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**Report to:** Cabinet  
Council

**Date of Meeting:** 15 January 2015  
22 January 2015

**Subject:** Local Plan for Sefton: Publication Draft Plan

**Report of:** Director of the Built Environment

**Wards Affected:** All

**Is this a Key Decision?** Yes

**Is it included in the Forward Plan?** Yes

**Exempt/Confidential** No

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### **Purpose/Summary**

To present to Members the Publication Draft Plan, a key stage in the preparation of Sefton's Local Plan, and ask Members to approve the Plan for Publication. The Plan sets out issues and challenges facing Sefton and includes:

- a vision for Sefton looking ahead to 2030
- a strategy for how Sefton's housing, business and other development needs can be met given the spatial challenges and numerous constraints which affect the borough
- development management policies to help guide development and provide a policy framework for making decisions on planning applications
- detailed site allocations showing how needs can be met
- details of the Publication period and next stages.

This is an important corporate strategy document which is being developed within the statutory planning framework. The Publication stage is an advanced stage in the process of adopting a Local Plan.

### **Recommendations:**

1. The **Planning Committee** recommend the Cabinet to recommend the Council to approve the following:

- (i) the Local Development Scheme as set out in Section 2.6 and Annex A of this report
- (ii) the Authority Monitoring Report as set out in Section 20 of the report
- (iii) the further evidence which supports the Draft Plan, as outlined in Section 21 of the report, for consultation
- (iv) the Draft Plan for publication
- (v) the approach to notifying people of the Draft Plan, as outlined in Section 22 of the report
- (vi) grant delegated powers to the Head of Planning Services to make minor editorial changes to the draft Plan before it is published, as referred to in Section 23.1 of the report
- (vii) following the end of the publication period, and subject to there being no material change of circumstances, authorise the draft Plan to be submitted to the Secretary of State for examination.

2. That **Cabinet** recommend the Council to approve the following:
- (i) the Local Development Scheme as set out in Section 2.6 and Annex A of this report
  - (ii) the Authority Monitoring Report as set out in Section 20 of the report
  - (iii) the further evidence which supports the Draft Plan, as outlined in Section 21 of the report, for consultation
  - (iv) the Draft Plan for publication
  - (v) the approach to notifying people of the Draft Plan, as outlined in Section 22 of the report
  - (vi) grant delegated powers to the Head of Planning Services to make minor editorial changes to the draft Plan before it is published, as referred to in Section 23.1 of the report
  - (vii) following the end of the publication period, and subject to there being no material change of circumstances, authorise the draft Plan to be submitted to the Secretary of State for examination.

3. That **Council** approves the following:
- (i) the Local Development Scheme as set out in Section 2.6 and Annex A of this report
  - (ii) the Authority Monitoring Report as set out in Section 20 of the report
  - (iii) the further evidence which supports the Draft Plan, as outlined in Section 21 of the report, for consultation
  - (iv) the Draft Plan for publication
  - (v) the approach to notifying people of the Draft Plan, as outlined in Section 22 of the report
  - (vi) grant delegated powers to the Head of Planning Services to make minor editorial changes to the draft Plan before it is published, as referred to in Section 23.1 of the report
  - (vii) following the end of the publication period, and subject to there being no material change of circumstances, authorise the draft Plan to be submitted to the Secretary of State for examination.

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

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

**Reasons for the Recommendation:**

To ask Members to consider the content of the Draft Plan and to request they approve it for publication and subsequently for examination.

**What will it cost and how will it be financed?**

**(A) Revenue Costs**

It is estimated that the total costs associated with the production of the Plan will not exceed £25,000. These include legal costs, costs of printing the Plan and publicising the consultation. This sum can be met from within the 2014/15 Planning Department’s (Planning Policy) Revenue budget.

There will be further costs, expected to arise in 2015/16, arising from the next formal stage of submitting the Local plan for Examination. These will include legal costs, printing and publicity, and the costs of a Programme Officer and Inspector for the examination. At this stage, it is expected that total estimated cost will be in the region of £200,000 for which an earmarked reserve has been created, but future reports will provide further detail.

**(B) Capital Costs**

None

**Implications:**

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

<b>Legal</b>	Incorporated into report
<b>Human Resources</b>	None
<b>Equality</b>	
1.	No Equality Implication <input type="checkbox"/>
2.	Equality Implications identified and mitigated <input checked="" type="checkbox"/>
3.	Equality Implication identified and risk remains <input type="checkbox"/>
These are considered in the Equalities Impact Assessment which is listed as a background document.	

**Impact on Service Delivery:**

None

**What consultations have taken place on the proposals and when?**

The Head of Corporate Finance (FD 3346 /14) has been consulted and notes that the costs in the current financial year can be contained within the existing revenue budget. An earmarked reserve currently exists to accommodate the additional costs that will arise from Local Plan preparation – this stands at £390,000 and can therefore meet the estimated requirement for 2015/16 of £200,000 referred to in this report.

The Head of Corporate Legal Services (LD 2638/14) has been consulted and her comments have been incorporated into the report.

### **Are there any other options available for consideration?**

The Council is required to prepare and adopt a Local Plan. Paragraph 153 of the National Planning Policy Framework states: "Each local planning authority should produce a Local Plan for its area". Under section 39 (2) of the Planning & Compulsory 2004 a local authority exercising their plan making functions must do so with the objective of contributing to the achievement of sustainable development".

It will be necessary to have the Local Plan formally examined by a government appointed independent planning inspector. The Local Plan must meet statutory planning requirements and will be assessed for 'soundness'. The Publication Draft Plan being presented in this report is considered to be the most appropriate option for Sefton when considering these various requirements. It is not an option for the Council to choose not to adopt a plan.

### **Implementation Date for the Decisions**

Council meeting on 22<sup>nd</sup> January 2015.

