it is unlikely

that this [duty to cooperate] can be satisfied by consultation alone'. This requirement should not only cover housing issues but also identify how the plan seeks to resolve them. Sefton needs to state how this has been dealt with during the preparation of their plan.

MPs, political groups

Bill Esterson MP: The government has made clear that building needs to take place and that the council needs to produce a plan which is acceptable to the government. The alternative is for government inspectors to either draw up the plan or to allow developers planning consent regardless of whether development sites fit with the council's plan. This makes the creation of a plan very challenging.

Green Party: Where are the priority actions for health, well being, education, even happiness? Sefton is in the lowest quartile for life expectancy in England but there is no big action to address this through the planning system? There is almost total emphasis on Economic Growth through building as the "cure all" for all our problems, rather than an approach which truly embraces Sustainable development.

Residents' groups and individuals

Sefton Council claims a number of alleged benefits arising from the plan's adoption. However, there is a circularity to their claims, and they all seem to come back to building houses.

Object to the failure in the Preferred Option Documents to be open and transparent, mature and professional in such an important area of our lives.

Understand the need for a local plan but consider this one does not understand local concerns or meet local needs. It feels more like a developers' charter.

The assumption that the borough's economic growth is significantly linked to the development of houses is considered to be wrong as there is no evidence to support this assertion.

The Regional Context is oversimplified. This is a major weakness of the Plan in what is one of the most densely developed parts of the Country and where the employment, retail and cultural offer has little regard to local authority boundaries. In particular the Context section should identify the key relationships between Southport and Manchester / Southport and Preston / Southport and the surrounding parts of West Lancashire Borough.

Any local plan should have as its priority the genuine all-round welfare of the people of Sefton, and the protection and enhancement of our shared environment. It should not be simply about house-building, nor about handing over swathes of precious farmland to developers.

Some local initiatives (such as the Maghull community edible garden scheme, and the Formby and Southport Transition groups) aim to create a truly sustainable future for our beautiful borough. These initiatives should be consulted.

The Local Plan is not sufficiently "creative" as is expected by the National Planning Policy Framework. Sefton should be looking for more innovative approaches to development, e.g. "University Village" approach, incentives to divide up large houses, car free developments.

Little regard is made for the real value of the environment to the economy and social well being, especially the proposals to build half of new houses on the Green Belt. We need to prevent all build on the Green Belt to protect farm land and natural habitats.

Disagree that Southport has a high proportion of immigrants.

The northern part of Sefton occupies a very narrow coastal strip and the Green Belt is very tightly drawn around the urban area. Sefton should look beyond its administrative boundary in order to accommodate new urban development. The Council has not fully co-operated with West Lancs Council in terms of the need for joint planning towards meeting future development needs.

The overall quality of the plan appears to be good in that all the aspects appear to have been considered to some degree and the general approach is reasonable and logical.

Accept most of the proposals contained in the Preferred Option document including the need to

plan for the building of new homes.
Four transformational actions have been defined by the LEP/The Mersey Partnership (TMP) to deliver sustainable economic growth across the City Region: Liverpool 2 Superport: Visitor Economy: the Knowledge Economy: the Low Carbon Economy. More explicit recognition should be given of the implications of latter two actions.
There is a lack of detailed working with West Lancs, demonstrated by West Lancs' comments about the Lydiate reserve sites and the lack of detail in either the Sefton or indeed West Lancs plans to address transportation issues (both rail and road) to the east of Southport.
Liverpool needs to rebuild its lost population and use up brownfield sites across the city for housing to begin to rebuild its population. The longer it takes to address this issue the greater the pressure will be on Sefton to sanction the building of houses on its high grade agricultural land. This is a sub-regional matter that needs to be addressed urgently.
This whole draft plan is market led, but promises to create new expansions to the existing environment, and provide a healthier life style for everyone. Concern that if thousands of new homes are built, it will not be possible to enhance or create new environmental assets.
Criticise the further delays to the Plan due to the need to wait for updated population statistics. There is no doubt that more homes are needed in Sefton and Sefton should progress quickly with a policy which is sufficiently flexible to allow for minor variations.
It is not a 'Local Plan but a developer's plan: 1. It is not sustainable on economic and environmental grounds 2. The sites chosen in Formby have major drawbacks for the local community. 3. The way the plan was drawn up has serious implications for local democracy and the long term viability of Sefton as a local government entity.
It would appear local planners are being ruled by central government who require increased growth.
The plans for the future of Sefton will lead to people leaving when the services are stretched, the traffic is grid locked and the green fields disappear.
Concern that Sefton residents feel they have no voice in the Local Plan process, that attempts to engage with the Council to develop an appropriate future for the Borough have consistently been ignored, and that the consultation was a sham. View that Preferred Option was not based on sound planning principles or in the best interests of the borough.
A comprehensive plan.

Chapter One – Introduction and Context

<u>Mersey Forest</u> queries whether the Context would benefit from a section which summarises the relationship of Sefton to its neighbours. This would support and justify Objective 14. If this included a reference to the MF, this would demonstrate a 'duty to co-operate' with a long-standing partner, and could refer to the MF Plan which is 'owned' by Sefton.
Para 1.8 "Making sure that sufficient land of the right type is available in the right places and at the right time to support sustainable growth." We have finite land resources and the Plan should acknowledge that there would be times when there is not sufficient (or sometimes, any) land available.
The Plan does not adequately differentiate between those measures which address adaptation to inevitable climate change and those measures which seek to mitigate the scale of climate change. Unless the Plan makes this distinction, it will be weakened in its role to shape development and will be less understandable as a policy document.
The Plan needs to express what is meant by sustainable development with greater clarity and hence priorities for measures which secure this and which also address climate change. Accessibility to high quality public transport should be much more clearly stated to be a fundamental measure of sustainability.
Understanding the key linkages between spatial planning and transport planning is nowadays seen as fundamental to sound outcomes. The Plan does not currently demonstrate this

adequately.

The introduction needs to handle the functions of town centres more effectively (as those places which are intrinsically the most accessible places by public transport). This should lead to the Plan making key, high level statements about 'location' of different functions/activities. The Plan currently lacks this 'high level' statement.

Chapter Two - Profile of Sefton

Environment Agency: Paragraph 2.23 could also highlight the important role watercourses provide with regards to green (and blue) infrastructure.

CPRE: Note that a very considerable limitation to sustainable growth in Sefton is the large legally protected area designated as nature reserves or landscape of special character.

SAFE Productions: Surprise at the lack of any reference to the potential of the Leeds Liverpool Canal as a key asset for South Sefton within the document.
Potential for the Plan to make some more positive statements, such as the ideas in the Greenprint for Growth, about the potential of Bootle and South Sefton in particular.

Canal & River Trust: the Leeds & Liverpool Canal should be referred to in paragraph 2.4 as a significant feature of Sefton and should be referred to under the sections relating to “Making connections – travel and accessibility” and “health and wellbeing”.

Mersey Forest: Reference to the importance of trees and Green Infrastructure in paragraph 2.23 is supported, although there is no reference to the Mersey Forest.

CPRE: Add to statement in para 2.16 about Formby being a location for executive housing, that “In contrast, Formby’s need per capita of affordable housing is the greatest in Sefton”.
In addition to noting the existing requirement for major non-residential development to include on-site renewable energy, para 2.24 should say that a comparable policy will be applied to residential developments above a specified size (say 10-premises?).

National Trust: request reference to coastal change being a challenge to the management of the coastal area, and also that the landscape quality and nature conservation interest of the coast attract many visitors to the area.

Peel Ports: Paragraph 2.35 correctly summarises the position with respect to the Port in terms of jobs and the economy, and that the ambitious plans for port expansion are restricted due to land availability, the requirement for improved access to the Port and the need to mitigate against adverse impacts on local communities.

Formby Play Sports Ltd: Acknowledge that the Merseyside Green Belt has been in existence for many years and is tightly drawn around Sefton’s towns and villages. Although this has to an extent channelled development to the main built up areas of the Borough, thus contributing to a number of historic and continuing regeneration objectives, it has also had the effect of stymieing the natural growth and development of many settlements in Green Belt.
Careful consideration to be given to ensuring that enough Green Belt Land is deallocated otherwise there will be need for a further review of Green Belt land in the short term.

Formby Play Sports Ltd: Surprise at no reference to importance and benefits of sports and recreation facilities for a healthy life style and related opportunities as this is a key aspect of creating sustainable communities. Concerned that there are few good quality sporting facilities that can be used by the public in many parts of the Borough.

ReClaim – your communities: More detail should be given on some of the environmental assets of the Borough, including quality of agricultural land, heritage assets, sites of ecological value, Mersey & Ribble estuaries, archaeological finds.

Section on Landscape should be added.

Agree with the key issues identified by Sefton Council as priorities.

Chapter Three - Key Issues

Environment Agency: You may wish to consider flood risk as a key issue as large areas of Sefton are considered to be at medium and high risk of tidal and fluvial flooding. Also, Sefton's Surface Water Management Plan has identified areas subject to surface water flooding.

National Trust: Note that whilst the protection of the high quality environment of the coastline is paramount, would like a reference included recognising its contribution to the local economy and the need to ensure that appropriate facilities and infrastructure are provided and maintained having regard to the effects of coastal change.

Mactaggart + Mickel: concur that issues such as accommodating future growth balanced against environmental considerations, meeting the need for new homes and the provision of affordable housing require coordinated action and require to be addressed in full over the lifetime of the plan.

Peel Ports: support key issues identified.

Peel Holdings: Further key issue suggested - how can Sefton support the growth of existing and new or emerging sectors that may wish to locate in the Borough, in response to the challenges of competition and a low carbon future and prompted by the growth of the SuperPort?

Formby Play Sports Ltd: A key issue for the Council is the need to ensure that all parts of the Borough benefit from and are able to offer employment opportunities for local communities. This is a key aspect of ensuring that settlements and their respective hinterlands are sustainable otherwise individuals will be forced to travel further than can be regarded as sustainable to secure employment. Unfortunately it is clear that this is not the case at present, particularly where there are heavy concentrations of Green Belt e.g. Central Sefton/around Formby.

Formby Play Sports Ltd: Amend key issue to highlight the need to maximise the potential of new developments to contribute towards the delivery of new facilities and services the Borough needs or would benefit from.

Include reference to effect that historic patterns of settlement and land use, as well as natural features including geology topography and the ecology of Sefton are key determinants of landscape character, and land use change should, where possible, respect these patterns (i.e. change should be appropriate to its setting).

Chapter Four – Sefton 2030, Our Vision for Sefton

Environment Agency: The last bullet point under Para 4.1 states 'New homes have been located in areas with the lowest risk of flooding, and where necessary have been designed to reduce the overall risk of flooding'. This statement is unclear and appears to conflict with other areas of the Local Plan. Clarification requested.

Canal & River Trust: suggest the inclusion of the following as an additional vision: 'The Leeds & Liverpool Canal has become vibrant, animated and valued as a corridor for leisure, recreation and sustainable transport throughout Sefton'.

Friends of the Earth: 1. The Local Plan is not sufficiently "creative" as is expected by the National Planning Policy Framework i.e. it just looks like the same old approach. Sefton should be looking for more innovative approaches to development, eg "University Village" approach, incentives to divide up large houses, car free developments. 2.Sustainability: there is almost total emphasis on Economic Growth through building as the "cure all" for all our problems, rather than an approach which truly embraces Sustainable development. 3. Priorities: where are the priority actions for health, well being, education, even happiness?

National Trust: The second bullet point is considered to be inconsistent with the Framework and the overall approach to sustainable development, particularly as set out at paras 7 to 9. Rather than balancing one role against another an approach that achieves sustainable development in an integrated way should be pursued.

National Trust: Under Formby section, request reference to provision of appropriate visitor facilities after the reference to enhancing the natural coastal environment.

<p><u>Home Builders' Federation</u>: The Vision is very general and could relate to most of the country. This is partly overcome by the area vision. A more positive vision would be 'to provide a good supply of quality houses which meet the district's need for both market and affordable housing'. The other positive statements relating to increasing jobs and attracting younger families are diluted by the plan's policies.</p>
<p><u>Turley Associates [on behalf of David Wilson Homes & Barratt Homes and on behalf of Mersey Care NHS Trust]</u>: Amend vision to say that sufficient provision should be made to meet the full housing needs of the Borough.</p>
<p><u>NJL Consulting for Strategic Land Group</u>: Vision which has been set out and the objectives of the Local Plan are considered to effectively address the recognised issues.</p>
<p><u>Bellway</u>: choice is not to pursue brownfield sites to avoid Green Belt release: it is to release Green Belt land for development as well as support development elsewhere to meet housing needs over the plan period, an approach we support</p>
<p><u>Formby Play Sports Ltd</u>: add bullet to vision – “Sefton maximises the potential of existing facilities and encourages the provision of new indoor and outdoor sports and recreation facilities in accessible locations so as to improve the health and well-being of all members of the local community”. Change vision to reflect that the employment park be expanded to the south rather than the north.</p>
<p><u>Barton Willmore on behalf of Countryside Properties (UK) Ltd; Persimmon Homes and P Wilson & Company LLP</u>: vision should be a much more concise and focused section which sets out the Vision for the Borough in general terms. Duplication between the 16 bullet points of the general Vision for the Borough and those within the bullet points under the different communities.</p>
<p>Agree with the Authority's vision in “meeting needs of homes, jobs and services”, particularly delivering a “wider range of homes” and “new employment sites” within the Southport area.</p>
<p><u>Barton Willmore on behalf of Mr Robert Swift</u>: The vision should be much more concise. It is also very general and could describe anywhere. The overall vision should be kept to a single paragraph, and the area-based visions kept to 2 or 3 bullets each.</p>
<p><u>Mactaggart & Mickel</u>: Whilst they support the provision of a wide range of homes, future employment provision and a substantive number of homes east of Maghull are dependent upon and require substantive and significant infrastructure.</p>
<p><u>Nuffield College & Hallam Land Management</u>: Nuffield College and Hallam Land Management are extremely supportive of the overall vision and objectives for the Local Plan in relation to meeting local needs through the delivery of appropriate infrastructure, housing development and development that secures economic growth.</p>
<p><u>Peel Ports</u>: supports the Plan's vision</p>
<p><u>Green Party</u>: The key vision for any local authority should focus on the health, happiness and well being of its population. Alternative, detailed, vision is proposed, based on this.</p>
<p>Current proposal is fundamentally flawed. An alternative approach for an effective local plan is to follow the approach to "rewiring" local government as advanced at the LGA Summer Conference in Manchester in 2013; creating a sub-regional, more cost effective basis for service delivery and major infrastructure planning, balanced by a more powerful localised planning framework to include a stronger voice for North Sefton as a whole.</p>
<p>Amend Crosby section of vision by adding that the centre should be extensively regenerated and that it should have new & improved vehicle and pedestrian links and improved parking facilities.</p>

Chapter Five – Objectives of Sefton's Local Plan

<p><u>Environment Agency</u>: Particularly welcome Objective 2 - To protect and enhance Sefton's important natural environment and where possible create new environmental assets which are well connected to existing assets and Objective 4 - To manage the effects of climate change, to encourage best use of resources and assets, land and buildings, and to reduce Sefton's carbon footprint within the environmental sustainability objectives.</p>

<u>Parkhaven Trust</u> : supports the broad objectives of the proposed plan.
<u>Sefton Partnership for Older Citizens</u> : Really important to provide appropriate housing (i.e one bed assisted living accomodation) appropriate for older people (especially in the north) where there are large numbers of incoming older people. Need good transport links and places to meet.
<u>Natural England</u> : Recommend that biodiversity and geodiversity be specifically referred to under objective 2 and this should also be reflected in the SA report, which accompanies the Plan.
<u>Environment Agency</u> : Some of the objectives could be linked to reducing flood risk, such as manage the effects of climate change & ensure developments include the essential infrastructure; this is not explicitly stated.
<u>National Trust</u> : No Objective that specifically supports the role of heritage in Sefton, for example its contribution to tourism or the opportunities for heritage-led regeneration. The following is suggested: 'To protect and enhance Sefton's heritage assets, not only for their intrinsic value but also for their wider economic and social benefits.'
<u>Canal and River Trust</u> : Leeds & Liverpool Canal could potentially make a significant contribution in respect of all of the objectives listed, with the exception of 13 (the Port).
<u>Barton Willmore on behalf of Mr Robert Swift</u> : duplication between the objectives and the vision – reduce the latter. Will be very difficult for objectives 5 and 7 to be met because the plan's housing land requirement is not based on the most up-to-date evidence. The Council must publish an updated SHMA and reconsider its housing requirement to meet objectively assessed needs.
<u>Barton Willmore on behalf of Countryside Properties (UK) Ltd; Persimmon Homes and P Wilson & Company LLP</u> : duplication between the Objectives and the Vision; Vision should be much more concise. Consortium broadly supports the Council's objectives but has concerns regarding Objectives 5 and 7 - very difficult for these objectives to be met because the Council's housing land requirement is not based on the most up-to-date evidence and no up-to-date Strategic Housing Market Assessment [SHMA]. The findings of both the SHMA and the up-to-date housing requirement should be made available at the earliest opportunity and be reflected in the next stage of consultation on the draft Local Plan.
<u>Mactaggart & Mickel</u> : support the Plan's objectives especially the one requiring high quality design that respects the local character whilst minimising the impact on local surroundings. Bullets 5 + 9 are also supported.
One of the objectives is "to support Sefton's town and local centres so that they are able to adapt to the local and wider needs for shopping leisure culture and other services and to develop a more flexible role". There is no suggestion in this Local Plan that Sefton Council are taking any satisfactory measures to encourage the regeneration of Crosby Village which is now urgently overdue.
Request new paragraph to make clear that one of the key objectives of Sefton's Local Plan is to ensure that the Sefton landscape is recognized, protected and preserved.

Chapter Six – Meeting Sefton's Needs - What are the Options?

<u>CPRE</u> : Delete para 6.2 [balance between value of the meeting needs and value of the environment] - incompatible with Policy ER2 [Nature Conservation and Enhancement].
<u>Hesketh Estate</u> : Supports the Preferred Option based on the evidence. Option 1 would almost certainly restrict the level of deliverable housing and employment sites and fail to meet identified housing needs leading to an overall decline in the viability of Sefton as a successful and attractive place to live.
<u>Mactaggart & Mickel</u> : The release of greenfield and Green Belt sites as soon as the Local Plan is adopted as required by paragraph 157 of the National Planning Policy Framework is supported. Mactaggart + Mickel also suport the release of the allocated sites that are currently in the Green Belt through the Local Plan to provide long term certainty and protection for the Green Belt.
<u>Barton Willmore on behalf of Mr Robert Swift</u> : does not agree that Option 2 should be the Preferred Option. The amount of land allocated under policy SR4 is insufficient to meet

objectively assessed needs. Some or all of the reserve sites should be allocated for development now in order to provide flexibility and ensure that the Council has a 5-year housing land supply. Option 3 should be the Preferred Option.

Barton Willmore on behalf of Countryside Properties (UK) Ltd; Persimmon Homes and P Wilson & Company LLP: Consortium supports the Council's statement in paragraph 6.2 which sets out why the Council must look to allocate land within the Green Belt for development. The Consortium does not agree that Option 2 should be the Preferred Option - only Option 3 would serve to achieve Sefton's economic growth aspirations, reducing the rate of population out-migration and out-commuting

Formby Play Sports Ltd: As the Green Belt boundary was drawn very tightly the main urban areas and towns like Formby have not been able to grow and develop naturally. It is sensible and inevitable that some areas of Green Belt will need to be deallocated from Green Belt and reallocated for development, both for housing and employment. The best option for the Borough lies somewhere between Option Two: Meeting Identified Needs and Option Three: Optimistic Household Growth. Such an option would provide the potential for lost opportunities for development to be met, previous levels of development in the borough to be delivered, and also provides a buffer and the scope for increased demand for development land to be met, including in relation to demand for new development in sustainable locations such as Formby.

Peel Holdings: The plan does not adequately follow the approach to objectively identifying and providing for employment needs set out in paras 14 & 17-21 of NPPF. Selection of Option 2 might meet the needs identified by the Council, but it will not meet an objective assessment of need in line with national policy.

Mactaggart + Mickel: prefer Option 3 to the Preferred Option in order to plan for growth, meet demand in full and stem migration.

Formby Parish Council: Disappointed that Sefton has not chosen Option 1, when Government advice is to protect the Green Belt.

Knowsley Council: welcome that Option 1 (as previously consulted upon at Core Strategy Options stage) has not been brought forward at this subsequent consultation stage.

Para 6.8 is unsustainable - it should not be Sefton policy to allow brownfield to go on indefinitely unused and use more and more of the Green Belt while little progress is made on decontamination and making brownfield economically viable. Developers will always choose to build new houses on existing agricultural land rather than convert already developed land from one use to another.

Confusion over need for a 5 year supply of available land [para 6.9], as says elsewhere we have a 10 year supply [para 6.6].

Para 6.9: Sefton should release greenbelt land in a slow, phased manner to top up the continuous 5 year land supply, not release it all at once to promote building on greenbelt in preference to urban sites.

Para 6.10: The Plan should set out the vacancy rate in each ward. The Plan should also make clear what Sefton Council is doing to ensure the highest vacancy rates will be brought down. The Plan should make clear what the different housing markets are — there is little point suggesting that a high vacancy rate for flats or terraced houses in Bootle has an affect on the market for detached houses in Formby. Much more detail should be given here.

Para 6.15 is misleading: "All our neighbouring authorities — West Lancashire, Knowsley and Liverpool — have told us they are unable to meet any of our housing or employment needs." Clear cross boundary housing & employment links between Sefton and Liverpool.

Para 6.23: Suggest first bullet be deleted - W Lancs has much more Green Belt than Sefton and a much less dense population. People will continue to move from Liverpool, Knowsley and Sefton to W Lancs. The plan notes Sefton's duty to co-operate but makes clear that W Lancs can be of no help to Sefton - it is all one way traffic in W Lancs' favour. Final two bullet points: query statement that brownfield sites are less viable and why Option One would be highly likely to result in an unsound Local Plan.

5. Summary of representations – Section B of the Local Plan

Section B ‘Economy’ includes Chapter 8 ‘Sustainable Growth and Regeneration’ and policies which aim to achieve this.

Where there is a significant number of representations, they are recorded under the following headings to make them easier to follow. In **Section B**, this approach is applied to reporting the comments under Policies SR3 ‘Housing requirement’, SR4 ‘Housing allocations and phasing’, SR5 ‘Employment requirement and strategic employment locations’ & SR8 ‘Centres and Parades’:

- Organisations
- Landowners and developers
- MPs, political groups and local authorities
- Residents’ groups and individuals

While comments made specifically to the content of Policies SR4 ‘Housing allocations and phasing’ and SR5 ‘Employment requirement and strategic employment locations’ recorded here, comments on individual site allocations are set out in Part B in Sections 10 – 14 which divide the sites into their different areas.

General

Green Party: It can be unrealistic to expect long term worklessness to be resolved by moving people straight into orthodox full time employment. This is where the intermediate labour market and the third sector can play a key role in the transition from long term unemployment to work. The Green economy offers many opportunities for this such as community regeneration projects, and environmental projects, through organisations such as Groundwork and the Wildlife Trusts.

The Sefton Local Economic Assessment [2011] indicates that Sefton's GVA was only 56% of the UK average. A major problem is the low levels of training and the lack of availability of high skill jobs. If there is to be an improvement more high technology industries (computer software, design, specialist crafts etc.) need to be attracted into the area. This will be difficult if the area's key selling point, its environment, is reduced to urban sprawl or overshadowed by 24 giant windmills. Although the plan supports the development of the industrial estate the council has no plan to attract jobs. There is no indication of what types of employment, the number of businesses or the infrastructure required.

Would like to see provision made for those already in private housing to be given some kind of financial help and incentive to improve and update their homes, many of which [e.g. in Waterloo] are at least 50 years old or more.

Policy SD1: Presumption in favour of Sustainable Development

Support for Policy SD1, including the presumption in favour of sustainable development, which is based on the model policy provided by the Planning Inspectorate and is consistent with the Framework.

The plan needs to express more clearly what is meant by ‘sustainable development’ with greater clarity on which measures will secure this, e.g. reduce the reliance on cars. Regrettably the Framework is somewhat vague on what sustainable development and sustainable growth mean.

The principles set out in this policy do not correspond to the strategy that follows it.

Policy SS1: Spatial Strategy for Sefton

Plan will give the wrong number of houses, of the wrong type in the wrong location.
Support the requirement, as set out in the policy, for development to be located on sites with the fewest environmental constraints and in accessible locations.
The Council should prioritise the use of brownfield sites first. There are more than enough brownfield sites in Sefton to accommodate its future development needs. The fact that sites need remediation should not be used as an excuse to develop Green Belt/field sites first. Suggest a strategy of urban containment, and sustainable renewal of housing and employment opportunities.
Concerned with the emphasis placed on the development of brownfield land in policy SS1 and the impact that this may have on the deliverability of the Local Plan. If it is intended that brownfield land is prioritised then this would make the plan unsound
Add further bullet under part 1 of the policy 'Be located at sites which have the potential to deliver the widest range of additional and/or complementary benefits.'
Support the proposal for new development to be concentrated in and adjacent to Sefton's key towns
The stated 'limited' growth in Policy SS1 is not sufficiently quantified for the settlements of Hightown, Aintree and Melling / Waddicar.
Whilst it is understood that the majority of development will be centred in and around the identified Key Towns of Southport, Formby, Crosby, Maghull and Bootle / Netherton, policy SS1 should not unnecessarily restrict development in the smaller settlements, e.g. Aintree.
Need to include the "reserve sites", e.g. those in Lydiate, Melling Lane, in part b of the policy
Some areas, such as Maghull, Churchtown, Formby, are taking an unfair proportion of new development. There is no evidence to suggest that these locations need the level of development that is proposed. Do Sefton intend to build on the whole of the Green Belt between Formby and Hightown?
There is a greater need for affordable homes in the South of Borough, but this will not be met as the spatial strategy provides an oversupply of development in other parts of Sefton.
Given the environmental constraints in Sefton, planners should look outside the borough to meet its development needs, e.g. West Lancs, Liverpool. Liverpool in particular has a huge supply of vacant homes and brownfield sites which could suitably be used to provide starter homes for young families.
The latest figures from the Council indicate that there is large supply of vacant homes which is more than twice the national rate. The fact that these are expensive to refurbish should not be used as an excuse not to bring them back into use and take an easy option of developing Green Belt land. The Council should make it a priority to bring back vacant homes back into use before land in the Green Belt is considered for development.
Do not believe that exceptional circumstances for building in Green Belt have been demonstrated. Need to protect all Green Belt land.
Stop industrialising Sefton. We need green belt and open spaces. Most people commute to work from here and like it that way.
There are 2000 empty school places in south Sefton. This should inform where homes are built. If builders were required to clean contaminated land this would be more cost effective than having to build new schools.

Policy SR1: Sustainable Growth and Regeneration

<u>CPRE</u> The Port part of the policy should make more reference for the need to minimise road use by freight and that any adverse effect on internationally important habitats will only be permitted if it can be demonstrated that no alternatives exist and there are "imperative reasons of overriding public interest". Compensatory provision will also be required.
<u>Peel Port</u> : Support the policy is respect of the Port.

The policy should be amended to make reference to the need for further growth in urban/rural locations including the Green Belt.
Part four of the policy should be clear that full, objectively assessed, housing needs should be met.
Whilst the policy is supported, the plan does not provide for enough homes to meet all Sefton's objectively assessed needs.
Too much reliance on the delivery of homes through regeneration
Policy should be more explicit about the opportunities to deliver regeneration on previously developed land and about the general sustainability credentials of using brownfield land which is well connected to existing settlements.
More emphasis on more homes for older people as this may free up homes for families.
Consider a greater supply of flats and higher density homes to reduce the land take-up.
Sefton is an area of commuter settlements with little industry. This is part of its attraction and we should not try to change this.
The plan is flawed as it assumes that encouraging economic growth is always desirable.
The plan does not consider planning beyond its boundaries and therefore cannot consider whether development may preferably be located in Liverpool.
It is well recognised that the social and economic benefits associated with construction are short lived. It's unclear what other employment creation the Council has identified. There is little noticeable support for local businesses or making sure that local employers employ local people.
What proportion of the purported jobs will be in short term construction?
Are we claiming that business growth is being frustrated by a lack of employment sites?
Include reference in policy to the potential for residential accommodation in town centres.
Support the plan's intention to meet housing needs, including open market housing, special needs, traveller pitches etc within the borough.
The plan is inadequate in setting a clear vision for north Sefton.
The growth strategy is based on an overly positive interpretation of economic data.

Policy SR2: Extent of the Green Belt

National Trust: The Council contend that the loss of 3.2% of its area would not amount to an exceptional change to the Green Belt. Bearing in mind that around 200 hectares, sufficient land to accommodate 5700 dwellings, together with a further 60 hectares of employment land would be involved, the Trust would not agree with this interpretation.
Knowsley MBC: Agree with the approach in the Preferred Options Report concerning the issue of safeguarded land to meet post Plan period needs. This is specifically that further such land beyond that set out in the Plan should not be identified unless informed by a potential future sub-regional Green Belt review, supported by a sub-regional Strategic Housing Market Assessment and a complementary review of employment land requirements.
Wirral MBC: Paragraph 8.24 implies that Wirral has agreed to participate in Merseyside review of the Green Belt. This is not the case.
Ince Blundell PC: Agree that Ince Blundell village has been identified as an 'inset' village in the Green Belt. Would like some clarification over the exact boundary to be inset and the status of the Carr Houses conservation area.
Blundell Estates: Support the identification of Little Crosby village being identified as a 'inset' village in the Green Belt
Object to Sefton village not being identified as an 'inset' village in the Green Belt
Green Belt boundaries should endure well beyond the plan period. Therefore to defer to a Merseyside Review for longer terms needs would be contrary to the Framework. The Green Belt boundary must be amended to include safeguarded land for longer term needs. The Council should therefore undertake a full review of its Green Belt taking account of the likely

need for development beyond the plan period. To exclude a greater area from the Green Belt now would give developers greater certainty
Land which no longer meets the purposes of including land in the Green Belt should be removed from the Green Belt.
The Framework states that Green Belt should only be used in 'very special circumstances', a definition, according to recent statements, that does not include housing need. If there is no way to avoid use of some Green Belt, a rational approach would be to release land sequentially with need. This would challenge current planning law/practice, which requires full release at the beginning of the process.
The review of Sefton's Green Belt boundary has not included a consideration of existing brown field sites. This is a missed opportunity.
Object to the fact that the plan has no real vision as to the future of the Green Belt. Will the Council secure its future, ring fence land in order to prevent being built on in the future?
Policy SR2 requires clarification as in its current form the policy wording is ambiguous. The policy states that the extent of the Green Belt will be maintained until a strategic review of the Merseyside Green Belt has been carried out, which is not anticipated to be commissioned until 2016. However, the supporting text to this policy states that the Merseyside Green Belt review is only intended to inform the identification of long term development needs, beyond the plan period, including the identification of 'safeguarded' land. Therefore, the Green Belt will be amended prior to the Merseyside Green Belt review, to reflect the release of Preferred Options Green Belt housing sites listed in Policy SR4 for development during the plan period. Policy SR2 should clarify the different stages of review and release of Green Belt land for development, as at present it reads that there will be no change to the boundaries until after 2016.
The policy says that a Merseyside sub-regional review of the Green Belt will be undertaken in about 2016. There needs to be a more firm commitment that this will occur. It is important that if the extent of a green belt is to be reviewed, the boundaries across Merseyside should be examined, not just those in one authority. The adoption of the plan as it stands would, effectively, pre-empt any consideration of the findings of a Merseyside Green Belt review.

Policy SR3: Housing Requirement

Organisations

<p><u>One Vision Housing</u></p> <ul style="list-style-type: none"> • Support policy SR3 and the general approach being taken. Consider that this will assist OVH to deliver more market and affordable housing
<p><u>The Home Builders Federation (HBF)</u></p> <ul style="list-style-type: none"> • Policy SR3 is not positively prepared nor based upon 'objectively assessed needs'. • Consider that whilst Option 3 is still on the low side, it is the most appropriate of the options tested when considered in relation to the evidence and Sefton's aspirations. • If Sefton wants to increase jobs and attract younger families through migration, it would need to adopt Scenarios 1, 5 or 7 of the NLP Study (700 – 2000 homes per annum). • At least 820 homes per annum would be required to meet the 2009 SHMA's affordable housing requirement based on the 30% provision indicated in policy PC2. • The backlog is likely to have increased since 2012, and a 20% buffer should be provided to account for non- or under-delivery.
<p><u>The Highways Agency</u></p> <ul style="list-style-type: none"> • the Local Plan proposals will require a sound evidence base • More information is required to understand how an extra 2,200 homes can be delivered in Sefton.
<p><u>Friends of the Earth</u></p> <ul style="list-style-type: none"> • The housing requirement figures are challengeable.

- Any future revision to the figures will be of little value if Green Belt has already been built on

CPRE Sefton

- In order to be found sound, the Local Plan must conform to government policy. Notwithstanding this, the CPRE fundamentally disagree with several aspects of government planning policy.
- Advocate a plan, monitor, and manage approach to the provision of housing rather than the Government's "predict and provide" approach.
- The housing requirement should be based on the 2011-based household and population projections, and not on the downwardly adjusted 2010 ONS sub-national population projections

Developers & landowners

Colliers, on behalf of Mactaggart and Mickel

- The housing requirement should have been based on Option 3 in order to plan for growth, meet demand in full, and stem out-migration from Sefton.
- The housing requirement is clearly and succinctly set out in the policy + paragraph 8.31 of the Preferred Option document. However, this needs to be corrected to include a 20% buffer as the Council has failed to provide a continuous 5 year housing land supply. This should also be applied to 2012 – 2015, leading to a total requirement of 12,129 homes, not 10,676 (equates to 674 dwellings a year not 510).
- The proposal to read just the housing requirement in light of the 2014 projections is unhelpful as it introduces further delay and uncertainty into the process.
- A 20% rather than a 5% buffer should be added to the requirement, to reflect a record of 'persistent under delivery' in Sefton. This would raise the total housing requirement to a minimum of 11,823.

Persimmon Homes

- A 20% rather than a 5% buffer should be added to the first 5 years of the housing requirement, to reflect a record of 'persistent under delivery' in Sefton. This would raise the total housing requirement to a minimum off 11,110.

Spawforths, on behalf of Harrison and Sons

- Policy SR3 is currently unsound and sets too low a housing requirement
- Option 3 is the most robust approach and is the most likely to meet the Framework requirements to meet objectively assessed needs for both market and affordable housing
- The downwards adjustments applied through the NLP study that underpins the housing requirement are not justified. If these adjustments are removed, the housing requirement stands at 700 per annum.
- The Council's assumed vacancy rate of 4% is not achievable
- The Preferred Option should match the vision which aims to increase jobs and attract younger families. This means considerably more than 510 homes a year.
- Meeting the critical need for 246 affordable homes a year (identified in the 2009 Strategic Housing Market Assessment) would require provision of 574 market homes a year (based on 30% affordable housing). This would require a total housing requirement of 820 per annum.
- A 20% rather than a 5% buffer should be added to the first 5 years of the housing requirement, to reflect a record of 'persistent under delivery' in Sefton.
- A housing requirement consistent with scenario's 1, 5 and 7 of the NLP work should be used, i.e. between 696 and 1,957 per annum.

How Planning on behalf of Taylor Wimpey UK

- A minimum of 820 new homes per annum is required to ensure that the annual need for 246 affordable dwellings is met.

- The backlog should be made up in the first 5 years (the ‘Sedgefield’ method).
- A 20% rather than a 5% buffer should be added to the first 5 years of the housing requirement, to reflect a record of ‘persistent under delivery’ in Sefton.
- An over reliance on Strategic Housing Land Availability Assessment sites or windfall sites could result in insufficient housing being delivered

Smiths Gore on behalf of the Hesketh Estate

- Support the proposed housing target and approach

The Emery Planning Partnership, on behalf of Mr Donnelly, Wain Homes and Formby Hall Investments

- the backlog of 1,113 dwellings should be met within the first 5 years of the plan period, in accordance with draft National Planning Policy Guidance. A 20% buffer should also be applied to the first 5 years. The revised annual requirement would therefore be 880 dwellings to 2017, and 536 thereafter.

The Emery Planning Partnership, on behalf of Wain Homes and Formby Hall Investments

- The annual affordable housing requirement should be 350 homes a year (not 246), and this figure is achievable.

Turley Associates, on behalf of David Wilson Homes and Barratt Homes Manchester,

- 510 dwellings per annum will fail to make adequate provision for future housing needs
- This target is based on highly optimistic assumptions about reducing the vacancy rate to 4%. No evidence has been provided to suggest that this might be achievable.
- This target will not result in an increase in jobs, attract more younger people to Sefton, or address affordable housing need. To meet these objectives, the housing target should be increased to between 696 and 1,957 dwellings per annum
- A 5% buffer is inadequate, and provides insufficient flexibility. This should be increased to 10-20%.
- The entire ‘backlog’ of 1,113 dwellings should be made up in the first 5 years

Strutt and Parker, on behalf of the owners of the Crowland Street site (SR4.4, SR5.e and SRS.1)

- Generally supportive of the proposed housing target of 510 dwellings per annum. However, consider that the Option 3 level of growth (700 dwellings per annum) has the potential to deliver the most benefits.

GVA on behalf of C P & S Ltd

- The Council appear to have chosen one of the lowest targets modelled within the evidence base, without adequate justification. The housing target should be significantly higher.
- 510 dwelling per annum is based on sustaining a vacancy rate of 4%. There is no evidence that this is achievable.
- The Framework requires plans to be positively prepared, ensuring that planning policies support economic and business growth. The Council has chosen to pursue an approach which has potential to restrain growth.
- The current housing target would reduce the number of economically active residents within the borough by around 11,260 people between 2011 and 2031. The number of jobs would also decrease, by around 6,520 over the 20 year period. This chosen level of housing delivery is effectively planning for economic retraction over the plan period.
- 510 per annum would meet only 61% of the borough’s affordable housing needs
- A higher housing target would: accommodate population increase, meet affordable housing need, retain young and working age residents, increase job opportunities in construction, increase local spending in centres, and reduce out-commuting.

Gladman Developments

- A target of 510 dwellings per annum is unjustifiably low and does not take account of the authority’s full, objectively assessed housing needs.
- The authority should not apply historic delivery or other supply constraints to the overall assessment of need.

- The Council's proposed housing requirement will not meet affordable housing needs in Sefton (246 dwellings per annum). This supports the need to increase the Council's overall housing requirement.
- The Council's previous under supply should be made up as soon as possible, and in the absence of evidence to suggest a longer timescale, within the first five years of the Plan.

Roman Summer, on behalf of the Craig Seddon SIPP

- A 5% buffer is inadequate and should be increased to 20% to reflect poor delivery in recent years.

Turley Associates, on behalf of the Mersey Care NHS Trust

- 510 dwellings a year will fail to make adequate provision for future housing needs
- NLP's reduction of the housing requirement from 696 to 510 is not based on any substantive evidence, and relies on the author's own interpretation of the available data.
- The assumed 4% vacancy rate is highly optimistic and there is no evidence that this can be achieved.
- 510 per annum will lead to an increase in affordability problems and will force young people out of the Borough. It will not meet identified affordable housing needs.
- The backlog should be made up within the first 5 years of the plan (the 'Sedgefield' approach), not the whole of the plan period. The Council's approach will exacerbate the acknowledged problems of 'pent up' need.
- A 5% buffer is insufficient, and should be increased to 10-20%, with a figure towards the upper end of the range justified in light of Sefton's persistent failure to meet its housing requirement.