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### **Background Papers:**

[National Planning Policy Framework, CLG, 2012](#)

[Review of Sefton Housing Requirement, NLP, 2014](#)

[2014 Strategic Housing Land Availability Assessment, Sefton Council, 2014](#)

[2014 Strategic Housing Market Assessment, JG Consulting, 2014](#)

[Employment Land and Premises Study, BE Group, 2010](#)

[Employment Land and Premises Study – Refresh, BE Group, 2012](#)

[Consequences Study, NLP, 2013](#)

[Agricultural Land Study, ADAS, 2012](#)

[Landscape Study, Ryder Consulting, 2014](#)

[Strategic Flood Risk Assessment, Capita Symonds, 2013](#)

[Green Belt Study, Sefton Council, 2013](#)

[Merseyside and West Lancashire Traveller Accommodation Needs Assessment, Arc 4, 2014](#)

[Study of the Economic Viability of Development for the Local Plan, Keppie Massie, 2014](#)

[Local Plan Site Selection Methodology, Sefton Council 2014](#)

[Assessment of Transport Assessments, Parsons Brinckerhoff, 2014](#)

[Infrastructure Delivery Plan No 1, Sefton Council, 2014](#)

[Sustainability Appraisal of the Local Plan, URS December 2014](#)

[Equalities Impact Assessment, Sefton Council, 2014](#)

[Habitats Regulations Assessment , URS, 2014](#)

[Letters from adjoining authorities re meeting Sefton's Housing Needs](#)  
[Letter from English Heritage re Area of Search for Wind Power, April 2014](#)

[Draft Mersey Ports Masterplan, Peel Ports, 2011](#)  
[Health and Wellbeing Strategy, Sefton Council, 2013](#)  
[Economic Strategy, Sefton Council, 2012](#)

Inspectors' letters & reports referred to in section 13 of this report :

[Cheshire East Local Plan: Inspector's interim letter](#)

[Chiltern District "Delivery Development Plan Document" : Inspector's letter, 24<sup>th</sup> November 2014.](#)

[East Staffordshire Local Plan: Inspector's letter, 11th November 2014.](#)

[Basingstoke and Deane Local Plan: Inspector's letter, 21<sup>st</sup> October 2014](#)

[Cherwell District Local Plan: Inspector's Note No.2, 9th June 2014.](#)

[Stroud District Local Plan: Inspector's initial conclusions on stage 1 of the examination \(para 47\), 2nd June 2014.](#)

[Uttlesford Local Plan: Summarised Conclusions of the Inspector 3<sup>rd</sup> December 2014](#)

For other background information, please see [www.sefton.gov.uk/planningstudies](http://www.sefton.gov.uk/planningstudies)

## **Summary**

### Sections 1-3

This committee report explains key aspects of the Publication Draft Plan and the key changes since the previous draft, the Preferred Option. This Publication Draft is an advanced stage in preparing the Local Plan for Sefton and the stage before submitting the Plan for examination by an independent Inspector appointed by the Government. Much work has been carried out since the previous draft, the Preferred Option, was consulted on in mid 2013.

A timetable is set out which forms the basis of Sefton's Local Development Scheme – the project timetable for Sefton.

The National Planning Policy Framework (the Framework) says what the Local Plan should contain. It also includes the Government's aim for planning which is to promote sustainable development i.e. positive growth.

### Sections 4-5

The Plan deals both with those issues which face all boroughs and also some which are of particular importance to Sefton e.g. responding to the growth of the Port and dealing with the implications of an ageing population. A particular challenge is how to enable the Borough to grow and develop and meet identified needs while protecting the high quality environment of Sefton.

### Sections 6-7

An extensive summary of the representations received at Preferred Option stage was reported to Cabinet in January 2014. Main issues raised by individual respondents were the principle of losing Green Belt, doubt over the number of new homes needed, concern over the ability of the infrastructure to cope with growth e.g. impact of extra traffic on the roads, flood risk and drainage, capacity of local schools and medical practices. Developers and landowners thought the housing figures were too low and many asked for further sites to be considered for development, mainly in the Green Belt, including a major site proposed by Peel Holdings at Switch Island. Adjoining local authorities and statutory consultees generally supported the Preferred Option.

### Sections 8-9

More studies have been carried out in a range of areas since Preferred Option stage, including a review of the housing requirement, an updated Strategic Housing Market Assessment, a study of the viability of our sites and policies, and a Merseyside and West Lancashire Traveller Accommodation Needs Assessment. Sites for traveller accommodation have been identified in the Publication Draft Plan. The likely effects of development on local infrastructure have been examined. Those promoting sites have been requested to provide more detailed information, where appropriate, on the implications of their proposals, including traffic, flood risk, ecology, heritage and viability. This has been assessed and taken into account in the final recommendation on sites.

### Section 10

The reasons for selecting the Preferred Option are reviewed. The strategy chosen for the Publication Draft still broadly accords with the Preferred Option. It offers the opportunity to secure affordable homes, investment in new infrastructure, new local employment opportunities, and a spread of development across the Borough. It is also the approach supported by neighbouring authorities.

### Sections 11-13

The approach to choosing the housing requirement for Sefton is explained and why it is considered to be the 'right' figure for Sefton. Recent examples are given of other authorities whose Local Plan do not include housing figures prepared in the way set out in recent Government guidance. The Inspector has generally suspended the examination of these Plans while giving those authorities an opportunity to follow the guidance and review their figures.

### Sections 14-15

Concerns about reviewing the Green Belt are addressed and other potential sources of housing land are considered. It is concluded that it is appropriate to review the Green Belt boundary when preparing a Local Plan if there are no other alternatives to meeting the objectively assessed housing, employment and other needs of the Borough. The requirement for authorities to have a five year supply of 'deliverable' sites is highlighted.

### Sections 16-18

The approach to assessing proposed development sites in the Green Belt is described. A list is given of sites which were included in the Preferred Option draft and are no longer being pursued; also a list of sites which were not part of that draft and which are now included. Where the area of a site proposed for development has changed, details are also provided. Ways of minimising the environmental impact of development are discussed.

### Section 19

Although identifying sites for new homes and employment is an important part of the Plan, this is just one aspect. Other key areas include meeting needs for affordable homes and providing homes for the elderly; a greater emphasis on those aspects of the environment which affect people's health, and how development can help to respond to the challenge of climate change.

### Sections 20-23

It is a requirement to monitor the Local Plan, and Section 20 includes brief monitoring reports for relevant areas of local planning and also Waste Local Plan matters during 2013-14. Much evidence has been prepared which is critical background to the content of the Plan and this is available to be commented on. When approved, the Local Plan will be published for a period of eight weeks. This is not a consultation similar to those held previously. If no major changes are proposed by the Council following Publication, the Plan will be submitted for examination. All comments made during the Publication period will be forwarded to the Inspector to be considered at the examination. Even if comments have been made before, they must be made again at this stage to be considered by the Inspector.

### Section 24

The strategy of the Publication Draft Plan is considered to be the best for Sefton. Not to identify land in the Green Belt would not ultimately protect the Green Belt but lead to it being developed piecemeal through individual proposals for development. The Draft Plan provides for a range of homes, jobs and infrastructure which will encourage more families and younger people to live and work in Sefton. This approach strikes a balance between promoting growth and protecting the most important environmental assets. It also represents the approach which is most likely to be found sound by an Inspector at a future examination of our Local Plan.

## 1. Introduction

1.1 Following the Preferred Option consultation in 2013 the Publication Draft is now the next stage of progressing Sefton's updated Development Plan and is at the final stage before the Plan is submitted to a Government appointed inspector for independent examination.

1.2 In January 2014, Members received a report on the response to the consultation on the Preferred Option stage. Since then various pieces of evidence have been updated including the following:

- NLP updated housing requirement study (taking account of the latest 2012 based population projections)
- Merseyside gypsy and travellers study
- Strategic Housing Market Assessment
- Strategic Housing Land Availability Assessment
- Local Plan Viability study
- 'Additional Sites' consultation

This report updates Members and progresses the Publication Draft Plan. Previous studies such as the Consequences Study still remain relevant evidence for the Plan.

1.3 The Publication Draft Plan was reported to the Overview and Scrutiny Committee (Regeneration & Environmental Services) meeting held on 9 December 2014. There was wide ranging discussion of the content of the Plan and the comments and responses are included in the minutes as follows:  
<http://modgov.sefton.gov.uk/moderngov/ieListDocuments.aspx?CId=364&MId=7983&Ver=4>.

1.4 This report will also be considered by the Planning Committee at their meeting on 12th January 2015 in addition to this Cabinet meeting and a decision will be taken at a meeting of full Council on 22nd January 2015.

## 2. What is the Publication Draft Plan?

2.1 The Publication Draft Plan sets out the strategic and detailed policies to guide and control development in the borough for the next 15 years. It includes site allocations and expectations for development of those sites, for example the infrastructure which will be required. It is prepared in line with Government policy and advice.

2.2 The Draft Plan comprises a [written statement including policies and a series of policy maps](#). Since the deadline for Planning Committee, changes have been made to sections 3 & 4 of Policy MN3 'Strategic Mixed Use Allocation – Land east of Maghull' to ensure a more comprehensive and co-ordinated approach to the proposed development of this site.

2.3 This stage of the Local Plan is the last stage before it is formally examined. While the Plan will be published for eight weeks, this is not a consultation similar to previous occasions. The local community, statutory bodies and other interested organisations are invited to make comments. However, Sefton Council is not able

to respond to any comments made at this stage of the Local Plan. These will be passed on to an independent Inspector to be considered at a public examination.

2.4 If people have made comments at an earlier stage of the Plan, they will need to make them again as any previous comments are not carried forward.

2.5 The following timetable shows how this stage fits into the overall process of preparing the Local Plan:

Consultation on Options	Summer 2011
Consultation on Preferred Option	Summer 2013
<b>Publication Draft Plan</b>	<b>February – March 2015</b>
Submission	May 2015
Examination	Late summer 2015
Adoption	Late 2015

2.6 We are taking this opportunity to update the Local Development Scheme [LDS] to reflect the proposed timetable above. The LDS is a project management tool to set out the different stages of producing different local planning documents, and the resources allocated for its production. The only formal local planning document we are currently working on is the Local Plan itself. The Local Development Scheme is attached at [Annex A](#).

### **3. The National Planning Policy Framework – the national context for preparing the Local Plan**

3.1 The National Planning Policy Framework (the Framework) sets out the Government's national policy for planning. The Government is committed to sustainable development which it defines as positive growth – 'making economic, environmental and social progress for this and future generations'.

3.2 In particular the Framework (paragraph 14) states that:

"Local planning authorities should positively seek opportunities to meet the development needs of their area; local plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
- specific policies in this Framework indicate development should be restricted".

The core land-use planning principles which are set out in the Framework (paragraph 17) are summarised below. These are expected to underpin the Local Plan and decision-taking.

3.3 Planning should (in summary):

- Proactively drive and support sustainable economic development to deliver the homes, business and other development needs of their area (including infrastructure)
- Seek to secure high quality design – to improve places where people live
- Take account of the different roles and character of different areas, including protecting Green Belts

- Promote mixed use developments and encourage multiple benefits from use of land – eg recreation, wildlife, flood risk mitigation
- Support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources
- Conserve heritage assets and enhance the natural environment – allocating land for development with lesser environmental value
- Encourage reuse of land which has been previously developed
- Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling.
- Support local strategies to improve health, social and cultural wellbeing.

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

#### **4. Issues which the Local Plan ought to address**

4.1 The Plan sets out a number of issues (chapter 4) which are well documented through evidence, our partners' strategies, and consultation with local people and organisations. They include long standing issues which all boroughs face as well as some more recent pressures which are becoming increasingly important for Sefton such as:

- how can we influence those parts of our environment which have an effect on people's health and raise the quality of life within Sefton's most deprived households?
- how can we develop skills and business growth to provide more jobs and reduce numbers of people who are not in education, employment or training?
- how do we best provide for an anticipated growth in population and number of households in the borough, including providing more affordable housing?
- how can we meet the needs of an increasingly ageing population? ( it is anticipated there will be a growth of 28% of those aged 65-74, 30% of those aged 75-84 and 81% of those who are aged 85 or over during the lifetime of the Plan)
- how do we address the reducing numbers of those in the economically active age group?
- how do we enable the Port to grow whilst ensuring no unacceptable harm to local amenity?
- how can we make the best use of our resources and assets – including brownfield land such as former industrial sites and vacant homes?

4.2 One issue poses particular challenges and requires a balance between meeting needs and the possible impact of development on the environment :

- given the limited capacity within the urban area, how can we enable the Borough to grow and develop and meet identified needs whilst protecting and enhancing the high quality environment of Sefton?

#### **5. Responding to the issues**

5.1 In planning for the future of Sefton there are a number of competing priorities. We wish to protect the many different assets of the Borough including its high quality environment and its rich heritage. We also have a responsibility to cater for

identified development needs and growth. We want to improve communities and create opportunities for our residents. We want to ensure new infrastructure is planned for and provided through the development process.