Barton Willmore, on behalf of Robert Swift

- The housing target should be significantly increased to meet economic growth and population objectives, and to comply with the requirements of the Framework.
- The Interim 2011-based Household Projections are not a reliable basis on which to base a housing target. They project forward recessionary trends, and assume that household formation amongst young people will be significantly depressed (particularly in the 25-34 age group). This is a reflection of recent economic conditions and not housing need. National Planning Policy Guidance requires that the Projections are adjusted where "formation rates may have been suppressed historically by undersupply and worsening affordability of housing"
- 510 dwellings per annum assumes a decline of the resident labour force by 563 people per annum and decline in the number of jobs that can be supported by 326 per annum. In contrast, Sefton's Employment Land and Premises Study Refresh' (October 2012) assumes a growth of 3,400 new jobs between 2011 and 2031 (170 new jobs per annum).
- The objectively assessed need for Sefton is for between 977 and 1,030 new dwellings per annum to meet demographic and minimum economic led growth requirements.
- The buffer should be increased to 20% and met within the first 5 years
- Option 3 (700 dwellings per annum) would go some way to meeting objectively assessed needs for Sefton

Satplan Ltd, on behalf of Hallam Land Management and Nuffield College

- Policy SR3 is not sound as it has not been positively prepared or based on objectively assessed needs.
- Reducing vacancy rates would be challenging. Vacancy rates could equally increase.
- A housing target of between 696 and 1,957 would be necessary to increase jobs and attract more younger families.
- If market housing is to deliver the required affordable housing (at a rate of 30%), at least 820 new homes per annum are required.

Cass Associates, on behalf of Redrow Homes

- Policy SR3 should emphasise that 510 dwellings per annum is a minimum requirement.
- There is a case for a 20% buffer to boost supply given historic under-delivery

Network Rail

- Given the historic under-delivery in housing provision, the buffer should be increased to 20%

Roman Summer, on behalf of PSA Developments

- Given the historic under-delivery in housing provision, the buffer should be increased to 20%

Barton Willmore, on behalf of Countryside Properties, Persimmon Homes and P Wilson & Company LLP

- The housing target should be significantly increased to meet economic growth and population objectives, and to comply with the requirements of the Framework.
- The Interim 2011-based Household Projections are not a reliable basis on which to base a housing target. They project forward recessionary trends, and assume that household formation amongst young people will be significantly depressed (particularly in the 25-34 age group). This is a reflection of recent economic conditions and not housing need. National Planning Policy Guidance requires that the Projections are adjusted where “formation rates may have been suppressed historically by undersupply and worsening affordability of housing”
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- The buffer should be increased to 20% and met within the first 5 years
- Option 3 (700 dwellings per annum) would go some way to meeting objectively assessed needs for Sefton

NJL Consulting, on behalf of the Strategic Land Group

- 510 dwellings per annum is considered to be far below the actual requirement for Sefton
- This level of housing cannot meet the economic aspirations of the Plan.
- The draft Local Plan requires all larger developments to deliver 30% affordable housing. Therefore at least 820 homes per annum would be required to deliver the Borough’s affordable housing requirement
- The 5% buffer should be increased to 20%, to reflect the record of persistent under delivery in Sefton

MPs, political groups and parish councils

John Pugh MP

- The housing requirement is based on speculative 15 year projections. This is inappropriate given that Sefton is currently depopulating by about 500 each year.
- The Projections made by CLG should be used in preference to the analysis produced by Nathaniel Lichfield & Partners
- scenarios of population growth speculatively assume changes in the economic behaviour and activity of residents for which no rationale is given
- A target of achieving 4% vacant homes is unambitious
- Sceptical that the backlog of 1,113 homes should be included in the forward requirement

Liberal Democrats

- Query why 500 the answer again - this is remarkably similar to the target of 500 houses per year previously contained in the Regional Spatial Strategy for the North West.
- Concerns about the quality and accuracy of the data used to select the Preferred Option, particularly in relation to the population projections for Sefton.
- The population is declining. No robust evidence has been provided to indicate that this will change.

Sefton Green Party

- feels that Sefton should recognise the figures used for housing need are challengeable.
- The intention to revise figures in the future will be of little value if Green Belt land has already been released for development.

UKIP

- Sefton's population has been falling for over a decade. There is no reason why this trend would reverse.
- Figures based on the 2011 Census should be used in preference to those based on the 2001 Census
- There are a large number of properties for rent, for which tenants cannot be found. This indicates that the supply of local housing already exceeds demand.
- Nathaniel Lichfield & Partners also work for developers, and are therefore not independent
- The basis on which the 510 per annum figure has been reached is unclear
- The average household size in Sefton dropped by 0.1 persons between 2001-2011. This is half the amount assumed by Nathaniel Lichfield
- The 2010-based population projections assume a significant increase in international immigration. This assumption is contradicted by the 2011 Census.
- There are no national plans to increase international immigration – the assumptions are therefore questionable. ONS have a poor track record of producing accurate projections.

Formby Parish Council

- The NLP Study's recommendations for Formby do not equate with the actuality of the area. The housing market is very slow. Many 'new builds' have not sold.
- The jobs market is very unpredictable, and forecasts expect poor growth.
- Option 1 (270 dwellings per annum) should be used as the housing target

Hightown Parish Council

- The housing requirement is based on the assumption that the population in Sefton will cease to gradually decline and will start to increase over the next fifteen years.
- There is no shortage of houses in Hightown with properties for sale across a wide spectrum of price and accommodation.

Lydiate Parish Council

- Sceptical about the need for 510 homes a year. Sefton's population has been falling for many years, and it is not clear why this would reverse.
- Question why the requirement is so close to the former RSS requirement.

Meols ward councillors

- The figure of 510 houses a year seems to be a considerable over-estimate of the actual need.
- Unconvinced that the population estimates that underpin the draft Local Plan are robust. The assumptions about inward migration are not backed up by credible evidence.

Councillor Tony Dawson

- The Councils within the Liverpool City Region should work together to allocate more of the housing needs of the sub-region within Liverpool itself.
- The depopulation of Liverpool City needs to be not only stopped but reversed, to bring the workforce much closer to the retail commercial and industrial workplaces

Residents' groups and individuals

ReClaim - your communities

- Object to policy SR3 in its entirety
- The figure of 510 per annum is not based on any accepted household formation figures until those are published in late 2014
- The calculation of the housing requirement is not transparent and needs to be clearly explained

- Is there a policy or explanation as to how a 4% vacancy rate will be achieved?
- Any backlog should be counted against the Unitary Development Plan requirement for 350 homes per annum (not the Regional Spatial Strategy requirement for 500 per annum) before 2008.
- The 5% buffer exists alongside other “hidden buffers” including reserve sites and an over allocation of land against the requirement

FRAGOFF

- There is no 'pent up' demand for housing and therefore no need to add a backlog to the housing requirement calculation.
- The size of the backlog is wrong.
- Before 2008, the housing target was set at 350 dpa and Sefton consistently provided more. The decline in Sefton's population and the above average rate of vacant homes suggest that supply outstripped demand during this period. The market was also skewed by HMRI.
- Concerned that there is insufficient evidence to support increasing this number to 510 dwellings per annum from the Communities and Local Government estimate of 399.
- Consider that the Strategic Housing Market Assessment produced by Fordham Research is methodologically flawed.
- Questionable reliability of the 'Popgroup' model used by Nathaniel Lichfield & Partners

- Support the principle of building of additional housing if local young people are able to purchase or rent properties and remain in their home town.

- 3.2% of the Green Belt is a small price to pay to help alleviate the housing shortage in Sefton.

- 510 houses per year for 15 years gives a total of 7650 houses. However, the Champion 'wrap around' states the need is for 10,000 new homes. Where do the additional 2350 come from? 10,000 new homes divided by 15 years equals 667 per year.

- The Council is using out of date statistics. The latest Government data for Sefton indicates that less than 400 houses per year will be required. Sefton have refused to use these statistics stating that they are Interim and are therefore not reliable. Government statisticians have confirmed that this interim data represents the latest data and should be used.

- The latest Government data for Sefton indicates that less than 400 houses per year will be required – not 510.

- The house building targets are probably too high. They make assumptions about long term economic prosperity and the emergence of concealed households that the CLG data does not show.
- The long term trend that assumes that personal wealth will continue to grow at the same rate as it has done since 1945 are past. If this is the case then the demand for affordable and market houses will likely be less than is currently assumed, although demand for social housing may well rise.

- The projected figures for housing need are out of date and need independent scrutiny.
- The estimates of population used to justify this plan are not credible.

- Household growth figures are tentative - Governmental bodies do not have a good track record in this area. The figures imply a reversal of previous trends and yet no evidence is produced to support this.

- Sefton's population has declined every year since 1974. Increased ratios of household formation will not generate the level of demand as it does elsewhere in the country.

- The Plan should be delayed until all issues are thoroughly debated using up-to date demographic figures

- Has the population really increased by so much in the last few decades?

- Question the need for 10,000 new homes in Sefton. Only a small proportion of the planned housing is "affordable". Most consists of market-value houses.

- Question the level of housing development proposed and suggests extreme caution in interpreting projected data for housing needs. Demographic data can be 'spiky' and what may appear to be a trend can transpire not to be the case.

<ul style="list-style-type: none"> • The population statistics are out of date and the number of new homes is therefore too high. The figures seem to be easily adjustable to suit the required outcome.
<ul style="list-style-type: none"> • Future population figures are at best a 'guesstimate' at a time when all indicators show Sefton's population is falling.
<ul style="list-style-type: none"> • The evidence base is not robust and overstates the need for additional houses due to the flawed assumptions about inward migration and the level of backlog necessary in order to provide for pent up housing need.
<ul style="list-style-type: none"> • For whom are the new homes being built a) to meet current housing needs of those on waiting lists or b) based on projected population increase within Sefton?
<ul style="list-style-type: none"> • There are many vacant homes in Sefton – building more will only flood the Market
<ul style="list-style-type: none"> • The population of Sefton is declining, despite the fact that we are living longer. What makes anyone think that building new homes will attract additional people to the borough or help revitalise Sefton? • There has been a steady decline in Sefton's population of 5% over the last 20 years. Extrapolating these figures forward over the next 20 years may lead to up to 10% empty housing.
<ul style="list-style-type: none"> • Question the need to build the number of homes suggested. This should not solely be dependent on modelling carried out by external consultants.
<ul style="list-style-type: none"> • There is no need for more housing in Formby. There are 400 existing homes of all types for sale at present, and have been for some time. With so many homes available for sale, even for those on a low budget, is there any need for new homes in Formby (other than to satisfy government statistics)?
<ul style="list-style-type: none"> • There are already many houses, of varying values, for sale in Hightown and many of these are struggling to sell so we don't see the need for so many new houses.
<ul style="list-style-type: none"> • Further houses are necessary in Southport. There is a lot of stock on the market already for sale and the jobs do not exist in Southport to support a large amount of new residents.
<ul style="list-style-type: none"> • There is not a requirement for this amount of housing in Sefton and certainly not from the residents of Maghull / Lydiate.

Policy SR4: Housing Allocations and Phasing

The following are comments made specifically to the content of Policy SR4 rather than individual sites. Comments on individual site allocations are set out in Sections 10 – 14 which divide the sites into their different areas.

Organisations

Sport England:

- Sport England will oppose any housing allocation that would lead to the loss of any part of a playing field, or land last used as a playing field, unless one of its specific exceptions applies.
- No evidence has been provided that the proposed allocations meet any of the exceptions set out in Sport England's playing field policy, or those set out in paragraph 74 of the NPPF. Sport England would therefore look to oppose the allocation of sites SR4.6, SR4.7, SR4.12, SR4.26, SR4.33, 4.35, SR4.36, SR 4.38, SR 4.39, SR4.40, SR4.42 and SR4.43.

The Home Builders' Federation

- If "objectively assessed needs" are to be met, then further allocations must be identified to accommodate a higher housing requirement (see comments on SR3).
- The 'reserve' sites should be included as housing allocations to provide greater choice and flexibility and enable the Council to meet its backlog and 5 year supply.
- The HBF queries the urban capacity. Paragraph 8.34 states this is 5000 homes, but the Strategic Housing Land Availability Assessment only indicates 3879 homes once demolitions

have been taken account of. The Council needs to clarify the difference.

- The assumed density of 35dph on constrained sites is likely to be excessive and needs to be reviewed to prevent under-delivery. A more cautious approach is advocated.
- The Council has not identified any Safeguarded Land – this is contrary to the Framework para 83

The National Trust

- Concerns would be partially addressed if the release of green belt land was phased and required the prior development of non-green belt sites first.
- The Plan could initially identify sites to meet development needs to 2020 or 2022 – with other sites required for the rest of the Plan identified as reserve sites. These would only be released subject to a wider the review of the Merseyside Green Belt. The concept of reserve sites is already in the plan - a greater proportion of sites should be dealt with in this way.
- Developers would likely build on unconstrained Green Belt sites in preference to brownfield sites. The suggested approach would ensure that the Framework’s 5 year housing land supply requirements were met without the unnecessary release of Green Belt sites

The Environment Agency:

- Sites (SR1 – SR8, SR4.11, SR4.15, SR4.23, SR4.27, SR4.29, SR4.34, SR4.44, SR4.45, SR4.46, SR4.49, SR5a, SR5.c, SR5.d, SR5.e and SR5A.3) have potential constraints (they are adjacent to or contain a 'main river' and / or an 'ordinary watercourse').
- Sites that are adjacent or contain 'main river' and/or 'ordinary watercourse' should incorporate an appropriately sized habitat buffer strip from top of bank to the edge of development to provide habitat enhancement and offer development free protection.

The Sefton District Branch of the CPRE:

- Advocates a phased release of any re-designated Green Belt land, so that sites which contribute most to the purposes of the Green Belt are developed only if / when improvement in market conditions causes them to be needed.
- Object to the allocation of sites SR4.03, SR4.09, SR4.10, SR4.14, SR4.23, SR4.24 and SR4.25. Suggest that site S127 may have some potential as an alternative to these sites

Developers and landowners

Emery Planning Partnership, on behalf of Wainhomes

Support the proposed allocation of SR4.2 for homes, but would like a larger area to be included

Hesketh Estate

Support the proposed allocation of SR4.3 for homes.

Cass Associates, on behalf of Redrow

- Support the proposed allocation of SR4.3 for homes

Support the proposed allocation of SR4.16 for homes

Strutt and Parker, behalf of Mr and Mrs C Watmore

Support the identification of SR4.4 as a mixed housing and employment area, but would like to see greater flexibility on the mix of uses to allow for viability issues

Cunningham Planning

supports the allocation of site SR4.9 for housing and the phasing policy.

eLandor Associates, on behalf of Mr Birch

Support the proposed allocation of SR4.10 for homes

How Planning LLP, on behalf of Taylor Wimpey UK

- Support the allocation of Site SR4.11 for homes but think this should be expanded to the bypass

Supports the approach to phasing. This is flexible and would facilitate the delivery of housing on site SR4.11 in the short term.

Turley Associates, on behalf of David Wilson Homes

Support the proposed allocation of SR4.14 for homes
<u>Network Rail</u> Supports the proposed allocation of SR4.19 for homes, and would like the site near Lynton Road to be added as a proposed allocation.
<u>Sat Plan, on behalf of Hallam Land Management and Nuffield College</u> <ul style="list-style-type: none"> • Support the proposed allocation of SR4.23, although consider that the site area should be increased to 9.85 ha, and the number of dwellings to 260. • Do not support the proposed phasing policy relating to SR4.23, which is not considered 'sound'. No evidence is provided as to why Thornton / Crosby needs a phasing mechanism in terms of market delivery. This approach is not consistent with other areas in Sefton. • Once the Thornton-Switch Island link road is complete no phasing should be applied. <p>There are no constraints that would prevent the site being delivered at the beginning of the plan period, and the site could make a valuable contribution to reducing the Council's current housing land supply deficit.</p> <p>The Plan does not identify Safeguarded Land, as required by the Framework.</p>
<u>Hitchcock Wright & Partners, on behalf of Mr and Mrs Rushton</u> Support the proposed allocation of SR4.24 for homes
<u>NJL Consulting, on behalf of the Strategic Land Group</u> <ul style="list-style-type: none"> • Support the proposed allocation of SR4.25, and the number of dwellings assumed <p>Concern at the phasing – believe the site should come forward before 2015</p>
<u>P Wilson & Company, on behalf of Messrs A Swift & C Pittaris [299]</u> Support the proposed allocation of SR4.25 for homes
<u>Barton Willmore, on behalf of Countryside Properties (UK) Ltd; Persimmon Homes and P Wilson & Company LLP</u> <ul style="list-style-type: none"> • Concerned that the supply of sites in the urban area has been over-estimated • There are very few brownfield sites in Maghull and Aintree to support housing delivery <p>Support the proposed allocation of site SR4.27. This site can deliver 1,400 dwellings.</p>
<u>Savills, on behalf of Taylor Wimpey and Hallam Land Management</u> Supports the proposed allocation of SR4.27 for homes
<u>Mr Hancock</u> <ul style="list-style-type: none"> • Supports the proposed allocation of SR4.30 for homes
<u>Emery Planning Partnerships, on behalf of Formby Hall Investments</u> Support the proposed allocation of SR4.46 for homes but would like a larger site included. Furthermore they would like the site to available earlier and not within the list of reserve sites
<u>Colliers, on behalf of Mactaggart and Mickel</u> <ul style="list-style-type: none"> • Sites SR4.47 and SSR4.48 (Lydiate) should be housing allocations, not Reserve Sites. • The phasing policy for Reserve Sites is too prescriptive. • The policy also lacks clarity – is the provision of affordable housing that cannot be provided elsewhere (p. 36) another trigger to release Reserve Sites? There should be no correlation between providing affordable housing that cannot be provided elsewhere as this will be part of the on-site provision. • Any shortfall in the 5 year supply from 2015 should trigger the release of Reserve Sites. • Sites SR4.26 and SR4.27 (east of Maghull) could only be delivered from year 6 onwards, due to the need for substantial upfront infrastructure. • Support the approach to density (35 dwellings per hectare on 75% of the site).
<u>Property Collateral, on behalf of the Orchard Co-operative</u> <ul style="list-style-type: none"> • Support the proposed allocation of SR4.48 for homes, but would like this included as a main allocation rather than a reserve site
<u>Barton Willmore, on behalf of Robert Swift</u> <ul style="list-style-type: none"> • Concerned that the supply of sites in the urban area has been over-estimated • There are very few brownfield sites in Maghull and Aintree to support housing delivery • Reserve Sites should not be identified in the Plan – these sites should instead be converted into Housing Allocations

- Parcel S131 (Site SR4.49) could accommodate up to 90 dwellings

Turley's on behalf of Mersey Care NHS Trust:

- The assumed density of 35 dph across 75% of the each site is too high. This should be adjusted downwards, reducing the capacity of the proposed allocated sites. It is clear that more sites are needed.
- Proposes the allocation of an additional site adjacent to Ashworth Hospital

Gladman

- Sefton has a number of different and distinct housing market areas. Each of these will have their own requirement for housing and this should be reflected in the spatial distribution of housing supply within the Local Plan.
- The Local Plan should identify additional Safeguarded Land for development, consistent with the Framework.
- The release of appropriate Green Belt sites may be necessary to maintain a five year housing land supply at all times. In some instances this may be best achieved on sustainable, sites that do not benefit from a formal Plan designation.

Nugent Care:

- Proposes land at Clarence House School in Formby as an additional site for housing and a care home.

GVA, on behalf of C P & S Limited:

- The housing target should be increased, which will necessitate the identification of additional sites in Green Belt
- Concerns regarding the method of site selection, which have led to the allocations listed in Policy SR4. The Council has failed to apply the methodology fairly, accurately or consistently. This has resulted in the unjustified rejection of parcel S157 from the list of allocated sites.

Bellway Homes Limited

- See no merit in Reserve Sites – all Green Belt sites should be treated equitably and allocated from the start of the Plan
- Bellway Homes Ltd has an interest in one of the sites proposed for allocation.

Spawforth's, on behalf of Harrison and Sons:

- Further allocations in Green Belt will be required to accommodate a higher housing requirement (510 per annum is too low).
- The sites identified as 'Reserve Sites' should be included as housing allocations. This will enable the Council to meet its backlog and five year supply earlier in the plan period. It is clear that further sites will also be required to meet the revised housing requirement targets and these are also likely to require Green Belt land release.
- The capacity of the urban area in Sefton to achieve the supply of 5,000 houses does not appear to be supported by the 2012 Strategic Housing Land Availability Assessment, which only indicates 3,879 once demolitions have been accounted for.
- A more cautious approach should be taken towards density assumptions. An average density of 35 dwellings per hectare is assumed which is based on development of 75% of the site. This may not be achieved on all sites, particularly those with technical or environmental issues such as flood risk. Lower densities would have a detrimental impact on delivery of the housing, the Council will need to allocate additional sites to compensate for this.
- No Safeguarded land is included in the Plan, contrary to the Framework.
- Propose additional land at Kenyons Lane, Lydiate as a housing allocation

A number of landowners, developers, organisations and residents proposed additional/alternative sites or locations that they considered should be part of our housing allocations. These are set out in Section 15

MPs, political groups and local authorities

<p><u>John Pugh MP</u></p> <ul style="list-style-type: none">• Housing density assumptions ignore the need in Sefton for one bedroom accommodation for single people and unmarried couples
<p><u>Bill Esterson MP:</u></p> <ul style="list-style-type: none">• If the Office for National Statistics revised figures indicates a lower level of housing need, then the sites identified in the draft plan should be adjusted to reduce the impact on the communities most affected, especially where green belt and urban green space are concerned.
<p><u>UKIP</u></p> <ul style="list-style-type: none">• no sites which have been shown to have been prone to flooding in the past should be built upon. This will cause new dwellings to flood and affect the existing drainage system.
<p><u>Sefton Green Party:</u></p> <ul style="list-style-type: none">• The intention to revise the housing need figures in future will be of little value if Green Belt land has already been released for development.• The Framework states that Green Belt should only be used in “very exceptional circumstances”. According to recent statements by Eric Pickles, this does not include meeting housing need.• If there is no way to avoid use of some Green Belt, a rational approach would be to release land sequentially, recognising that current planning law / practice which requires full release at the beginning of the process could change.
<p><u>Liverpool City Council:</u></p> <ul style="list-style-type: none">• The phasing guidance is unclear. Paragraph 2 in Policy SR4 implies that planning permission will be granted immediately upon the adoption of the Plan, rather than the more realistic position set out in para 8.40 that "once the Plan is adopted, almost all the sites will be allocated for housing development almost immediately".

Residents' groups & individuals

<p><u>ReClaim – your communities</u></p> <ul style="list-style-type: none">• There should be a full review of pressures on Bootle and Sefton's school places before any former school sites are allocated for development• The proposed density of 35 dph at 75% site development on Green Belt sites, equates to 26.5 dpa net. This, and the proposed density of 30dph in urban settlements, is too low and would lead to wasted resources and sub-urbanisation.
<ul style="list-style-type: none">• Higher density housing, such as apartments, should be considered to minimise land take.
<ul style="list-style-type: none">• Brownfield sites should be developed before Green Belt sites are considered• Brownfield sites included are obviously available now and are not contaminated.
<ul style="list-style-type: none">• The 'reserve' allocations should not be built on in the event that the population figures prove to be inaccurate.
<ul style="list-style-type: none">• In order to meet a 5 year supply, Green Belt land will be released straight away. The amount of land set to be released in the Green Belt is far more than a 5 year supply.• Developers will prefer to build on Green Belt land than urban sites. Therefore releasing all of the Green Belt land so early will result in Green Belt being developed before urban sites. This contradicts paragraph 6.7 which says that the Council will try to prioritise urban sites.• Sefton should release Green Belt land in a slow, phased manner to top up the continuous 5 year land supply, not release it all at once to promote building on the Green Belt in preference to urban sites.

Policy SR5: Employment Requirement and Strategic Employment Locations

Organisations

The Environment Agency:

- A number of the proposed employment allocations (SR5a, SR5.c, SR5.d, SR5.e and SR5A.3) have potential constraints (they are adjacent to or contain a 'main river' and / or an 'ordinary watercourse').
- Sites that are adjacent or contain 'main river' and/or 'ordinary watercourse' should incorporate an appropriately sized habitat buffer strip from top of bank to the edge of development to provide habitat enhancement and offer development free protection.

Sefton CPRE

- Suggest further clarification is required in the drafting of the policy

Landowners and developers

Peel Holdings (Land and Property Group)

- Advocate the allocation of 70 ha of Green Belt land between Aintree and Maghull as an additional Strategic Employment Location. This site would be: accessible to communities in South Sefton, served by the rail and motorway network, support businesses that benefit from a location near the Port, and would be a natural extension to the Dunning's Bridge Road Corridor.
- Section 6 of the draft Local Plan does not adequately follow the approach to objectively identifying and providing for employment needs that is set out within NPPF paras 17-21.
- The Employment Land Study & Premises Study conflicts with NPPF, as it is backwards looking and based on historic take up. Past take up has been constrained by the amount and quality of available land, in the context of a tight Green Belt boundary. It is therefore an entirely circular calculation.
- The growth of the Port of Liverpool will shift employment demand towards locations that are close to the motorway or rail network. More strategically located sites are more likely to attract businesses into Sefton than peripheral or small sites.
- Port related manufacturing and logistics businesses often require more space and land flexibility than is available in the business park settings identified in the Local Plan.
- The Plan has very limited opportunities to attract a major business occupier. Many of the sites are considered to be in only secondary locations
- The Council has not demonstrated that its existing employment land supply is viable, and viability testing could reduce the amount of land identified.
- Sefton currently has a low proportion of manufacturing and logistics / warehousing jobs. Sefton's employment land supply is also the smallest in Merseyside.
- Recommendation 4 of the Employment Land & Premises Study suggests that a larger site in South Sefton may be necessary to meet future demand. However, the Local Plan has only identified a number of smaller sites in peripheral locations.

DPP, on behalf of Formby Play Sports Ltd:

- A further point should be added to Policy S5 to reflect that there are advantages from encouraging development where it would deliver a range of other benefits.
- Advocates the identification of land South of Formby Industrial Estate as an alternative Strategic Employment Location.
- Serious concerns are raised in relation to the proposed Strategic Site d): Land North of Formby Industrial Estate (13.8 ha). This land is less suitable than land to the south of the existing Industrial Estate in terms of sustainability, ecological, planning policy and access considerations.

Estuary Park Holdings Limited

- Object to the identification of Senate Business Park as a Strategic Employment Location. There is no reasonable prospect of the policy being complied with.
- The site has long been protected for employment purposes. However, there is no realistic prospect that such development will take place. Marketing evidence supports this contention. The site has been on the market for almost eight years and there has been no meaningful interest in development for employment uses.
- Identification of this site under policy SR5 would be contrary to NPPF para 22
- The allocation of this part of the site for employment is therefore unsound as it is not deliverable.

Barton Willmore, on behalf of Countryside Properties (UK) Ltd; Persimmon Homes and P Wilson & Company LLP

- Support the identification of the land to the east of Maghull as an employment location.
- Object however to the amount of employment land required, at 25 hectares. This amount of land is not justified, and is not consistent with the Council's own evidence base. In order to make this Policy sound, the reference to the amount of employment land should be in accordance with the evidence base – and reduced to around 15 hectares.
- The Framework Plan submitted shows that the employment land will be located within the north-eastern part of the site close to the junction with the M58.

GL Hearn, on behalf of S Rostron Ltd

- Supports the identification of Land North of the Formby Industrial Estate as a Strategic Employment Location
- Object to the restriction of development on the site to B1 uses only, which is inflexible. This requirement should be amended to allow for “a range of employment generating uses”.

Smiths Gore, on behalf of the Liverpool and Chester Property Company

- If Green Belt parcel SK001 (Land east of Bull's Bridge) is not allocated for housing or as safeguarded land, it should be considered for employment use or a mixed use development due to its close proximity to the A59 and motorway network.

MPs, political groups and parish councils

The Green Party:

- The definition of employment land is misleading in that it tends to ignore or undervalue the close mix of employment and residential areas.
- Employment land needs to be identified as a community asset and subject to high standards of visual and structural amenity, rather than "out of sight, out of mind".

Formby Parish Council

- The Parish Council has consistently stated it would like to see some development and enhancement of the Formby Business Park. Not adverse to some enlargement of the Park northwards.
- Would like to see the business park proactively promoted, especially to attract high value businesses.

Scarisbrick Parish Council:

- The proposals for additional business and employment opportunities within the area are welcome. However, the Parish Council is concerned about the additional traffic that this would generate on the A570. This is already a very busy transport link between our joint area and the motorway system, and subject to congestion. The Plan correctly emphasises the need for transport infrastructure to underpin economic growth and it is encouraging that improved access along the A570 corridor is seen as a priority (SR10 Transport).

Residents' groups and individuals

<ul style="list-style-type: none"> • The extra business park is supported, but would prefer it to be on lower grade agricultural land.
<ul style="list-style-type: none"> • Object to the proposed business park in Maghull. Concerned that this would in reality mean a large supermarket development. There are already empty business units / offices in Sefton Lane and a number on the Aintree retail park.
<ul style="list-style-type: none"> • Whilst Southport Business Park, Kew has poor accessibility, it is recognised that some businesses wish to have out of town office locations. This policy should say more about the dynamic of Southport Business Park, Kew which attracts investment to Southport but which also undermines the ability to attract higher value jobs to the Town Centre.
<ul style="list-style-type: none"> • Sefton is a post industrial, post recession commercial / tourist / dormitory where 40% of the jobs are in the threatened public sector. There is no shortage of brownfield land to provide for the Borough's medium or long term needs at a sustainable level, either in supply or demand terms. We are all for more homes and jobs; the point where you lose local residents is that there is a real, as opposed to a contrived, need to build in the Green Belt.
<ul style="list-style-type: none"> • The Council's 'Local Labour policy' (currently in the UDP) should be included in the Local Plan, possibly in policy SR5. The policy should be more strongly worded to state that it must be adhered to, and that it should apply to the whole of Sefton, rather than being an 'encouraging' request in south Sefton only. Developers should also be required to take on apprentices.
<ul style="list-style-type: none"> • More 'light' industrial units would be helpful.
<ul style="list-style-type: none"> • Road and rail links in and out of Sefton need further review if we are to truly attract bigger business to invest in business parks.
<ul style="list-style-type: none"> • The Plan states 7000 new jobs would be created over the building term – not clear whether these relate to the building programme or are they long term and if so in what industries • What jobs will the Local Plan create? Most people in Formby are happy to commute to Southport or Liverpool for work.
<ul style="list-style-type: none"> • The most recent Government statistics shed doubt on the necessity for large edge of town industrial parks, which threatens local traders and town centres.
<ul style="list-style-type: none"> • Despite the desire to generate additional employment in the area through the creation of new business parks, this will not be successful and new business units will probably remain empty. This has occurred in other Merseyside authorities which have already gone down this route. • There are empty business premises in Sefton already. No new sites are needed. • The existence of large areas of vacant and derelict commercial land / properties across Sefton, for which occupants cannot be found, clearly indicates that supply exceeds demand. No evidence has been put forward that would indicate from where all of the new demand will come. Only once all of the available land has been taken up should the creation of further such sites be considered - especially on green spaces and Grade 1 Agricultural Land.
<ul style="list-style-type: none"> • We are in favour of business parks, though we hope that some of the distribution outlets will be small scale to suit local pedestrians. We are in favour of job creation.
<ul style="list-style-type: none"> • I don't believe that most people who live in Southport work in Southport. I suspect the majority of the work in Southport is low paid. If you want a higher salary you need to travel, the industry simply isn't there in Southport.
<ul style="list-style-type: none"> • There are already empty units on the existing industrial estate. Which are the businesses that are desperate to come to Formby? There is no need for a new business park
<ul style="list-style-type: none"> • The need for further business parks in Southport does not seem necessary, from what I can see the business park on Benthams Way does not appear fully occupied and Kew, Southport and Birkdale industrial estates have many empty premises.

Policy SR5A: Primarily Industrial Areas and Employment Allocations

Sefton CPRE

- In paragraph 1, bullet 1, there is a need in Sefton for an area specifically intended to be attractive to prestigious high-tech companies, requiring good design of buildings, high quality landscaping and tight control of signage and advertising. It would provide employment opportunities for highly qualified local young people educated in first-class Sefton schools.

The Environment Agency:

- A number of the proposed employment allocations (including SR5A.3) have potential constraints (they are adjacent to or contain a 'main river' and / or an 'ordinary watercourse').
- Sites that are adjacent or contain 'main river' and/or 'ordinary watercourse' should incorporate an appropriately sized habitat buffer strip from top of bank to the edge of development to provide habitat enhancement and offer development free protection.

Sport England

- The proposed allocation SR5 A4 appears includes or comprise of a playing field (either in current use or last used as a playing field). Would oppose any allocation that is used [or was last used] as playing fields unless the site is shown to be surplus to pitch requirements (consistent with the Framework para 74).

Turley Associates, on behalf of Sainsbury's

- The policy should be amended and expanded to provide a more flexible approach to development within existing and proposed employment areas.
- The policy should avoid long term protection of employment sites where there is no reasonable prospect of a site being used for that purpose.
- Retail developments can provide significant employment opportunities that are both accessible & attainable to local people.

Policy SR6: Regeneration

Smiths Gore, on behalf of the Liverpool and Chester Property Company

- Strongly question the delivery of identified regeneration sites during the Plan period. It has not been demonstrated that these sites can be viably delivered. The sites will have long lead in times to secure funding and remediation, and will require significant upfront investment.
- Sufficient greenfield sites should be identified to meet housing needs.

- Concerned that previously areas of decent housing were demolished "in the name of progress" and home-owners forced out of their homes.

- Would like to see provision for those living in private housing to be given incentives / assistance to improve and update their homes, many of which are more than 50 years old.

- More emphasis needs to be put on converting former retail areas to housing in Southport Town Centre to assist its revitalisation e.g. on Tulketh Street.

- The Council should rethink its approach to Crosby Village centre. The Local Plan is a missed opportunity for dealing with the ongoing decline of Crosby Village.
- Sefton Council should ensure that redevelopment of Crosby takes place urgently. If the current policy of "talking to stakeholders and land owners" is maintained nothing will happen. The Council has a duty to be pro-active in achieving its stated objectives in the Local Plan, and realise the development value of its own land holding in the Centre.
- The Council should put pressure on Sainsburys to assist redevelopment in the centre. If necessary this should include the compulsory purchase of land to enable redevelopment to take place.
- Concerned that the redevelopment of some vacant sites in the Centre is not currently viable

- The Local Plan should concentrate on Crosby Village regeneration. For over a decade this shopping area has been subject to rumours about redevelopment.
- The Centre is the heart of the community. Its improvement would have a ripple effect which will improve the whole of the area.
- The rates payable on commercial properties is too high and is a big drain on local shops. This is driving out small local businesses.

- Crosby and Waterloo already have far too many licensed premises and too few niche business to attract enterprises into the area and stop the continuing decline.
- Greater effort is needed to find a way to work with current and prospective businesses to make the shopping areas affordable and attractive.
- Crosby village needs developing, but this has been promised for many years.

Liberal Democrats

- There is a need for a clear direction for the future of Crosby Town Centre to be set out in the Local Plan. Interventions by developers in recent years have hollowed out a formerly thriving Town Centre.

A Better Crosby

- Pleased that Policy SR6 Regeneration identifies Crosby as an 'opportunity for remodelling and regeneration' and that further guidance will be prepared to guide redevelopment proposals.
- Support the commitment to prepare a master plan approach for Crosby Centre and include a list of points the masterplan should cover

Roman Gee, on behalf of Maghull Developments Ltd:

- Supports the identification of Crosby & Maghull town centres under Policy SR6.
- Objects to current extent of Regeneration Area indicated in Central Maghull, and suggests that this should be amended.
- Asks that the proposed additional guidance for these centres should be prioritised.

- SR6 should be expanded upon, specifically in relation to Crosby and Maghull Centres which are in need of regeneration. Supplementary guidance for these centres would be a useful addition to this policy and would support the Local Plan.

Royal Mail

- Supportive in principle of the Council's regeneration objectives for Maghull Centre.
- Royal Mail wish to emphasise the need to protect Maghull Delivery Office from development that may adversely affect mail services provided from it.
- In order for Royal Mail's site to be brought forward for redevelopment, relocation will need to be viable for and commercially attractive to Royal Mail.

- The Local Plan states that Maghull Town Square will be enhanced. To cope with the increase in population the town centre will have to be made bigger, more shops, more parking. There appears to be limited space into expand into. The only option for new retail outlets is to create a new town centre away from the current location. This would negatively affect Central Maghull.

Sefton CPRE

- Suggest change of wording to policy SR6
- Urge the Council to be more ambitious in finding a means of regenerating contaminated sites which are otherwise suitable / intended for housing development. Development of these sites will reduce the need to redesignate Green Belt sites for housing.

ReClaim – your communities

- Endorse the development of 595-509 Hawthorne Road and the People's Site on Hawthorne Road for housing. At 50 dwellings per hectare, these sites could provide 600 dwellings
- Strongly object to the identification of the Klondyke area under this policy, and the redevelopment of other former HMRI sites such as Coffee House Bridge

Royal Mail

- Supportive in principle of the regeneration objectives for the Dunning Bridge Road Corridor.
- The Bootle and Seaforth Delivery Office (on Orrell Lane) is operational and Royal Mail currently have no plans to close or relocate it. Any redevelopment of land surrounding Royal Mail's site should be in a way that is sensitive to Royal Mail's operations.

Liverpool City Council

• This Policy identifies 495-509 Hawthorne Road (5.2ha) and Peoples site, Hawthorne Road / Linacre Lane (7ha), as "Regeneration Opportunity Sites" for which the preferred use is housing. However, they are not identified as housing allocations in Policy SR4. It is therefore unclear where they sit in wider supply of housing land.

• South Road (Waterloo) needs investment and regeneration to improve its attractiveness. Better use can be made of South Road's attractions such as the Marina, the sea front, the park, the historical houses, St. Thomas of Canterbury, etc. The environment is not sufficiently attractive for investors and only marginally so for residents.

• The future of the Plaza cinema, Civic Hall, and Library have been in the spotlight for some years. This site should be included in the Local Plan. The Civic Hall should be protected in community use.

• More investment needs to be directed towards south Sefton, which is becoming run down. The area around Kirkdale station is very run down and there are a large number of empty houses. The Council needs bring empty houses back into use and more owner occupied. This will help to improve the area'.

• Too much investment is going towards the northern (more wealthy) parts of the borough, and the southern parts are being overlooked

Policy SR7: Infrastructure and Developer Contributions

As yet there is no plan for providing the necessary infrastructure required to support 10,000 new households.

The infrastructure should be put in place first before new homes are built.

It is recognised that the proposed level of development will put significant demands on infrastructure, particularly the health service and schools. This is a particular pressure in Maghull where the proposed development is disproportionate to existing size of the village.

It can be unrealistic to expect long term worklessness to be resolved by moving people straight into orthodox full time employment. This is where the intermediate labour market and the third sector can play a key role in the transition from long term unemployment to work. The Green economy offers many opportunities for this such as community regeneration projects, and environmental projects, through organisations such as Groundwork and the Wildlife Trusts.

Concerns that existing infrastructure cannot cope with the proposed level of new development. This includes issues raised with regards to:

- Drains and sewers
- Schools
- GPs, health centres and dentists
- Shops
- Road capacity
- Public transport
- Open spaces and leisure facilities
- Utilities
- Council services

Particular problems occur in the areas which are proposed for large new housing areas, such as Maghull.

The Local Plan relies too heavily on ad hoc infrastructure planning and what concessions may be provided by developers. This approach risks a lack of integration, including between sub-districts. Only large developments would seem likely to bring infrastructure improvements and these will alter the nature of an existing local community.
The Local Plan does not clearly set out how and when the infrastructure, that will inevitably be required, will be provided.
While it may be possible to secure improvements to serve development at the local level, how can improvements to the wider infrastructure be secured? [example of the sewer network is given]
A number of the proposed development sites are on existing or former schools/hospitals etc. Wouldn't it make sense to retain these buildings/land to be brought back into use if required?
Para 8.68 should list all the strategic infrastructure required to support the plan.
An Infrastructure Delivery Plan is needed to clearly set out information on the infrastructure needed, costs and funding mechanisms. This should also set out the priorities and how these relate to other requirements, e.g. affordable homes.
CIL should be the only tool for collecting funds for infrastructure. Policy SR7 needs to explain that funds collected through Section 106 can only be used if they relate directly to the site and make the application acceptable in planning terms. Section 106 should not be used to secure wider infrastructure improvements or to solve existing deficiencies. The Council should produce a Section 123 list to set out clearly what infrastructure it would like to be funded through Section 106.
Infrastructure requirements placed on strategic sites must not make the development of the sites unviable, particularly given how important these site are to the Council fulfilling its housing requirements.
All development contributions sought must not be set at a level that makes development unviable. Evidence should be provided that shows that this is the case.
We need to move away from the 'big grid' approach to infrastructure provision and consider ways in which community schemes can provide key infrastructure requirements [e.g. water, energy]
Pleased to see that green infrastructure is listed amongst the infrastructure that should support new development.
Need to ensure that engagement with utility companies is done at an early stage so that development aspirations can be met without any delay.
How much unaccounted for space will be required to provide for infrastructure [such as schools, playing fields etc].
Existing deficiencies with infrastructure need to be addressed first before increasing new homes.