- 5.2 'Sustainable growth' is about seeking economic, social and environmental gains jointly and simultaneously through the planning system (Framework, para 8). We want to provide opportunities and choices for the people of Sefton, but in a way which best balances the protection of our special environment.
- 5.3 Protecting greenfield land at all costs would mean we would not provide enough homes and jobs for our residents. Similarly, focusing entirely on development and growth in the Borough would inevitably and irreparably harm Sefton's special environment. Yet we could not improve communities and offer new opportunities without promoting some level of growth and development.
- 5.4 It is not a simple choice between protecting the environment on the one hand against enabling growth and development on the other, but rather a matter of seeking the right balance between competing interests.
- 5.5 Protecting Sefton's environment also includes a commitment to make the best use of Sefton's resources. There are many opportunities to redevelop land to provide new homes and land for jobs, together with new infrastructure, services and facilities.
- 5.6 The challenge is to meet the Borough's needs for development over the next 15 years while protecting the most important areas of undeveloped land for the long term.

## **6 Overview of representations made at Preferred Option stage**

- 6.1 In January 2014 Cabinet received a report summarising the representations made at Preferred Option stage. A full Report of Consultation has been prepared including responses to the representations and has been published on the Sefton web-site.
- 6.2 Just under 1,200 representations were received in total. Around 570 of the total number of representations comprised an identical form signed by residents objecting to sites identified for housing development in Melling. Two petitions were received against proposed sites in the Green Belt at Moss Lane, Churchtown [778 signatures] and at Sandy Lane/ Lamshear Lane, Lydiate [892 signatures].
- 6.3 The vast majority of comments related to sites in the Green Belt identified for development. The main concern in this regard related to concerns about inadequate infrastructure being provided – for example, the traffic generated by proposed developments and its impact on the local roads, the danger of flood risk and whether sites would be adequately drained, whether there were enough places available in local schools, and whether local doctors' and dentists' surgeries could cope with additional demand. There was also concern about the loss of high quality agricultural land, impact on the natural environment including wildlife, loss of recreational opportunities and, quite simply, the loss of the ability to enjoy countryside so close by. Many people also expressed doubt about the

housing requirement figures underpinning the Local Plan and, based on that, queried the need for any Green Belt release. Linked to this, many respondents thought better use could be made of brownfield land and empty homes. Despite significant objection to any development in the Green Belt - there was also some support for development and growth.

- 6.4 In addition to comments from local people, a significant number of representations were received from developers and land owners. These included support for growth resulting in the development of certain sites, including some not identified in the Preferred Option draft. Many of these representations were accompanied by detailed studies relating to traffic, flood risk, ecology, agricultural land quality, noise and vibration. Members of the public also suggested sites which they considered suitable for development.
- 6.5 A consistent theme in the developer / land owner representations was that Sefton's Local Plan is not ambitious enough to comply with Government planning policy, or to encourage economic growth. Many of these representations argued that the Local Plan would need to identify significantly more land than was proposed in order to be found 'sound' by the Planning Inspectorate.
- 6.6 Adjoining local authorities generally supported the Preferred Option and welcomed the opportunity to comment on the draft Plan as part of the Duty to Co-operate. Statutory consultees also broadly supported the approach taken, and offered comments on matters of detail. Many other organisations welcomed the overall approach in the Preferred Option and offered detailed comments in relation to their specific area of interest.
- 6.7 Sefton Council as local planning authority must balance the representations it has received with Government requirements, precedents created by the decisions and advice of Inspectors of Local Plans, and the evidence of what the Borough needs in the long term.

## **7 Issues arising from the Preferred Option consultation: additional sites submitted and change to policy approach**

### **7.1 Additional sites submitted**

23 sites were promoted for development by others during the Preferred Option consultation which were not included in the draft Plan. The Council consulted on these in an eight week consultation between June – August 2014. The representations made have been taken into account as part of an updated assessment of sites. The approach to selecting sites at Preferred Option stage was refined and a further assessment was carried out both of the Green Belt sites included in the Preferred Option draft and of the 'additional sites' proposed during the consultation on the Preferred Option.

### **7.2 Proposal by Peel Holdings**

The most significant site to be proposed during the Preferred Option consultation was approximately 48 hectares in size, between the M57 and M58 motorway at Switch Island. This was submitted by Peel Holdings and specifically relates to future demand for Port related logistics uses.

7.3 This proposal must be viewed in a wider context. The Liverpool City Region Local Enterprise Partnership (LEP) commissioned a Superport demand study in autumn 2013. The study was published in summary form (Liverpool City Region Superport Market Analysis: Land and Property, March 2014) and identified an estimated sub-regional demand, over the next 20 years, for an additional 634 hectares of land for port related logistics (418 hectares) and related manufacturing (216 hectares), rising to 851 hectares if an additional 25% "headroom" provision were allowed for to cater for market choice etc. Taking account of existing suitable supply across the sub-region, the net additional demand is for some 400 hectares or 500 hectares assuming 25% headroom.

7.4 In short, the study commissioned by the LEP has estimated sub-regional port related logistics demand (i.e. demand for logistics and related logistics manufacturing) in the period to about 2034. The LEP suggests that this demand is for employment land over and above that assessed in the 2012 Employment Study Refresh for Sefton, which assessed demand for traditional employment uses (Use Classes B1,B2 and B8) for the borough. Some of Sefton's proposed employment allocations could meet an element of this demand in the short term. However, this demand relates to the strategic requirements of the Port which cover a very large geographical area including, and well beyond, the Liverpool City Region.

7.5 Sefton therefore considers that this potential demand should properly be appraised through a separately commissioned sub-regional study, which reviews demand and supply options for Port related logistics as part of an assessment of wider employment demand. To do otherwise risks decisions being taken without knowledge of the sub-regional and regional implications of such a proposal. This also has potential to link to an anticipated sub-regional Strategic Housing Market Assessment. It is not however thought appropriate to delay the preparation of the local plan until such work has been completed. Rather it is a matter than can best be addressed by a commitment to an early review of the plan.

7.6 Changes in relation to sites already proposed  
Representations from landowners / developers or objectors have meant we have reviewed the principle of developing some sites, or the density at which they might be developed. For instance, the Ministry of Defence objected to the development of land south of Coastal Road, Ainsdale, because of the potential impact on the operation of Woodvale Airfield. The draft Plan proposed that this one site could accommodate over 500 dwellings and this has had to be excluded from the Publication Draft Plan.