Policy SR8: Centres and Parades

Organisations

<u>The Theatres Trust</u> : Paragraph 23 of the NPPF states that a range of suitable sites should be allocated to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that these needs are met in full and are not compromised by limited site availability. LPAs should undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites. We do not see all of these elements in this policy. There are many references throughout the document to cultural development in town centres, but this is only mentioned for Southport town centre. Although the retail element is by far the most important, it should be stated that other town centre uses, such as leisure, recreational and cultural venues, provide vitality for your evening economy, of which there is no mention.
<u>A Better Crosby</u> :

- Welcome and support the objective of the draft Plan to support Sefton's town and local centres, together with the related objectives to improve access to services, facilities and jobs and to promote economic growth and jobs creation, as well as those relating to the built environment and design.
 - Support Policies SR1, SR6 and SR8 and especially where they refer to the Crosby centre, however they could be strengthened through recognising that town and district centres have the potential to be key economic drivers in a 'Thriving Sefton' through the allocation of sites / use of space for business and employment initiatives.
 - The centres are important transport (and particularly public transport) hubs and therefore support sustainability and accessibility principles.
 - The centres offer the opportunity for the location / co-location of a range of public services, e.g. Council, health, police, community facilities, etc.
 - The centres have the potential for more residential development in their vicinity, particularly for smaller / single person households, the elderly, students, households without cars, and people who require easy access to local services and public transport.
 - There is therefore the opportunity to increase the density of development in and around centres through the development / redevelopment of sites and the conversion / re-use of buildings and vacant upper floors. This will bring the added benefit of sustaining and further supporting the vitality and viability of centres and the use of public transport.
- Centres are the public image of local communities and can be an expression of local pride as well as providing the opportunity for bringing different sections of communities together through the shared use of (social) space.

Landowners & developers

Turley Associates, on behalf of Sainsbury's Supermarkets Ltd:

- Supports the aim of promoting retail development within defined centres.
- A clearer definition of what 'appropriate uses' would be permissible within shopping parades is required.
- Part 3 of the policy, which sets out the thresholds for retail impact assessment, is overly prescriptive & not consistent with paragraph 26 of NPPF. There is no current justification to depart from the 2,500 sq. m. threshold contained in the NPPF. The Retail Study needs to be refreshed in line with the NPPF to ensure the Local Plan's thresholds are fully justified.
- The Policy Maps should be amended to include the Primary Retail Areas (PRAs) within town and district centres and boundaries of Local Centres & Local Shopping Parades. This would add clarity to Policy.
- The Maps should also be amended to show clearly where more than one policy designation applies to a specific site / area e.g. Crosby District Centre should show district centre boundary, the PRA and the regeneration allocation.

Roman Summer, on behalf of Maghull Developments Ltd:

- Part 1: requests requirement for sequential assessment be clarified.
 - Part 3 of policy: concerned that it is confusing and the seemingly arbitrary choice of 800m & 300 sq. m. for impact assessment - the latter of which will undermine centres.
 - Support Pt 7, but requests minor amendment to wording to include 'or adjacent to'.
- Pt 7 - district centres - objects to 'small scale' and suggest that it should relate to all new retail development

Mactaggart + Mickel: as part of their plans for the development of SR4.47 (land north of Lamshear Lane) to provide a small element of convenience retail and community facilities as part of a sustainable and master-planned development. These would be in a form and scale akin to the 'Local Shopping Parades' set out in section 8 of Policy SR8. The development would not harm overall provision in the local area, would form part of the proposal from the outset, and would not adversely impact on the amenity of the surrounding / neighbouring area.

Political groups and other local authorities

The Southport Labour Party: concerned about the proliferation of bookmakers and 'payday loan' providers in Sefton's town, district and local centres. The Council should include a policy in the Plan that proposals for these uses will not provide a positive contribution to the overall vitality and viability of local centres. Although this is currently contrary to current planning law, this could change during the plan period.

Liberal Democrats:

- The Local Plan should aim to restrict the spread of betting shops (particularly given the prevalence of fixed odds betting terminals) and 'payday loan' shops, in order to avoid these uses having a negative impact on other developments in retail areas.
- Southport Town Centre requires significant redevelopment in the area between London Street and Eastbank Street via an iconic development which includes high-quality energy-efficient homes to fit a variety of income groups. Such a development would take pressure off the Green Belt via a mix of retail, leisure and housing in the Town Centre. A zone within the Town Centre for independent shops, possibly around the Market Street area, needs to be pursued. It needs both small independent shops offering a unique retail experience and sufficient modern retail floor space of the size that many national retail companies require. Both need to be facilitated via the Local Plan.
- The future of the sadly rather messed up Crosby Town Centre needs to be properly planned because the interventions by small and large developers in recent years have hollowed out a formerly thriving Town Centre. Without a clear direction which has community support via the Local Plan processes this issue will not be successfully resolved and Crosby will continue to suffer further retail stresses instead of developing a sustainable economic future.

Councillor Dawson: We need to take a more active role in bringing together projects which will encourage retailers to base their physical presence (shops) together in centres of high footfall - and identify and encourage other uses for those ex-retail premises left behind.

Councillors McIvor and Dutton: worry that the retail situation is not given more robust attention in the draft plan; we have concerns that our high streets are being taken over by bookies, payday loan companies and charity shops, and that the heart is being taken from some of our retail areas

Wirral Borough Council: Policy SR8 should be amended to make it clear that the impact on the vitality and viability of existing centres would include centres designated in the adopted Local Plan of adjacent authorities

Liverpool City Council: supports this policy as the proposed centres hierarchy is consistent and compatible with that for Liverpool.

Residents' groups and individuals

Crosby

- The Local Plan is a missed opportunity for dealing with the ongoing decline of Crosby Village.
- It is the duty of Sefton Council and the Planning Department to ensure that redevelopment of Crosby takes place urgently. If the current policy of "talking to stakeholders and land owners" is maintained nothing will happen. Sainsbury's have shown their clear intention not only to walk away from a supermarket redevelopment of appropriate design for Crosby, but also to do everything possible to thwart anybody else dealing with matters comprehensively.
- Confident that there are supermarket operators (and developers alongside them) who would jump at the chance to provide a more suitable retail offer for the village.

- The Local Plan should show much more detail and the Council should indicate that if a development is not forthcoming within a very short period of time that they will promote a Comprehensive Development Scheme supported by compulsory acquisition of the necessary property and land to enable the development to proceed.
 - Not only are Sainsbury's deliberately thwarting any development of proper "local and wider needs for shopping, leisure, culture and other services" the other land holder, Maghull Developments Limited, are unable to obtain funding for their proposed development on Central Buildings. Development on this site in accordance with the current planning consent which also envisages upper floor development is unlikely to be viable in the foreseeable future.
 - Sefton Council owes it to Crosby residents to be pro-active in achieving its stated objectives in the Local Plan. Furthermore the Council is missing an opportunity to realise the development value of its own land holding in the Village.
- The Council should rethink its approach to Crosby Village centre.

Maghull

The Local Plan says Maghull Town Square will be enhanced. To cope with the increase in population the town centre will have to be made bigger, more shops more parking unless you knock down houses in the vicinity of the square there is no space to expand into. The only option for new retail outlets is to create a new town centre away from the current location, this would turn Maghull into the new Skelmersdale.

More attention ought to be paid to parking generally but especially near shops and supermarkets. Over many years, charging to park close to supermarkets and shops has been and still is a deterrent and has affected trade, in some cases, severely. If we are to encourage investment we need also to encourage people willing and able to spend to do so and not exploit them by excessive parking charges. With land at such a premium it will be difficult to provide better and more adequate parking facilities in the Borough. The present economic situation adds to the problem. Better and clearer signage for car parks will help and a reasonable level of charging with perhaps some form of concessionary schemes to make the whole shopping experience an attractive one.

Southport

- Policies RS2 and SR8 should be much more explicit about the desirability of creating quality office and education sector jobs in Southport town centre. The town centre is the most accessible location by public transport and one ought to have specific reasons not to promote office based employment uses in the centre.
- The policy could also usefully identify the need for the centre to be a place for young people and the Plan should legitimise aspirations for additional Further Education Establishments in addition to the expansion of Southport College e.g. a faculty from one of the local universities. Such a strategy would also have positive effects in relation to regeneration (as evidenced in other seaside resorts that have secured university faculties) and in the overall age structure of the Town.
- Eastbank Street would benefit from attention to advertising and shop fronts.
- In addition to the tourist visitor economy, the Town Centre policies should be more explicit about the ability to host conferences, congresses and trade fairs in Southport and that a core goal of the Plan is to re-create Southport as a 'quality destination'. This would give a stronger context for policies relating to hotel capacities etc.

Why can't many of the shops which are currently charity shops be developed for sheltered housing for the elderly?

We need more domestic accommodation to be built above and close to the town centre areas to bring more life to these areas 7 days per week, including appropriate services for these expanding populations.

The functions of town centres (as places which are intrinsically the most accessible places by public transport) should lead to the Plan making key, high level statements about the 'location' of different functions / activities. The Plan currently lacks this 'high level' statement and there is therefore a weaker context for the various town centre strategies. In particular,

the Plan is flawed in that it fails to identify the importance of securing more (high value) employment in Southport centre as a key goal (in particular employment in offices and health and education services). This would give a real opportunity to reduce car based travel and above all will help to underpin regeneration of the centre through greater levels of investment, activity and footfall.

More emphasis needs to be put on converting former retail areas to housing in Southport Town Centre to assist its revitalisation e.g. on Tulketh Street.

Policy SR9: Mixed Use Areas

Turley Associates, on behalf of Sainsbury's Supermarkets Ltd: generally supports the policy's aims, but it should be expanded to promote mixed use development in all locations, to be consistent with Para 17 of NPPF.

DPP, on behalf of Formby Play Sports Ltd: Policy SR9 lists mixed use areas and the forms of development they are considered suitable for, which include offices and light industrial, health and educational uses, leisure and recreation, civic and community facilities and other uses. The representor's site south of Formby Industrial Estate is being promoted for an allocation (through other representations on Policies SS1, SR1, SR2, SR5 and SRF1) for a mix of uses, i.e., new offices, research and development facilities, light industry, sport and recreation (and provides the potential for a small extension to the existing Tesco foodstore and its car park). The Local Plan should consider whether such an allocation should be secured through this policy. If so, then the other relevant policies listed above, need to be amended to reflect this, Policy SR9 should be changed as follows:

'1. The mixed use areas listed below are suitable for the following forms of development: offices, research and development, light industry, sport and recreation, leisure, health and educational uses, civic and community uses, retail and related facilities if related to an existing retail use and which complement the main proposed uses and the character of the area:'

a) – f) as existing;

'g) Land South of Formby Industrial Estate.'

John Pugh MP: Potential of the town centre(s) in providing dwellings both above shops and in areas where following changes in planning guidelines unused retail units become once more residential. The potential for this to happen is under-estimated and betrays not only a misunderstanding of the changing face of retail but the absence of a retail or town centre strategy.

The Green Party The approach proposed is too cautious in mixing employment/leisure and residential uses. There is an opportunity to require high standard development which complements rather than obstructs all other types of development.

Policy SR10: Transport

Sefton needs to place greater emphasis on rail transport:

- Liberal Democrats: The Port. A greater emphasis needs to be made of using the Port rail access for freight. Peel Ports supports the Council's priorities for transport through the inclusion of 'improved access to the Port of Liverpool by a range of transport types'.
- Southport and improving linkages to both Ormskirk/Maghull and to Preston through reinstatement of the Burscough curves.
- The mainline to Manchester needs to be upgraded to have more frequent services and faster journey times.

Green Party and Friends of the Earth: The development should not be car-centric.

- Green Party – More needs to be done to promote other modes of travel and to restrict

<p>car usage.</p> <ul style="list-style-type: none"> • <u>Green Party</u> – Should promote electric car charging points. • More and better cycling and pedestrian links both for developments and to town centres and employment areas. • Cycling is briefly referred to, but no strategy or policy is apparent. There is a paucity of provision for cyclists in the Borough. Cycling is beneficial to health and the environment.
<p>The policy and the plan fails to address key sustainability and public transport principles:</p> <ul style="list-style-type: none"> • Development adjacent to sustainable and public transport • Improve Public transport and walking and cycling opportunities with new development • Office based jobs in or near town centres.
<ul style="list-style-type: none"> • SR10 should affirm that the addition of developer contributions and / or CIL will not make development unviable. • <u>Barton Willmore</u>: new railway station and park and ride facilities at Maghull North, as well as the upgrading of the motorway access at junction 1 of the M58 are priorities for the transport network in Sefton during the plan period. It is imperative that the Council identifies the funding for these critical, strategic priorities as soon as possible. They should be on the 123 list for CIL charging. • <u>How Planning</u>: the policy should not prevent development from coming forwards which is not served by a new access or junction on to the primary route network.
<p><u>Merseytravel</u>: If the Council decides to release Green Belt sites for development, provision of good sustainable transport links, especially in terms of public transport provision, should be an absolute pre-requisite. Merseytravel express an interest in working with Sefton whilst taking forward the work.</p>
<p>Economic and social benefits would be realised by creating a route from Crosby to Liverpool City Centre, along the coastline that is designed for walking and cycling.</p>
<p><u>Scarisbrick Parish Council</u>: The Plan correctly emphasises the need for transport infrastructure to underpin economic growth and it is encouraging that improved access along the A570 corridor is seen as a priority.</p>
<p><u>Network Rail</u>: level crossings can be impacted by developments in a number of ways. A transport Assessment should be produced that assesses this impact. Potentially a level crossing may need to be replaced if the impact cannot be successfully mitigated.</p>
<p><u>Sefton CPRE</u>:</p> <ul style="list-style-type: none"> • Insert an additional bullet point to Part 1 of the policy: Creating opportunities for existing transport to become more sustainable such as by promoting/installing charger units at appropriate places along routes (NPPF 35, bullet pt. 4). • Amend bullet points 2 & 3 of Part 2 of the policy as follows: <ul style="list-style-type: none"> ○ proposals which unless carefully controlled could lead to significant harmful effect on road safety, access or road capacity; or ○ proposals which unless carefully controlled could result in pollution levels in excess of those recommended.
<p><u>A Better Crosby</u>: supports the partial re-pedestrianisation of Crosby Town Centre.</p>

Policy SRS1: Crowland Street, Southport

Jo Lovelady on behalf of Mr and Mrs C Watmore : Whilst the site was originally identified for a pure employment allocation, we are encouraged by the Authority's understanding that housing needs to be allowed at the site to help the viability of a scheme. This is considering

the costs associated of abnormal ground conditions and the need for highways infrastructure and the provision of an improved electricity supply to Southport.

Whilst generally supportive of the Authority's intention (to have 50 % for employment land and 50% for housing land), maximum flexibility needs to be built into Policy SRS1 to allow scope for a higher degree of dwellings to be delivered. This is due to continuing concerns regarding the viability of the employment element which will need to be pump primed by housing development. Policy SR5 in fact suggests a minimum employment area of 7.5 hectares.

An initial review of viability indicates that the majority (around 75%) of the site will need to be proposed for housing to deliver a viable and comprehensive scheme on the whole site. There a numbers of factors that affect this that will depend on in depth investigation and a review of the economic conditions at the time of any detailed scheme being proposed, so this figure is purely indicative.

Policy SRS2: Southport Central Area

Cllr Dawson We need the large area between London Street and Eastbank Street in Southport to be built over with an iconic development including retail, parking, offices and a substantial number of high-quality energy-efficient homes to fit a variety of income groups. This would take considerable pressure off the local Green Belt.

The areas that are included are on the outskirts of the central area and little is mentioned about regeneration of local inner areas e.g. current road traffic management, walkways & current cyclist routes with the increase of traffic or effects of increased traffic. Improved lighting on bridge across Southport railway station between Virginia Street and Derby Road.

Grants available for current housing stock to be improved, or improvements in other local areas e.g. Shakespeare Street, Virginia Street, Upper Aughton Road have buildings and roads that are in need of improvement, support for local businesses and empty offices that could be occupied if affordable rents for small businesses.

John Pugh MP Potential of the town centre(s) in providing dwelling both above shops and in areas where, following changes in planning guidelines, unused retail units become once more residential.

The potential for this to happen is under-estimated by the council and betrays not only a misunderstanding of the changing face of retail but the absence of a retail or town centre strategy. Currently over 13% of retail floorspace is vacant. Town-centre occupancy, like city-centre occupancy, adds to the sustainability and vibrancy of the centre itself. There is huge potential in Southport in particular and further potential for purpose built quality apartments in town, which of course can be multi-storey.

It is difficult to resist the conclusion that Sefton in their strategy have simply followed the line of least resistance, employed data in an overly creative fashion and provided a menu that suits the taste of builders for fresh turf rather than faces up to genuine but tough challenges.

This Policy [and SR8] should be much more explicit about the desirability of creating quality office and education sector jobs in Southport town centre. The town centre is by definition the most accessible location by public transport and one ought to have specific reasons not to promote office based employment uses in the centre. The policy could also usefully identify the need for the centre to be a place for young people and the Plan should legitimise aspirations for additional Further Education Establishments in addition to the expansion of Southport College e.g. a faculty from one of the local universities. Such a strategy would also have positive effects in relation to regeneration (as evidenced in other seaside resorts that have secured university faculties) and in the overall age structure of the Town. SRS2 should include a policy concerning the scale and architectural quality of the Town Centre buildings and streets. This should facilitate an active policy of building conservation in any

redevelopment and regeneration and also secure good quality new buildings where existing buildings are not suitable for retention and where they do not contribute significantly to the street scene. This should also relate to advertising and shops fronts which can all too easily be devalued by security shutters and inappropriate adverts. Eastbank Street is a street which would benefit from such attention to advertising and shop fronts. In addition to the tourist visitor economy, the Town Centre policies should be more explicit about the ability to host conferences, congresses and trade fairs in Southport and that a core goal of the Plan is to re-create Southport as a 'quality destination'. This would give a stronger context for policies relating to hotel capacities etc.

Liberal Democrats: The Town Centre requires significant redevelopment in the area between London Street and Eastbank Street via an iconic development which includes high-quality energy-efficient homes to fit a variety of income groups. Such a development would take pressure off the Green Belt via a mix of retail, leisure and housing in the Town Centre.

Liberal Democrats A zone within Southport Town Centre for independent shops, possibly around the Market Street area, needs to be pursued. The Town Centre needs both small independent shops offering a unique retail experience and sufficient modern retail floor space of the size that many national retail companies require. Both need to be facilitated via the Local Plan for Southport to continue to flourish as a shopping destination of choice and quality.

Town centres are those places which are intrinsically the most accessible places by public transport. This should lead to the Plan making key, high level statements about 'location' of different functions/activities. The Plan currently lacks this 'high level' statement and there is therefore a weaker context for the various town centre strategies. In particular, the Plan is flawed in that it fails to identify the importance of securing more (high value) employment in Southport centre as a key goal (in particular employment in offices and health and education services). This would give a real opportunity to reduce car based travel and above all will help to underpin regeneration of the centre through greater levels of investment, activity and footfall.

Policy SRS3: Southport Seafont

What is the vision for Southport? Just building homes is not a vision. Some suggestions for Southport centre: Get Legoland or similar into Southport. Market Southport as a family friendly place to holiday. Create green park area around the station and town hall. Move shops from front to centre. Move plaza cinema into the town. Create Lakeside opportunities. Stop traffic on Lord Street on Saturdays, Sundays and holiday time.

The Green Party. More emphasis should be put on the environment value of the seafont as part of the visitor value. This should include a presumption in favour of development addressing the seafont rather than turning its back on it as Ocean Plaza does.

This policy should secure that development complements the theme of Southport as 'England's Classic Resort'. As such, provided the design quality is sound, re-establishment of Pleasureland on its former scale ought to be encouraged. The policy should make statements about retention and enhancement of key features such as the historic miniature railway and about encouraging greater use of the Marine Lake. The policy should also make statement about the scale of development. The reclaimed seafont area at Southport has been characterised by attractive open spaces and open-air facilities and one should secure that the end result is not simply buildings containing leisure facilities which are surrounded by ground level car parking. In view of the highly undesirable outcome on the redevelopment of Peter Pan's Playground into retail 'sheds' with a large area of car parking, the policy should not make any statement at all about 'enabling development' to secure overall leisure based redevelopment. It should also set out the value of informal green space in Princes Park and attractions such as the Pitch and Putt Golf.

Policy SRS4: Employment Sites in Southport

This is an important policy. As the Plan identifies, there is a shortfall in employment land in Southport and those sites that exist should be retained. An important site is the former Vulcan Motor Works at Crossens. In view of the historic nature of this site and the quality of the buildings, I suggest that the site is worthy of a specific mention within the Plan where it should not only be retained in employment uses but stringent efforts should be used to retain the existing buildings.

Policy SRF1: Land North of Formby Industrial Site

This section should be read in conjunction with Section 11 which considers comments on proposed sites in Formby.

Formby Play Sports Ltd The explanation and justification in support of Policy SRF1 cannot be substantiated (paragraphs 8.125+). Paragraph 8.125 confirms that as far as the Council is concerned the land north of Formby Industrial Estate is the only site which is suitable and capable of meeting the need for a new business park in the north of Sefton. This is simply not true. It is one of a number of sites that offer potential. It is though only one of two options that directly adjoin the industrial estate.

Of the two options, the land to the south is by far the most suitable, deliverable and sustainable option. The allocated site is affected by a number of existing constraints, would be difficult to access through the existing industrial estate, and has not been fully assessed by the Council or actively promoted for development by the landowner.

On the other hand the land to the south of the industrial estate has to be regarded as a better site in planning and sustainability terms and also has the potential to deliver a wide range of other benefits, including a range of new high quality sport and recreation facilities. Linked to the above, the evidence used to justify the allocation of the land to the north of the Formby industrial estate for business uses is flawed.

In due course the Highways Agency will require specific details of the proposal to assess its impact on the strategic road network.

GL Hearn on behalf of Rostron Ltd To provide sufficient flexibility Policy should be amended as follows: Policy SRF1 a) Development proposals will be for employment generating uses.

Formby Parish Council supports the northward extension of the Business Park. It would like the businesses currently located on the Mayflower Industrial Estate to relocate here, in order to make this area available for housing.

Policy SRM1: Land East of Maghull

More general comments are set out below. Other comments on the individual site allocation are set out in Section 13 below.

Barton Willmore on behalf of Countryside Properties [UK] Ltd; Persimmon Homes and P Wilson & Company LLP[the Consortium] The Consortium supports the Council's intention to allocate Land East of Maghull as a strategic allocation. The Framework Plan is submitted to support the Concept Plan submitted in support of Representations to the Core Strategy Options Paper in August 2011.

The Council identifies that it now includes a significant area of employment land of 15 hectares with the remaining land being 42 hectares of net residential developable area, 1 hectare for a Local Centre and approximately 27 hectares for public open space, SUDs and buffers and road infrastructure.

The Consortium considers that there is some ambiguity as to the site areas with reference to Policy SR4. Policy SR4 states that the site area for the land east of Maghull is 60.5 hectares with a capacity of 1,588 dwellings. Policy SRM1 includes the land east of Maghull with the site of the proposed prison for a minimum of 45 hectares gross of housing. Whilst the Consortium does not object because the first Bullet Point of Policy SRM1 states that there will be a minimum of 45 hectares gross, it considers that there is scope for the Council to further clarify the site areas of the Maghull East site and the prison site to provide greater clarity in the site areas and capacity of both sites.

The Consortium does not take any issue with the mix of proposed uses on the land east of Maghull, which includes residential, employment, a Local Centre, public open space and other infrastructure and sustainable transport measures. However, the Consortium does object to Bullet Point 2 of Policy SRM1, which identifies at least 25 hectares gross of serviced employment land on the east side. For the reasons set out in the representations to Policy SR4 and SR5, the reference to 25 hectares of employment land is not justified, as it is not in accordance with the Council's own evidence base within its most recent Employment Land & Premises Study Refresh (2012).

The Consortium considers that in order to make the Policy sound, it should make reference to 15 hectares of employment land on the site. If the Council were to take a different view, then it would consequently reduce the land available for residential development which would have the knock-on effect of reducing the capacity of the Site and meaning that the Council would need to identify additional housing land elsewhere in the Borough, and release further Green Belt sites for development.

The Consortium considers that the figure of 25 hectares may have arisen from earlier iterations of the Masterplan submitted to the Council in response to the 'Call for Sites' exercise in 2009 where an area of 25 hectares was shown for employment uses. The Consortium considers that there has been further work carried out with relation to this Site, both by the Council and the Consortium which identifies the more appropriate figure of 14 hectares of serviced employment land.

Part 4 of Policy SRM1: the Consortium objects to the statement that the development will deliver a new Maghull North Station and associated park and ride facilities on land to the north of School Lane. The Maghull North Station has been identified for some time as a strategic priority by Mersey Travel and also as a strategic priority by the Council. The Consortium considers that more correctly, the Maghull North Station should be delivered through developer contributions by way of a CIL levy.

The Maghull North Station will deliver benefits to the whole of Maghull and is not required to make the development of the Maghull East site appropriate in planning terms. There can, therefore, be no justification for acquiring the development of a new Station solely through contributions from the development of the Maghull East site.

In due course the Highways Agency will require specific details of the proposal to assess its impact on the strategic road network. This will specifically include the proposals for the M58 slip road and public transport infrastructure.

Mactaggart & Mickle : This site is developable in the post 2020 period due to its scale, size and associated masterplan requirements. It will provide limited numbers of homes in the period up to 2020. The benefits to be delivered are substantive in number. There is no indication within the policy or supporting text with regard to the timing of the new station and the provision of the new slip roads. Without certainty or funding and the unknown timing of their provision, the ability of this site to contribute to new housing pre-2020 is open to reasonable doubt.

Bill Esterson MP : a new station at North Maghull should be a priority and new shops and other employment land need to be part of the mix.

Canal & River Trust This major site allocation would result in the increased use of the canal towpath by pedestrians and cyclists in the vicinity of the site. This would place an increased burden on the Trust in terms of maintaining the towpath surface to an appropriate standard. The Trust would therefore request that the following criterion is added to SRM1.4:

“Appropriate improvements to the Leeds & Liverpool Canal towpath in the vicinity of the site in order to maximise its role as a sustainable route for pedestrians and cyclists”.
As detailed at 8.147, Whinney Brook runs through the strategic site, which passes beneath the canal in culvert in the vicinity of Damfield Lane. The Trust should therefore be included as the scheme for surface water disposal is developed and is pleased to note that discharges to the brook will be limited to existing rates.

Roman Summer, on behalf of Maghull Developments Concerned about implications of new local centre and possible competition to Maghull centre - unclear what 'appropriate scale' means.

Apparent neglect of new community facilities in the Plan. The 1960's construction of the Moss Park estate in Maghull included virtually no community facilities and very few shops. Only one (thriving) school was built there. People who live east of Moss Lane have absolutely no building accessible to the general public. It would be tragic to repeat the mistakes of the 1960's and to imagine that houses are the only real human need. Our population is not just growing but ageing. Children, teenagers and retired people need more community facilities, not fewer. If quite a high proportion of future residents of east Maghull may live alone, or become infirm, they are going to need new facilities close to where they live. Most people moving to a new area would like to see a range of small shops nearby, including a post office, a clinic, a nursery, a centre of community activity based on a church or "village centre", such as exists in Lydiate. Could the council require developers to include significant provision of buildings for use in some of these ways? The Tree View Court row of shops close to Maghull Station has got a number of shops currently out of use, boarded up and silent after dark. New residents of Area SR4.27 are likely to find no shops at all or any of the other centres we would like to see the developers include.

Bryan Smith Associates on behalf of Hunter and Seller families, support the proposed allocation of a comprehensive mixed-use development (SRM1). The opportunity to provide for residential and employment opportunities, supported by required facilities, contributes to addressing some of the identified Issues, objectives and vision of the plan.

The Hunter and Seller families are owners of land immediately adjoining the eastern side of Junction 1 (M58), the improvement of which is an integral part of the site specific Policy SRM1 and Policy SR 10 Transport. As owners of land that will be required for junction improvement to enable unrestricted directional access and egress, they are amenable to the accommodation of the required improvements to the motorway junction.

Network Rail : request that the council ensure that any walking routes or cycling routes do not include crossing the railway via a level crossing. Any material increase in the type or volume of users over a level crossing could potentially present issues of safety and performance. Any open spaces that are adjacent to the operational railway would be required to have trespass proof fencing adjacent to the railway boundary to ensure that the risk of unauthorised access from users of the open space, including minors, is mitigated.

Savills on behalf of Taylor Wimpey UK LTD & Hallam Land Management Ltd The Strategic Allocation at Policy SRM1 provides the Council with the opportunity to deliver sustainable strategic residential and economic development as part of a high quality urban extension that will meet the requirements of Sefton. Accordingly, TW/HLM provide full support to the Council's commitment to deliver beneficial development at the Strategic Allocation through the statutory development plan and so support the objectives for the site stated at Part (1) of Policy SRM1.

As part owners of the site, TW/HLM are keen to work with all the other landowners of the site to ensure the comprehensive, integrated delivery of this strategically important site in accordance with the requirements of Policy SRM1. Accordingly, TW/HLM agree with the Council that the best way to ensure this objective is achieved is to work with the other owners of the site to adopt a master planning approach to the delivery of proposals at the site and so support Part (2) of Policy SRM1.

TW/HLM agree that the site can deliver a number of significant benefits as a result of the development uses proposed and they note that subject to viability, it will be appropriate to secure benefits that are listed as part of Part (4) of Policy SRM1 through planning conditions, s106 and other legal agreements.

It is important to stress that one of the key benefits listed at Part (4) that TW/HLM is committed to through its land ownership is the delivery of the two slip roads at Junction 1 of the M58. It is agreed with the Council that the delivery of the slip roads will provide significant benefits to the surrounding highway network. The slip road will provide an appropriate access from the site to the local and national highway network. This will be of significant benefit to the users of the site. Given the focus of the road network at this end of the site, it seems appropriate that the principal access into the site is from the roundabout at the Junction of the M58. There is sufficient land here to deliver an appropriate access solution.

Harrison and Sons have concerns with the deliverability of the former prison site and its identification of a strategic allocation in the Local Plan. Given how important this site is to the Council in meeting its housing requirement, it is important that this site is deliverable and viable. There is a significant amount of planning obligations identified as part of this policy, including the provision of a new rail station and park and ride, contribution towards a slip road to Junction 1 of the M58 and social infrastructure and there is no evidence that the cumulative effect of these obligations could be viably delivered on this site. On these grounds Harrison and Sons are not confident this policy is sound and consistent with the requirements of the NPPF.

The concern regarding the viability and deliverability of this site to meet the Council's housing requirement would add further weight to the consideration of other housing allocations as part of Policy SR4 that will require release of Green Belt land on the edge of Maghull, or alternatively another strategic site which is deliverable. This is also discussed in the representations to Policy SR4.

Would like to see a new railway station at Maghull North. We always support better public transport links.

Policy SRB1: The Port and Maritime Zone

Wirral MBC The requirement under Policy SRB1 'The Port and Maritime Zone' for local mitigation measures to ensure there are no additional harmful impacts on the amenity of 'adjacent communities' should be amended to make it clear that 'adjacent communities' includes cross-river communities in Wirral.

Liverpool CC supports this policy. The City Council will continue to work with Sefton and other key partners to facilitate the Port expansion plans, including by making appropriate provision within its own Local Plan.

Sefton needs to be praised for the way it has actively promoted improvements to the port and improved and encouraged development there over many years. Certain we will all benefit from the improvements already under way in Seaforth.

ReClaim - your communities The investment in the port should be linked to the local plan as jobs for Sefton residents and business opportunities which are linked to the port development should be a key benefit of the major investment being made by Peel.

Peel Ports supports the inclusion of a specific policy, including reference to the key projects identified in the Mersey Ports master plan. They also support the extent of the 'Port and maritime Zone' shown on the Policy Map which is entirely compatible with the land use plans and aspirations of the master plan.

Although port expansion is needed for local economy fear an increase of heavy traffic that not only adds to more damaged local roads and increased noise but also adds to heavy pollution for local residents. Many trucks are now using Gorsey Lane as a short cut to avoid traffic on Church Road and Dunningbridge Road, it is only a matter of time before a child or elderly person are killed. To alleviate this problem it may be wise to consider re-opening of old rail track lines to carry freight from docks to a more convenient location.

Liberal Democrats Developing the presently all but mothballed rail link to the docks has to be a high priority especially as the Seaforth Container Terminal is to undergo significant expansion. The environmental benefits of rail over increased road traffic (and potentially a major new road) for the movement of containers must make the rail connection and its full use a very clear objective for the Council.

Highways Agency Keen to continue working and liaising with key stakeholders on the development of the major port proposals. This includes detail of the options for improved port access via the A5036, the potential for a link via the Thornton - Switch Island link road, and related developments that will initiate significant freight movement. Ask that reference to the 2011 study regarding improvements for the upgrade of the A5036 post 2020 be reflected in the plan. In relation to port-related development, the employment use within the Port and the potential for peripheral sites in Sefton to accommodate port-centric development needs to be made explicit. The Highways Agency will assess the potential impact of such development on the strategic road network, especially the A5036, and new trips between the Port and these sites.

ReClaim - your communities : the Local Plan makes absolutely no mention or reference to additional unidentified land requirement of 105 acres for port related purposes [as set out in the Port Masterplan]. There is underused and under-utilised industrial lands between Seaview Road (S) to N side Church Gardens and from Rimrose Road to Irlam Road. This is open to Port related re-development.

The Port Masterplan also makes explicit the extent of the expansion and effect on the road network. This includes options for improved road access including a potential route through the Rimrose Valley. There is nothing in the Local Plan on this proposal. Given the plan period of 2015 to 2030 road access to the Port is an obvious requirement only 5 years in to the plan period. There should be thorough consultation with all local communities affected.

ReClaim - your communities: We reject all the policies and references to the Port.

With the docks expansion and its obvious effect on increases in heavy transport, not at all certain that the route from Seaforth to the M57 will be able to cope with the punishment increased numbers of lorries will inflict. Difficult to see how that route may be improved except for widening at all points along the way giving rise to considerable disruption to local residents. Apart from this, the only possible alternative is to encourage the use of an alternative route from the container base along Knowsley Road/Southport Road/Bridle Way, joining Dunnings Bridge Rd at the Netherton pub. It might be possible also to make use of Bridle Rd and encourage traffic to turn right into Park Lane and then left at Aintree Station which can lead heavy traffic directly to the M57. Not certain if the logistics make this a feasible alternative or how we can persuade truck drivers to use an alternative and less congested route which will help reduce wear and tear on our roads.

6. Summary of representations: Section C – Environment & Resources

Policy ER1: Environmental Assets

<p><u>The Environment Agency</u> Part 3 of policy should require developers to open culverted watercourses, in order to improve water quality, improve habitat and reduce flood risk and so contribute to the requirements of the Water Framework Directive.</p>
<p><u>Natural England</u> Welcome 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. The Framework also includes requirements to protect and enhance public access and best and most versatile soils. Therefore the LPA should ensure they have adequately covered these issues in the next iteration of the Plan. Welcome the inclusion of soil as an environmental asset.</p>
<p><u>The Mersey Forest</u> Supports the adoption of a hierarchical approach to the protection and enhancement of environmental assets in Parts 2a), b) and c). In Part 2 of policy the reason for the hierarchical approach is clear for a), b) and c) but not for d) water resources/dune aquifer or e) land resources. Nor is it clear how this relates to the multi functionality of green infrastructure implicit in policy ER4 'Green infrastructure' and para 9.37. Is this a guide to allocating resources or to selecting sites for development? Need to make clear that The Mersey Forest is a partnership which includes Sefton (para 9.1, 9.49, 9.59). This will help clarify the role of Sefton in the partnership and demonstrate cross-boundary working contributing to the 'duty to cooperate'.</p>
<p><u>The National Trust</u> Scheduled [Ancient] Monuments should be added to the national heritage designations listed in Part 2. "Where appropriate" should be deleted from Part 3 and Part 4, consistent with the National Planning Policy Framework. Part 4 should be re-worded to refer also to the setting of Sefton's heritage assets, Para 9.31 should refer to a specific paragraph of the Framework (CPRE).</p>
<p><u>Sefton CPRE</u> Part 2(f) and para 9.3 should also refer to hedgerows</p>
<p><u>Sefton Green Party and Friends of the Earth</u> Policy, notably Part 3, is potentially contradicted by the proposed Green Belt release, e.g. loss of established habitats in the Green Belt. Vital to enhance, as well as protect, Sefton's valuable and high quality natural environment – this would benefit development, adding value to it. Enhancing the natural environment will be a positive stimulus to sensitive development. Must protect Green Belt and green space land from development. Well maintained green space and water space should form a corridor connecting urban space to the wider natural environment (coast and countryside) – beneficial to people's health, fitness, general well being and to biodiversity (by maintaining pathways – except for grey squirrels)</p>
<p><u>John Pugh MP</u> Plan takes little account of community, infrastructure needs, sacrifices agricultural land, side steps any assessment of flood risk, and puts the demands of the building industry above the demands of the community.</p>
<p><u>Peel Ports Group Ltd</u> Relevance of this policy noted in terms of the Mersey Ports Master Plan.</p>
<p><u>Formby Play Sports Ltd</u> Policy confirms the importance of Sefton's natural and heritage assets and its landscape character, and that a hierarchical approach will be taken to the protection and enhancement of Sefton's assets, with particular regard to designations. Query the employment allocation for land north of Formby Industrial Estate in SFR1 as much of the land is a designated nature site, and there are other alternative employment sites. The SFR1 allocation would seem to be at odds with Policy ER1. Policy ER1 should be given weight over Policy SRF1, and a new policy added regarding the allocation of land south of Formby Industrial estate (a better and more supportable option in planning and sustainability terms).</p>
<p>Policy should make clear that development (especially in the Green Belt) will be permitted</p>

only if is consistent with the 2003 Landscape Character Assessment of Sefton.
Government and Council should stop pretending that they are improving the natural environment if they are destroying it.
10,000 new households in Sefton will increase visitor pressure on the Coast's environmentally sensitive areas, e.g. dunes and the woodlands (already parking problems in Formby). Need to address this. New areas of greenbelt must be opened up for public use to reduce pressure on these sensitive areas.

Policy ER2: Nature Conservation and Enhancement

<u>Environment Agency</u> Welcome the inclusion of policy ER2 'Nature Conservation and Enhancement' due to the protection and enhancement it seeks to establish to the natural environment.
<u>Natural England</u> Protected species are briefly mentioned but could be specifically included in policy (see Natural England Standing Advice).
<u>Liverpool City Council</u> Not clear whether Policy ER2 offers protection from direct and/or indirect effects as a result of development in Sefton, for nature conservation assets beyond the Sefton boundary in adjoining districts. This includes internationally protected habitat sites.
<u>Wirral MBC</u> Support the policy subject to reference to the potential for cross boundary partnership working between neighbouring authorities to address the impacts of development on designated European Sites outside Sefton.
<u>The Woodland Trust</u> Welcome the policy's hierarchical approach to protection of natural habitats and assets. However, policy/ explanation should refer to the fact that some habitats (e.g. ancient woodland and ancient trees) are irreplaceable because of their age and complexity, and cannot be recreated once they are lost. Welcome the commitment to creation of new habitat wherever possible but this should not be at the expense of loss of habitats which are irreplaceable.
<u>The Mersey Forest</u> Need to clarify the hierarchical approach of this policy. E.g. If a site of local nature importance takes precedence over an urban park, this is potentially confusion and undermines a multifunctional approach to green infrastructure.
<u>The National Trust</u> Thrust of this policy is supported. Part 1, first para could be read as being unduly permissive and does not sit well with other parts of this section of the Plan - second sentence should be deleted. Part 2, first sentence should be reworded to say: "In exceptional circumstances where there is a compelling case for development which would adversely affect nature conservation or geological interests, mitigation or compensation including replacement provision will be required, where appropriate, under the terms of 1a to f above".
<u>Sefton CPRE</u> Policy should also protect undesignated assets, which are locally valued, and should make clear that that The Hedgerows Regulations 1997 will be enforced. First bullet point in Figure ER2-1 should refer to the "site boundary" not 'the site'. Para 9.21 should refer to the "unitary authority" not 'county'
<u>Sefton Green Party</u> The balance of this policy should be weighted more toward enhancement. Compensatory approaches to conservation are often too readily accepted for what is in effect unsuitable development.
<u>Peel Ports Group Ltd</u> Relevance of this policy noted in terms of the Mersey Ports Master Plan.
<u>Formby Play Sports Ltd</u> Policy confirms the importance of Sefton's natural and heritage assets and its landscape character, and that a hierarchical approach will be taken to the protection and enhancement of Sefton's assets, with particular regard to designations.
What is the planned 'compensation' for loss of habitat referred to in section 16.1 of the report to Council dated 27 June 2013, and the alternative habitat and Nature Improvement Area provisions referred to in section 17.7? What is the evidence for this; does not make much sense and few references in the Local Plan.