7.7 The Preferred Option recommended that land to the rear of Crowland Street could provide a mixed use employment and residential site. However, a viability study has shown that an employment use on this site is not viable, and it is therefore now proposed to be a housing site. An additional allocation for employment uses on land to the south of Formby Industrial Estate is now proposed.

7.8 Area of search for wind energy

The Preferred Option proposed an area of search for wind energy north east of Ince Blundell and adjoining the boundary with West Lancashire. This has been omitted from the Publication Draft Plan for a number of reasons including:

1. Government commitments to local communities having a greater say and increased benefits in relation to the siting of on-shore wind farms (published too late to be taken into account in the preparation of the Preferred Option).
2. 2013 guidance which was published too late to be taken into account in the preparation of the Preferred Option (and its subsequent online update in 2014)
3. the concerns of English Heritage about the potential impact on local heritage assets, expressed in their letter of 15 April 2014.

## **8 Issues arising during Preferred Option consultation - infrastructure**

- 8.1 The provision of services and facilities, or a perceived lack of services and facilities, is a major issue for many local people. During each consultation stage residents raised issues with accessing GPs, schools, public transport, problems with drainage, parking, traffic congestion and other issues. It is a requirement that the Local Plan is supported by sufficient infrastructure.
- 8.2 We have been working closely with a range of infrastructure providers to ensure our emerging plans will not put undue pressure on existing services and facilities and to see where improvements need to be made. A members' Infrastructure Working Group was set up by the Council's Overview & Scrutiny (Regeneration and Environmental Services) Committee to review the approach to providing infrastructure as part of the Local Plan and their final report with recommendations was reported to the Overview and Scrutiny meeting on 9<sup>th</sup> December 2014.
- 8.3 Discussions with infrastructure providers have highlighted some key improvements that are required to support the Local Plan, particularly in relation to a number of the proposed development sites. Examples of these include:
- The need for new motorways links at junction one of the M58
  - A new rail station at Maghull north
  - The expansion of Summerhill Primary School
  - Mitigation of flood risk north of Formby
  - New junctions, controlled by traffic lights, on the Formby bypass to access housing and employment sites.
- 8.4 Other improvements to infrastructure will be provided by developers and other organisations as part of normal development requirements. These include access, drainage schemes, electricity and broadband, and open space. Many infrastructure providers have a statutory duty to provide the infrastructure which is necessary to allow development to function satisfactorily. Other improvements, such as additional school places, health facilities and services, and public transport schemes will be provided when it is determined they are needed.
- 8.5 Some of those promoting sites submitted studies to support the development of their sites including assessments of traffic and flood risk, impact on ecology and heritage where appropriate, viability assessments to show that the site was financially capable of being developed. The Council also invited owners of land which it had already identified for development to submit relevant studies. Where studies were not submitted and were considered to be necessary to fully understand how a site might be developed, developers/ landowners were invited to submit further detailed information.

- 8.6 Such information was appraised by relevant officers within the Council or by consultants with expertise in that area. The conclusions of such appraisals have been taken into account in assessing the sites and in coming to a final recommendation on whether sites should be included in the Publication Draft Plan.
- 8.7 The Council's approach to infrastructure in relation to the Local Plan is set out in the Infrastructure Delivery Plan. This includes making sure that providers are aware of the infrastructure required to support the level of development proposed through the Local Plan, and when that infrastructure may be needed. We will continue to work with infrastructure providers and will regularly update the Infrastructure Delivery Plan to ensure that all relevant parties are aware of their obligations. That Plan will also be subject to scrutiny at the Local Plan examination.

## **9. Further studies carried out since Preferred Option Stage**

- 9.1 The draft Local Plan is based upon wide ranging and robust evidence. Over the past 12 months we have updated our evidence in a number of areas in order to best inform the Local Plan. This is an expected part of the Local Plan process, where we are required to continue to make progress to final adoption whilst accommodating and reflecting upon changes that happen during this time, including changes to and clarifications of government advice. This includes new data such as that published by Government / Office for National Statistics, legislation and other issues.

The key piece of new evidence is the 2012 based population projections published by the Office for National Statistics which were released in late May 2014, which informs the objective assessment of housing need. It had always been anticipated that the housing requirement would be updated when these population projections became available. This updated work now underpins the Publication Draft Plan.

### **9.2 Requirement for new homes**

Independent consultants, Nathaniel Lichfield and Partners, carried out an updated assessment of the housing requirement for Sefton in summer 2014. The housing requirement is able to take account of the latest published demographic data, including the 2011 Census and the 2012 based population projections, and has sought to anticipate some key aspects of the anticipated household projections. Further household projections are expected to be issued shortly by the Department of Communities and Local Government. Whilst the most recent NLP study has sought to anticipate this publication some further minor updating may be necessary. It is not anticipated that this will result in a significant change. Due to the need to make progress to final adoption of the Local Plan and the ability to make minor adjustments at submission stage, it is considered appropriate to progress to Publication Stage.

### **9.3 2014 Strategic Housing Market Assessment update**

- It concluded that Sefton is a reasonably self-contained housing market for planning purposes over which to assess and meet the housing requirement

- It identified a net need for up to 434 affordable dwellings a year in Sefton. This need is highest in Southport, Formby and Maghull/Aintree.
- The majority of affordable housing need is for social rented housing.
- It recommended that 15% of all housing provision should be for older people, reflecting Sefton's ageing population. In particular, there is a strong need for additional 'extra care' older persons housing.
- It recommended that the majority of new market housing should be 3 bedroom family accommodation. The majority of new affordable housing should be for 1 and 2 bedroom accommodation.

This study is the subject of a separate report on this agenda.

#### 9.4 Gypsy & Traveller study - 2014

Local Authorities have a duty to provide for the accommodation needs for travellers through their Local Plans ('Planning policy for traveller sites', March 2012). Local Plans must identify sufficient land to provide for traveller accommodation based on objectively assessed needs. Sefton led on a Merseyside and West Lancashire Traveller Accommodation Assessment which was approved by Cabinet in September 2014.