Policy ER3: Minerals

Wirral MBC Suggest that Policy ER3 'Minerals' is amended make it clear that planning applications would also be subject to rigorous assessment on the impacts on adjoining authorities where applicable

Cllr Dawson Oil & Gas exploitation: we need the government to identify implement and monitor processes to guarantee safe hydraulic fracturing technology. We need to ensure an appropriate process for sharing and distributing financial benefits of such mineral exploitation with the local population.

Friends of the Earth & Sefton Green Party Given the proximity of Fracking proposals to Sefton (and possibly at some stage in Sefton) the Local Plan should recognise the possible impacts of Fracking and seek to ensure no negative impacts for the people of Sefton. This would include a policy which expects an EIA for any such proposal, and stringent baseline and operational monitoring conditions for any proposal, and that any applications for unconventional oil or gas be considered by full planning committee.

Liberal Democrats Shale Gas extraction has to be a major issue for Sefton as exploration work is already happening in neighbouring West Lancashire and the license under which that is taking place also covers parts of our Borough. It is almost certain that the UK will need to exploit this source of fuel within the next few years yet the Local Plan is all but silent on the matter.

Southport Labour Party The requirement for Site Waste Management Plans which it is suggested is included in policy CC5 'Waste' should also be included in this policy, bearing in mind the potential for shale gas exploration in Sefton.

Make clear that development in Sefton (and particularly on the Green Belt) for Mineral Extraction only if (1) development is temporary (as per existing Unitary Plan), and (2) consistent with the Strategies and Policy Guidelines set out in the 2003 Landscape Character Assessment of Sefton.

Policy ER4: Green Infrastructure

Canal & River Trust Welcome the inclusion of policy ER4 'Green Infrastructure'. The Leeds & Liverpool Canal is a unique multi-functional form of green infrastructure and should be specifically referred Part 4 of the policy and para 9.38.

Environment Agency: Welcome the inclusion of policy ER4 'Green Infrastructure' which reflects many Environment Agency priorities. Policy should be expanded to include a section on Sefton's important waterbodies (links to Water Framework Directive). Need a requirement to protect and enhance the water environment - developments should lead to no deterioration, and where feasible should improve water quality, ecological quality/potential and geomorphology including de-culverting and removal on redundant structures in line with the North West River Basin Management Plan.

Natural England Welcome this specific green infrastructure policy and its emphasis on the importance of green infrastructure and multifunctional benefits. Good quality local accessible green space, ecosystems and actions to manage them sustainably offer a range of benefits. Will help deliver Sustainability Appraisal topic areas. Will help make sure that green infrastructure is an integral, cross-cutting theme.

Sport England Support the broad aims and objectives of this policy. Concerns about detailed policy wording and whether the policy would operate effectively – notably Part 3, Part 4, Figure ER4-2 (Sefton standards) and the emphasis on public open space provision standards which simply maintain the existing level of provision. Policy would weaken the level of protection offered to sports facilities compared to para 74 of the National Planning Policy Framework.

In Part 3, outdoor sports the quantity standard is simply the existing level of provision,

relates only to supply, not demand; assumes that the existing level of provision is sufficient to meet the existing level of demand, which might not be the case. A single standard for outdoor sports is only a blunt, high level indicator, e.g. might hide a surplus of golf courses but a deficiency of football pitches, and could allow the loss of a facility when there was a quantitative deficiency of this type of facility. Other local standards for sport and recreation might impact on the policy's effectiveness at some future date when the evidence base is updated.

Part 3 (b) would appear simplistic and not in alignment with guidance Sport England are currently preparing.

Part 4 seeks provision / enhancement of public open space in relation to new developments in situations including a deficiency compared to the standards. But if the standard is the existing level of provision, then could not show a deficiency (Sport England).

The National Planning Policy Framework (unlike PPG17) does not require local standards to be calculated for sport and recreation; instead, it requires (para 73) planning policies to be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. Sport England preparing national guidance on preparing Playing Pitch Strategies and these local needs assessments – neither advocates standards.

Para 9.46 is not factually correct; the Statutory Instrument merely requires consultation with Sport England.

Sport England: Whilst Policy ER4 deals with outdoor sport facilities, does not appear to be a policy that covers protection, enhancement and provision of built facilities for sport. If this is the case, then it is assumed local planning authority is happy for the NPPF to adequately address development proposals affecting these facilities.

The Woodland Trust Welcome the use of standards for public open space provision.

Welcome the policy of planting two trees for every new home, one for each parking space etc and the commitment to a two for one replacement ratio for trees which have to be removed.

Policy should advocate new woodland planting particularly as part of new development; woodland provides more benefits than individual trees in streets or parks.

Woodland Trust has developed an access to woodland standard: everyone should have access to a wood of at least 2 hectares within 500 metres of their home and a 20 hectare wood within 4 kilometres. This standard can be used to derive targets for the amount of new woodland which is needed in an area. Trust happy to advise.

The National Trust Add National Trust to list of partner organisations in para 9.59

Sefton CPRE Part 1 should refer to "footpaths and bridleways" not 'paths'.

Para 9.46 should refer to 5 years "from the date of the application", para 9.53 should refer to different paras of the National Planning Policy Framework (109 – 125)

Sefton Green Party Welcome the policy intent to protect, enhance and extend.

In Part 1 and para 9.38, Sefton's natural waterways, and the Leeds and Liverpool Canal should be included as key components of green infrastructure – corridors for people and wildlife.

Policy should highlight the health benefits (social and economic) of ready access to green infrastructure; and refer to allotments, "edible bus stops and train stations" as managed green infrastructure.

Policy should emphasis the scope to incorporate 'wild' elements in all green developments; should not focus only on tidy/pretty plants and animals.

Home Builders Federation Policy should not apply a uniform [open space] requirement, as this does not take account of existing surpluses of open space. Council should clarify this, based on a credible up to date evidence base.

The proposed economic viability assessment also needs to take account of the requirements of this policy.

Formby Play Sports Ltd Policy confirms the importance of Sefton's natural and heritage assets and its landscape character, and that a hierarchical approach will be taken to the

protection and enhancement of Sefton's assets, with particular regard to designations.

SAFE Productions Ltd Plan needs to give more, positive, emphasis to the importance of the Leeds Liverpool Canal as a key asset for South Sefton, in terms of green Infrastructure, historic assets or as a potential contributor to the development and diversification of Bootle Town Centre.

Policy's recognition of importance of landscaping welcomed but need to consider the bigger picture when assessing future needs. When new trees are planted [in Southport] they are often broken soon after planting – policy should address this.

Policy should recognise Sefton's landscape (set out in the 2003 Landscape Character Assessment) should be seen as part of its green infrastructure.

Policy ER5: The Sefton Coast and Development

National Trust Generally support the policy and the supporting text.

However, Plan should recognise the operational requirements at the National Trust's Formby Point site and the need to replace visitor facilities that will be lost as a consequence of coastal change. The National Trust site is extremely important for local tourism, ecology and nature conservation. 350,000 visitors per year, many from outside the region, contributing to the local economy.

Add to Part 3 of the policy: "This includes the replacement of facilities threatened by coastal change, such as the car park at the National Trust's Formby Point site." Add to paragraph 9.68 "It is recognised however that the replacement of certain existing visitor facilities affected by coastal change will be required".

Policy ER6: Heritage Assets

Ince Blundell Parish Council Broadly support policy; parish's heritage assets should be protected. However, prefer the heritage policy approach in the Unitary Development Plan 2006. Conservation Areas should continue to be shown on Policy [Proposals] Map.

National Trust Support, except Part 1 (third bullet point) and para 9.88 should refer also 'Registered Parks and Gardens "and their settings" ...'.

ReClaim - your communities : Broadly welcome and endorse the approach to undesignated heritage assets and local listing policy. Must apply Boroughwide so delete 'where appropriate' from para 9.96. Suggest sites in Bootle e.g. Carolina Canal Basin.

Policy ER7: Landscape Character

National Trust Policy is supported.

Sefton CPRE Para 9.101 should refer to "Relationships between isolated and nuclear settlements" not 'patterns of dispersed, or nucleated settlement including relationships between farmsteads' to remove ambiguity.

In para 1.102, add the following wording to the end of the first sentence: "its amenity value and the threat arising from the need for new transport connections to the Port of Liverpool" and delete 'and'/add comma in preceding list. Change 'or' to "and" in last sentence, change.

Add a new Part 3 to the policy to say that: "Development in Sefton (and particularly on the Green Belt) will be permitted only so long as consistent with the Strategies and Policy Guidelines set out in the 2003 Landscape Character Assessment of Sefton" (*sic*).

Policy CC1: Climate Change and Carbon Reduction

<p><u>Environment Agency</u> Welcome the inclusion of this strategic policy and related strategic objectives which reflects many Environment Agency priorities.</p>
<p><u>Liberal Democrats (and others)</u> The 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) - forward thinking and realistic. E.g.</p> <ul style="list-style-type: none"> • Energy conservation and the highest possible energy-saving/low carbon targets for all new developments • More district hearing schemes (as at Kew) and communal biomass boilers. A windmill or a bore hole for every say 20 houses, solar panels and electric car charging points in garages as standard • Identification of effective ways to improve energy use in the Borough's current stock of commercial and domestic buildings.
<p><u>Sefton CPRE (and others)</u> Need additional policy wording regarding encouragement of :</p> <ul style="list-style-type: none"> • Best use of sites, existing buildings, materials; innovative design and technologies • Cycling and walking by the provision of safe and convenient routes • Capture, storage and use of rainwater in both residential and industrial developments <p>Need additional wording in explanation:</p> <ul style="list-style-type: none"> • Aims of policy should include making a contribution to the UK meeting its Climate Change Act 2008 greenhouse gas emissions reduction targets and EU Renewal Energy Directive 2009 use of energy from renewable sources target. • Need for optimum positioning of paths and bus shelters in site/ building design and layout.
<p><u>Sefton Green Party (and others)</u> 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. Unless the Plan makes this distinction, it will be weakened in its role to shape development and will be less understandable as a policy document.</p> <p>New development must take full account of flood risk: that with unacceptable vulnerability must be opposed. Sustainable Urban Drainage Systems [SuDS] should be a requirement of all new developments, e.g. porous alternatives to concrete on pavements and driveways flood storage basins, urban marshes etc.</p> <p>Need to design cars out of more of the built environment, e.g. further pedestrianisation of centres, removing vehicles from some streets and 20 mph zones in residential area to reclaim them for all ages who live in them, car free communities.</p>
<p><u>Bellway Homes</u> Support the general nature of this policy and its recognition of the role of Part L of the Building Regulations.</p>
<p><u>Renewable UK- the trade and professional body for UK wind and marine renewables industries</u> Welcome the inclusion of this strategic policy and related strategic objectives. Support the identification of areas of search for wind energy, which is in line with national policy, the provisions for promoting wind energy development in any appropriate locations, and recognition that all projects should be assessed on their individual merits.</p>
<p><u>Turley Associates on behalf of Sainsbury Supermarkets Ltd</u> Welcome the inclusion of this strategic policy and related strategic objectives.</p> <p>Support the need to locate and design development in a way that is able to mitigate for and adapt to climate change.</p>
<p>We also need plenty of trees to be planted to replace the ones which will inevitably be pulled down.</p>

Policy CC2: Flood Risk and Surface-water Reduction

<p><u>Environment Agency</u> Welcome the inclusion of policy CC2 because it seeks to reduce flood risk where possible, promote development in areas at the lowest risk of flooding, ensuring new development does not increase flood risk on site or elsewhere.</p>
<p><u>Liberal Democrats</u> Plan does not give enough emphasis to flood prevention.</p>
<p><u>Bill Esterson MP</u> Concern about the impact of development on flood risk</p>
<p><u>Sefton CPRE</u> Section 2(b) of policy should be amended to include new text, so first sentence reads: "Surface water run- off rates and volumes ...for greenfield sites meet acceptable SuDS standards".</p>
<p><u>The Woodland Trust</u> Welcome the policy reference to creation of wetlands and other habitats to help alleviate flooding. Policy should refer to the role of tree planting and woodland creation in reducing flooding and improving water quality in appropriate locations.</p>
<p><u>United Utilities</u> There are a number of ways to dispose of surface water, depending on the nature of the propose development. Connection to a public sewer must be the last resort. Section 2(b) of policy should be amended to include new text, so last sentence reads: "Robust justification is required for any development seeking to connect surface water run-off to the public sewer network demonstrating why all other alternative mitigation measures cannot be implemented". United Utilities comment that they will seek strict enforcement of this policy at all times.</p>
<p>Policy takes no account of the effects of development on surface water and flooding problems outside the site. In the Alt catchment area flooding often originates outside the areas which flood.</p>
<p>Should not build on flood plains which are extensive in Sefton (as listed in the Council's Strategic Flood Risk Assessment 2013, e.g. its summary). Especially given climate change.</p>
<p>Better flood defences are needed. Should allow the extraction of emergency resources for defences, such as sand and rock extraction in the case of worst-case [flooding] scenarios.</p>

Policy CC3: Energy and Carbon Reduction

More general comments are set out below. Other comments on the proposed Windfarm area of search at Nice Blundell are set out in section 11 below.

<p><u>Environment Agency</u> Welcome the inclusion of this policy CC3 as it promotes a reduction of carbon emissions with Sefton.</p>
<p><u>The Woodland Trust</u> Woodland creation should be referred to as a possible allowable solution for zero carbon homes, like North Northants Joint Planning Unit draft core strategy.</p>
<p><u>Sefton CPRE</u> In Part 2 There is no evidence to justify the need for local standards and it is not clear how these would be established. Need a higher target than 10% as a renewable energy requirement for larger housing development schemes and major non-residential development. Section 4 should start: "Where development is not practicable..." rather than Where development is not viable ..." (Sefton CPRE)</p>
<p><u>Sefton Green Party</u> Welcome the inclusion of this policy CC3 as it promotes a reduction of carbon emissions with Sefton and environmental and other benefits and its reference to energy efficiency and decentralised energy options. Policy could refer to potential for development to be "car independent" as a key measure of reducing energy usage.</p>
<p><u>Bellway Homes</u> Part 3 should not require larger schemes to incorporate renewable energy measures for at least 10% of the energy requirements. Developers should be free to decide the most appropriate solutions to meet stronger Building Regulations requirements. Should not resort to Regional Spatial Strategy target.</p>

Part 4 should not refer to 'allowable solutions'. This is expected to be managed through Building Regulations.
Policy should cover only energy infrastructure. Strategic policy CC1 'Climate Change and carbon reduction' is sufficient to cover other energy issues.

Turley Associates [on behalf of some or all of David Wilson Homes & Barratt Homes, Mersey Care NHS Trust and Sainsbury Supermarkets Ltd] Supports in principle the need for development to be more energy efficient and reduce carbon emissions; however policy CC3 is unsound for a number of reasons:

Part 2 of the policy should not refer to 'locally determined' standards, unless this can be done in a way consistent with the Government's zero carbon buildings policy and adopted national standards. Part 2 should be removed.

Part 3 should not require larger schemes to incorporate renewable energy measures for at least 10% of the energy requirements. Developers should be free to decide the most appropriate solutions to meet stronger Building Regulations requirements. Part 3 should be removed.

Part 4 should not refer to 'allowable solutions'. This is expected to be managed through Building Regulations. Part 4 should be removed.

The reference in Part 6 to decentralised or district heating systems is not appropriately worded as a policy requirement. This is only possible under particular circumstances and for certain types of development. Part 6 should be removed.

Formby Play Sports Ltd Generally supportive of the policy, but it should include an exemption clause for non-commercial development schemes which would deliver community benefits, where their viability is threatened by additional cost of energy efficiency and low carbon design.

Home Builders Federation Part 2 of the policy should not refer to 'locally determined' standards. There is no evidence to justify the need for local standards and it is not clear how these would be established. They would stall development.

Part 3 should not require larger schemes to incorporate renewable energy measures for at least 10% of the energy requirements. This is not justified and will have a significant impact on viability.

Part 6 It imposes further burdens on developers and viability, and should be deleted.

Negotiation is not an adequate defence as the onus of proof lies with the Council.

Renewable UK- the trade and professional body for UK wind and marine renewables industries Welcome the inclusion of this policy CC3 as it promotes a reduction of carbon emissions with Sefton and environmental and other benefits.

In part 5 and explanation, welcome the Renewable energy capacity study and identification of a search area for wind energy, in line with national policy. Also support the provisions for promoting wind energy development in appropriate locations, and its approach that all projects should be assessed on their individual merits.

Renewable UK also comment on issues to be considered when assessing renewable energy proposals (paras 10.34, 10.35):

- Shadow flicker is easily modelled and can be predicted and taken into account in a design stage. Potential effects on homes can be mitigated, e.g. tree planting (screening) or programming the turbines to stop operating during the brief periods of time when shadow flicker occurs. Generally, shadow flicker is easily addressed via planning conditions.
- Community Benefits were introduced as a good will gesture and should not be seen as 'compensation for impacts', in contrast to planning obligations which make a proposal acceptable in planning terms and relate to impact of the development. Developers have introduced community benefits as goodwill gestures in addition to any planning obligations or conditions – genuine and tangible additional local benefits for communities which accommodate onshore wind projects. As they are voluntary contributions, community benefit should therefore be separated from planning decisions and should be based on the specific needs of local people, not on the

<p>impact of the project. Thus community benefits should not be included in the Plan in relation to mitigation, but as a separate issue to be discussed alongside the planning process.</p>
<p>Should adopt locally the highest possible energy-saving and low-carbon targets for all new buildings, and seek methods to increase energy efficiency and improve energy use in existing industrial, commercial and domestic buildings.</p>
<p>There should be more wind turbines in the Irish Sea close to the Sefton coast.</p>

Policy CC4: Making the Best Use of Resources

<p><u>Environment Agency</u> Welcome the inclusion of policy CC4 'Making the Best Use of Resources' as it promotes sustainable resource use</p>
<p><u>Sefton CPRE and Sefton Green Party</u> Part 1b, bullet point 1 should be amended to include "capture, storage and use of rainwater" where practicable.</p>
<p><u>ReClaim - your communities</u> Delete Part 3, which sets out a density standard of 30 dwellings per hectare.</p>
<p><u>Bellway Homes</u> Delete Part 3, which sets out a density standard of 30 dwellings per hectare. This is contrary to the National Planning Policy Framework, not backed up by evidence, and unsound. Densities vary by location and time (market conditions) and therefore, whilst only an indication, we would prefer this to be removed from the policy.</p>
<p><u>Turley Associates [on behalf of some or all of David Wilson Homes & Barratt Homes, Mersey Care NHS Trust and Sainsbury Supermarkets Ltd]</u> Support the objectives and principle of this policy, but reference in Part 2 to "any future locally determined standards" should be deleted.</p>
<p><u>Countryside Properties [UK] Ltd; Persimmon Homes and P Wilson & Company LLP</u> Delete Part 3, which sets out a density standard of 30 dwellings per hectare.</p>
<p><u>United Utilities</u> Part 1b, bullet point 4 should be amended to include "inclusion of permeable surfaces wherever feasible to reduce surface water run-off"</p>
<p>Use of permeable material where possible is important. All options for reducing surface water run-off from new development and implementing solutions (where viable) should be considered, in order to reduce potential flooding.</p>
<p>Emergency resources such as sand and rock extraction should be used to construct flood defences (including from sites outside Sefton) in case the worst scenario occurs.</p>

Policy CC5: Waste

<p><u>Southport Labour Party</u> Site Waste Management Plans should be required as a planning condition on all major development projects. This would also support Policy ER3 'Minerals'.</p>
<p>Sefton should commit to a Zero Waste Policy</p>

7. Summary of representations: Section D - Community

General

It seems that community and recreational needs have been neglected in the plan. It would be tragic to repeat the mistakes of the 1960's and to imagine that houses are the only real human need.

Sefton Partnership for Older Citizens: Must consider the housing and transport needs of older citizens. It is unclear if these needs have been taken account of in Local Plan. Should provide older people's accommodation on Council owned sites.

Policy P1: People and Places

If noise and pollution are a serious issue, then there should be no development near to Woodvale airfield.

Whilst inequalities in the borough are recognised, increasing development and therefore pollution across Sefton will actually make people's lives worse and increase poor health and death.

Poor quality health and health inequalities between areas is a really important issue to address.

The policy is imprecise and vaguely worded.

The impacts of the ageing population and mobility issues have not been adequately addressed in the plan.

What exactly does 'local participation in decision making' mean and isn't that already the case/do you need it embedded into policy?

Policy PD1: Design

Southport Labour Party – This policy should allow for local design reviews in accordance with paragraphs 62 - 64 of the NPPF. There is no provision for a local panel. We suggest there should be 3 in Sefton corresponding geographically with the 3 Areas Committees.

A Better Crosby – draw attention to the advice in the following documents offering strategic guidance: 'Large-scale Urban design –getting the picture right' (CABE) 'Environmental Quality in Spatial Planning – guidance to help in the preparation of Regional Spatial Strategies and Local Development Frameworks' (English Heritage)

Support the inclusion of policies which explicitly consider:

- Use of the services of 'Places Matter' to provide 'Design Enabling' and 'Design Review/Appraisal' for large/major development proposals.

The importance of high standards of design and environmental improvement along some of Sefton's key transport corridors/radial routes. These might include the Bridge Road/Linacre Road/Stanley Road and the Dunnings Bridge Road corridors; the main rail corridors; and the Leeds- Liverpool canal corridor. All of these affect the perception of Sefton as a place to live, work and invest in.

All void shop fronts should have a standard façade to keep shopping centres and high streets looking attractive.

CPRE – The Local Plan and policy PD1 fail to specify the circumstances under which a Design and Access Statement is necessary.

CPRE Par. 11.14: Add to end of paragraph: In this context, new development should be understood to include modernisation of buildings of historical and cultural significance.

Canal and River Trust – Supports the policy which appropriately reflects and expands on the guidance on design set in the National Planning Policy Framework. The canal corridor has a significant role to play in achieving the points listed at PD1.3, particularly in terms of

connecting to existing travel corridors and improving safety and security through natural surveillance and the creation of active frontages.

Sefton and Merseyside need to work to redress the balance presented in most of the media that crime is rampant. More work needs to be done to design out crime.

Liberal Democrats

- Should encourage the installation of sprinkler systems in all new commercial property builds in the Borough and retrofitting into older properties?
- Surprised that the policy doesn't address serious crime issues (especially given the amount of gun crime in Bootle).

Policy PD2: Education and Care Institution Sites in the Urban Area

Sport England Note that policy is permissive, allowing for development which meets certain criteria.

Part 2 c) provides less protection for playing fields than the National Planning Policy Framework (para 74), and 'sufficient provision' should be defined. Policy could allow development of a playing field where the quantity of remaining provision might meet education requirements but would not take into account community need for the playing field.

Education and planning have different legislative, procedural and consent regimes and definitions regarding playing fields and there is a concern that what is acceptable under one regime may not be acceptable under the other. For example, the School Premises Regulations 2012 only require "suitable outdoor space" to be provided in order to enable physical education to be provided to pupils in accordance with the school curriculum; and pupils to play outside. [There is no emphasis on community needs].

Development for educational purposes (say a new build school or an extension) can often result in tensions between the need to develop land for educational purposes and the need to protect land and buildings for sport and recreation. It is the role of the planning system to understand and balance these competing interests. The proposed policy would prevent the planning system from trying to resolve such tensions by appearing to prioritise non-playing field considerations. Could have a wide impact. Nationally, educational institutions typically contain a high proportion of the stock of sports facilities, e.g. artificial grass pitches. The policy would potentially allow this stock to be eroded as long as educational need was still met irrespective of whether these playing fields were helping to meet (or had potential to meet) wider community sporting needs.

Concern that Part 3 allows for development of sites formerly but no longer used as schools, colleges or other institutions as long as other local plan policies are met. Could result in development of playing fields and other sports facilities that are not genuinely surplus to requirements.

Sefton CPRE Insert a new part to the policy after Part 2 (under the same heading): "Because educational establishments are uniquely well-placed to introduce young people to the requirements for sustainable living, their design should exemplify as wide a range as possible of green technologies, for example exploitation of solar and wind power, green roofs, minimum use of artificial light, conservation of water, etc"

Policy PD3: Development in the Green Belt

Formby Play Sports Ltd – This section would benefit from additional albeit brief guidance on types of circumstances that might enable what would otherwise have to be regarded as inappropriate development to be supported because very special circumstances can be demonstrated.

There should be qualification in the supporting text to explain what is meant by expressions

such as 'materially larger' and 'disproportionate additions' to provide clarity as to what will and what will not be acceptable development within the Green Belt.

Smiths Gore – Have concerns about criterion (b) of part 4 of the policy (changes of use of existing buildings). Due to the current economic climate, it is felt that the requirement that the building should have 'been in existence for more than 10 years or the agricultural use did not permanently cease more than 3 years before the date of an application' is too onerous. Many agricultural buildings have ceased use over the past 3 years but due to the higher costs associated with conversion compared to new build, conversion may not be viable. The buildings should be considered in the same way as non-designated heritage assets.

Detailed comments are made on the wording by some representors.

Maghull Developments object to the draft Local Plan's failure to recognise Formby Hall Golf Resort as a special case in the Green Belt. They request that the facility be given special recognition in the Local Plan and maybe a bespoke policy that pledges support for and encouragement of the maintenance and appropriate expansion/improvement of the facility.

A number of supports for the policy.

Policy PD4: House Extensions and Alterations

Should add a section stating that "Extensions that exploit sustainable materials and technologies will be encouraged".

This policy seems admirable, but fail to see how it can be implemented, given the current Government's own policy of laissez faire towards home extensions.

Policy PD5: Telecommunications

Detailed comments on supporting the development of communications whilst being more protective of important landscape features and ecology.

Policy PD6: Advertisements

Support policy, object to its non-implementation and enforcement. The policy is a continuation of current policy, which has not been applied, nor enforced.

Adverts fixed to street lighting columns create clutter and distract motorist and therefore compromise safety.

Add - Signs in open countryside, other than necessary directional signage, will not normally be allowed as these can detract from the intrinsic character and beauty of the countryside.

Policy PH1: Health and Well-Being

Formby Play Sports Ltd Proposed changes to the policy are as follows:

The Council and its partners will help to improve environments and places and facilities that encourage people to play sport and/or get involved in recreational pursuits and generally lead healthy and active lifestyles.

Green Party

- Unrealistic to attempt to fully improve health as the factors are complex and varied. In simple terms there is a need to put health at the core of the strategy. It remains a major concern that Sefton is in the lowest quartile for England for life expectancy, and the disparities across the borough are very marked.
- Need to improve engagement with communities to allow them to voice their solutions. Economic growth and housing not all of the answer.

Sefton needs to be ambitious in its approach to well being and should not be afraid to use the word "Happiness" as an aspiration for its people.

The Policy is supported, in particular the acknowledged importance of improving access to special places valued for qualities such as tranquillity, fresh air and refreshment.

Amend part 3 of the policy "The proliferation of food and drink and hot food takeaway outlets (Use Classes A3, A4 and A5) will be managed and restricted in established retail areas and town and district centres".

Reason: The above amendment is crucial due to the proliferation of A3, A4 and A5 Uses, like parts of Waterloo, Southport, Bootle and Crosby Village.

Policy PH2: Food and Drink Uses

A number of schools support the proposed restrictions on takeaways near to schools, whilst recognising that it is just one of a package of measures required to address childhood obesity.

There is UK and International research evidence indicating that children who attend schools near fast food outlets are more likely to be obese and less likely to eat healthily. This is a concern. Therefore, we welcome the proposed policy PH2 Food and Drink, that hot food takeaways within 400 metre walking distance of secondary schools, sixth form colleges and borough and district level parks will not normally be granted permission. However, we do recognise that this intervention is one aspect of weight management and a multifaceted approach is required to encourage and support healthy lifestyles for all adults and children in Sefton.

In relation to Crosby can the following parks also be added (to the restrictions on takeaways):

- Alexandra Park
- Coronation Park
- Moorside Park

Policy PC1: Access and Facilities

More innovative solutions to cars

- Congestion charging
- Car Clubs
- More bus lanes
- More better marketed Park and Rides schemes

Better rail and bus services and the east to west routes (particularly out of Southport) Work with regional transport authorities for improvements on regional trains

The key element of access should be about the universality of access i.e. that all the people of Sefton should have equality of access. This 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.

Sefton needs to work with public transport providers so that provision is coordinated to provide timely connections.

Sefton could provide a route planner service on its website as does Lancs CC.

In the future accessing services remotely by electronic media should play a key role particularly for those in remote locations or with mobility issues.

Require housing suited to the needs of Sefton's growing elderly population e.g. low maintenance, smaller properties with good access to shops, health and other services.

Policy PC2: Affordable Housing

The affordable housing figure/target is not ambitious enough:

- In particular there is greater need for social rented housing across the borough and especially in Southport. Liberal Democrats Social housing up to 40% of developments may be appropriate
- Other have suggested up to 50% of developments should be made available for affordable housing

Wainhomes There is a need to meet the full objectively assessed needs for affordable housing as stated in the NPPF which is considered to be 350 dpa. This will require more market housing to meet these affordable housing needs. It is noted that the Council is in the process of commissioning an update to the SHMA and this will be available in time to inform the next stage of the Local Plan. This may alter the evidence base although a reduced figure must be considered unlikely and therefore the Council should aim to maximise the level of affordable housing by increasing the overall requirement.

The affordable housing figure is too high because of

- Viability (especially where a lot of infrastructure is required)
- Little track record of delivering such a high rate (more like 0 – 20%)

Bellway Whilst acknowledging that the proposed policy position seeks 30% affordable housing on schemes of 15 or more dwellings (with an 80/20 split social rented/intermediate) across the Borough apart from Bootle (where viability work demonstrates this is not deliverable), it is suggested that the policy needs to add a viability point to allow a departure from 30% (or the mix) as per NPPF. Also suggested that the possibility of a commuted sum payment in lieu of on-site provision be added to this policy.

Should not include viability considerations in any affordable housing policy as it will allow developers to get out of providing affordable housing.

Will make market housing undeliverable as no one will pay good money for a market house next to affordable housing.

Don't want affordable housing. Will bring crime and antisocial behaviour into the area.

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 to families on low incomes.

This policy does not adequately address the needs for homes for:

- Sefton's ageing population (more bungalows in particular are required). In some communities this will allow residents to stay in the community but downsize as they get older.
- People with limited mobility.
- People needed extra care.

Most of the need is for one and two bedroom homes and flats for young people, single people, childless couples and people on low incomes. Developers are likely to mostly build 3, 4 and 5 bedroom executive housing.

Not truly affordable –

- need starter homes or will cause real generational problems.
- Shared equity homes in Formby (and other areas) will not be affordable. The mortgage may be halved but a co-owner would demand rent for the other half of the property. Rents are very high at the moment.
- How can £200,000 – £300,000 houses be affordable?

Southport Labour Party It is strongly recommended that positive strategies for the promotion and development of housing co-operatives are incorporated into the Local Plan. Housing co-operatives offer a sustainable solution to housing and provide opportunities for the provision of affordable housing.

The Green Party Should encourage and support more self build "clubs" to provide affordable homes and specialist provision in areas of need.

ReClaim - your communities : Issues raised:

- Support the provision of the delivery of affordable housing across the whole of the borough
- Request the exclusion of affordable housing measured by bedspaces
- Opposed to the policy exclusion of any affordable housing requirement in Bootle wards
- Concerned that no SHMA undertaken since 2007 and query whether a SHMA Refresh will be adequate
- Request any SHMA to include detailed analysis on measures of distribution of household composition and especially household incomes from all sources, including housing benefit
- Financial viability information must be provided in an open and transparent manner
- Question the implicit assumption that financial viability “is a stand alone test”
- Note that significant issues are being raised by changes to housing benefits and the bedroom tax. The Local Plan should include a policy on how it will address affordable housing needs in the light of these benefit changes.

Need affordable housing in the South of the Borough.

HBF Issues raised:

- The policy requires 30% affordable housing on all sites above a threshold of 15 units, with the exception of Bootle. The percentage requirement for affordable housing is considered too large and it will lead to viability issues across much of the district.
- The 2010 Affordable Housing Viability Assessment (AHVA) indicates that at such levels much of the district will either be unviable or marginal in current market conditions. On this basis the Council has correctly omitted Bootle from any requirements; however the viability concerns are not just restricted to Bootle. The assumptions used within the AHVA are also questionable in the current market. This is likely to mean that the viability issues are not fully highlighted within the AHVA. The Council are advised to consider updating its AHVA as part of a wider overall plan viability assessment. This wider assessment of the whole plan viability should be undertaken in conjunction with local developers and land agents to ensure that the assumptions being used are consistent with and founded upon market realities.
- Concern over content of paragraph 11.75 of the plan which indicates that affordable housing contributions may be amended in an SPD. Such policy requirements must be examined through the Local Plan process. NPPF paragraph 153 states SPDs should be used where *‘they can help applicants make successful applications’* and SPDs *‘should not be used to add unnecessarily to the financial burdens on development’*. The use of an SPD to introduce new requirements is therefore inappropriate.

ReClaim - your communities Need to remove from the policy of Affordable Housing the provision measured by the stated bed space. Point to recent case law on the requirement and application of S326 Housing Act 1985 on bedroom space standards and expect this to be applied by the Council.

OVH Support the Affordable Housing Policy “where possible”

Adactus Housing

- Welcome the proposals under the Local Plan to provide much needed additional housing in the Borough. The requirements for affordable housing are particularly welcomed to meet high demand in an area where suitable sites are currently in short supply.
- However the requirement to provide affordable housing on the identified sites only in accordance with Sefton's current affordable housing policy may mean that in some areas where there is a vast undersupply of affordable housing, the provision of housing proposed in the Local Plan does not meet demand. In such areas some sites should be made available specifically for affordable housing to balance this undersupply, and where land is within the control of the Borough [Council] for this be

provided with nil value to facilitate this.

- In addition, where affordable housing is provided through Sefton's affordable housing policy requirement, careful consideration needs to be given to ensure that the mix of accommodation reflects current demand, especially where changing welfare policies may mean that current SHMA evidence is out dated.

Policy PC3: Planning for Travellers

ReClaim - your communities: Wholly support policy provision for additional and much needed sites for travellers.

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.

Clarification needed on the meaning of paragraph 2, bullet 3 of the draft policy

The Local Press have reported that the Council will be using Green Belt Land for "Travellers' Sites". There is no mention of this in the Plan. Do hope the Press reports are wrong. The Council should spend its money on permanent residents, not on people passing through the area.

Policy PC4: Community Facilities

Mactaggart + Mickel : new or improved community facilities should be provided in accessible locations which maximises their access and usage.

Formby PDC & Community Centre:

- Well used community centre for a variety of activities and organisations.
- Convenient location.
- Adaptable to be changed back into a school if required.
- Community behind keeping the centre.

Theatres Trust : Support policy in principle, but should start by supporting existing community and cultural facilities before including criteria for their loss and development of new. Gives suggested wording for the policy. Also suggest an alternative definition of a community facility.

Policy PA1: Development in Primarily Residential Areas

Suggest the following sub paragraph be added to part 2 of this policy:
(c) and complies with policies PD1 (Design), PD5 (Telecommunications), PH1 (Health and Wellbeing), PH2 (Food and Drink) and PC1 (Access and Facilities).

Turleys : Support the policy but recognise that some retail development of an appropriate scale can make residential areas more sustainable.

Policy PA2: Planning Enforcement

The intended approach to planning enforcement is noted and agreed.

Policy PEP1: Pollution and Hazards

Welcome the inclusion of policy PEP1 'Pollution and Hazards' (page 116) as this requires developments to ensure no unacceptable risk of pollution, which is intended to complement (some of) our regulatory regimes.

Suggest Policy PEP1 'Pollution and Hazards' is amended to make it clear that planning applications would also be subject to rigorous assessment on the impacts on adjoining authorities where applicable.

Peels Ports : acknowledge the inclusion and relevance of this policy in terms of the assessment of certain port-related projects and the wider objective of supporting the growth of the Port whilst mitigating against adverse impact on local communities.

United Utilities : are seeking the following additional text within the Policy:

Development will only be permitted where it can be demonstrated that: proposals for sensitive uses to be located close to existing sources of pollution must demonstrate, by way of appropriate assessments, no detrimental impact on the amenity of existing or future occupiers.

Proposals for sensitive uses (such as residential development) should be located away from existing sources of pollution. New development schemes must demonstrate they are compatible with surrounding land uses, both in terms of its impact upon those uses and the impact of the surrounding land uses upon the amenities of future residents/users. New development should be located an acceptable distance away from existing operational businesses with the potential for noise, odour or traffic generation.

Policy PEP2: Land Affected by Contamination

Environment Agency : Welcome the inclusion of policy PEP2 'Land Affected by Contamination' as this requires the remediation of land which could/does pose a risk to controlled waters receptors.

ReClaim - your communities : Request Council to pursue the introduction of the former England Partnerships policies for decontamination and remediation of historically contaminated lands and particularly where such land uses would be suitable for early regeneration. This would extend across Bootle where the degradation to the environment by disused and derelict sites is palpable and causes wide spread low site values, and inhibits any willingness by any developer, RSL or otherwise, to develop such sites. Such contribution to the regeneration of environmental settings across Bootle would immediately have a positive effect.

Appendix 3 Approach to current urban greenspaces

<p><u>Bellway Homes</u> : Would like to discuss the implications of this proposed change to the approach. Appendix 3 acknowledges that the 2009 Green Space and Recreation Study requires an early review and is out-of-date.</p>
<p><u>Diocese of Liverpool</u> : Support the proposed, revised approach to urban greenspace set out in Appendix 3, and in particular the proposal that all former private green spaces will now be part of the primarily residential area within which they may be located.</p>
<p><u>Nugent Care</u> : Clarence House School (site G245) and Brewery Lane Playing Fields (Clarence House) (site G244): Support the proposed designation of the Clarence House site as an 'education and care institution', as this would appear to allow a range of development, including housing. In with the National Planning Policy Framework (para 4, annex 2).</p>
<p><u>Parochial Church Council of St Peter's Church, Formby</u> : Formby Tennis and Cricket Club (site G239): Concern over possible redesignation of land (which belongs to the church), within Green Lane Conservation Area. The unused part seems to refer to land behind St Peter's vicarage immediately to the east of the cricket club boundary and extending to houses on Green Lane. This part of the vicarage grounds (known as the Paddock) has nothing to do with the cricket club. Well wooded, regularly used as recreational space by the Scout movement in Sefton and wider afield. Would not support development of this land for housing – it should remain designated for recreational purposes only, with enhanced facilities to encourage increased use by the Scouts and other organisations. Access to site only via Cricket Club, with their agreement. In 1981, Sefton Council ruled out any possible development of this area on traffic / access grounds and these objections remain valid. Site is in the Green Lane Conservation Area and many of the trees would have some protection, causing problems with possible housing development. Also a wildlife haven (e.g. bats, red squirrels). Development would be unpopular locally. Site within Green Lane Conservation Area so housing development likely to be problematic given the protection afforded the trees by the Conservation Area designation.</p>
<p>Site at Kerslake Way, Hightown (site G192): The absence of the Kerslake Way site from the list of housing sites in policy SR4 has prejudiced the residents of Hightown in making objections to the proposed change in designation of the site.</p>
<p>Land at Harebell Close (site G220), Formby: Re-designating the land as Primarily Residential Area will eventually lead to its development.</p>

8. Summary of representations – Studies Supporting Local Plan

Consequences Study

GVA :The Consequences Study modelled the impacts of different levels of Green Belt release in different locations around the borough across the plan period. However, not all of the Green Belt sites which were assessed in the 2013 Study were modelled in the Consequences Study (2013). The justification for choosing to study only some of the sites considered for release was that only the ‘best’ Green Belt sites, defined as ‘those with the least constraints and therefore the most suitable Green Belt housing sites’, were modelled in the study. NLP state that the selection of sites to model was conducted in agreement with Officers. However, this does not explain why only some of the sites were chosen. The rejection of the Oriel Drive site, particularly in light of the correct application of evidence set out above, is therefore unjustified and undermines the outcomes of this Study. NLP’s Consequences Study states that it is not the aim of the study to assess individual sites, as this is a task for the Local Plan. However the selection of some sites to model in the Consequences Study, at the expense of others, appears to be in line with the final Local Plan Preferred Options. This would imply that the Preferred Options were chosen prior to the evidence base being completed. If so, this method is premature and the chosen options are not appropriately evidenced.

Lack of detailed information available concerning some of the consequences of development. The Infrastructure Delivery Plan will support the Local Plan but is not currently available for review. The Greenbelt Study Red/Amber/Green assessment identifies a number of areas where more information is required - for Moss Lane these include Ecology, Conservation, Flood risk, Services and Traffic. Comments from interested parties should ideally be based on factual evidence at this stage of consultation - but this is not possible without the detailed information being made available. The current consultation period will close before the information is available. By the time the information becomes available, the Draft report will be published. This will be too late to object to specific areas of land being included for development - effectively rendering the current consultation pointless.

Green Belt Study

A number of detailed comments on the methodology employed in the Green Belt Study in identifying, classifying and choosing sites for potential development.

Sustainability Appraisal/Strategic Environmental Assessment

Natural England : Recommend that biodiversity and geodiversity is specifically referred to under objective 2 and this should also be reflected in the SA report, which accompanies the Plan. Objective 18 could be improved by referencing geodiversity, i.e. Protect and enhance biodiversity and geodiversity. Soils form the thin layer of our geodiversity, linking the underlying geology with the land surface and atmosphere. Therefore it is important to make the link between geodiversity, biodiversity and soil resources. Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 17 of the NPPF

Environment Agency : The Water Framework Directive should be considered an international relevant plan or programme, and the North West River Basin Management Plan should be considered a regional/local relevant plan or programme, for 'Pollution' and

'Biodiversity'. Any new development within an area at risk of flooding will need to ensure it is safe without increasing flood risk on site or elsewhere. A Flood Risk key question could be 'will the local plan help reduce the risk of flooding to new and existing developments'.

CP&S Limited : Sustainability Appraisal (2013) involved an assessment of Green Belt sites, grouped by sub-area. S157 was considered alongside sites S154 and S155, which are also located in Aintree. We believe that the site has been unfairly and inaccurately assessed; whether this is due to incorrect information about the site itself or a result of its assessment in tandem with sites S154 and S155. Detailed changes to the SA report in respect of this site proposed.

Strategic Housing Land Availability Assessment [SHLAA]

Lots more potential for housing within the built up area: There are lots of homes for sale. Government initiatives make it easier for people to purchase these properties.

- Toad Hall and adjacent properties should be developed.
- Fairway and Kew Park and Ride sites could be developed.
- Empty shops in Southport should be converted.
- Many derelict areas in Sefton are ideal for homes and in need of redevelopment.
- Lots of suitable sites have been discounted.

Request that a list of brownfield sites that have been rejected are published with the reasons why.

A significant amount of brownfield sites have been discounted when they are perfectly feasible and in some cases development would be welcomed.

Nugent Care – Sefton's 2012 SHLAA has identified a total land supply equivalent to almost an 8 year total supply but importantly it recognises that there is a significant deficiency in the Borough's 5 years supply position. Effectively urban housing capacity will run out in the Borough by about 2020, leaving a very significant shortfall in future years and to meet objectively assessed housing needs in the local plan period to 2020 to 2030. Sefton have also looked at the potential for making up that shortfall in the wider Merseyside area, especially the core city Liverpool. However it has been made clear by Liverpool officers that the city does not have the capacity of available readily deliverable housing land to make up for the shortfall in Sefton.

Not clear in the SHLAA what the windfall capacity is in Southport. This could be of the order of 100 units annually and would reduce the need for opening up large-scale development on more sensitive green field sites.

John Pugh MP – The potential for town centres to meet housing needs has been underestimated. Living above shops has not been properly explored.

- Changes in planning guidelines for shops and the number of vacant properties (currently 13%) mean that there will be many more conversions to housing.
- City centre occupancy in Southport has huge potential. There is the potential for multi-storey apartments.

Barton Willmore – There is too much reliance on sites without planning permission in the first five years of the plan.

Turleys – The plan places too much reliance on windfall sites. The NPPF allows windfall sites to be included in the first five years of the plan when there is compelling evidence and not over the whole plan period as shown in the plan.

Persimmon Homes – The figure of 5000 is questionable as the sites with permission and in the housing supply identified within the SHLAA equate to approximately 4500. Once

demolitions have been discounted from this; the figure is approximately 3850. This figure decreases further once Green Space sites (which are already counted separately), stalled sites and sites with questionable viability are also deducted equalling a figure closer to 3000. It is therefore uncertain how the total for urban centre sites has been achieved.

Persimmon Homes – some of the assumptions regarding the timing of delivery within the SHLAA are over ambitious. Point 2.4 of the HEaDROOM study states that

'...the government's recent cancellation of the HMR fund is likely to ensure that housing delivery on these sites will be substantially reduced'. This calls into question the delivery of SR4.41 (site 9057 in the SHLAA) which was previously funded by HMR.

Site 9507 in the SHLAA 2012 also known as allocation SR4.41 in the Local Plan Preferred options is Klondyke clearance area; previously a project funded by HMR. The SHLAA 2012 states that this site is deliverable within 0-5 years and is currently without permission. The explanation provided does not mention viability or why it is thought this site is deliverable within 0-5 years when other studies within the evidence base contradict this. There are several such assumptions throughout the SHLAA without significant evidence provided to support the position. It is therefore suggested that if the SHLAA is responsible for identifying a substantial number of units in the future supply; more reasoning should be given to substantiate a site's classification.

Sefton has persistently under delivered on meeting its housing requirement. Therefore a 20% buffer is required to be included in the five year supply of housing (NPPF para 47, 2nd bullet).

CPRE – Sefton is greatly concerned that Sefton MBC, like many other Local Authorities, has an increasing deficit in the estimate of its 5-year housing land supply. A contributory reason for the deficit is that, if it can be shown at any time that a developer is unable to implement a planning permission during its period of validity, or has not implemented the permission during the course of five years, the land associated with the permission is removed from the estimate of the 5-year housing land supply. So as a local authority grants planning permissions that are not implemented because of the depressed state of the market, its reserve of housing land supply diminishes. We advocate that housing land with planning permission should be included unconditionally in the estimate of the 5-year housing land supply.

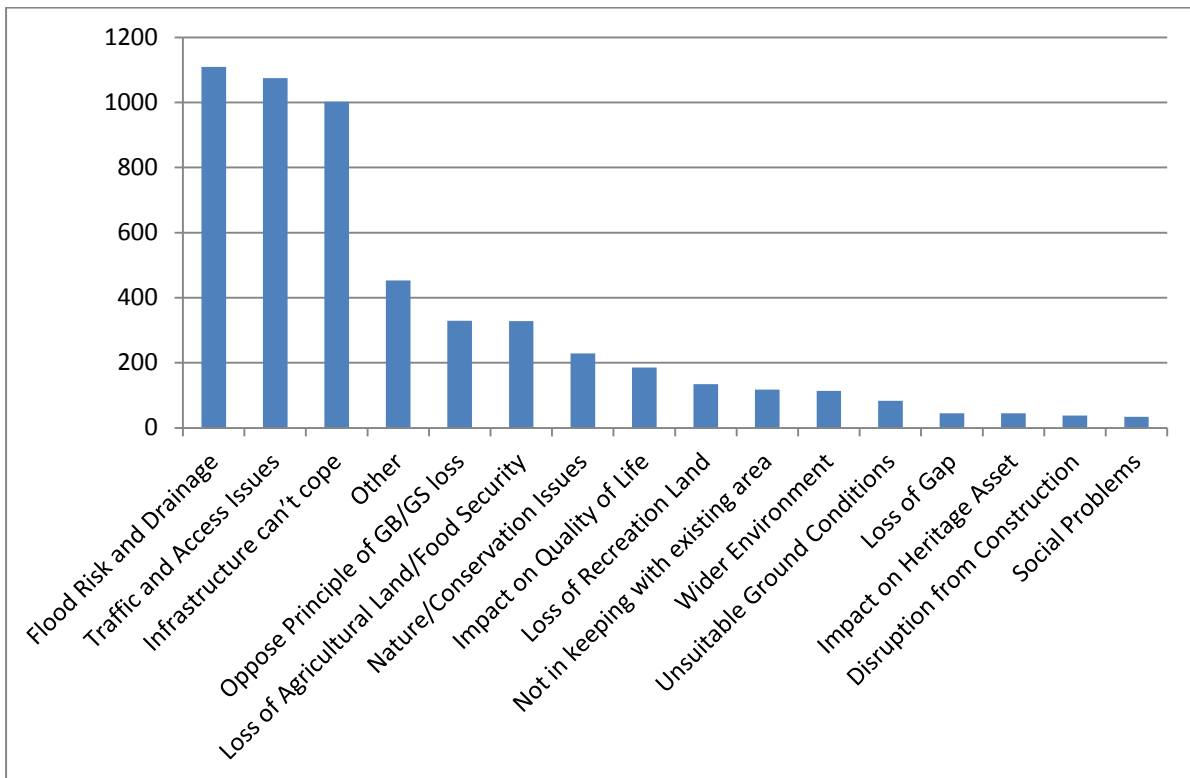
Sefton claim that they have a supply of urban building sites which will last for 10 years (para 6.6). However there is a requirement to have a continuous 5 years supply of available building land at all times(para 6.9) which Sefton does not currently have. These paragraphs contradict each other.

Strategic Housing Market Assessment [SHMA]

FRAGOFF – The report produced by Fordham Research on Strategic Housing Market Assessment is self contradictory and some of its methodology is questionable, in particularly using one focus group to represent the whole of Sefton. The composition of the group was ill-conceived in view of the aspirational nature of the questions asked and other surveys relied on participants gauging what those other than themselves may require in a home.

Many additional comments that are picked up in PC2 Affordable Housing section

9. Summary of representations – Proposed Development Sites General



In the chart above GB is Green Belt, GS is Green Space

There has been significant opposition from thousands of local residents, against either development on a local Green Belt site or against building on Green Belt land in principle. The main reasons are shown in the figure above, and summarised in the text below.

This section also sets out comments by area and by site. Please note that this section of the report sets out the primary comments on the sites but does not detail every last point made.

A number of land owners, planning consultants and house builders have also submitted comments supporting the development of sites. Some of these are sites put forward for development in the Preferred Option of the Local Plan. Other sites put forward have not been included in the Preferred Option paper. These are listed in section 15 of this report. Section 15 also lists sites supported forward by those who do not own them.

Oppose principle of Green Belt Loss

The Council has a Green Belt duty to safeguard the countryside from encroachment and maintain an attractive landscape near to where people live.

Green Belt should only be released under exceptional circumstances and we have not been convinced that these have been proven by Sefton Council.

Residents have bought properties near to the Green Belt understanding that the Green Belt designation will protect the countryside and character of the area for future generations. To build on this will therefore negatively alter the character of the area.

Many residents understand the Green Belt to be sacrosanct and do not think land is needed for new homes and businesses.

Strongly oppose the use of any Green Belt land for housing or industrial use, in any part of Sefton. 3% of Sefton's Green Belt is the 'thin end of the wedge'. This seems to be an 'easier' option than using brownfield sites first.

The public value the open countryside for recreation, wildlife and for the best and most versatile agricultural land which characterises many parts of Sefton.

Sefton has a number of towns and villages that are separated by relatively small areas of valuable countryside. The Green Belt prevents these settlements from merging into each other and therefore allows them to retain their character. Some of the proposed developments will greatly reduce the effectiveness of the Green Belt.

Traffic and Access Issues

A number of areas of Sefton suffer from existing traffic congestion issues. Proposed development of large numbers of houses, business parks and the expansion of Port activities is likely to greatly increase these issues. In many cases it may be technically very difficult to address these issues and also many members of the public are sceptical that developers will do enough to mitigate/improve congestion and safety problems.

The above traffic issues have not been effectively addressed in the plan.

Infrastructure cannot cope

Where is the infrastructure, the funding or the social facilities to support any new urban population? These issues are vaguely mentioned but not properly addressed. In not addressing these important elements at this stage shows a worrying failure to appreciate the scale and therefore the full social and environmental impact of such extensive development.

Loss of agricultural land

Sefton's Green Belt comprises Grade 1 Agricultural Land, of which there is less than 3% in the whole of England. A large part of this irreplaceable land will be destroyed forever if Option 2 is implemented. At a time of nationally increasing population, where demand for food is increasing and our country's reliance upon imports of food from abroad is also increasing, it is simple common sense that land that is most suitable for food-production should be preserved at all costs. The Government's planning guidance allows for such a case as this to be put forward as a reason as to why land should not be built upon. Sefton Council's elected and employed representatives should use this as a major defence in the protection of our Green Belt. The plan has not given enough regard to agricultural land quality.

Sefton Council failed to have much of the land ear marked for development re-tested during the latest land classification study, instead relying on extrapolations from tests in similar or adjacent areas. This means that when land is surveyed for development purposes there is a high likelihood in certain areas that the only definitive data will be collected by housing developers, who are motivated by financial gain, which leaves residents and groups unable to challenge these assertions, and weakens any fight to save high quality arable land. Sefton is unusual in that whereas most Boroughs similar to our own would provide around 42% of land considered the best and most versatile, here we have as much as 65% of the land in this category. Local Plan does not given enough weight to this.

The Government says that we need to be more self-sufficient in the production of food and accrue a low carbon footprint on food we buy. These proposals do not fit into this rationale.

Nature and Habitat issues

Need to protect wildlife and flora and fauna. The Green Belt helps provide natural wildlife habitats. Impact of loss of hedges, trees and other habitats for birds, insects and mammals, especially species already in decline like hedgehog, field mice, bees, butterflies.

Loss of recreational land

Green Belt and greenspace land provides many easily accessible recreational facility for many of its residents; peace and tranquillity. Loss of opportunities for countryside recreation, including walking, jogging, cycling, horse-riding, bird watching and nature study, angling, dog walking, game shooting. Loss of these sites would be contrary to proposed policy PH1 'Health and Wellbeing' and the goals of 'Active Sefton'. Council has a duty to preserve public open spaces for the enjoyment of outdoor leisure. The provision of new 'open spaces' following the destruction of any green belt is highly cynical and hypocritical.

Loss of playing fields, including concerns from Sport England. Sport England would look to oppose any allocation which includes, comprises or was last used as playing fields unless one of the 5 specific exceptions set out in Sport England policy (consistent with the Framework's para 74) applies. The fact that a playing field is not in current use does not mean that the site is surplus to requirements. Sport England would require an up to date playing pitch strategy to demonstrate that this was the case, and have concerns that the existing evidence base (especially the Playing Pitch Strategy) is out of date.

Loss of site-specific recreation facilities including Southport Old Links Golf Course, angling on Three Pools Waterway, Kentonwood Stables (north of Formby).

Flood risk and drainage issues

Site or surroundings are in a flood plain/flood zone /floods regularly and is at risk of river or tidal flooding – even if flood models or labels do not reflect this. Watercourses would be overfull and development (hard surfaces) would displace the floodplain, so development would increase flood risk.

Site or surroundings area at risk of surface water flooding / floods regularly. Development would result in more hard surfaces which would displace the flood plain/ make this flooding worse and affect new and existing homes. Climate change will make this worse. Scepticism whether sustainable surface water drainage systems (SuDS) or design measures would be able to control this flood risk.

Foul sewerage infrastructure / flooding, and linked surface water flooding issues.

High water table, waterlogged land / standing water, groundwater flood risk issues. Agriculture helps control the water table and flooding generally. Unsuitable for development / development would make this worse.

Insurance problems issues for homes built on these sites. Difficulties in selling homes. Unfair to new residents. If houses flood, who will pay / take the blame?

Concern that Plan gives insufficient emphasis to flood prevention.

The Environment Agency note that sites that are next to or contain main river(s) should incorporate an appropriately sized development-free, habitat enhancement buffer strip between bank top and development. Developers must have Environment Agency prior written consent for any proposed works/structures within 8 metres of the bank top. The Environment Agency also note that site allocations should be guided by the flood risk sequential test.

Impact on quality of life and wider environmental issues

The Council has a duty to safeguard the countryside from encroachment and maintain an attractive landscape near where people live.

Green Belt is sacrosanct and should be preserved for our future generations. Building on Green Belt will affect health and wellbeing, and devastate and industrialise the Green Belt, everyone needs to connect with nature. Journey to work/home views of countryside, seasons and wildlife are very important to quality of life.

Loss of peace, tranquillity, loss of sense of space, loss of feeling of wellbeing.

More people, pollution and cars with noise and pollution leading to more stress and a less healthy population. There is evidence that even low level exposure to traffic fumes can increase the risk of lung cancer.

Need to retain certain balance between the on-going urban sprawl and the few remaining green zones, otherwise will do more harm than good for everyone.

The view is the reason people chose to live where they do. Green spaces make the area attractive to live in.

Sadly the environment of Sefton is continuously deteriorating.

Not in keeping with existing town and villages

Green Belt helps retain characters of towns. The proposed developments around Maghull, Formby, Melling and Thornton would alter the character of the nearby towns and villages because of a significant increase in the size of those communities. Any such proposals should be considered only by working with the communities affected, rather than be being imposed on them.

Loss of gap between settlements

If both W Lancs and Knowsley Councils go ahead with their Green Belt development plans as well, then in a short space of time there will be no boundaries between these areas and Maghull, Lydiate, Melling, Kirkby, Aughton etc will all be part of one giant conurbation.

Unsuitable ground conditions

A considerable number of representors made comments about unsuitable ground conditions in Churchtown, notably for site SR4.3 Land at Moss Lane (Churchtown South). These relate mainly to the peat character of the soil, and Concern about structural damage to existing properties from construction and piling works needed for new development. How would this be monitored and who would respond should a problem arise?

There were some comments relating to sites in Ainsdale, Formby and Hightown, especially in relation to sandy soil.

Impact on heritage assets

Concern over the loss of heritage assets was site specific, relating to Churchtown (e.g. impact of traffic vibrations on older properties in Churchtown Conservation Area), Hightown (impact on Rose Cottage which is a Listed Building) and the proposed windfarm area of search at Ince Blundell (e.g. impact on area's many heritage assets including Listed Buildings, Registered Parks and Garden and Conservation Area). In Churchtown, similar concerns were expressed about the disruption from piling works and construction vehicles.

Other

Developers out just to make money. The Plan will see half of the new homes built on Green Belt land and treats it as a ready source of development land. Most of these new homes will

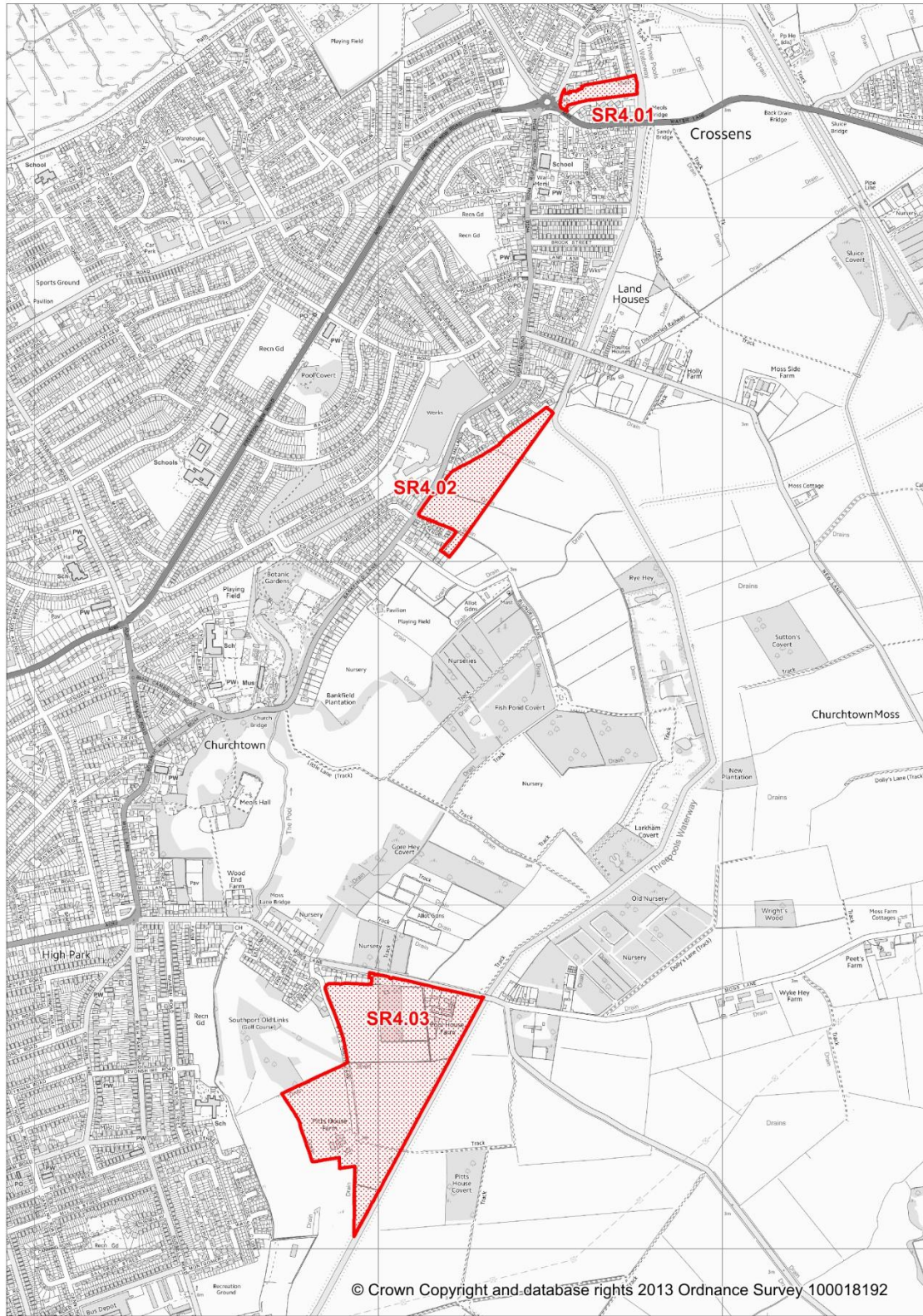
not be for the benefit of Sefton's indigenous population but will accommodate in-migrants mainly attracted from other areas of the UK and also internationally. Using a finite resource such as green belt in this way will ultimately lead to a loss of all of the green belt. It also raises the prospect in 15 years time of the necessity for almost all homes to be built on green belt as this influx generates household formation pressure of its own leading to a chain reaction and accelerated consumption of green belt land.

Where are the jobs to support the new residents? Why are we planning to put so many people on the edge of Sefton? It is totally inappropriate to build up to the Borough boundary.

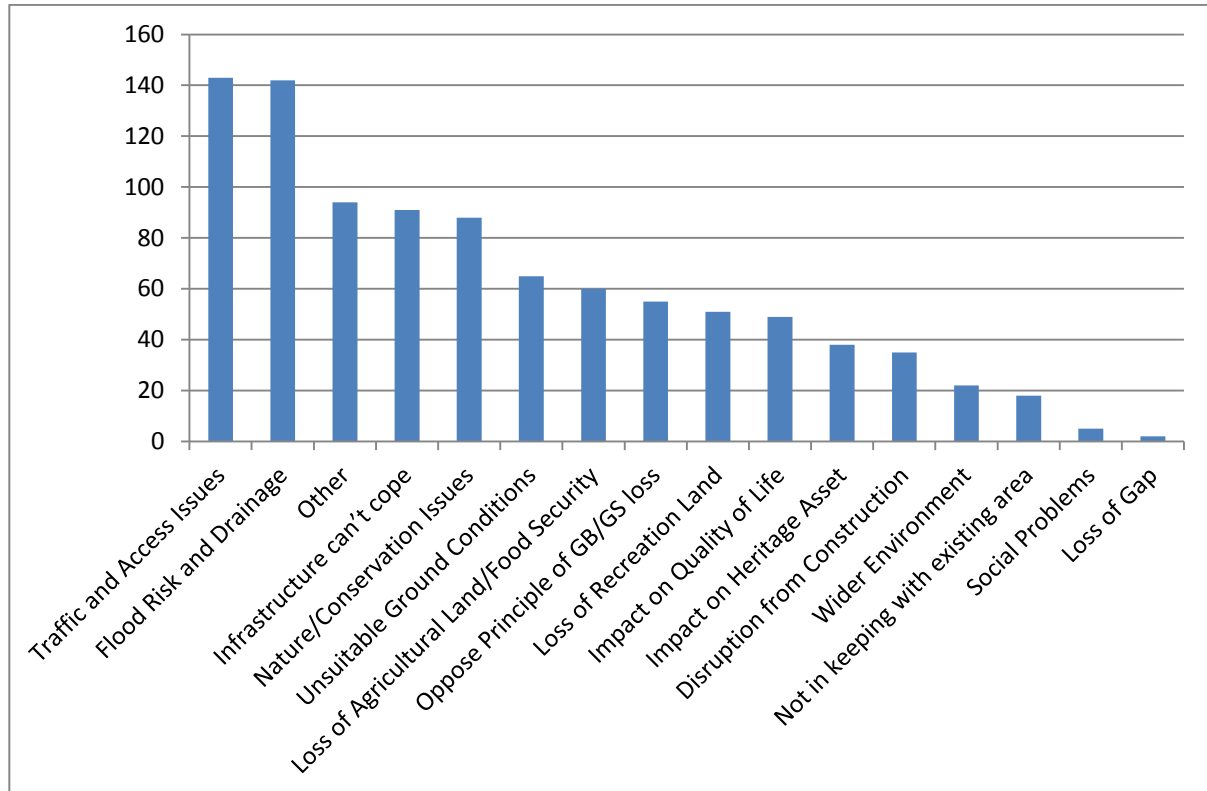
The Council has a duty to care for its residents and to protect them from harm. This has not been done.

10. Summary of representations – Proposed Development Sites in Southport Area

Churchtown



Breakdown of comments by topics in Churchtown



In the chart above GB is Green Belt, GS is Green Space

Traffic & Access

Churchtown already suffers from heavy congestion both down Bankfield Lane through Churchtown Village down through Roe Lane and also down Preston New Road through to Cambridge Road. There is real pressure on a number of junctions including the Lanes End junction and the Preston New Road / Cambridge Road / Marshside Road junction. This pushes traffic onto other residential roads which are unsuitable for heavy traffic. (A traffic Survey undertaken in 2007 claimed that the roads (in Churchtown) at that time were considered to be at breaking point).

If the additional development proposed is built this will make the situation much worse. This will result in even heavier congestion with an associated increased in air quality issues from queuing traffic. The roads will be more dangerous both for cars and pedestrians. There will be impacts upon the structural solidity of historic buildings having their foundations damaged due to the vibration of vehicles and in particular, due to construction traffic.

Flood Risk and Drainage

Sites in Churchtown are prone to flooding. Flood risk concerns due to proximity to Three Pools Waterway, proximity to storm water tank and increased/ displaced surface water runoff linked to increased hard surfacing. Possible suggestion is to build only a smaller number of private houses spaced out along edge of field similar to facing existing properties.

Scarisbury Parish Council comment that drainage in area adjoining Scarisbury Parish (notably Boundary Brook, and wider Crossens Pumping Station system) is already problematic, particularly at times of heavy runoff. Development will increase runoff. Scarisbury Parish Council are concerned over impact on rural floodplains in West Lancashire, especially given possibility of pumping capacity reductions in the Alt Crossens catchment.

Infrastructure

The number of new homes proposed in the Churchtown area would result in 1000+ additional pupils. Local schools are already at capacity. Churchtown primary is already huge and oversubscribed and it is difficult to see how this could be expanded further. Other nearby schools are also oversubscribed, including Bishop David Primary. Birkdale primary is full and recently had to expand, with playground on top of buildings. If places are not available locally will pupils have to be bussed elsewhere in Sefton, such as Bootle or Crosby.

Queries on whether Churchtown is a sustainable location for more development given the lack of local facilities. There is no public transport. The police station is under-staffed. The library has closed. Additional services will be necessary if the area is to be a viable proposition. Water pressure in this area generally is poor. Will the developer be funding a new water distribution system to prevent it getting worse for the residents already here? The services to the existing properties are poor (the gas pressure falls to an unacceptable level in cold weather and the drainage is pumped and unreliable).

The Local centre is not easily accessible by the proposed sites in Churchtown, particularly the site of Moss Lane. The Council's assessment of accessibility to services is incorrect and should be updated.

Nearest children's A&E at Ormskirk. Difficult to get to and this will put children at risk.

Doctors and dentists in Southport are struggling to accommodate appointments. Most are oversubscribed and refuse to take new patients. There is only one GPs that is in walking distance [Roe Lane]. Will additional GP/dentists be provided? Local services are not suitable.

Impact on Heritage Asset

Structural damage from construction traffic and other traffic (vibrations) on Listed Buildings, shrimpers' cottages, older properties and those with unconventional foundations in Moss Lane, Mill Lane and Botanic Road in Churchtown Conservation Area. Who will pay for repairs? Scale of development and increased traffic congestion would impact on character of Conservation Area and Churchtown generally. Access problems for tourists visiting Churchtown; could reduce visitor spend locally.

Impact of development on the open setting of the North Meols Conservations Area, including views in and out of the Conservation Area.

Loss of prime agricultural land.

Much of the land around Churchtown is classed as the 'best and most versatile' agricultural land which should be avoided if land of lower quality is present. This is part of the borough's great assets and should be preserved at all costs. The area has always been farmed and is very fertile.

SR4.1 Site at Bartons Close

Traffic and Access

Barton's Close leads directly onto the Plough roundabout which already has 5 exits which generates countless traffic congestion problems. To introduce another exit to the roundabout or even consider an access to the potential new houses through Fell View and therefore increase traffic by a potential additional 72 cars will add to existing congestion. It is already dangerous for pedestrians in the area and there is a primary school just down the road. Reducing the speed limit and introducing speed bumps has made no difference.

This strip of land was specifically reserved for improvement of the Southport -Preston Road (the Water Lane by-pass). Surely it would be wise to retain the ability to carry out this scheme in the future as circumstances could change.

Flood Risk and Drainage

Environment Agency refer to main river and potentially Flood Zone 3 constraints.

Crossens is an area where flooding occurs, so the proposal to build 36 houses on the land adjacent to Barton's Close is a disaster waiting to happen with Three Ponds Waterway at one end and a large storm water storage tank at the other end. The open field with land drains, & ditches just about cope most of the year. 36 houses with drives, pathways, hard standings and garages plus a new access road will put considerable strain on the area's drainage capabilities. The surface water run-off will flood nearby properties. A smaller number of new houses might not cause so much of a problem.

Not in Keeping with Area

Barton's Close is a lovely, quiet cul-de-sac with a little field at the front. It is a truly safe place. The proposal for 36 "affordable" houses is devastating.

SR4.2 Land at Bankfield Lane – Churchtown North

The Emery Planning Partnership, on behalf of Wainhomes, supports the identification of the site for homes but argue that a larger site should be identified for 300 homes. Their submission is supported by an Illustrative Masterplan, Transport Assessment, Flood Risk Assessment, Ecology Assessment, Utilities Statement and a Vibration survey.

There were a number of objections, as below.

Traffic and Access

Access to the site will be a major problem. Only two places can make a suitable access:

1. Blundell Lane. The entrance is near to a number of other junctions (The Grange, Merlewood Avenue etc) and at the foot of the old railway bridge so access may be dangerous. Blundell Lane would need significant widening as currently it is a narrow country lane.
2. Through Three Pools and the Crescent - very narrow access roads in a quiet residential area and double parking already causes problems for service and emergency vehicles.

Blundell Lane is an accident black spot. Bankfield Lane is already busy - speed humps have been provided. These have made it difficult to pass in parts where parking on both sides of the road has taken place and have also pushed more traffic onto Preston New Road and redirected traffic onto other roads. The speed bumps have slowed private cars but make little difference to heavy vehicles.

The expansion of Churchtown Primary School has made congestion unacceptable for residents – further expansion of the population will result in more children needing school places and further congestion.

The existing road congestion on Bankfield Lane and volume of traffic cause air pollution. More development will exacerbate this.

Flood Risk and Drainage

The Environment Agency refer to potential main river and Flood Zone 2 constraints.

Nature Conservation

The area is a designated Local Wildlife Site and brings pleasure through its flora and fauna. The Green Belt Study 'Stage 4 Assessment' document may not have considered 'area 4a (now SR4.02)' as the 'best habitat' for protected species but the area is home to legally protected species such as water voles whose numbers are in rapid decline. Bats are also a protected species and frequent this area. Barn owls regularly return here early each spring to mate. There are also over wintering-visitors on their way to Martin Mere such as migratory swans. Despite the proposal being scaled down the affect on many of the species mentioned above will be the same.

Flood Risk and Drainage

The proposed development area is low lying and subject to flooding in the winter months. It is also adjacent to the edge of the flood plain. Covering this area with housing and concrete is liable to displace the flood plain and may cause damage to already established properties. The existing development on The Grange requires a sewage pumping system, which is overloaded and liable to flooding. Presume the proposed development would require something similar but on a much larger scale. The system here regularly fails and if the system employed on the proposed development was to do the same this could lead to a backup of waste leading to a severe health hazard.

Flood risk — the area is in a flood zone. Sefton's own flood risk prevention strategy warns against inappropriate development. Climate change will make things worse. The area is at risk of flooding and this is recognised by all of the insurance companies.

Unsuitable Ground Conditions

Houses in the area suffer from acute vibration, apparent in the number of cracks in the structure and fabric of our homes. The houses will require piling as the soil is peat. This is very unhealthy, especially the methane that rises from the peat. The roads and drains in the area constantly sink and are in need of constant repair.

Other Comments

This is not a sustainable location for development.

SR4.3 Land at Moss Lane – Churchtown South

A Petition signed by 779 Churchtown residents objecting to developing the site, was received. In addition a detailed objection to this site being allocated for homes was submitted by Matthews & Goodman, on behalf of the Churchtown Green Belt Action Group. The comments have been summarised in this section, and the general Churchtown Section above. The submission was supported by a Transport and Highways review.

The site is in two ownerships. The Hesketh Estate support the allocation of the site for homes on the basis that the delivery of housing in this location would serve to provide good quality, affordable and resource-efficient housing in an area of high housing demand. They are willing to work together with the other land owner to develop the site, as appropriate. Redrow Homes, the second owner, support the inclusion this site for housing and consider this is a positive opportunity to meet the housing needs in Southport. Their submission is supported by a Transport Assessment, Flood Risk Assessment and a Geo-Environmental Risk Assessment.

There were a number of objections, as below.

Traffic & Access

Moss Lane is a very narrow country lane, totally unsuited to heavy traffic and is already too busy. There is little (if any) scope to widen the road and it lacks footways in many areas

and is dangerous for pedestrians. The road is in poor condition and due to the unstable ground conditions needs frequent mending. The road has only one way out into Southport (Warren Road not being suited to large volumes of traffic) onto the Lanes End roundabout which is already very congested.

The junction at Lanes End is already very busy at all times and particularly at peak times due to traffic coming through the village heading down Mill Lane and going down Roe Lane. Some of this traffic is to avoid the busy junction on Preston New Road.

The junction can result in very long tailbacks up Moss Lane and can be dangerous to get out of. 500+ additional houses and all the additional cars would have a huge negative impact. The Moss is used as a rat run for traffic from West Lancs wanting to avoid the Preston New Road junction. It is narrow, poorly maintained and already too busy. Development on the site might cause the Moss to become more dangerous. Wykes Lane is likely to be similarly affected.

The traffic can also back up Mill Lane having a knock on effect on traffic on Churchtown village and some of the cul-de-sacs off Mill Lane. The development may well add to pressures on Roe Lane. The traffic will also be likely to have a knock on effect on many other local roads with traffic trying to avoid the roundabout.

Historic buildings are being damaged by vibrations from traffic. This is likely to increase with more traffic from any development and in particular with construction traffic.

There is a lack of public transport in the area and Moss Lane is not suitable for buses should they be proposed to be introduced.

Detailed traffic assessments have been submitted by both Redrow Homes and the Churchtown Green Belt Action Group.

Many residents felt that detailed traffic studies should already have been carried out.

Flood Risk and Drainage

Environment Agency refer to main river, Flood Zone 2 and potential Flood Zone 3 constraints

Concern that Sefton's flood risk information not accurate, do not agree with recent reclassification of site from Flood Zone 3, despite official reclassification 2 year ago area still floods each winter. Site is in a Flood Zone, next to a waterway and flood plain. Site low lying, site and surroundings subject to surface water flooding after heavy rain and in winter. Council's own Strategic Flood Risk Assessment says that development is not appropriate in such areas.

Existing local sewerage/ drains needs pumping and local sewerage holding tank. System regularly fails - the same could happen if development has a similar system. Raw sewage has flooded onto Moss Lane. The Grange development, off Bankfield Lane, overloaded an existing sewage system which regularly floods in heavy rain; more development unacceptable.

If the planned houses were built there would need to be a new system put in place. Who would pay for this? Have United Utilities been approached about this potential problem? Concern about where surface water will go, as local ditches and watercourses often full to capacity through the winter months? Site unsuitable as land drainage/surface water backs up if Banks pumping station affected by high tides and heavy rain.

If Environment Agency stop pumping the land will revert to its natural, wetland state.

Loss of Agricultural Land

Has Sefton have carried out a soil test to see if it is appropriate to develop on this site? The land is mainly good quality farmland which should be protected. The loss cannot be compensated for. The land currently has varied uses, such as for the livery and grazing of horses, and growing salad crops and vegetables.

Nature Conservation

The area contains a mixture of deciduous woodland, meadow and arable farmland. It is next to a designated Local Wildlife Site in the Unitary Development Plan (UDP). No additional ecological survey work has been commissioned in relation to this site. Any data is therefore out of date and cannot be relied on. Water voles are especially prevalent. Has the Council done an ecological survey to identify rare species?

The proposed site is often waterlogged and a temporary home to many important migrating birds as well as indigenous species. This land is too important to wildlife conservation to be developed for housing. There are red squirrels which are protected. These and other species need room to survive.

Loss of Recreational Land

The Old Links Golf Club would lose 2 tees (2 and 11) and it would impact on fairway 4 meaning it would be practically difficult to operate the Golf Course as a result of this development, unless remedial works at an anticipated cost of up to £100,000 were carried out.

Development will have an adverse impact on people who cycle, jog, fish, horse ride, bird watch, walk their dogs, ramble, stroll, or tend allotments. The area contains a very active stables and Riding School. These would have to close should the development go ahead.

The site forms part of the Mersey Forest. The Framework states that these offer considerable opportunities for improving landscapes and providing for recreation and wildlife. The woods, which are used by many local people need to be assessed by kept.

The area currently offers safe paths for walking, cycling and riding in a rural setting, all of which are recognised as beneficial for health and wellbeing. The loss of this amenity will be felt by everyone who takes advantage of all that the area has to offer.

Unsuitable Ground Conditions

Unstable land (sand or peat-bog over wet clay), subject to subsidence and unsuitable for new development. Land lies in water for 8 months each year.

New homes would need costly piling. Many existing homes are piled to depths of up to 80ft /30m. Also problems with gardens, driveways, patios and other structures. On Moss Lane/ Fosters Close, these, structural/ subsidence damage/ problems caused by ground conditions and vibrations - garden has sunk almost 2 feet in 30 years.

Construction works (piling) and construction traffic would cause vibrations and structural damage (e.g. cracks, roof tiles) to existing properties, who will pay?

While can pile new houses, cannot protect land around homes, foul sewers, roads, pavements and other infrastructure from peat shrinkage and instability – or else these too would need piling. Significant- long term maintenance and cost issues plus danger of blocked drains and leaking gas mains. A serious problem in 2009 when a drain collapsed in the road, needing 3 weeks of traffic lights, single lane traffic, & repair time.