#### 9.5 This assessment identified the following needs for traveller accommodation in Sefton:

	2013/14 to 2017/18	18/19 to 2022/23	2023/24 to 2027/28	2028/29 to 2032/33	Total need 2013/14 to 2032/33 (20 years)
No. of permanent pitches	4	6	4	1	15
No. of transit pitches	4	0	0	0	4

#### 9.6 We have undertaken a 'call for sites' to identify potential sites for traveller pitches. We have also looked at surplus Council sites and other vacant sites. We also asked our neighbouring authorities if they had sites to meet our needs. A small number of potential sites were identified through these stages. We assessed each of these sites against the same criteria used for all our development sites. The result is that we have identified a small number of sites to meet our traveller accommodation needs. The identified sites are:

Site location	Size	Type of site	Maximum Number of pitches
Land north east of Red Rose Traveller Park, Broad Lane, Formby	0.4ha	Permanent	6-8
Land south west of Red Rose Traveller Park, Broad Lane, Formby	0.2ha	Permanent	2-3
Land at Plex Moss Lane, Ainsdale	1.0ha	Permanent	6-8
Land at New Causeway, Ince Blundell	0.4ha	Transit	4-6

#### 9.7 All of these sites are in the Green Belt. Two of the sites are adjacent to the existing Red Rose Traveller site at Broad Lane. These sites will be shown on the

Policy Map as 'inset' in the Green Belt to indicate they can only be used for traveller accommodation only.

9.8 Study of Economic Viability of Development - 2014

The Framework requires that the Local Plan should be deliverable, ensuring that the sites and policies are achievable and that we are not setting obligations and standards that undermine the economic viability of development. We commissioned a Viability Study of the Local Plan to test our emerging policies and key sites. In general this report concluded that the emerging Local Plan is viable and the policy requirements will not make development unachievable in economic terms. The Viability Study also considered the potential scope to implement a Community Infrastructure Levy in Sefton.

**10. A review of why the Preferred Option was selected**

10.1 The Preferred Option was supported for a number of key reasons and these continue to be valid reasons which support the Publication Draft :

- it meets the Government's requirement to meeting needs, providing choice of homes and other economic development
- it will provide more opportunities for families and young people to meet their housing needs and access jobs
- it will enable significantly more affordable homes to be provided than at present (this was assumed by NLP based on the 2008 Strategic Housing Market Assessment as a minimum of 1,230 dwellings over a 5 year period i.e. equivalent to 246 dwellings a year)
- at a time of severe cutbacks in public sector funding, the allocation of land for new homes may help to keep some existing local services viable because more people will live in a particular area
- it will also bring significant investment in new infrastructure which will be paid for through the development process
- this Option has the unanimous support of our adjoining local authorities. We have a legal 'duty to co-operate' on strategic planning matters so it is important that we work closely with and take note of the views of our neighbouring authorities
- this Option best matches past rates of development in the Borough - we have built an average of 470 dwellings in Sefton for the past 30 years
- It will identify the most sustainable green belt sites for development with fewest constraints – having regard to local constraints such as flood risk and ecological designations
- It will ensure that best use is made of our assets – including for land in the urban area and the Green Belt
- It will enable, as far as possible, a spread of development across the Borough – meeting needs, in the main, where they arise
- It will deliver a new urban extension, providing significant investment in local infrastructure, meeting needs in a sustainable mixed use development
- It will provide significant new local employment opportunities to help support the economy
- It will protect the heritage and environments of Sefton with detailed policies requiring high design standards in new development
- It is considered to be a deliverable option.

10.2 Much further work has been carried out since the Preferred Option draft. However, there is no reason to change the strategy which underpinned that document and so the Publication Draft is based on the same strategy.

## 11. How does the proposed housing requirement compare to that at Preferred Option stage?

11.1 The overall housing requirement at Preferred Option stage was 10,700 dwellings for the period of the Plan i.e. 2012 – 2030 (this accorded with base dates for key evidence on housing and employment and more recently the Office for National Statistics (ONS) 2012 based population projections). The overall requirement at Publication stage is now 11,070.

11.2 The figures at the two stages have been reached in different ways to reflect changing advice in National Planning Practice Guidance (only published on 6th March 2014) and best practice, so it is important to explain how they have been arrived at.

11.3 The Preferred Option figure of 10,700 was based on an annual housing requirement of 510 dwellings a year over a plan period of 18 years. There were additions for 'backlog' (or underprovision) and a buffer of 5%. The calculation is set out below:

• Housing requirement (18 x 510)	9,180
• Backlog since 2003	1,113
• 5% buffer of housing requirement	<u>383</u>
Total	10,676

**Rounded up to 10,700**

11.4 The Publication Draft Plan figure of 11,070 is a more simple calculation based on an annual housing requirement of 615 dwellings a year multiplied by the number of years in the Plan:

• Housing requirement (615 x 18 years)	=	<b>11,070</b>
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The annual requirement of 615 dwellings a year includes an allowance for housing backlog so this no longer forms a separate element. The 5% additional buffer which was part of the 'requirement' at the Preferred Option stage, is now more appropriately added in to the 'supply' side. This is to allow for flexibility, a degree of choice of sites, slippage and/or the non delivery of some committed housing sites. This different approach reflects best practice and has been used successfully by some other local planning authorities in their Local Plan examinations.

11.5 The total identified supply is **11,793** homes which includes a little more than the 5% buffer referred to in the previous paragraph.

- 11.6 The housing requirement of 11,070 dwellings would equate to an average of 615 dwellings a year between 2012 and 2030. However, it is recommended that this requirement will be staged and will be met at a rate of 500 dwellings a year between 2012 and 2017, and at 660 dwellings between 2017 and 2030. This acknowledges the recent and current housing market downturn and allows for a more gradual revival in the housing market following the adoption of the local plan.
- 11.7 This approach is proposed for two important reasons. Firstly, the early years of the Plan from 2012 have been characterised by high levels of demolitions associated with the former Housing Market Renewal programme in Bootle. These demolitions have the effect of significantly depressing 'net' completions in the Borough. There are no plans (and no funding) to identify new clearance areas beyond the current programme and therefore such demolitions will significantly reduce beyond 2016-17. Secondly, some of the proposed housing allocations are large greenfield sites that will have significant lead in times to development. This staged approach is therefore based upon local factors.

## **12 How has the annual requirement of 615 been calculated?**

- 12.1 Government guidance sets out a clearly prescribed method advising how local authorities should calculate the objectively assessed needs for housing in their area. The Nathaniel Lichfield & Partners (NLP) report ('Review of Sefton Housing Requirement') is a detailed assessment of how they arrived at a figure for Sefton. The key stages are summarised in paragraph 7.60 of the report.
- 12.2 The Government guidance states very clearly that the most recently published official household projections are the starting point for calculating the housing requirement. However, they are not the end point as further issues also need to be considered. The latest 2011 based (Interim) household projections cover the first part of the Plan period to 2021 and suggest a figure of (just over) **399** dwellings a year.
- It is also necessary to add in an element to take account of vacant homes and second homes (4.63%) in the Borough – this brings the figure up to approximately **419** a year which NLP use, as a starting point, and which they have applied for the whole of the Plan period to 2030.
  - The requirement figure also needs to take account of demographic factors including changes to population (births and deaths) and migration into and out of the borough. A whole series of scenarios were modelled by NLP to consider different economic conditions and how these would impact on the housing requirement figure. Over the past few years household growth has been suppressed because of the economic downturn. It is expected that the rate of household formation will begin to return to levels which existed before the recession, although not in total. This brings the requirement up to about **562** a year. This figure reflects demographic factors and does not include any allowance for economic growth or national policy requirements to “boost significantly” the supply of housing.
  - National Planning Policy Guidance is clear that the calculation also needs to take account of 'market signals'. These include factors such as price of land, house prices, rent levels, affordability, rates of development and overcrowding. If a local authority does not perform well against any one of these factors, the housing figure should be adjusted upwards. In this regard, there is firm evidence of lower than average rate of development and declining affordability

and an assessment of these figures has led to an upward adjustment of 53. Added to 562, this gives an overall figure of **615 dwellings a year**.

### **13 How do we know this is the 'right' figure for Sefton?**

- 13.1 This figure is towards at the lower end of the range NLP suggested, but it is supported by NLP. It would fully meet the borough's demographic requirements and it is considered that this figure would be likely to be acceptable to an Inspector at an Examination, although it does not reflect full economic growth potential. However, it is not considered that a housing requirement figure embracing full economic growth option is right for Sefton for the following reasons:
- Sefton's role in the Liverpool City Region
  - its key and longstanding residential/commuter function
  - the fact that more people travel out of the Borough to work than travel in; and
  - the Borough's significant environmental constraints.
- 13.2 NLP have carried out housing requirement studies for many local authorities as well as for private sector clients. Their approach is well respected and Inspectors have commended this at other local plan examinations (see Preface to their Report).
- 13.3 There is clear Government guidance about how to calculate the housing figure. Many local planning authorities who have tried to avoid meeting their full objectively assessed needs, or who have not calculated these in the appropriate way, have generally been found wanting at examination. On many occasions the Inspector has suspended the examination and authorities have been asked to carry out further work on assessing the housing need for their boroughs. There are several recent examples, including five from November and December 2014 alone.
- 13.4 In suspending the examination of the Uttlesford Local Plan (Essex), the Inspector noted that "while evidence on some of these topics is patchy .... I consider that an uplift of at least 10% would be a reasonable and proportionate increase in the circumstances of Uttlesford, say to about 580pa. The submitted plan therefore does not provide for a full PPG-compliant OAN" [*PPG = Planning Practice Guidance; OAN = Objectively Assessed Need*]. The Inspector concluded that the scale of work needed to submit a 'sound' Plan went beyond the accepted 6 month suspension of the examination, and advised the Council to submit a revised Plan (Inspector's letter, 3<sup>rd</sup> December 2014).
- 13.5 The examination of the Eastleigh Local Plan (Hampshire) is set to be postponed after a planning inspector suggested that its housing target should be 10 per cent higher. In an as yet unpublished letter dated 4<sup>th</sup> December (but selectively quoted by Eastleigh Council on their web-site), the Inspector described the Council's failure to recognise the "true scale" of the borough's affordable housing need and how to address it as "a serious shortcoming". Secondly, he said, there were "market signals which indicate that some additional market housing is required". He said that market signals justified an uplift of about 10 per cent above the original housing need figure.

- 13.6 At the recent examination into the Cheshire East Local Plan, the Inspector sent an interim letter to the local authority on 6th November 2014 stating the following:  
“ ..... on the basis of the evidence and discussions during the examination so far, I consider there are serious shortcomings with the Council's objective assessment of housing need and the preferred housing provision figure. These suggest that further work needs to be undertaken to assess the housing need for the area in a way which explicitly addresses all the relevant factors outlined in the NPPF & PPG (National Planning Policy Framework and Planning Practice Guidance), using assumptions which are robust and realistic ...” (Para 69, Inspector's interim letter).
- 13.7 As recently as 24<sup>th</sup> November 2014, the Inspector suspended the examination into the Chiltern District “Delivery Development Plan Document” (the Plan setting out the District's development allocations), expressing his concern that “the Council is pursuing a Delivery DPD which is not in accord with the NPPF, most particularly in that it does not seek to meet the full, objectively assessed needs for market and affordable housing in the housing market area” (NPPF para 47). He continued: “it appears to me that the absence of a recent objective assessment of housing need to support the requirement which this Plan seeks to deliver is a fundamental weakness of the Plan”.
- 13.8 In suspending the examination into the East Staffordshire Local Plan on 11<sup>th</sup> November 2014, the Inspector concluded: “On the evidence currently available it is impossible to conclude that the Objectively Assessed Housing Need figure as put forward by East Staffordshire Borough Council is adequately justified such as to provide a sound basis for the overall housing requirement” (Inspector's letter 11<sup>th</sup> November 2014).
- 13.9 There are other examples. On 21st October 2014, within two weeks of Basingstoke and Deane submitting their Local Plan for examination, the Inspector wrote to the Council that he was “seriously concerned that the Local Plan may not provide a sufficiently robust platform for providing new homes in Basingstoke and Deane or an adequate strategy for delivering that objective”.
- The Local Plan examination hearings for Cherwell District were suspended on 4 June 2014 for six months. This was “to enable the Council to put forward proposed modifications to the plan involving increased new housing delivery over the plan period to meet the full, up to date, objectively assessed, needs of the district” (Inspector's Note No.2: 9<sup>th</sup> June 2014).
- In relation to the Stroud District Local Plan the Inspector considered that “SDC has not properly undertaken an objective assessment of housing needs for its district”. He concluded that this together with other matters “represent fundamental shortcomings in the soundness of the submitted Plan which cannot be rectified without undertaking a further objective assessment of housing needs for the district” (para 47 of the Inspector's initial conclusions on stage 1 of the examination, 2nd June 2014).
- 13.10 The consequence of not producing a robust housing requirement figure would almost inevitably result in an unsound Plan. This would lead, in the short term, to speculative applications being submitted to the Council with no clear direction as to what land was appropriate for development. This would not be an effective way of safeguarding the Green Belt or protecting urban land considered unsuitable for

housing. The Council would be in an extremely difficult position defending applications for development in the Green Belt in these circumstances. It would also inevitably lead to a need for widespread updating of evidence to support any resubmitted plan, and the extension of the local plan timeframe beyond 2030 to ensure a 15 year local plan timeframe.