Moss Lane is unstable; subsidence from heavy use, re-surfacing falls away after only a short time. Construction traffic will make this worse. Will need considerable strengthening works along drainage ditches to cope extra traffic from the development or it will subside. Frequent road works leave sunken areas on road.

The old cottages in the Conservation Area have no foundations. Many are built on railway sleepers. Covering the land with new properties and concreting surfaces will cause the underlying ground to suffer from drying. This is likely to result in more land movement (affecting paving, roads, utilities (sewerage etc) that are not underpinned) and subsidence.

With need for piling, development is expensive. How would any developer be able to build the 30% of affordable housing that a project of this size is required to have?

Wider Environment

Will create urban sprawl and will result in a loss of character and identity for Churchtown. It would also encroach on the hamlet on the West Lancs side of Moss Lane. The proposal is not consistent with the Framework as it is not a sustainable location for housing — being "poorly related to the urban area." The area is very flat. The site will be highly visible in the landscape. There has not been any consideration of the visual impact of developing this site on land in West Lancashire. There is no physical connection between the proposed site and the rest of Churchtown, being separated from the latter by the Old Links Golf Course. Will create an "isolated small town" not connected to Churchtown village.

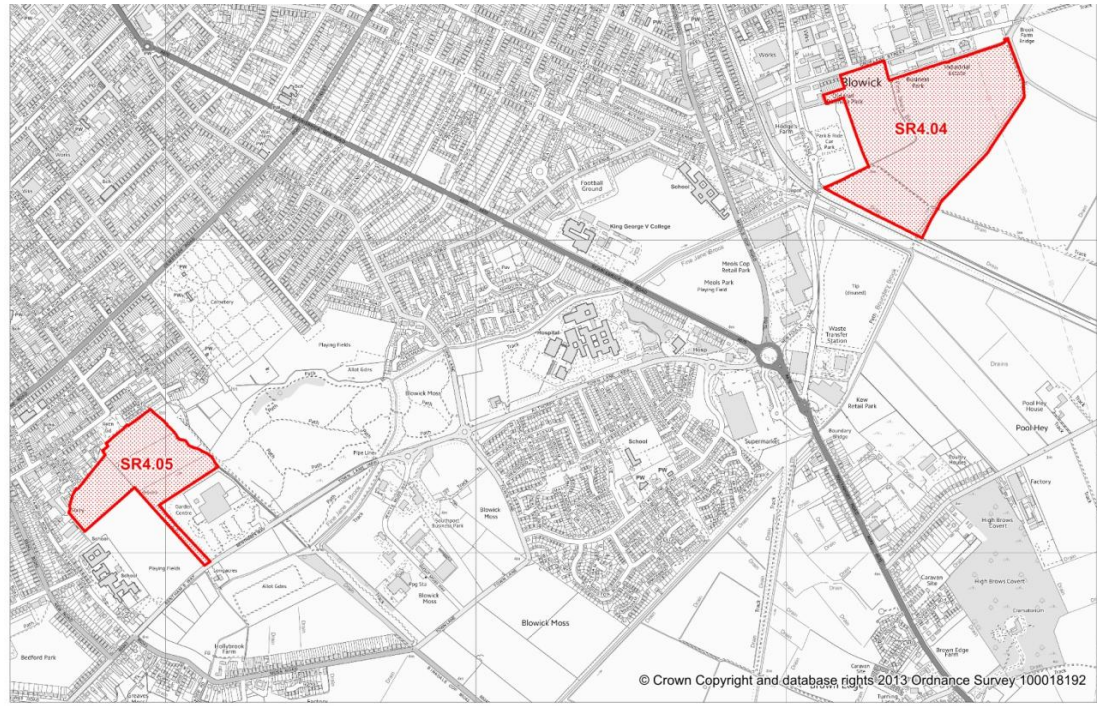
Other Comments

The Council has incorrectly applied its methodology. Do not agree with Council's response in March 2012 Report of Consultation. The 'Old Hospital hamlet' at the end of Moss Lane is separate from outskirts of Southport. This gap should be kept open in accordance with paragraph 4.2 of Draft Green Belt Study 2011. It is unacceptable for the Council to state "The houses on Moss Lane [in West Lancashire] were not considered to constitute a settlement for the purposes of the Green Belt Study."

The peat gives off methane which is unhealthy.

Do not believe that there is a high proportion of immigrants in Southport. What are the figures to support this statement?

West Lancashire BC: Does not object to the allocation, but wishes to ensure that all potential impacts of these sites on land and communities within West Lancashire have been considered and that policy requirements for mitigation for any negative impacts on the West Lancashire side of the boundary are included within the Sefton Local Plan.



SR4.4 Land at Crowland Street

Strutt and Parker on behalf of the owners Mr & Mrs Watmore supports the identification of Crowland Street for mixed use housing and employment. However, they wish that greater flexibility of the mix of development to allow for more housing [about 75% of the site] to ensure viability.

Traffic and Access

Scarisbrick Parish Council is concerned about the additional traffic generated by the proposal and the impact it will have on the A570. This is already a very busy transport link between the area and the motorway system. Congestion on the main A570 will lead to much greater volumes of traffic using the smaller moss roads in the Parish. The paediatric A&E facilities for the local area, including Southport, are based at Ormskirk General Hospital whilst adult services are based at Southport. The A570 is an important link between these hospitals.

Loss of Agricultural Land

It is regrettable that good quality agricultural land has been identified for development, but it is probably a preferable location to sites SR4.03 (Moss Lane, Churchtown) and SR4.09 (Segar's Farm, Ainsdale).

Flood Risk and Drainage

Environment Agency refers to potential main river constraints.

Other Comments

No objections to any applications, which may come forward for a mixed housing and mixed business environment.

Promoting business park and office uses here would undermine the ability to secure such jobs in Southport town centre where they are really needed.

Since this Park + Ride site is very under-utilised, perhaps it could be closed and incorporated into the proposed development area. Relocate this on the former tip site closer to the Kew roundabout. This would exclude potential interchange with the Southport-

Manchester Railway in a new station, but this is unlikely to be achieved at the current location and would in any case be detrimental to the rail service offered to existing rail users on this line.

Land at Broome Road, Southport [Local Plan site SR4.5]

Supporting representations were received. There were a number of objections, as below.

Overview: 5 representations were received, 3 objecting and 2 supporting.

Flood Risk and Drainage

The Environment Agency refers to potential ordinary watercourse constraints.

Traffic

Concern if Broome Road itself is used as an access to the site.

Infrastructure

Where will all the children go to school? Birkdale Primary is full, so it had to expand with the playground on top of classrooms.

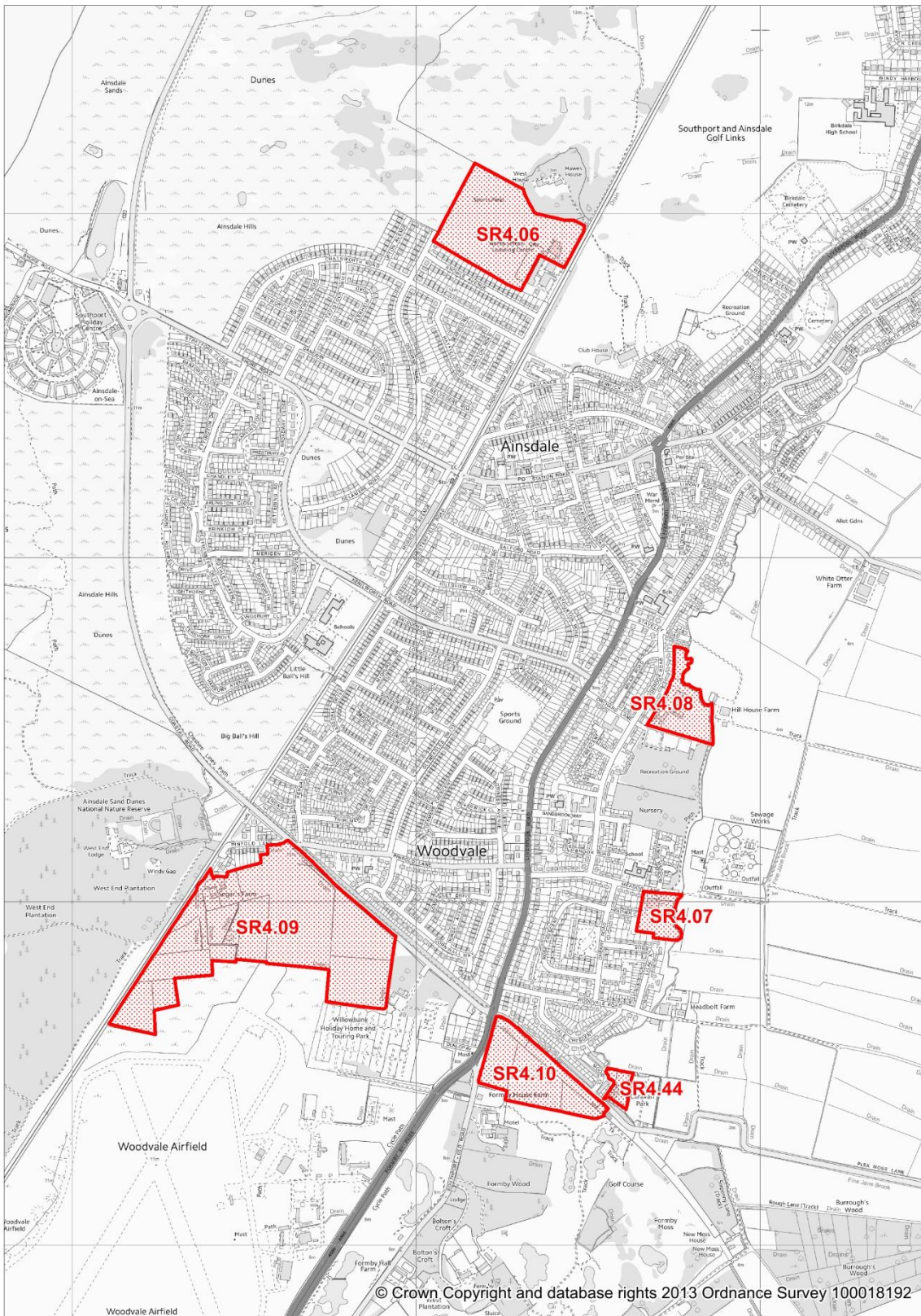
Loss of Recreational Land

The proposed houses will be built on the playing fields

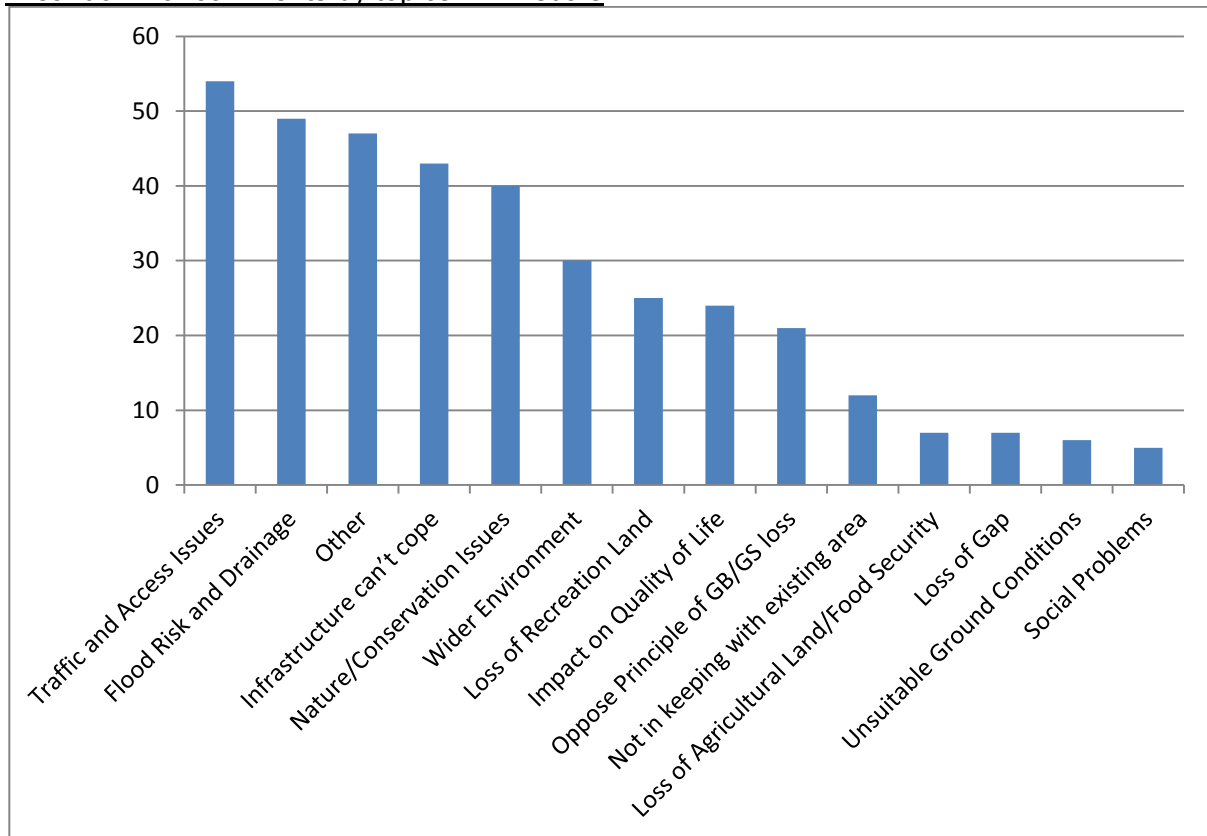
Other Comments

Halsall Parish Council concerned about the impact that the additional proposed developments that border Halsall will have on the environment and safety of the residents of Halsall (and particularly those of Shirdley Hill).

Ainsdale



Breakdown of comments by topics in Ainsdale



In the chart above GB is Green Belt, GS is Green Space

There were a number of objections, as below.

Traffic and Access

Concerns with capacity of the roads in the village. Already has a number of busy roads, particularly at peak periods. Liverpool Road is already very busy right through the village from the roundabout linking with Station Road / Segars Lane down to the Coast Road junction to the south. Station Road/Shore Road is also very busy with long holdups due to the railway crossing which closes 8 times per hour, often for several minutes at a time causing congestion.

The roads can also be very dangerous with the junctions with Moor Lane/Coast Road/A565 junction being backed up in particular.

There is limited car parking in the village which makes access to the village centre difficult. Residents are concerned that the amount of development proposed will result in all of the above issues being made much worse. It may also result in more traffic using unsuitable secondary roads to avoid congestion on some of the main roads and junctions.

Infrastructure

There is already a shortage of primary school places in Ainsdale. The promotion of family homes in Ainsdale would make this situation worse. Local facilities are lacking, with Ainsdale having no secondary school. Secondary schools in Birkdale/Hillside may not be acceptable to all parents as they are single sex. There may be an over-supply of places in Sefton, but the fact that they are in Bootle or Southport is not appropriate for Ainsdale. Given the proposed growth in Ainsdale, the retention of the Ainsdale High site for a new state of the art school would make financial and planning sense. The retention of the site for education use

would be far more beneficial than a one-off financial benefit the Council would receive by selling land to developers.

Nursery schools and Secondary schools also oversubscribed. Who will pay for the expansion of primary schools? Will compulsory purchase be used? It is difficult to see how parents would still be offered a choice in the school they would like to send their children. Some parents would not want to send their children to such a huge school.

The existing foul and surface water drainage is barely adequate for the existing homes. The existing water supply is inadequate, there is often low pressure. No idea how existing gas, electric and telephone services could cope with the influx without major improvements. Ainsdale lacks shops, libraries, leisure facilities etc. This will lead to a high degree of car use in order to access even the most basic of services. Doctors and dentists in Ainsdale would not be able to cope with the increase of new residents.

Quality of Life

The quiet nature of the area will totally change if development takes place.

SR4.6 Former Ainsdale High School, Ainsdale

Supporting representations were received. There were a number of objections, as below.

Traffic and Access

The site is only potentially accessible in two places, by Sandringham Road and by Osborne Road / Knowle Avenue / Harewood Avenue. Neither of these approaches is suitable. The roads are narrow, windy, and parked cars can cause congestion. The access onto Shore Road by the level crossing often gets blocked when the level crossing barriers are down. This can also force more traffic to go through the village onto Kenilworth Road. The roads and footways are also poorly maintained by the Council.

Concerns have been expressed that this will get much worse with the proposed development. Residents also feel that so much more traffic down small narrow residential lanes will have an impact upon the quiet residential character of the area and may also be dangerous for pedestrians

The site is in a sustainable location with good transport and near the village core - therefore ideal for an educational institution.

Network Rail: would like Transport Assessments to be carried on all developments near level crossings to assess the impact of the development.

Infrastructure

It would make more sense to use the land to rebuild a super school and make it an academy of excellence. With growing number of school children and the shortage of school places, there is a strong possibility that Ainsdale Hope School will be needed as a school. Birkdale and Greenbank schools could then be closed and their land, (much more valuable in building terms) could be used to build both premium homes and affordable homes.

Site is not on any existing public transport route.

Nature Conservation

The Ainsdale Community Wildlife Trust is fully committed to recreate low dunes of high conservation value. Due to its botanical interest it may qualify as a Local Wildlife Site. The Trust wants to develop the area as a nature reserve with parking and would contain part of the footpath link linking Ainsdale to Birkdale stations. The Trust would accept 50% of the site for this purpose with the rest for housing and a buffer if the Council decides not to let them develop the whole site.

Site is enclosed by a golf course and a Site Special Scientific Interest (SSSI - sand dunes). Need to protect wildlife and flora and fauna. These are now re-colonising the school field.

Loss of Recreational Land

The shore side area of Ainsdale is lacking any leisure space accessible for everyone. The sand dunes are difficult to negotiate if you have any mobility problems and the nearest park is Liverpool Road which is a considerable distance away. Sport England oppose this allocation unless the site is shown to be surplus to pitch requirements (consistent with the Framework para 74).

Disruption from Construction

The construction of 200 plus houses will cause disruption, damage to the existing roads and possible disruption to water and sewerage services.

Unsuitable Ground Conditions

School built on stilts because of methane issues. Presumably methane still an issue; would new homes need to be built on stilts?

Flood Risk and Drainage

The Environment Agency refer to potential constraints as site is next to SSSI.

SR4.7 Former St John Stone School, Meadow Lane

1 representation supporting the allocation was received. Objections were received, as follows. The Environment Agency refer to main river constraints. Sport England oppose this allocation unless the site is shown to be surplus to pitch requirements (consistent with the Framework para 74).

SR4.8 Meadows ATC, Sandbrook Road

1 representation supporting the allocation was received. The Environment Agency refer to main river constraints.

SR4.9 Segar's Farm, Coastal Road, Ainsdale

A supporting representation was received from Cunningham Planning. There were a number of objections, as below.

The Airfield

The Ministry of Defence (MOD) have objected to the site being developed for housing because typical two-storey housing would cause a physical obstruction to the extended runway approach impeding landing and take-off procedures. Residential properties developed so close to the end of the runway would be subject to noise disturbance caused by aircraft movements to and from the aerodrome. Other residents and groups have made similar observations. The Woodvale Aircraft Owners Group have also objected that clear areas in the vicinity of airfields are vitally important in the event of an engine failure during take-off.

Traffic and Access

The Coastal Road should remain the dividing line between the urban development and the coast and dunes to the west.

Development will make the entrances to Pinfold Lane / Kendal Way even more dangerous. Traffic comes quickly over the railway bridge (a blind summit). Without significant

improvements (filter lanes + traffic lights or a roundabout), safety issues will increase. A speed camera might help.

Lack of public transport to the site.

Infrastructure

Any development south of this road would need substantial infrastructure works - pedestrian bridges/underpasses etc. for safe access to Ainsdale village and road changes for vehicular access onto an already busy arterial road.

Loss of Recreational Land

Adverse visual effects on the Trans Pennine Trail and local walking routes. Some of this land could have been used to provide a car park to gain access to the woods and alleviate the congestion in Formby and Freshfield.

Quality of Life

Building on Segars Lane will destroy the health and wellbeing of Ainsdale residents.

Wider Environment

The proposed allocation will have an adverse impact on the role of the open land to the south and directly affect the 'openness' of the Green Belt. The Green Belt boundary is currently particularly strong in this location but would be undermined by any attempts to provide development land to the south of the Coastal Road.

Unsuitable Ground Conditions

Asbestos has been discovered on the site resulting in the annual Woodvale rally being moved to another venue.

SR4.10 Land south of Moor Lane, Ainsdale

elandor Associates, on behalf of the owner Mr Jonathon Birch, support the identification of the site for homes. The representation is supported by a Habitat Survey, Phasing and Masterplan.

There were a number of objections, as below.

Traffic and Access

The junction at Moor Lane/Liverpool Road/Coastal Road is already extremely busy and dangerous. More housing will make this situation worse. Without significant improvements to the roads, including the A565, (filter lanes + traffic lights or a roundabout), safety issues will be created.

Nature Conservation

Building near to nature reserve will affect rare breeds like natterjack toads and sand lizards. An Extended Phase 1 Habitats Survey has been carried out. A Great Crested Newt survey will be required.

Flood Risk and Drainage

Development should not interfere with natural drainage (pond in middle of site). Site is higher than the surrounding area, so there is an increased risk of surface water flooding after development.

Unsuitable Ground Conditions

Not solid reliable ground on which to build.

Quality of Life

Building on this site will destroy the health and wellbeing of local residents. The small bungalows on Moor Lane are, were obviously built as places where people could retire to with a good environment. This location has the lovely view over the fields. We would be devastated if any development took place here. Proximity to Woodvale - noise + safety issues for residents.

SR4.44 Land at Woodvale Sidings [Local Plan site SR4.44]

The Environment Agency refer to main river and Flood Zone 3 constraints.

Employment sites in Southport

SR5.a – Southport Business Park

Objections were received regarding this site.

West Lancashire Borough Council: The proposal for additional business and employment opportunities within the area is welcome. However, the Council is concerned with regard to the additional traffic that this would generate on the A570. This is already a very busy transport link between our joint area and the motorway system. Congestion is particularly marked when events such as the Flower Show are taking place and such congestion inevitably leads to much greater volumes of traffic on the smaller moss roads in adjacent parishes. The Council also points out the importance of this road for ambulance services since the review of accident and emergency provision in our joint area.

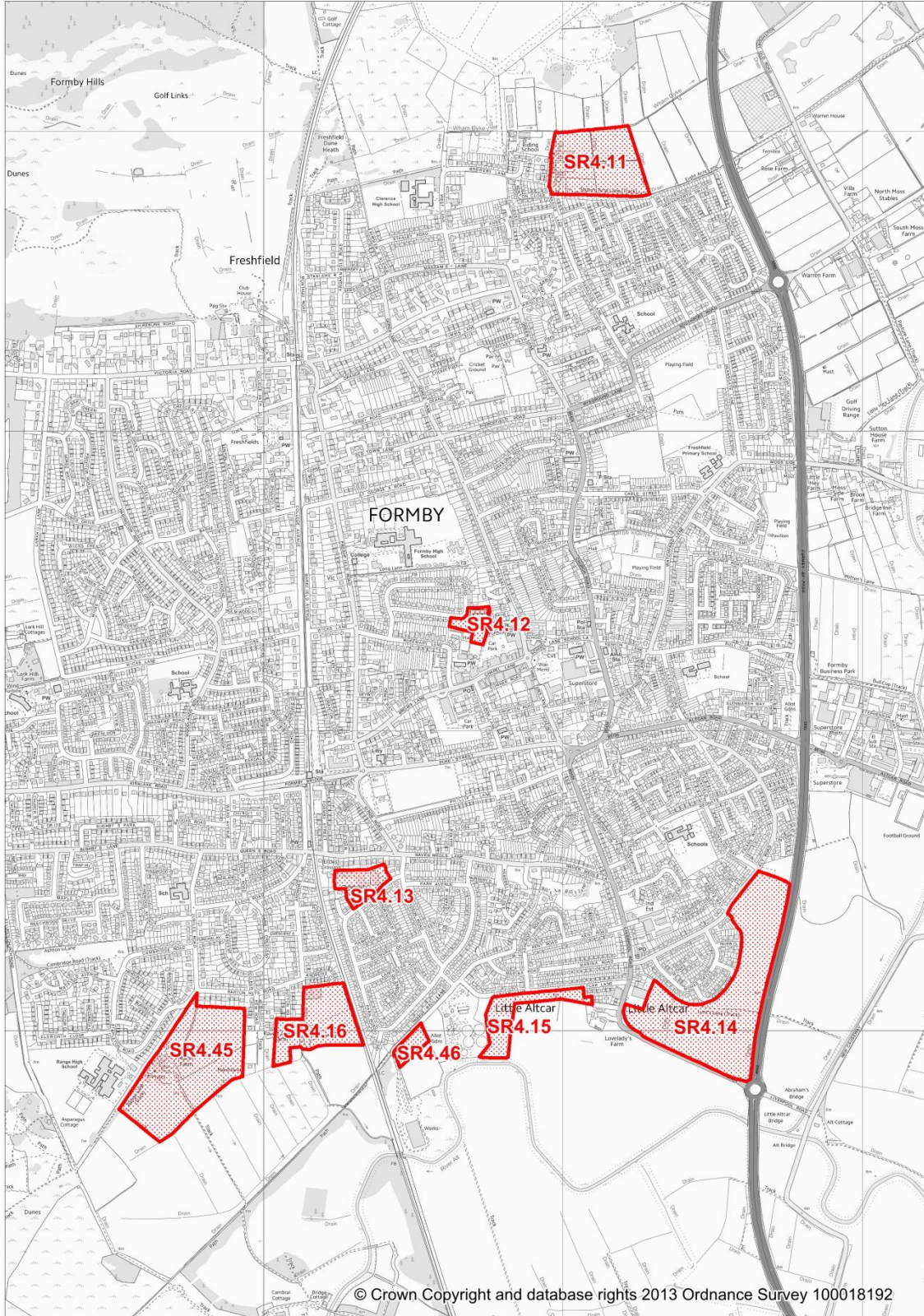
The Environment Agency refer to potential main river constraints.

SR5.e - Part of land to the South of Crowland Street, Southport

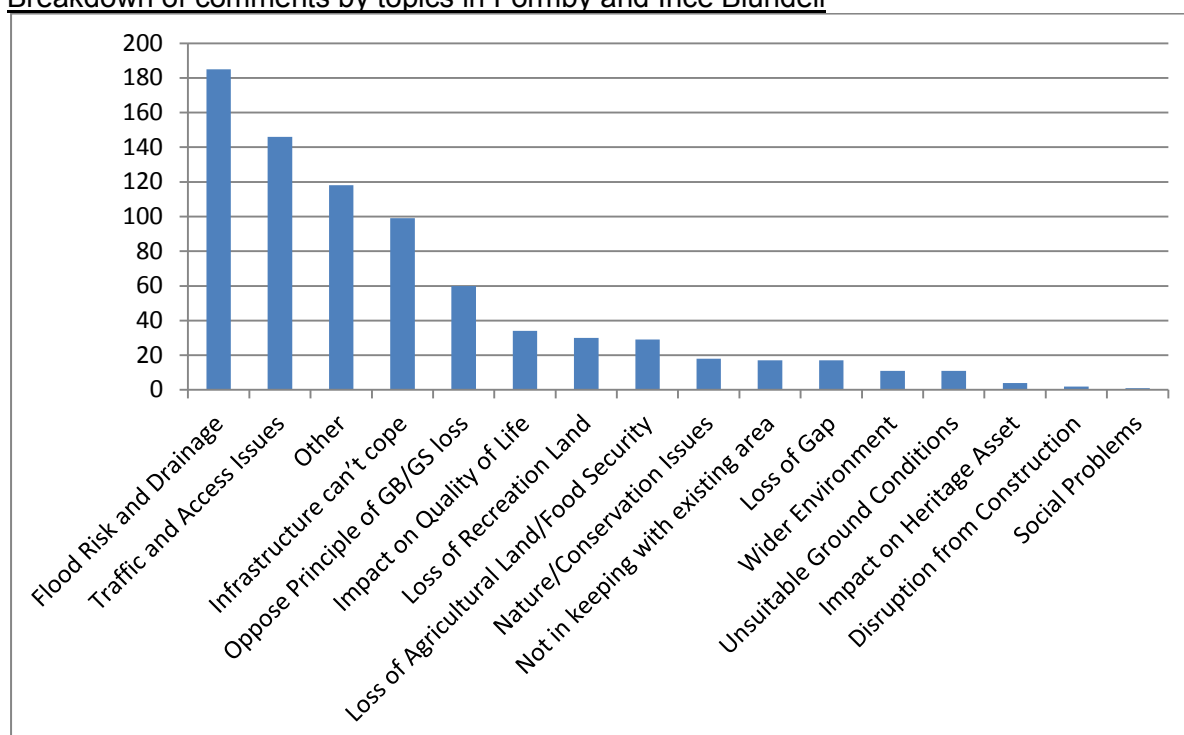
Strutt and Parker on behalf of the owners Mr & Mrs Watmore supports the identification of Crowland Street for mixed use housing and employment. However, they wish that greater flexibility of the mix of development to allow for more housing [about 75% of the site] to ensure viability. The Environment Agency refer to potential main river constraints.

11. Summary of representations – Proposed Development Sites in Formby and Ince Blundell Area

Formby



Breakdown of comments by topics in Formby and Ince Blundell



In the chart above GB is Green Belt, GS is Green Space

Flood Risk and Drainage

The area around Formby is very low lying and is vulnerable to flooding of all types. Many of the comments relate to not wanting building on floodplains, especially near the River Alt. The River Alt is above site levels so how can water drain into it? Formby suffers from blocked drains, failing drainage system, a rising water table, flooding after moderate rain - development would make this worse.

Development will increase flooding in Formby, which is already a high risk area with flood problems. Land around Formby, near the Bypass, and sites at the southern edge of Formby, flood most years - this problem would not be easily solved. Evidence elsewhere in UK shows not good idea to build here.

Need adequate drainage on sites that are currently farmers' fields drained by ditches. Concern about reliance on natural coastal protection processes (given erosion of Formby Point) in area with big population - risk of flooding.

There have been two recent incidents in Formby of structural damage to existing properties due to neighbouring construction work - concern about further damage from development sites and difficulty of redress. Need special Local Plan provisions for Formby and other areas with sandy soil.

Should not build on flood plains which are extensive in Sefton (as set out in the Council's Strategic Flood Risk Assessment 2013). Especially given climate change.

In terms of flooding and environmental effects no account has been taken of the effects of Green Belt development in neighbouring areas - very important as far as flooding is concerned as many of the surface water and flooding problems are associated with neighbouring areas particularly in the Alt catchment area.

The developers are planning to discharge a lot of surface water into Downholland Brook and the River Alt because they know that SuDS only works by enhancing the original drainage or in areas where there is insufficient drainage. SuDS are costly to implement and largely ineffective- any other advice provided is economical with the truth.

If water is discharged into these rivers, with climate change there will be an increasing danger of "flash floods" unless considerable environmental countermeasures are introduced (see Sefton's climate change document).

Traffic and Access

The consultation identified a number of transport and access issues in Formby. There are only three roads into the village, some of the junctions can get very busy at peak periods. The east-west links in Formby are limited by only three crossings over the railway – two of these levels crossing, causing congestion at peak periods

Summer weekends can result in very heavy traffic and big parking issues for people trying to access the beach and the woodlands causing problems for residents.

The roads in Formby are in a poor state in many areas of the village in need of repair. Public transport is very limited. Whilst the railway has a good service, it can be very overcrowded. The bus services are slow and infrequent in some of the edge of town areas within Formby.

20mph limits are being imposed in Formby because the roads are dangerous. The proposals will result in more traffic issues with commuters using most of the new homes. Formby is in real need of a Park and Ride. This could be serviced by a bus route to take people into the village centre and the coast.

The amount of homes that is proposed in Formby (particularly in the southwest of the village) would require a new access road. Ideally, none should be built to the west of the railway.

The Thornton Switch Island Link will make matters worse with the section around Ince Woods/Lady Green becoming a funnel.

Infrastructure

You propose to build on two former school sites, yet increase the population and create demand for school places. Holy Trinity School is still in basically sound condition and it would be more cost effective than to build a school. Most of the schools are fully subscribed and therefore new ones would be needed for the level of development proposed.

How far would pupils have to travel? Significant number of Formby pupils have to travel to Thornton, Crosby, Southport etc. Three or four of the nine Formby primary schools are currently over-subscribed. Already have difficulty getting children into school. Formby High only has space for 160 new admissions each year. New developments would create shortfall in places. The availability of school places in Bootle suggests this should be the location of new affordable homes.

There aren't enough dentists to cope with existing residents so additional homes will add to the problem. Cannot get on a list at a Formby dentist and have to travel to Thornton. Doctors cannot provide a satisfactory service in Formby for existing residents never mind others. We have an acute lack of GP appointments, with a two week waiting time. There will be a problem with increased delays to ambulance services.

Wider Environment

Formby and Freshfield are already overbuilt and we should hold on to what little green we have left.

The amount of development proposed will negatively affect Formby.

SR4.11 - Land north of Brackenway, Formby

A representation was received from the landowner How Planning LLP, on behalf of Taylor Wimpey UK to support the allocation of Site SR4.11 for homes but think this should be expanded to the bypass.

There were a number of objections, as below.

Traffic and Access

There are only two access points to the site – Paradise Lane and Deansgate Lane. These roads cannot cope with additional traffic.

Entry onto Paradise Lane is very busy and extremely congested around St Peters School both in the morning and the evening. The roads are very narrow and people drive on the footpaths creating a danger to pedestrians (particularly school children).

Deansgate Lane is a quiet residential street not suited to a significant amount of traffic. Coaches already use the proposed access roads to access Clarence House School.

The Council will need to commission a Highways Study on whether the roads can cope around the school. Residents should be consulted on how traffic issues will be addressed.

If the Kentonwood Stables were lost, and people were stabling elsewhere, how would the bypass handle the traffic and the danger of horse trailers accessing the bypass?

Infrastructure

The two schools near Brackenway are both oversubscribed and there would be little space in them for new families. There are no shops or other services within walking distance and therefore an unacceptable increase in local traffic would be the inevitable consequence.

Nature Conservation

The parcel is designated as a Local Wildlife Site and has an abundance of protected wildlife – flora and fauna. Any interference to the water courses would seriously impact on the natter jack toad population in the area. The area forms part of the natural progression from a coastal habitat to natural meadowland.

Loss of Recreational Land

The livery yard has approximately 60 horses which provides local recreational opportunities for over 130 local people. It also teaches children about responsibility. There are no safe, alternative sites. The land is currently used to graze horses. It contains a large floodlit outdoor menage, barns, indoor facility, car park and horse trailer storage and stabling.

The ancient boundary also provides a valuable amenity for the neighbourhood as a recreational path for walkers, dog-walkers and horse riding, its continuation with Eight Acre Lane would be broken by any development. The people of Formby have so few areas of open recreational land that the loss of this particular site would have a dramatic effect.

Flood Risk and Drainage

Already a flood risk in Formby area (SFRA); historic drainage pattern and low lying land relevant.

The Environment Agency refer to potential main river and Flood Zone 2 constraints.

The land is susceptible to flooding after only modest rainfall, is in /next to flood plain which floods frequently with about half of site severely affected, e.g. drainage ditch burst its banks 2012. Site waterlogged for a good proportion of each year, surface water flooding, drainage services in area already inadequate. Drainage services are almost certainly inadequate to cope with any significant increase in housing development on this site. Drains are constantly in need of unblocking.

Next door land floods to local properties and bridlepath, past Hawksworth Drive floods (including 2012), requiring pumping and causing £10,000s damage to homes, months of stress, insurance to be doubled).

Development (hard surfaces) will displace flood plain, stop land absorbing surface water and increase flood risk to existing properties (has happened elsewhere in Formby). Would not be able to comply with SuDS aspects of Flood & Water Management Act.

Increased flood risk due to development unfair to existing buyers, Environmental Impact Assessment required regarding flood risk especially sea level rise and surface water. IN the past the presence of natterjack toads has stopped development, what has changed?

Heritage and Conservation

Site close to Lancashire Wildlife Trust nature reserve and RAF Woodvale which has important and significant historic links to WWII. Site will need to be assessed according to Government guidance.

Quality of Life

Development would change a quiet residential area into an upmarket Council Estate. Loss of view and will destroy ambience of local area. We moved to Freshfield for the surroundings, we wanted a country village feel, not a built up city area.

Loss of a gap

Building here would eliminate the desirable, natural break between Formby and RAF Woodvale and Ainsdale.

Other Comments

Proximity to Woodvale would cause noise and safety issues for residents. Street and property lighting could well be a potential hazard for night flights to and from RAF Woodvale. At the moment this area provides a natural barrier between the airfield and existing homes.

The proposed density at site SR4.11 should be at least equal to, or preferably less than, the adjacent area of dwellings to its immediate south (circa 25 dwelling per hectare).

This land was subject to a high court ruling 15-20 years ago not to be built on.

SR4.12 Former Holy Trinity School, Lonsdale Road

Supporting representations were received. There were a number of objections, as below.

Traffic and Access

The local access roads are not capable of taking additional traffic. This is a small, quiet residential road with little in the way of traffic – it is effectively a cul-de-sac. The site acts as a buffer between the residential area and the town centre. Concerns that a through road / path from the back of the shops directly onto Lonsdale Road will create an increase in traffic, people, noise and the associated reduction in road safety as people take a natural shortcut to and from the shops, as well as causing issues with parking.

Concerns that due to the residential nature of the roads, access points for construction traffic may potentially be very disruptive.

Infrastructure

The loss of this site would make the shortage of primary school places worse as it could not be reinstated

Flood Risk and Drainage

The area around the school suffers terribly when it rains, with deep standing pools of water sometimes coming up and over the kerb side. Development will exacerbate this.

Loss of recreational opportunities

As a former school site it is likely to contain other sports and ancillary facilities. Sport England oppose this allocation unless the site is shown to be surplus to pitch requirements (consistent with the Framework para 74).

Other

Would this be a suitable location for affordable homes or homes for first time buyers?

SR4.13 Formby Professional Development Centre, Park Road

Infrastructure

The site is a valuable community resource. The buildings are used by a wide range of local and community and by the Sefton Council. The Ravenmeols Community Centre and the Formby Bridge Club commented that the diverse users of the centre would struggle to find a suitable alternative venue in Formby

The fields are also used by local residents and children. The site is also suitable to be converted back into a school should the need arise. Losing the site would result in losing this opportunity which might be required with all of the new development.

Loss of recreational opportunities

The field next to the woods provides a safe welcome open space for the local community and is used extensively by families and dog walkers on a very regular basis.

Nature Conservation

The woods house Woodpeckers, Owls and Red Squirrels. We understand that some of the older trees have Preservation orders on them.

SR4.14 Land at Liverpool Road, Formby

A planning application was recently submitted [and subsequently withdrawn] on the site by Turleys representing David Wilson Homes. This attracted considerable opposition from local residents.

A supporting representation was received from Turley Associates on behalf of David Wilson Homes NW & Barratt Homes Manchester to this site being allocated for homes.

There were a number of objections, as below.

Traffic & Access

Liverpool Road is the main access into Formby from South Sefton and Liverpool. Traffic currently backs up a long way down Liverpool Road at peak hours (primarily in the morning).

More traffic will greatly increase this. The road is narrow and is hard to improve and the roundabout onto the bypass is dangerous with northbound traffic causing a major hazard. The site if developed, would need a direct road access from the bypass. The road is also dangerous for pedestrians and cyclists with a particular concern being for the safety of children using the playground.

Local roads (Alt Road, Altcar Road etc) may become "rat-runs" to avoid the additional congestion created by the development. They are narrow and unsuitable for large amounts of traffic and therefore unsuitable to direct access from the site. The additional traffic will cause problems for Formby as a whole including more car parking issues and more pollution.

Flood Risk and Drainage

FRAGOFF Contrary to the Green Belt Study, a study commissioned by FRAGOFF shows considerable, even prohibitive, flood risk constraints to development. Throws doubt on the robustness of the Green Belt Study and Draft Local Plan.

Dispute that the area is no longer classed as flood plain. Site contains low-lying fields which are prone to regular, long-standing surface flooding especially in winter, high water table and water-logging. Regular flooding of neighbouring roads and houses, including from sewerage. Concerns that the pumping station cannot cope after heavy rain. Whole site has a major flooding problem which will not be solved by SuDS. If the site developed and SuDS used, concern for the health & safety to children from rat. polluted run-off, and maintenance of swales/drainage area. Excess winter/autumn runoff will flow into River Alt & Downholland Brook increasing risk elsewhere. Spring under Mr Storey's property [land to west] flowing under the road into the next field.

Low-lying fields, prone to regular, long-standing surface flooding especially in winter, water-logging. Area below the water table. Regular flooding, including sewerage. The pumping station cannot cope after heavy rain. Development (hard surfaces) will increase the flood risk to existing properties. Raising the land will increase surface water runoff to surroundings, making existing flood problems worse.

Infrastructure

An independent appraisal to assess the impact of the Liverpool Road development site on issues such as schools, social services, doctors and dentists, refuse collection and sewerage services; telecommunications and postal services; policing and externalities.

Loss of agricultural land

This is farming land which has produced crops for many years. It should not be built on.

Nature Conservation

There is a lot of wildlife in the area including Red Squirrels.

Quality of life

Will existing homes have reduced natural light from new homes? We enjoy seeing fields in the area. The increase in pollution is detrimental to physical health and lack of green space detrimental to mental health. Development on this scale is inappropriate and out of keeping with the area. Formby will lose its village charm.

We enjoy seeing fields in the area. The increase in pollution is detrimental to physical health and lack of green space detrimental to mental health. Development will spoil the "rural boundary and entrance" to Formby

Other Comments

372 homes too high a density given the problems of retaining an open space, drainage and traffic congestion. There will be no affordable housing, especially for local people. These properties could be difficult to sell and this may lead to anti-social behaviour.

SR4.15 Land at Altcar Lane, Formby

Traffic and access

This development will cause major traffic problems particularly at the junction with Liverpool Road. The area is not convenient for the railway station.

Flood risk

Low-lying land subject to winter flooding, flooding in front of existing houses in heavy rain, homes below water table, drainage problems and sewerage issues. Development and climate change will make this worse. The shape of the river Alt would suggest that if the river flow increases there will be a problem of erosion of the river bank thus making this development highly questionable.

The Environment Agency refer to potential main river, Flood Zone 2 and Flood Zone 3 constraints.

Loss of gap

This development will seriously affect the open space between Formby and Hightown.

Other Comments

Building houses so close to the river's edge will constitute a public health risk. The river Alt is not a particularly clean river and building close to the river's edge could cause a Weil's disease from rodents.

SR4.16 Land at Andrew's Close

A representation was received from Cass Associates, on behalf of Redrow supporting the allocation of this site for homes.

There were a number of objections, as below.

Traffic

The proposal could only be accessed through either Andrews Close or Sutton Road. Both are too narrow for an access for many homes. Traffic already backs up at peak times with children coming and going to school and with traffic backing up on Queens Road from the level crossing when the barriers are down.

Big problems to the west of the level crossing and on approach access roads. A new access road to Southwest Formby would be essential if either this site and/or the site at Range Lane (SR4.45) are developed. More traffic and congestion will be dangerous for pedestrians and cyclists (particularly by the high school and the Andrew's Lane footpath).

Need a traffic assessment regarding how existing roads will cope with the additional traffic at peak times and how the road system could be improved.

Network Rail – level crossings can be impacted by development in a number of ways. A Transport Assessment should be produced that assesses this impact.

Flood risk

Low-lying land and subject to winter flooding, flooding in front of existing houses in heavy rain, homes below water table and drainage problems. Development and climate change will make this worse.

Quality of Place / recreation

The cycle path links to the Sefton coastal path and is very well used by cyclists, dog walkers and people going for a walk. It is very attractive countryside that when lost cannot be replaced.

Infrastructure

The area suffers from drainage, electricity and gas which can be inconsistent. This would not be able to cope with so much additional housing.

SR4.45 Land at Range Farm

Traffic and access

Concerns about how this site can be accessed. Barton Heys Road and Jubilee Road are already very congested when the schools are open. This would be made considerably worse if the site were developed for housing. This also is likely to be dangerous for school children and other pedestrians.

Similar comments to Andrew's Close site in relation to approach access roads and need for a transport assessment.

Network Rail – level crossings can be impacted developments in a number of ways. A transport Assessment should be produced that assesses this impact.

Loss of agricultural land

This land has produced crops for years.

Quality of life / loss of recreational asset

This area is in the middle of open space and recreational area enjoyed by people in and around the area, as well as contributing to tourism. It would be a travesty if this land was released for building and spoil a well used public space and amenity across the railway line. Access to this kind of 'relaxed' open space which gives people a chance to get away from built up areas, is really important for the overall health and wellbeing.

Flood risk and drainage

The Environment Agency refer to ordinary watercourse, Flood Zone 3 and possibly Flood Zone 2 constraints.

Other

To have this sort of land being developed so close to the already diminishing sand dunes and pinewoods is short-sighted. It cannot be classed as sustainable development either in 'green' terms or 'economic' terms.

SR4.46 Powerhouse site, phase 2

A representation was received from Emery Planning Partnerships, on behalf of Formby Hall Investments supporting the proposed allocation of SR4.46 for homes but would like a larger site included. Furthermore they would like the site to available earlier and not within the list of reserve sites

There were a number of objections, as below.

Flood Risk and Development

The Environment Agency refer to potential ordinary watercourse, and possible Flood zone 2 and Flood zone 3 constraints.

Employment sites in Formby

SR5.d – Land north of Formby Industrial Estate

A supporting representation was received for this site. Objections were also received, see below.

S Rostron Ltd (owner): objects to the restriction of the uses to B1 only which is inflexible. The site is appropriate to provide for a range of employment generating uses.

The Environment Agency refer to main river, Flood Zone 2, Flood Zone 3 and flood defence constraints.

Formby Play Sports The site south of Formby industrial site is the preferable site [see comments to policy SRF1]

Where is the plan for a thriving local economy which will support local independent shops and retail for a greater population? We are not against an expansion to business park if it supports small local independent businesses. The current business park in Formby is not customer friendly or easy to access and has poor signage. This doesn't encourage footfall and usage. There also seem to be quite a lot of empty industrial buildings - will more buildings actually bring in more businesses?

Ince Blundell

There were no housing or employment development sites proposed in the Ince Blundell area. However, an 'area of search' for wind energy was identified. The responses received are summarised below. They are arranged thematically rather than by representor.

Renewable UK welcome the Renewable energy capacity study and identification of a search area for wind energy, in line with national policy. Objectors include Ince Blundell Parish Council, National Trust and others. In summary reasons for objecting are:

General

This is not a suitable site. Proposal is contrary to other local Plan policies or objectives.

Similar objections here as to West Lancashire proposal.

Ince Blundell Parish Council support Sefton Council's report of October 2012 regarding the Scoping Report for the proposed Lower Alt Wind Farm in West Lancashire. Report addresses many issue of concern regarding the development of a Wind Farm in Ince Blundell, and Ince Blundell Parish Council considers that Sefton MBCs observations on the Lower Alt Wind Farm are very relevant to the proposal to site a Wind Farm in Ince Blundell. Sefton should take the same view here.

Green Belt land should be kept for future generations.

Contrary to the Framework (paras 87, 91) regarding renewable energy and special circumstances. Contrary to national July 2013 Planning Policy Guidance, especially para 15. Impact on proposed housing developments and planning applications (e.g. Liverpool Road, Formby). Plan should have referred to 6 June 2013 Ministerial Statement regarding the importance of the views of local communities, and national Planning Policy Guidance published at the end of July 2013 – these omissions have misled local communities.

Impact on the environment, and on visual amenity.

Peaceful and tranquil area. Many Ince Blundell residents would support use of low carbon, decentralised and renewable energy, including micro-generation, where practicable, but would object to developments which result in unacceptable harm to their local environment. Impact on Ince Blundell but also Formby, Little Altcar and Hightown, Thornton and Sefton Village. Sefton has contributed to the wind farm need through the visual impact of the off shore sites.

Blight from industrial scale energy production. Inquiries are also being made regarding the establishment of a Solar Park in Ince Blundell bounded by Orrell Hill Lane, Moss Lane and North End Lane and the A565 Bypass. A biomass development is already installed at Ince Blundell Hall and similar renewable energy developments, including solar panels on houses and even mini domestic turbines are considered acceptable in the Village. Parish Council willing to participate in community based initiatives for renewable energy, but wind farms which dominate the landscape are not acceptable.

Health impacts

Health impacts on communities e.g. shadow flicker, strobing effect on properties - turbine blades cast moving shadows on properties during sunrise, sunset and low sun times, which can cause visual disturbances day and night; noise pollution. Stress and anxiety to tax-paying and voting residents of a quiet rural village. Studies report that wind farms sound levels and visual impact is statistically stronger in quiet areas/rural communities, disturbing sleep and causing psychological distress than in noisy areas.

Loss of high quality / Grade 1 agricultural land.

Impact notably on Rigmaiden Farm in Carr Houses. Agriculture is a feature of the Ince Blundell economy.

Wildlife impacts

Ecological importance of the site and surrounding area cannot be underestimated. Contrary to The framework para 14. Loss of habitat for endangered and protected species in the local and wider area (e.g. Ribble and Alt Estuaries Special Protection Area/Ramsar site (approx 1.5km to the west), other international nature sites), deaths from direct contact with turbines (birds). Impact on migratory birds (notably pink-footed geese) and several rare predatory birds (e.g. raptors) living at Lunt Meadows washland and the fields and woods surrounding Carr Houses. Area could end up being surrounded on three sides by wind turbines: Burbo Bank, Lower Alt and Rigmaiden, leaving the birds nowhere to fly, roost or hunt. Impact on bats - evidence of lung damage to bats, from air pressure changes produced by wind turbines.

Permanence

Permanent infrastructure remains, including huge, deep areas of concrete remain in the ground and can never be removed- permanent damage to the land. Estimated 25 year life span but the effects of development will damage the region forever.

Flood risk

Conflicts with the flood risk control measures of Local Plan; area at risk of flooding; likely raising of the water table.

Impact on aviation

Impact of turbines on aviation flight paths from/to Woodvale Airfield and the Tr- Service Helicopter Pad at Altcar Training Camp - facilities which are of national importance. Likely closure of the Microlight Airfield. Possible impact on emergency service helicopter support units e.g. Police Helicopters, Air Ambulances.

Electromagnetic effects.

These include radar and radio impacts (e.g. Air Traffic Control Radar).

Impact on Ince Blundell's significant heritage assets (including archaeology)

Impact on Ince Blundell's significant heritage assets, e.g. Ince Blundell Hall / Old Hall / Pantheon / Garden Temple, Church (Grade II* Listed), Conservation Areas e.g. Carr Houses. Windfarm 'area of search' surrounded by a large number of Listed Buildings and an aged drainage network which has high archaeological value. Close to recently discovered Lunt Meadows Mesolithic site of national significance. Sites of similar merit could be found at many points along the banks of the Alt. Wind farms have the potential to destroy this significant historic heritage. Contrary to Framework (paras 126, 132, 133) and to Sefton's past stance in the area.

Area is full of important historical sites, and ancient settlements. Area retains ancient drainage methods. Close to recently discovered Lunt Meadows Mesolithic site of national or international significance. Sites of similar merit could be found at many points along the banks of the Alt.

Impact on landscape character

Visually damaging/ loss of views across the open, flat landscape of the Lancashire Plain in West Lancashire and Sefton – contrary to the Framework. Cumulative impact of being surrounded by wind turbines on Seaforth Docks, Lower Altcar and Liverpool Bay.

Undermining of the green belt and the natural beauty of the area will see local people moving to nicer, unspoiled parts of the North West.

Impact on house prices

Loss of value of homes for those who can see turbines, all new homes in Sefton's housing development programme.

Viability

Government concerned about the viability of on-shore wind farms and their poor efficiency compared to coastal turbines. No full viability assessment has been carried out here - could affect proposals. Sefton has very little open space, so wind may not be an appropriate sustainable energy supply.

Impact on local recycling firm

Proposed site includes WRS Green waste processing plant (serving Sefton MBC). If the firm is forced to close where then will Sefton's green waste be processed?

Consultation, alternatives and related issues

No consultation has taken place with local people, contrary to government guidance, and pending Government legislation giving communities the right to say whether they want a wind farm. Trust that any pre-application consultation with local communities will be genuine, in line with new approach set out by government. Section 5 and para 10.35 refer to impacts on international nature sites and imply there must be another alternative windfarm area of search in Sefton; which is not the case. Para 10.31 indicates that the decision to include Ince Blundell is a fait accompli, and does not oppose the West Lancashire proposal (contrary to local expectations and Sefton's past approach).

Evidence and rationale flawed.

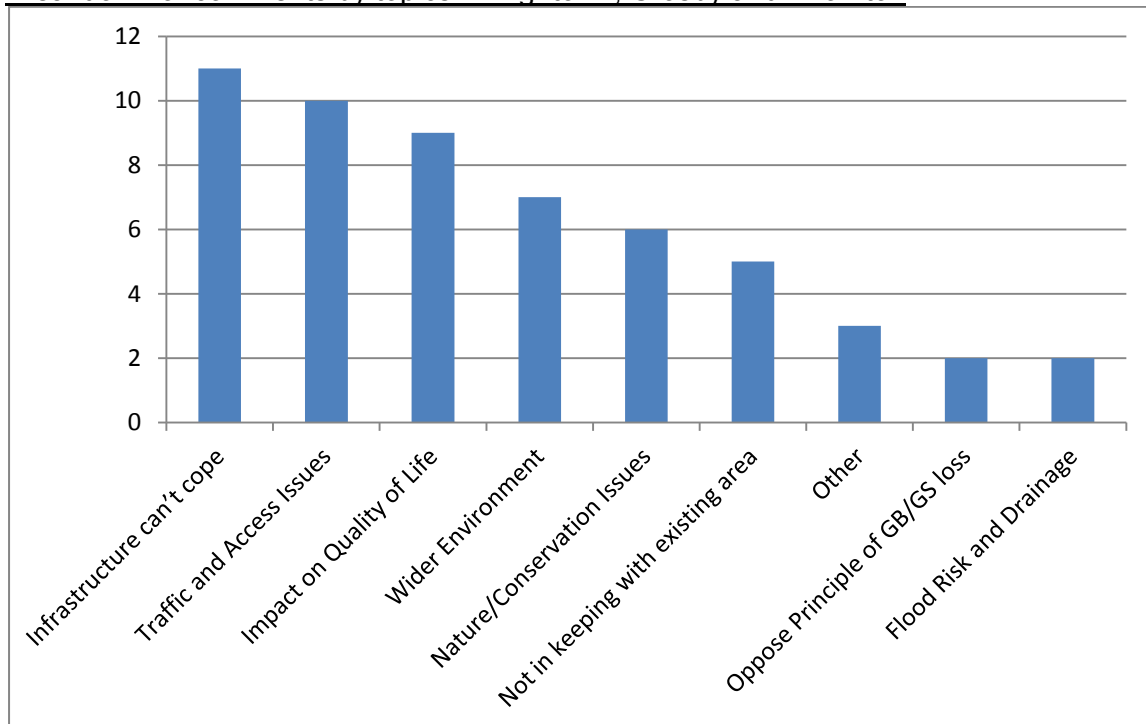
Renewable Energy Capacity Study 2011 is desk based, broad brush, clumsy and flawed (section 5 and paras 10.32, 10.33). Since 2011 Council should have reviewed viability of site and the outstanding issues referred to; instead of blighting Ince Blundell. Inclusion of Ince Blundell area of search is procedurally and substantively defective. Only evidence presented is that Ince Blundell is as windy as the rest of Sefton but has a less dense population. Para 10.34 mistakenly gives the impression that a planning application has been made or is likely to be made in Sefton. Para 10.35 should not set out an exhaustive list of matters to be considered in terms of mitigation of harm to the local environment.

12. Summary of representations – Proposed Development Sites in Hightown, Crosby & Thornton Area

Hightown



Breakdown of comments by topics in Hightown, Crosby and Thornton



In the chart above GB is Green Belt, GS is Green Space

Traffic & Access

Both sites are accessed only off Sandy Lane. Sandy Lane is narrow road and often poorly maintained and can suffer from high levels of use when football matches are being played and when Church services are being held and this can result in parking restricting passage down the road. More houses will add to this issue, especially as the road cannot realistically be widened. There is no footway in places which makes it hard to walk into the village centre or railway station. The amount of traffic already using these lanes is dangerous (especially to children using the sports pitches). The roads are totally unsuitable for construction traffic. Elmcroft Lane is a narrow residential lane and is not suitable for a large increase in traffic, including for construction. It is doubtful if emergency vehicles could reach the far end. It is impossible to walk from Elmcroft Lane to the Hightown train station or village centre without crossing the road twice in the absence of a continuous footpath. Sandy Lane by the SR4.18 site is extremely narrow and poorly maintained. There is no realistic possibility of widening this road or widening and upgrading Gorsey Lane leading to Moss Lane.

Infrastructure

There are no schools in the village and Formby schools are full. Need a school in Hightown. The two proposed sites in Hightown [58 homes] together with the Kerslake proposal [13 homes] would mean a significant number of school places at a time when Formby schools are full. More school children would have to be bussed out of village adding to congestion.

Local GP/dentists at capacity. More will be needed. There are no plans for BT infinity fibreoptic broadband in Hightown. Mobile phone coverage is almost absent. There is little in the way of amenities or facilities. Already amenities are stretched (e.g. drainage). Need an improved bus service.

Nature Conservation

The area is full of wildlife and natural vegetation. The ecology of the area would be destroyed. All the trees at the southern end of Elmcroft Lane would be chopped down - this is a pretty little copse.

Flood Risk & Drainage

Land is below sea level and could flood. Hightown's existing drainage and subsidence problems will be made worse by this greenfield development. Drains and sewerage in area already reaching life expectancy. Development would require drainage improvements; need evidence that there will be no drainage problems after development. The main sewer in Elmcroft Lane regularly blocks. Drains to small local pumping station (nr Riverside) already over-burdened in wet weather, e.g. flooding in Thirlmere Rd after heavy rain.

Wooded area at the end of Elmcroft lane is waterlogged and spongy. Field drainage problems on site and surrounding area.

Ground conditions

There is a history of subsidence issues that may be exacerbated by the proposed developments.

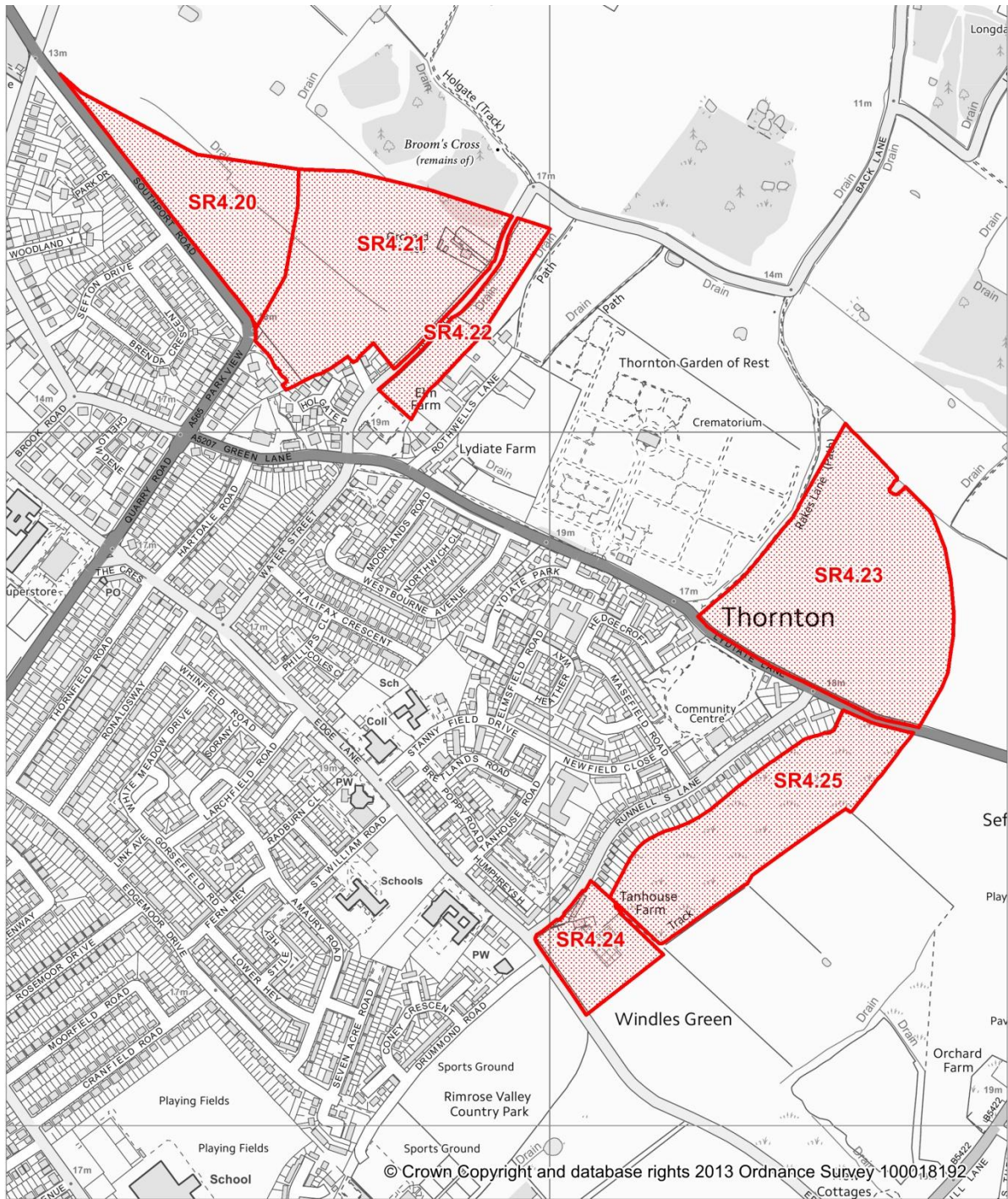
Other Comments

People choose to live here because of the peace and quiet and its semi-rural nature. House values will be seriously reduced. Hightown is the last true village in the area and the character and feel of Old Hightown will be completely changed. To be in keeping with the local area, a maximum of 10 houses should be built here. High density housing would spoil the look of the area, be out of keeping and would damage the character of Hightown. The amount of development is out of proportion and would be detrimental to the aesthetic appearance and character of the area.

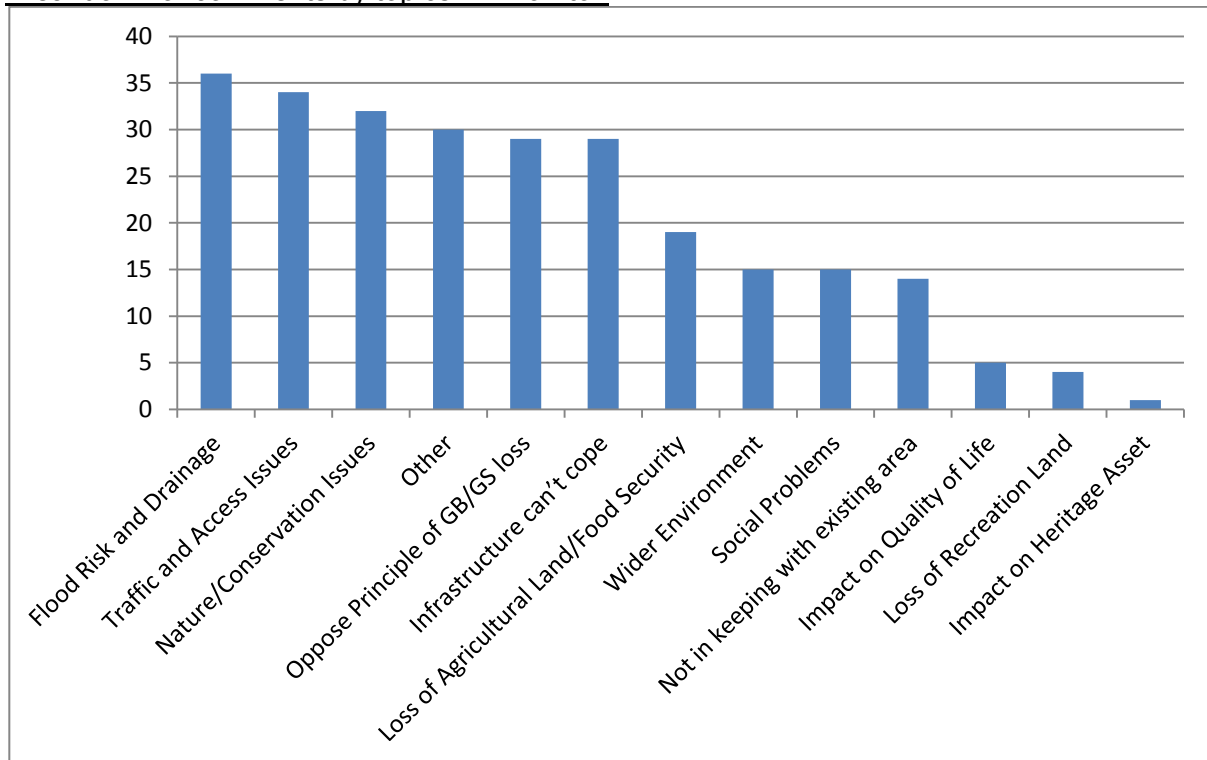
Hightown is unsuitable for affordable housing due to the lack of facilities. Residents will suffer from extra noise, may be overlooked and suffer from a lack of privacy. Siting of the houses near to the playing fields will lead to increased complaints regarding noise above those raised by the current residents of Elmcroft Lane.

Impact on Rose Cottage or its setting, which is a listed building.

Thornton



Breakdown of comments by topics in Thornton



In the chart above GB is Green Belt, GS is Green Space

A representation was made by Sat Plan, on behalf of Hallam Land Management and Nuffield College supporting the proposed allocation of SR4.23 for homes, although consider that the site area should be increased to 9.85 ha

A representation was made by Hitchcock Wright & Partners, on behalf of Mr and Mrs Rushton supporting the proposed allocation of SR4.24 for homes

A representation was made by NJL Consulting, on behalf of the Strategic Land Group supporting the proposed allocation of SR4.25.

A representation was made by P Wilson & Company, on behalf of Messrs A Swift & C Pittaris supporting the proposed allocation of SR4.25 for homes

Traffic & Access

The proposed bypass will remove traffic from the roads and yet the proposed housing will cancel out those benefits by increasing local traffic and possibly also result in congestion on the bypass.

Question whether there is an inter-dependency between the Local Plan and the proposed 'Brooms Cross Link Road'. Residents may have objected to the Link Road had the proposed housing been known about.

Concerns that straightening Long Lane near to the Jospice may make it more dangerous for vehicles and cyclists join the main carriageway. May make it very dangerous at busy periods.

Restrictions will be required on Southport Rd / Sefton Drive / Ince Rd to prevent these roads becoming a rat run and concern about where the access points to new development will be. Lydiate Lane is already overused by vehicular traffic (a situation that is exacerbated by the

location of the crematorium and burial ground). There is a narrow footpath on one side of the road only and no provision for cyclists.

Some of the local roads like Holgate are not suitable for large amounts of traffic and therefore not suitable for development as an access point.

The building of an estate of 235 new houses with one exit/entrance on Lydiate Lane will only make matters worse.

Infrastructure & Services

Thornton primary school has been closed. Where will new families send their children? There are Catholic schools only in area. Local GP/dentists at capacity. More will be needed.

Flood Risk and Drainage

Existing flooding on Long Lane and opposite Jospice (land has always had natural ponds), increased incidence in last 10 years due to increased hard surfaces. Flooding from field run-off to existing gardens would be made worse by development. Would increase pressure on drainage system. The land opposite Southport Road floods in parts and gardens flood. Additional building would increase the flood risk to our properties. Not against development in itself but would like guarantee that flooding issue can be resolved

For site SR4.23 Land at Lydiate Lane, Thornton, the Environment Agency refer to ordinary watercourse constraints.

Nature Conservation

Numerous owls and bats in the Thornton area and it is a haven for a host of other wildlife which would lose their habitat if houses were built here.

Wider environment

Instead of living adjacent to a rural environment, we will view out over a vast housing estate, Brooms Cross Road, traveller sites and in distance a vast wind turbine farm.

Other Comments

We were assured at the time of these proposals that the land between our properties and the link road would not be used for development, but would be planted with trees and shrubs to protect us from the noise, pollution and unsightly outlook of the new road.

Affect on local footpaths, some of which are old routes and of local historic interest.

Affordable Housing in the area will have a detrimental effect on existing property prices in a highly desirable area and prime location.

Crosby

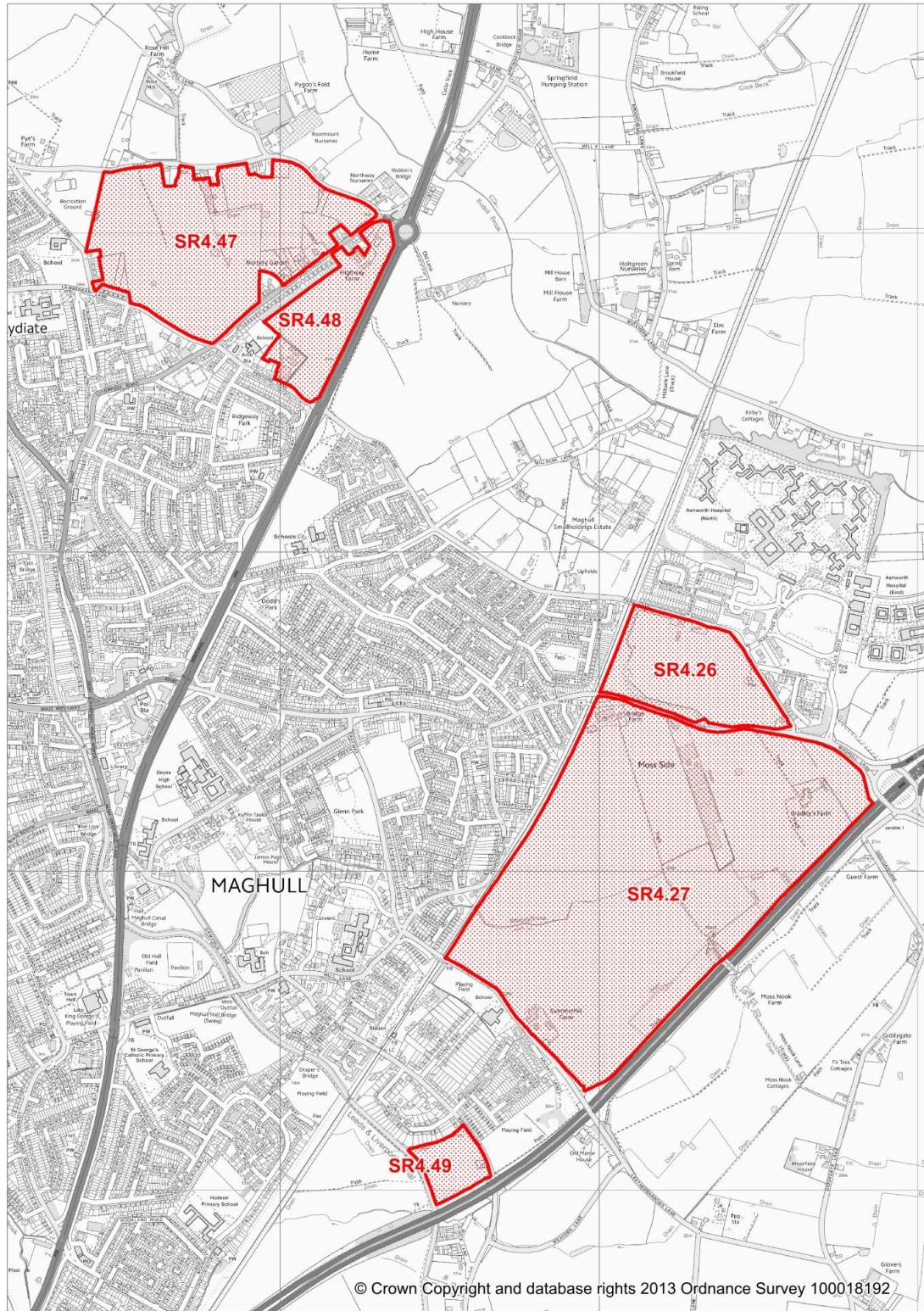


SR4.19 Land at Hall Lane West, Crosby

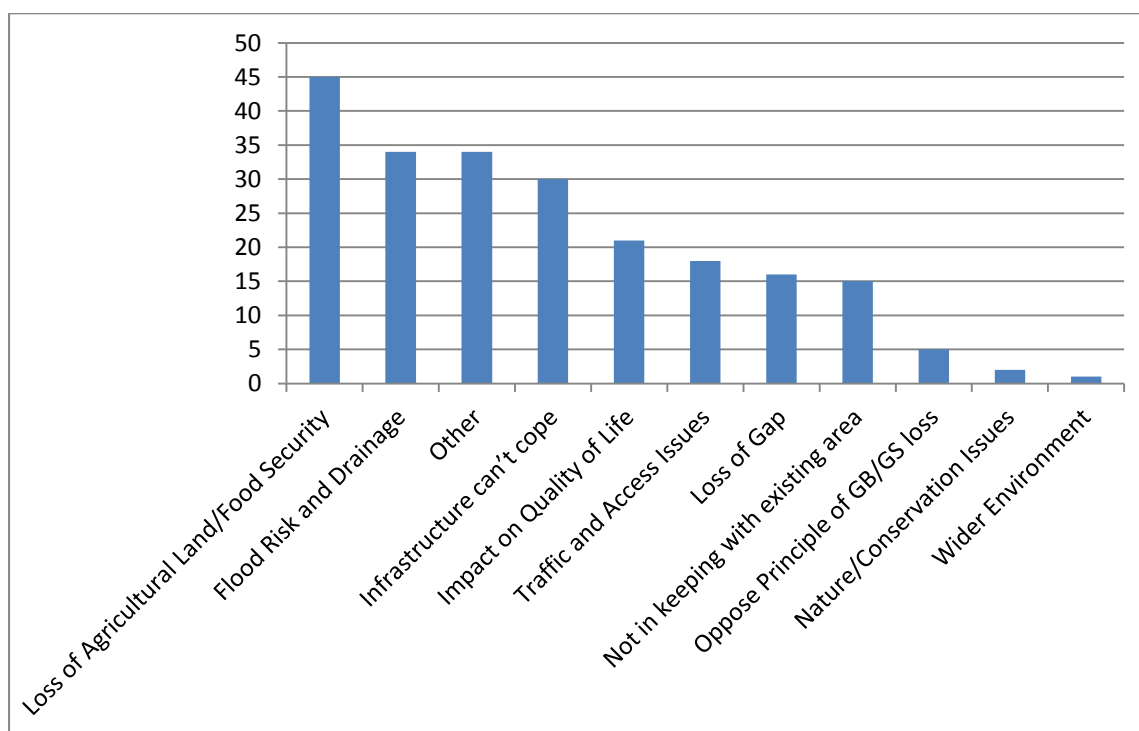
One supporting representation from the landowner, Network Rail, for developing this site. No site specific objections were received .

13. Summary of representations – Proposed Development Sites in Maghull, Lydiate, Aintree & Melling Area

Lydiate



Breakdown of comments by topics in Lydiate



In the chart above GB is Green Belt, GS is Green Space

SR4.47 Land north of Lambshear Lane, Lydiate

Supporting representations were received including from Colliers, on behalf of Mactaggert and Mickel supporting the allocation of site SR4.47 for homes.

A petition was received containing 892 signatures against developing the site and the Green Belt generally. There were a number of objections, see below.

SR4.48 Land north of Kenyon's Lane, Lydiate

Supporting representations were received including from Property Collateral, on behalf of the Orchard Co-operative support the proposed allocation of SR4.48 for homes.

There were a number of objections, as below.

Traffic and access

The sites are approached on the whole by narrow, often rural, lanes as well as the A59 to the east. Many of these lanes and some of the junctions are already at capacity and cannot be remedied. The junction of Liverpool Road / Lambshear Lane / Kenyon's Lane in particular is hazardous. The proposals would increase the traffic significantly and exacerbate those issues. The village is used as a shortcut to the motorway and is already very dangerous and congested (particularly around the primary schools). More housing will make this situation worse. Existing traffic issues have not been resolved despite traffic calming measures. The roads flood during spells of bad weather making them more dangerous.

The A59 towards Bootle / Liverpool / M57 / M58 can get extremely congested at peak times. The 819 houses will add a lot of traffic on the roads in an area where there are three primary schools.

Flood Risk and drainage

Many sites prone to flooding, or have high water table / water-logging. Development (hard-surfaces) will result in runoff or displacement to existing properties, increasing flood risk elsewhere, including in areas where it is not currently a problem. Site floods regularly and has high water table - acts as natural flood protection area for surrounding houses.

Infrastructure

A school in Lydiate has recently been demolished and level of new development will put added strain on existing schools. Remaining schools in Lydiate are full to capacity.

There are no doctors surgeries in Lydiate. Have to wait a long time to get a doctor's appointment. The medical facilities would have to be expanded or new facilities provided.

Not in keeping with the area

Lydiate could grow by a third if sites are developed, completely changing the character of the area.

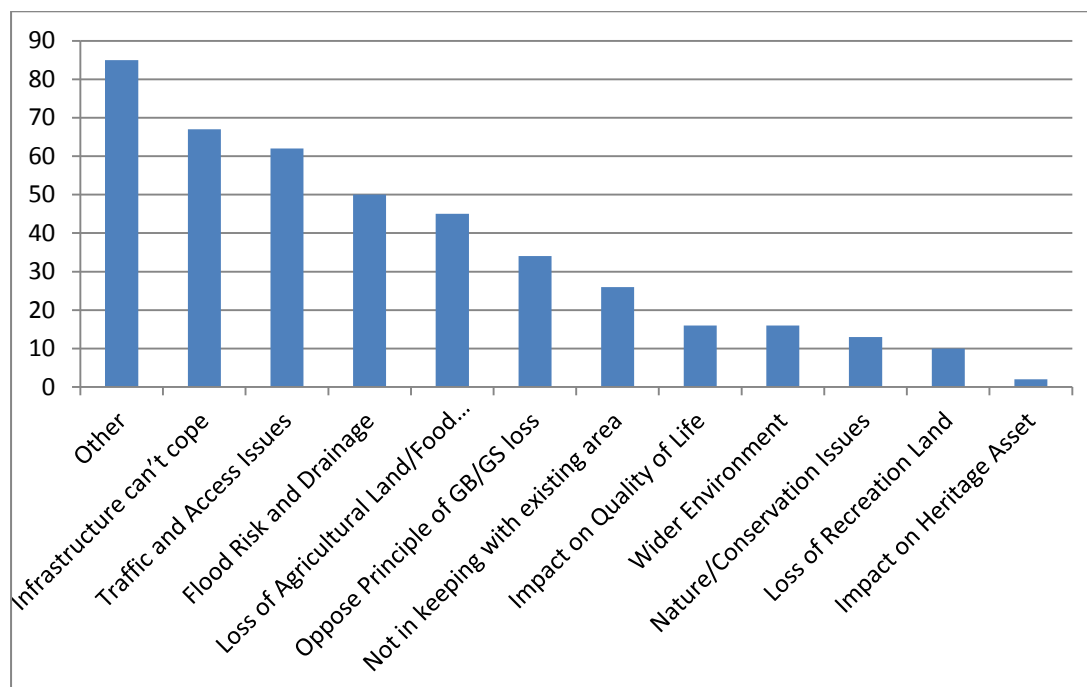
Other comments

These are reserve sites. As they will only be protected from development for 5 years, they are considered to be under the same threat as the proposed allocations in Maghull. Lydiate Parish Council will not sell any of its land to facilitate this development.

Maghull

[see map above in Lydiate section]

Breakdown of comments by topics in Maghull



In the chart above GB is Green Belt, GS is Green Space

For Maghull generally there were flooding concerns, flood protection concerns, high water table, unacceptable extra pressure on drainage.

SR4.26 Former Prison Site, Park Lane, Maghull

Supporting representations were received in respect of this site. There were a number of objections. Sport England oppose this allocation unless the site is shown to be surplus to pitch requirements (consistent with the Framework para 74).

SR4.27 Land east of Maghull

Supporting representations were received in respect of this site including from Savills, on behalf of Taylor Wimpey and Hallam Land Management and Barton Wilmore, on behalf of Countryside Properties (UK) Ltd; Persimmon Homes and P Wilson & Company LLP.

There were a number of objections, as below .

Development needs to be built alongside infrastructure including Maghull North Rail Station and suitable bus transport linked both to the rest of the Maghull and to the rail stations. The link off the M58 and the Maghull North station are key infrastructure and as such funding streams need to be identified. Whilst the station will be beneficial for the site it is for the wider benefit of Maghull and as such a large proportion of the cost shouldn't fall on the developers of this site.

Flood plain, land is at highest risk of flooding so should not be developed. Large brook running through site floods readily, up to Poverty Lane. Regular winter flooding (attracts migrating birds), to around 50-75m of Poverty Lane. Past flooding in School Lane

(continually), Deyes Lane and Eastway, near to the cleared Park Lane site. Increased run-off from local watercourses e.g. River Alt.

High water table. Existing surface water and sewer flooding increased in various places around Maghull in recent years. Current on-going need for farmer to clear Whinney Brook and land drains. Existing sewer flooding increased in various places around Maghull in recent years. Drains are often blocked with a putrid stench at the end of Hesketh Drive since the building of H.M.P.Kennet.

Development (hard surfaces) will increase flood risk to existing properties -need control over patios etc.

The Environment Agency refer to main river, ordinary watercourse, Flood Zone 2 and Flood Zone 3 constraints.

SR4.49 Land south of Melling Lane, Maghull

A supporting representation was received in respect of this site from Barton Wilmore, on behalf of Robert Swift

There were a number of objections received, as below.

Traffic and access

There was a lot of concern from local residents that the lanes and roads around the east of Maghull are already very busy and suffer from heavy congestion. It is so congested that the Council are bringing in a 20mph speed limit. If the proposed housing and business park are built along with improved access to the M58 and the station, it will have a very serious impact. Deyes Lane and School Lane will suffer a from a lot of congestion. Poverty Lane and Melling Lane are very busy now and the access through Hall Lane and up to Damfield Lane are very narrow and unsuited to current levels of traffic. The proposed developments and the expansion of the school could cause huge increases in traffic. Melling Lane is extremely narrow with very limited potential for widening. It is already dangerous for pedestrians with vehicles mounting the pavements. Congestion also backs up from the level crossing.

If the development goes ahead then the access from Poverty Lane should not be opposite Molyneux Road. Summerhill Drive would become a route for pedestrians and cars. There are also some public footpaths going through between buildings that are quiet now but could become very busy.

The bus services in the large parts of the area are limited or non-existent.

The strategic allocation at Land East of Maghull could cause highway capacity and safety issues / constraints along the A506 Bank Lane corridor. The transport considerations of both the Tower Hill (Kirkby) Action Area and the Kirkby town centre redevelopment scheme provide evidence of existing highways capacity and safety issues / constraints

Flood Risk and drainage

The Environment Agency refer to potential FZ2, ordinary watercourse and culverts constraints. They suggest that the Council consider opening up the culverted watercourse to prove water quality, habitat and flood risk management benefits.

Infrastructure

The infrastructure in Maghull will not accommodate an increase in population through more housing. Apparently no new community facilities proposed. The community and recreational needs have been neglected. It would be tragic to repeat the mistakes of the 1960's and to

imagine that houses are the only real human need. Most people moving to a new area would like to see a range of small shops nearby, with a vital post office, possibly a bank, a clinic, a nursery, a centre of community activity based on a church or "village centre", such as exists in Lydiate. Could the Council require developers to include significant provision such uses? We need more small shops.

There are a number of excellent schools in Maghull. Would these be expanded to cope with additional homes; would they maintain their current standards? Maghull children will be forced to travel elsewhere to attend school. Will new schools be built? Children will need something to do and somewhere local to go in the evening and at week-ends. If Summerhill Primary is expanded this should not encroach on neighbouring properties.

Our ambulance service is not meeting its 8 minute response time. This will be made worse by new development.

Concerned about implications of the proposed local centre and possible competition to Maghull centre - unclear what 'appropriate scale' means.

The health centre in Maghull, with three GPs, has just parking for 19 cars. Need to consider providing other services, such as a new walk-in centre in Maghull or much-improved out of hours/weekend service to Aintree Hospital. We have so few dental surgeries and doctors in Maghull at present.

Development needs to be built alongside infrastructure including Maghull North Rail Station and suitable bus transport linked both to the rest of the Maghull and to the rail stations. The link off the M58 and the Maghull North station are key infrastructure and as such funding streams need to be identified. Whilst the station will be beneficial for the site it is for the wider benefit of Maghull and as such a large proportion of the cost shouldn't fall on this the developers of this site.

If Sefton Council can show that the above infrastructure is offered I am sure that many people will no longer object to the Maghull building plans. This site has by far the greatest number of houses in one site, its size alone brings inherent problems and risks, not least to the infrastructure that will be required.

Given that developers will have to fund the necessary infrastructure costs, it is highly improbable that the necessary affordable housing will be built as this is less profitable than 'high end' housing. The net effect will be either the non building of the necessary infrastructure or the building of unnecessary housing units or a combination of the both.

Loss of agricultural land

The site is Grade 1 agricultural land which will be lost forever if built on. If, eventually, some building on green belt proves to be necessary, it should not, under any circumstances, take place on large areas of Grade 1 agricultural land. There are some smaller areas of green belt which farmers can perhaps claim with some justification to be uneconomic and impracticable to farm but this does not apply to this site.

The farmland in question has always been graded 1, until it was strangely recently downgraded, but is still classed "most versatile" and as north west farmland is the most expensive in the country, to destroy it is a criminal act against this and future generations. The amount of wheat and vegetables grown over the years here is incalculable and we need home produced food now more than ever.

Nature Conservation

This particular land area is vibrant with wildlife which will go. Flora and fauna are a necessity to our area. It is home to many species of wild life and thousands of migrating birds.

Loss of recreational land

Will the public foot path right of way from School Lane through Swifts Farm onto Giddygate Lane and Poverty Lane be lost if this site is developed?

Quality of life

The whole area is bordered by the electric rail line on one side and the M58 Motorway on the other. This may not make the most pleasant place to live.

If this area was to be developed it would have a significant effect on the existing local population.

Not in keeping with the area

This number of houses constitutes a 'whole community' in itself and is a huge development which will change the whole character of this area. A secure hospital site is not designed to be integrated with surrounding residential neighbourhoods.

Other comments

The business park is intended to take advantage of the expansion of the Seaforth container base, to create jobs. However, it will not be fully occupied for a considerable time and businesses may just relocate from one site to another within the area without creating any additional jobs. Will the inclusion of a business park mean a huge supermarket development? There are already empty business units / offices in Sefton Lane and a number on the Aintree retail park. The Square needs to be renovated.

Disagree with the plan to build small pockets of houses year on year – this drags out huge disruption. Instead I believe you should concentrate on the completion of fewer sites, before moving to the next.

Bradley Farm, though not designated, is a heritage asset

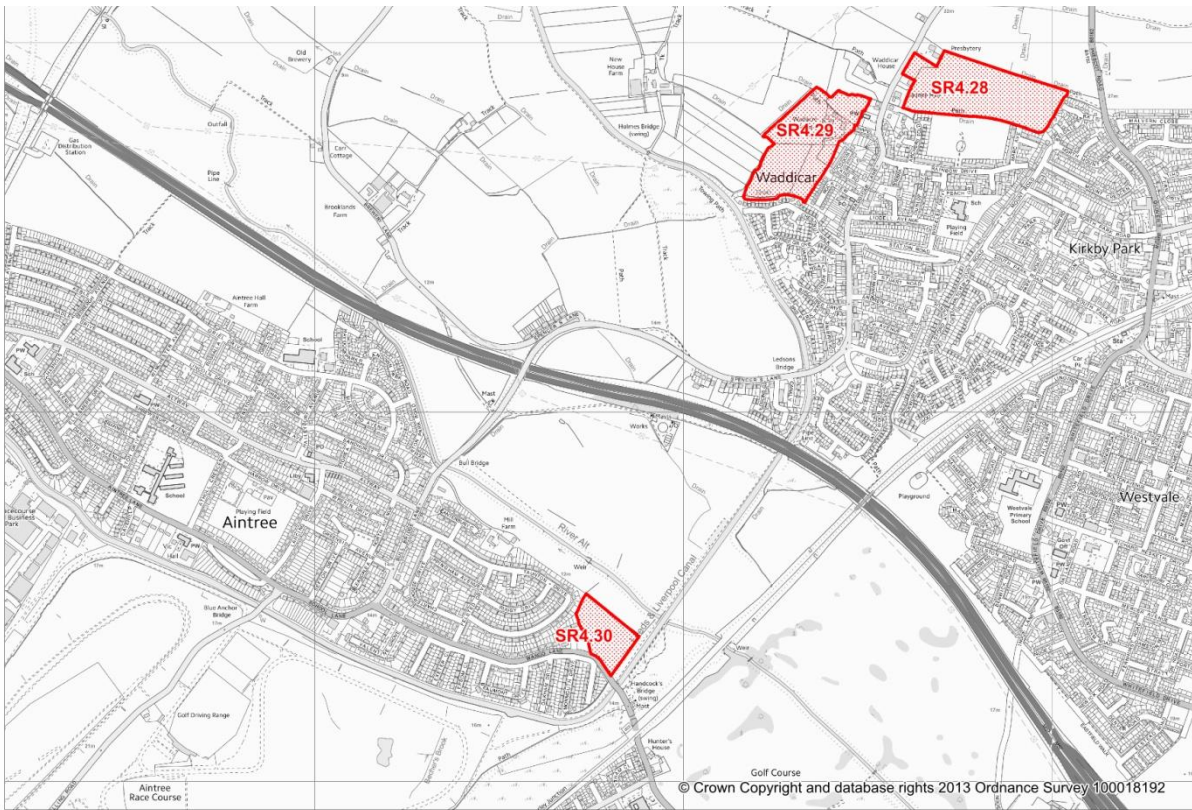
Harrison and Sons (who are promoting an alternative site not previously identified) have concerns with the deliverability of the former prison site and its identification of a strategic allocation in the Local Plan. A significant number of planning obligations have been identified as part of this policy. No evidence has been provided that the cumulative effect of these obligations could be viably delivered on this site.

Employment sites in Maghull

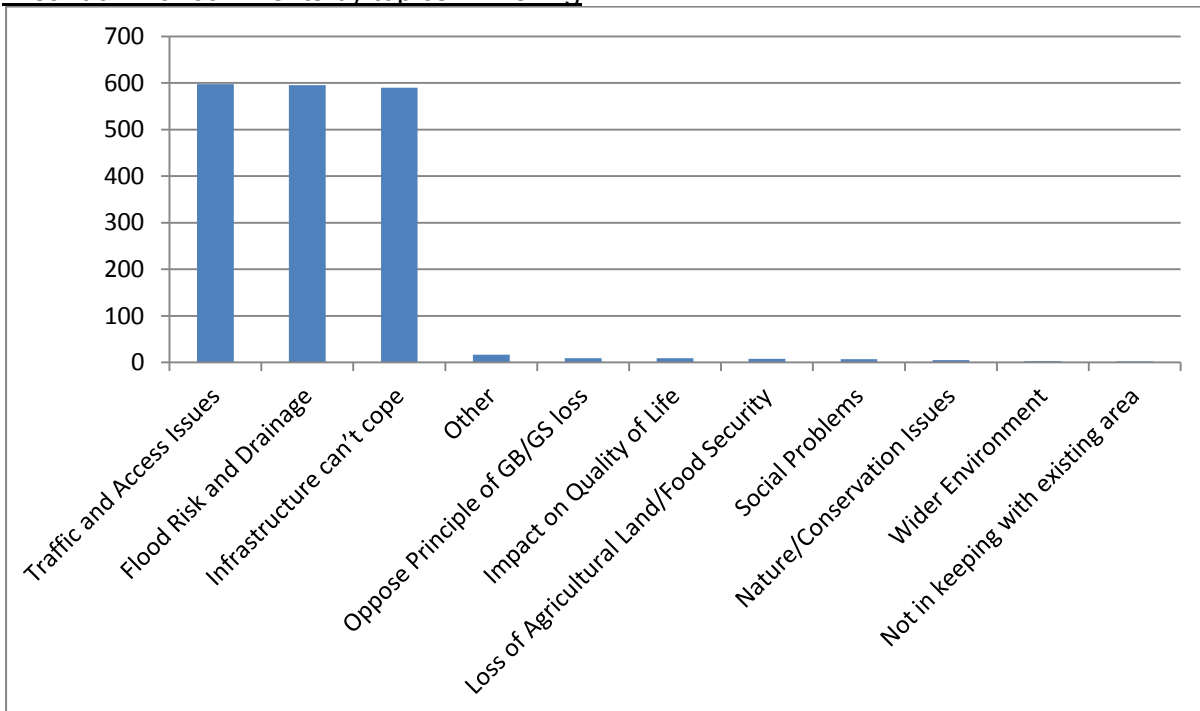
SR5A.3 - Former Sewage Works, Sefton Lane, Maghull

The Environment Agency refer to main river and Flood Zone 2 constraints.

Melling



Breakdown of comments by topics in Melling



In the chart above GB is Green Belt, GS is Green Space

There were a number of objections, and 570 standard letters objecting to development in Melling were also submitted.

SR4.28 Land east of Waddicar Lane, Melling

Supporting representations were received in respect of this site.

SR4.29 Wadacre Farm, Melling

Supporting representations were received in respect of this site.

Traffic and access

The impact of a potential 300 new homes on the roads of such a small village will be very large. Recent developments have already made the situation much worse. The village is totally unsuitable for heavy traffic.

The village has limited services and amenities and is reliant on the car as there is limited public transport. The station in Kirkby is too far from the sites for people to use.

Waddicar Lane is the only way in and out of the village, does not have the capacity or durability to safely handle current traffic levels. It also is very narrow, twisting include blind bends and has very limited possibility to be extended.

The homes may have an impact on the roads in Kirkby, Aintree and Maghull (especially when considered in conjunction with the proposed developments in Maghull). Will therefore need a Transport Assessment covering the whole area.

Site SR4.28 [Land east of Waddicar lane] – Residents were very concerned about having a potential access point off Waddicar Lane near to the scout hut as this part of the road has limited visibility and cars drive too fast. Therefore there may be a safety issue.

Residents of Marc Avenue concerned that their properties might be subject to a Compulsory Purchase Order to access the site.

Residents of Kirkby did not want access off their estate, considering the roads to be unsuitable.

Site SR4.29 [Wadacre Farm] – A potential access off Chapel Lane is not suitable because the road would need widening and there is little room to do so and any access onto Waddicar Lane is dangerous due to the speed of vehicles and limited visibility.

Other potential access points (for example off Rock View) would involve purchasing existing homes to make an access and would otherwise be unsuitable on small, residential lanes.

Flood risk and drainage

Flood protection concerns, sites prone to surface water flooding at rainy times of year, high water table. The drainage system in Melling (rain water and sewage) is already unsuitable. There are capacity issues with internal and external foul sewer and surface water flooding problems. These cannot cope with new developments. United Utilities are aware of these issues. Drainage worsened since houses were built on the BICC site. Concern about [foul] waste discharge from new homes.

High water table, poor ground conditions, sites frequently water-logged.

Village already gets cut off by brook flooding and more houses will make this worse.

Issues with the drains at all 3 housing developments and wider Melling - more housing would put more strain on this. Existing surface water problems and numerous incidences of overflowing drains - both rainfall and foul, affecting sewers which back up into kitchen, e.g. Rock View area, since Archers Fold built. Concern about [foul] waste discharge from new homes.

Village already gets cut off by brook flooding and more houses will make this worse. High water table. Sites frequently waterlogged; poor ground conditions and troublesome sewers and drains. Gardens turn to marshland in winter. Recent flooding problems from canal overflow (e.g.. Horse and Jockey, Waddicar Lane).

For site SR4.29 [Wadacre Farm], the Environment Agency refer to potential ordinary watercourse and main river constraints.

Infrastructure

The only school in the village is at capacity already. Will school be expanded? Melling has minimum children's facilities, oversubscribed doctor surgery [with limited appointments], minimum shops, small primary school, narrow roads and poor public transport links. Recognise that the Melling GP falls under Knowsley NHS but Sefton have to work with them to increase capacity.

Melling Parish Council is opposed to the building of further houses in the parish. However, it recognises it may be inevitable that some additional building takes place. Any development must be preceded by appropriate improvements to all infrastructure in the village - roads, drainage and leisure facilities and by significant improvements to school capacities.

Loss of agricultural land

The site comprises 'best and most versatile' agricultural land which is in constant use

Nature conservation

Melling is a semi rural location with a lot of wildlife diversity.

Quality of life

Melling is classed as a village. We don't want it to change to a town. There has been too much development over the past 15 - 20 years.

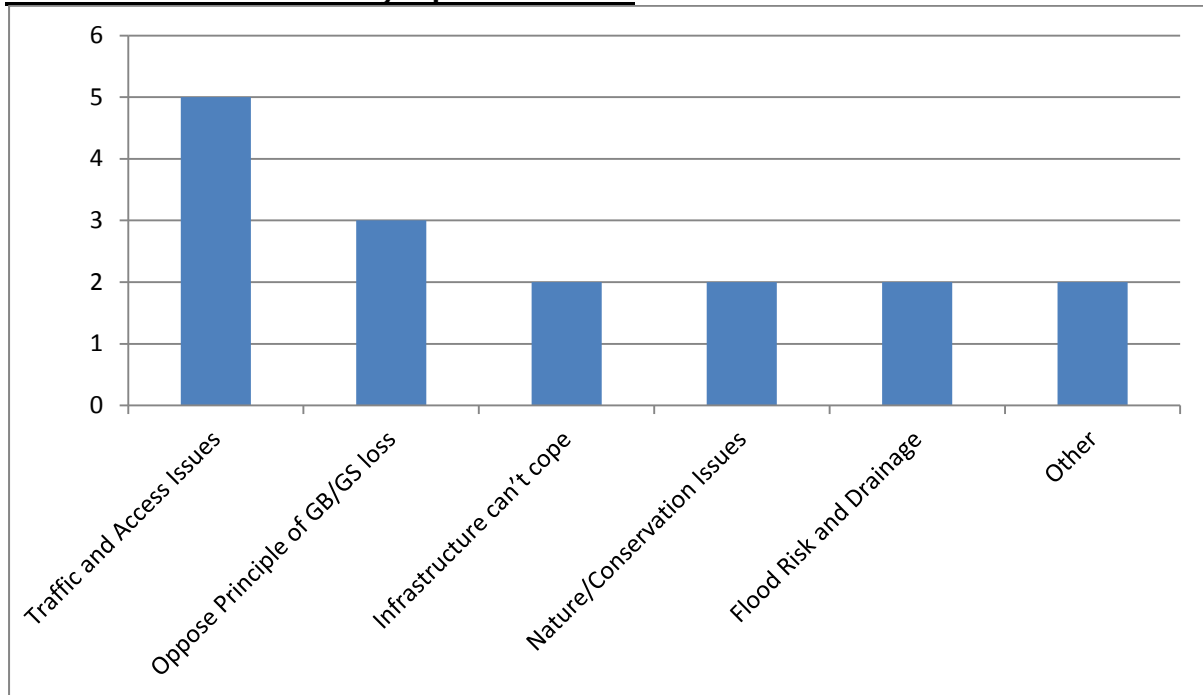
Other

Only 50% of the area should be developed with a total of 93 houses not the 141 as stated. Objects to social and rented housing, encouraging lower class people to live amongst those who work and pay their mortgages. Will the housing be built up to the scout hut? This is not a good idea, as children are there for scouting events/activities.

Aintree

Please refer to the map under the Melling section, above.

Breakdown of comments by topics in Aintree



Supporting representations were received in respect of this site including from the owners.

There were a number of objections, as below.

Traffic and access

Wango Lane is already a major arterial highway [e.g. to hospital and retail parks] so does not need extra development / traffic. There is congestion at canal bridge traffic lights especially when bridge is 'open' to allow passage of boats. Site access via Valley Close would require demolition of homes and would destroy quiet cul-de-sac.

The bus service in Aintree is very poor and the station is a long way from the site.

Infrastructure

There are few shops, the bus service is inadequate, our Library services are being withdrawn and we continually have to contend with traffic congestion when entering and leaving Aintree as a result of the heavily used Aintree Retail Park. The proposed development would aggravate each of these matters, as would capacity being reached at the local schools and GP.

Nature conservation

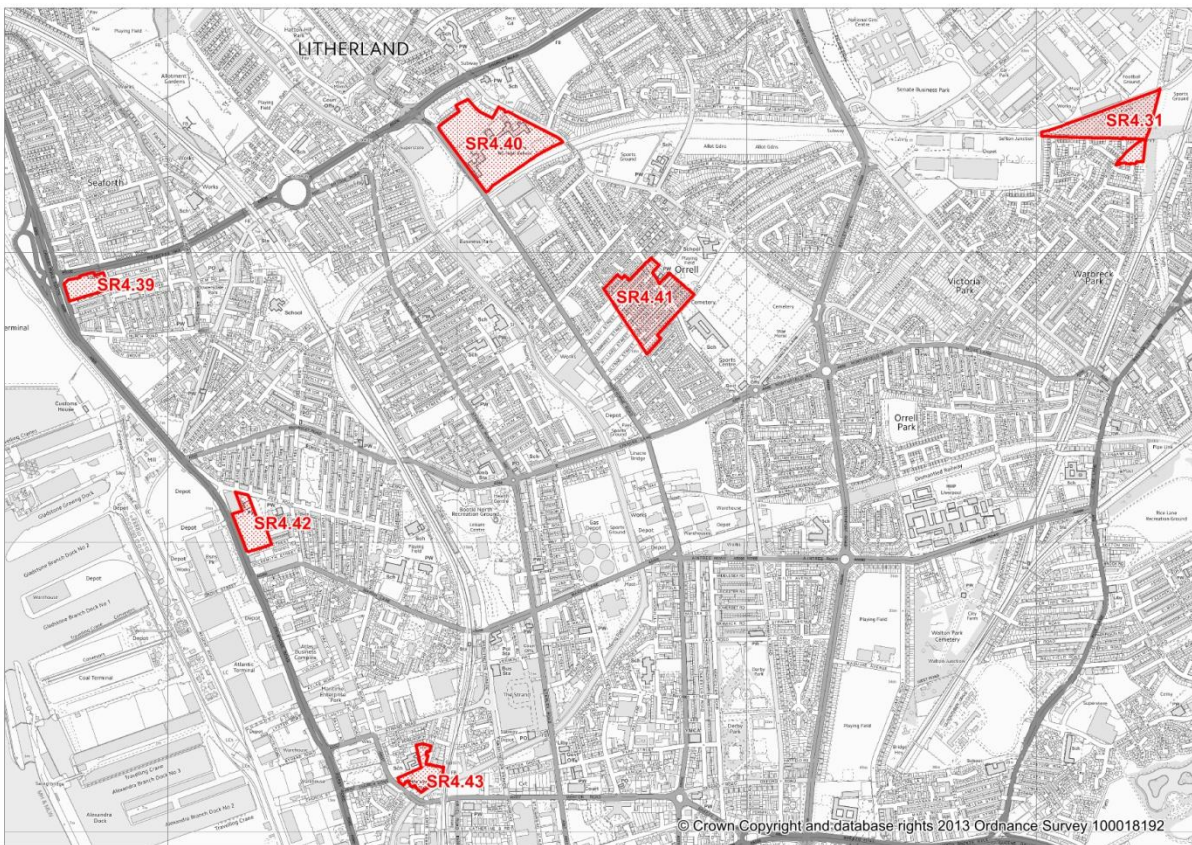
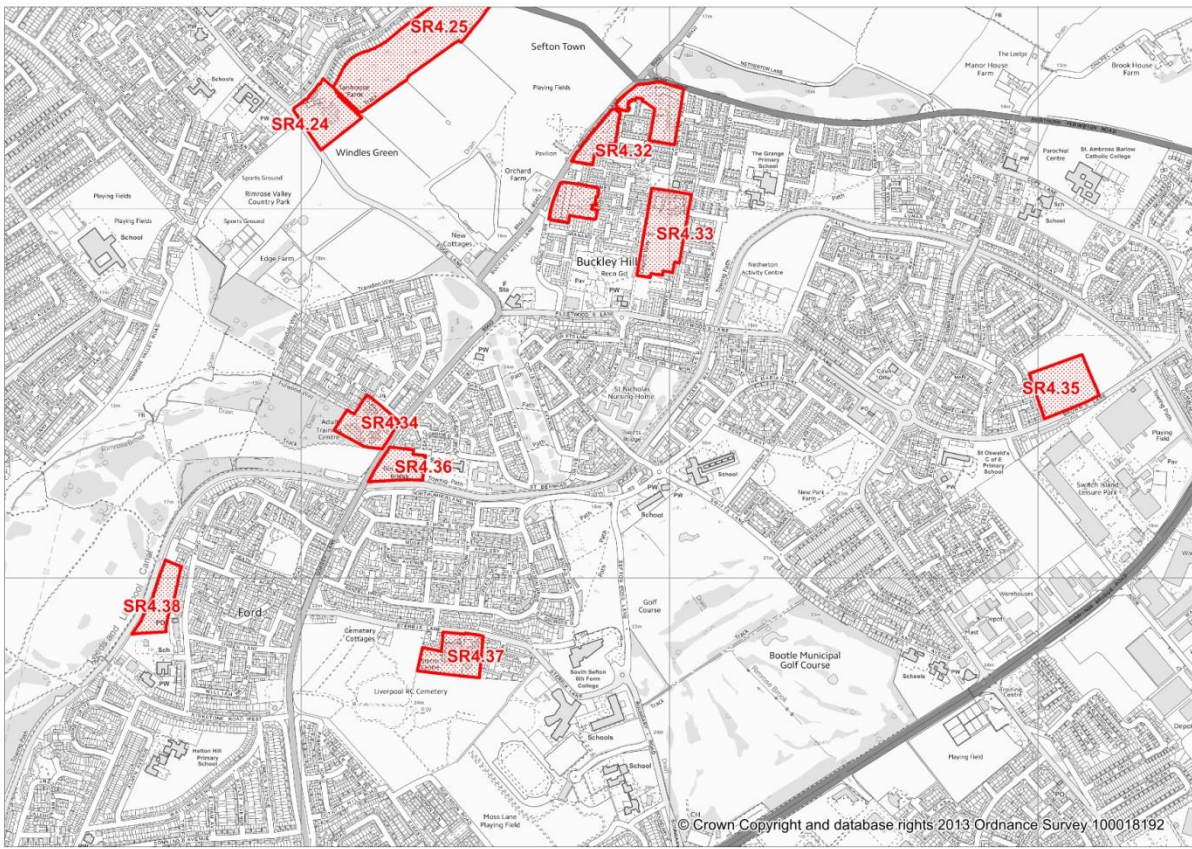
Development would have a detrimental impact on the wide variety of wildlife in the area.

Flooding and drainage

Frequent, and sometimes heavy, sewer, surface water and other, flooding on site and nearby, especially after heavy rain. There will be an increased risk of canal flooding. Aintree Lane side of the canal regularly floods and is often closed to through traffic, despite many attempts to address the issue over the years. Valley Close flooded several years ago and has on-going sewer problems.

Development would increase flood risk in areas around canal bridge, from flood plain, higher water table and cause more surface water runoff due to hard surfaces. Concern about risk of canal flooding on site.

14. Summary of representations – Proposed Development Sites in Bootle & Netherton Area



No representations were received regarding some sites in Bootle and Netherton. Representations received for other sites are set out below. Sport England oppose any allocation that is used [or was last used] as playing fields unless the site is shown to be surplus to pitch requirements (consistent with the Framework para 74).

SR4.31 – Aintree Curve

1 supporting representation received.

SR4.32 – ‘Z’ blocks sites, Buckley Hill, and SR4.33 – Former St Raymond’s School site

Objections were received to the loss of both sites. The Sefton Lane estate was built at a very high density with small front and rear gardens, with substantial areas of open space provided within the estate. These areas should be maintained. Building on these green areas will increase anti-social behaviour.

SR4.34 Land at Pendle Drive, Netherton

The Environment Agency refer to potential ordinary watercourse and culverts constraints, and suggest that the Council consider opening up the culverted watercourse to prove water quality, habitat and flood risk management benefits.

SR4.35 Former Bootle High School, Browns Lane, Netherton

SR4.36 Former Daleacre School, Daleacre Drive, Netherton

SR4.37 Land at Sterrix Lane, Netherton

SR4.38 Land adjacent to Our Lady Queen of Peace School, Ford Close

SR4.39 Former Rawson Road County Primary School, Rawson Road, Bootle

ReClaim your Communities oppose proposed housing allocations sites at SR4.39

SR4.40 Former St Wilfrid’s School, Bootle

ReClaim your Communities supports the allocation of this site for homes. However objects to 6 other school sites identified for housing redevelopment in Bootle and Netherton.

SR4.41 Klondyke Phases 2 and 3

SR4.42 Former St Joan of Arc School, Rimrose Road, Bootle

ReClaim your Communities oppose proposed housing allocations site SR4.42

SR4.43 Former St Mary’s playing field, Bootle

SAFE Productions: This land, and a wider surrounding area, should be designated as land for Regeneration within Policy SR6. The land defined by SR4.43 is a complex and inefficient shape which breaks up a larger area of potential development. By excluding the St Mary’s Complex and land around the Little Merton Public House this boundary is reducing the apparent amount and consequent efficiency of potential new development of any kind. By changing the designation to Regeneration, this would not preclude residential development, but would allow additional uses which could contribute to the place-making/ leisure/ employment objectives of the Plan.

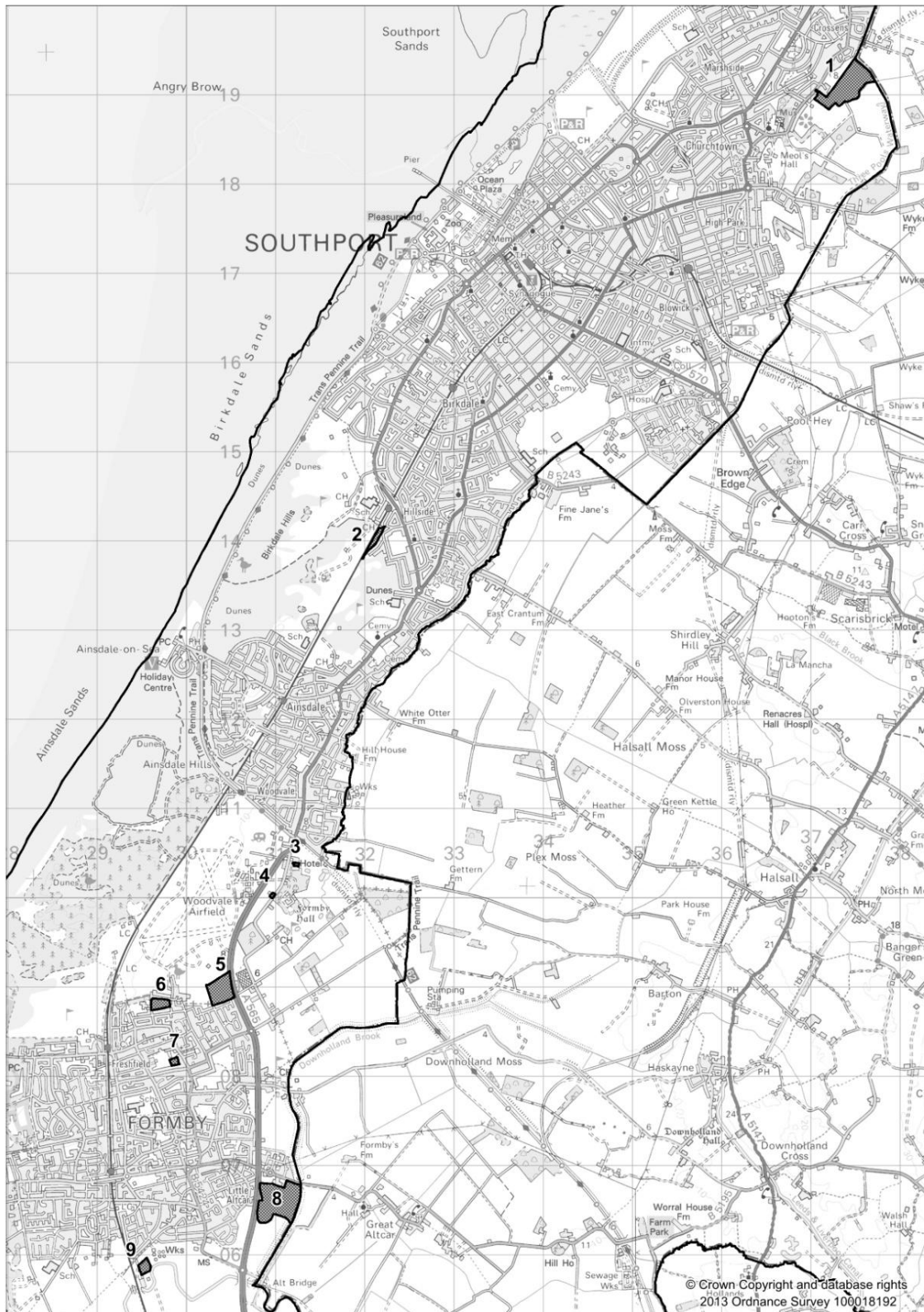
Employment sites in Bootle

SR5 A4 Former Playing fields, Heysham Road, Bootle

Sport England oppose any allocation that is used [or was last used] as playing fields unless the site is shown to be surplus to pitch requirements (consistent with the Framework para 74).

15. Summary of representations – Alternative sites proposed by Landowners/Developers with interest in site, and by others

Map 15A Alternative/additional Sites Proposed by Landowners/Developers in North Sefton



Alternative Sites Proposed by Landowners/Developers in North Sefton		
Site Name	Proposed for	Proposed by
1. Bankfield Drive extension	Housing	Wainhomes
Supporting Information: Illustrative Masterplan, Transport Assessment, Flood Risk Assessment, Ecology Assessment, Utilities Statement and a Vibration survey.		
2. Land West of Lynton Drive, Birkdale	Housing	Network Rail
Supporting Information: indicative masterplans and an Extended Phase 1 Habitat & Reptile Survey.		
3. Wood Hey, Southport Old Road	Housing	Maghull Developments Ltd
4. Formby House Farm	Housing	Maghull Developments Ltd
5. Land at Brewery Lane, Formby	Housing	Nugent Care
6. Land at Hawksworth Drive	Housing	Taylor Wimpey UK Limited
Supporting Information: development statement		
7. Piercefield Road, Formby	Housing	Diocese of Liverpool
8. Land South of Altcar Road, Formby	Leisure, Retail and Employment	Formby Play Sports Ltd
Supporting Information: indicative masterplan.		
9. Powerhouse Site 2	Housing	Formby Hall Investments Ltd

Alternative Sites Proposed by Landowners/Developers in South and East Sefton		
Site Name	Proposed for	Proposed by
10. Land at Edge Lane, Thornton	Housing	The Craig Seddon SIPP
Only part of this site is proposed to be for housing development.		
11. Senate Business Park	Housing	Estuary Park Holdings Ltd
12. Land west of Maghull	Housing	The Landowning Trust
Supporting Information: Indicative masterplan, agricultural land and transport assessment.		
13. Cheshire Lines Health Club, Maghull	Housing	Stuart Jones and Philip Beattie
14. Land at Highway Farm, East of Northway, Lydiate	Housing	Harrisons and Sons
Supporting Information: indicative Masterplan.		
15. Land S of the Crescent Maghull	Housing	Priory Asset Management LLP
Supporting Information: indicative masterplan.		
16. Land opposite Maghull Station	Housing	Maghull Developments Ltd
17. Land at Switch Island North of M57	Retail and Employment	Peel Holdings [Land and Property] Ltd
18. Oriel Drive, Aintree	Housing	CP&S Limited
Supporting Information: indicative masterplan and Junction Modelling Report		
19. Land west of Bulls Bridge Lane, Aintree	Housing	PSA Developments Ltd
Supporting Information: Strategic Transport Assessment and Extended Phase 2 Habitat Survey		
20. Land at Spencers Lane Melling	Housing	Maghull Developments Ltd
21. Land east of Bulls Bridge Lane, Aintree	Housing	Liverpool & Chester Property Company
22. Mill Lane, Aintree	Housing	Persimmon Homes Ltd
Supporting Information: Flood Risk and Foul Drainage Assessment and Access Appraisal		
23. Land East of Aintree Racecourse [south of Wango Lane]	Housing	Clark Planning Consultants Ltd
24. Land adjacent to Ashworth Hospital, between School Lane, M58 and Old Prescott Close, Maghull	Housing	Mersey Care NHS Trust

Supporting Information: site advocacy document		
Land at The Stables, Netherton	Housing	Mr & Mrs Radford
Note: Not shown on map as precise boundaries not provided.		
Land to the front of 73 Southport Road, Thornton	Housing	Mr & Mrs Lyon
Note: Not shown on map as too small for scale of map		
Extension to site SR4.23 – Lydiate Lane, Thornton	Housing	Hallam Land Management & Nuffield College
Note: Not shown on map as too small for scale of map		

Land proposed by others

[i.e. those who are not owners/developers, that is without control of the site]

Southport

Former Philips Sites, Balmoral Drive/Bankfield Lane, Churchtown
Small site at the junction of Marshside Road and Fleetwood Road, Churchtown
Land within Crowland Street Industrial Estate
Preston New Road
Southport Old Golf Course
Two redundant Park and Ride sites, Southport
Land adjacent to Coastal Road, Southport
Capita Site, Fleetwood Road
Open space at Stamford Road, Birkdale
Site of Birkdale Sand Dunes
Waterloo Road, next to Greenbank School, Birkdale
Pontins site, Ainsdale
Woodvale Airfield, Ainsdale
Old Liverpool Road, Woodvale [near Tree Tops]

Formby and Hightown

Deansgate Lane, Formby
Powerhouse, Formby
End of Blundell Avenue, Hightown
Old telephone exchange, Hightown
Land beyond Mayfair Close, leading up to West Lancashire Golf Club.
Land at Altcar, near the rifle range

Maghull, Lydiate, Melling & Aintree

Former Ashworth Hospital Site
Parcel S152 from Green Belt Study
Parcel S158 from Green Belt Study
Land at Brewery Lane [Rock Lane end]
Land to rear of Bootle Arms, Rock Lane, Melling
Land between Rock Lane and Melling Lane, Melling
Former Orchard, Sandy Lane, Melling
Land at junction of Tithebarn Lane, Waddicar Lane and Giddygate Lane, Melling
Unused land at Spencers Lane
Near Horse and Jockey Pub, Spencer's Lane, Melling
Wasteland near Bull Bridge Lane, Aintree
Land off Switch Island

Bootle & Netherton

South of Sefton [general]

Tracts of land at the head Drummond Road to Gorse Lane at head of the Rimrose Valley

Rimrose Valley [between Ford and Thornton]

Atlantic Complex in Dunningbridge Road

The Peerless Site in Dunningbridge Road

Derelict Warehouses in Bootle

Hawthorne Road, Bootle

Empty homes in Seaforth

Other

New town in West Lancashire

Lunt Village

Land at junction of Brickwall Lane and Bridges Lane, Sefton.

16. Conclusions and next stages

Conclusions

This report indicates that a large number of responses have been received during the consultation process for the Preferred Option of the Sefton Local Plan, 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.

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.

A further report will be prepared alongside the Publication Draft version of the Local Plan. This will contain responses to the comments submitted as part of this consultation.

The main responses to the Preferred Option identified were generally split between different development interests. Some considered that Option 2 would not meet the Borough's needs and that more development and growth should be planned for.

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

Government guidance makes it clear that local planning authorities are expected 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 Sefton's needs is supported by appropriate and up-to-date evidence.

Further work to be undertaken

This report identifies a number of areas where further work needs to be carried out, and these are set out below. This is by no means an exhaustive list. The need to carry out additional work at this stage is not unexpected and is part of the normal process of developing and finalising a Local Plan.

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.

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 Options 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.

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 to be held with Merseytravel, Highways Agency and other relevant bodies about transport priorities.

Further work in relation to the environment and resources:

- Review key topic areas in the light of government guidance and current best practice
- We will continue to assess the suitability of the Area of Search near Ince Blundell for wind energy

- An updated Habitats Regulations Assessment will be carried out and further policy responses will be developed in relation to mitigation of ecological issues.

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.

Next stages

It is expected that the Publication Draft version of the Plan will be consulted on for an eight week period during August/ September 2014.

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