#### **14 The draft Plan identifies land in the Green Belt for development – isn't this contrary to the Government's Framework ?**

- 14.1 Whilst the Framework says that one of its land-use planning principles is to protect the Green Belt, this needs to be read in context of the rest of the Framework. Paragraphs 83 and 84 of the Framework also says that: "Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan... Local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences of sustainable development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt....".
- 14.2 There is not enough land in the urban area to comply with other requirements of the Framework – in particular the requirements of paragraph 156 which requires Local Plans to deliver the homes and jobs needed in the area, based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area (paragraph 158).
- 14.3 The Government requires local planning authorities to 'use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework' (para 47). If local authorities are not able to do this, they have a 'duty to co-operate' with adjoining authorities to establish whether their needs can be met by those authorities.
- 14.4 In early 2013 adjoining local authorities were asked whether they might be able to help meet some of Sefton's unmet housing needs. All confirmed in writing they were unable to do so. The Council therefore consulted on its Preferred Option during summer 2013. This included the provision of 10,700 dwellings, two business parks and a new employment area to meet Sefton's needs.
- 14.5 The Council is reviewing its Local Plan so this is the right time to review the current Green Belt boundary so that the Local Plan can demonstrate how future needs will be met.
- 14.6 The Framework also requires local planning authorities when defining Green Belt boundaries to
- "where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period", and
  - "satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period" [paragraph 85].
- 14.7 Once it is established that the Green Belt boundaries have to be reviewed, the Government requires local authorities to look ahead not only for the period of the Plan, but well beyond this – to this end land is proposed to be safeguarded

between the inner boundary of the green belt and the urban area. No timescale is given but the expectation is that there will be no need to carry out a further review of the Local Plan for some considerable time. The Framework makes clear that the safeguarded land would not be allocated for development at the present time, but would require a future Local Plan review to propose the development of these areas.

- 14.8 We propose to identify some safeguarded land in our Local Plan. The figure is based on an annual requirement of 500 a year for a three year period. Population projections beyond 2030 suggest a slightly lower housing requirement. This gives a figure of 1,500 dwellings (3 x 500) and sites are identified at Lambshear Lane, Lydiate and adjacent to Ashworth Hospital, Maghull for this purpose. These sites are not allocated for development during the life of the Plan but are proposed to be safeguarded for development until the Plan is reviewed.
- 14.9 There is some risk in preparing a Local Plan which undertakes to review the boundaries of the Green Belt, but does not look further ahead to beyond the end of the Plan period [i.e. well beyond 2030]. However, it is considered inappropriate to identify substantial areas of further land at this stage in advance of a sub-regional review of housing and employment needs which would be able to review both the need and opportunities for meeting that need across the whole of the sub-region. This would require a review of the Merseyside Green Belt.
- 14.10 The revised Green Belt boundary is shown on the Plan entitled 'Proposed extent of Green Belt in Sefton'.

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

- 15.1 A number of possible ways of doing this are regularly suggested such as using more brownfield land, reusing vacant homes, increasing densities of development or building on more green spaces within the urban area, and asking neighbouring authorities if they can meet some of our needs. We have considered all of these issues and our approach in the draft Plan addresses many of these approaches.
- 15.2 They have been examined in some detail, and have been taken account of in our calculations. However, none of these alternatives, even when taken together, is able to provide nearly enough dwellings to make up the shortfall. None offers a realistic alternative to providing for needs for development in the Green Belt. However, it is worth highlighting a few of these, as listed below.

Sites in the urban area

- 15.3 We have undertaken a Study to assess how much housing can be accommodated in the urban area, excluding greenspace sites. Whilst over 5,400 new homes can be accommodated on such sites, this would not be enough to meet Sefton's housing needs in the years ahead and most of these would be likely to be developed in the earlier part of the plan period. All of this capacity, in the urban area, is included for development in the Publication Draft Plan – and comprises almost half of the overall planned housing development in Sefton.

Use of green spaces in the built-up area

- 15.4 We have identified a small number of surplus greenspaces which could be developed in the urban areas, with capacity for almost 900 dwellings. These sites will be consulted on alongside other proposed development sites. However, the vast majority of Sefton's urban greenspaces are not appropriate for development and will continue to be protected.
- 15.5 The availability of sites is important because local planning authorities are expected to maintain a five year supply of 'deliverable' sites for housing. This is measured against strict criteria, including that the site is available now and is viable. Sefton has around a 4 years' supply of housing sites. This is a further reason why Sefton needs to be able to identify extra land so we can get back to a five years' supply. The draft Plan must address this. As long as it does not, we will be vulnerable at planning appeal to unplanned and speculative proposals. The Local Plan will address this issue and allow Sefton to return to a defensible five year supply - along with the longer term supply over the whole plan period. In order to achieve this it is not possible to have a phasing policy which would restrict when sites could be developed. (This does not apply to safeguarded sites which are protected until the Local Plan is reviewed).

## **16. What factors have been used to decide where to locate development?**

- 16.1 This is referred to in the Strategy of the draft Plan (chapter 5). The Plan includes the following objectives:
- to support urban regeneration
  - to encourage the best use of resources and assets
  - to meet the diverse needs for homes, jobs, services and facilities, as close to where they arise as possible.
- 16.2 A study has been carried out to identify suitable sites within the built-up area - the Strategic Housing Land Availability Assessment. Traditionally Bootle and Southport have accommodated most of the development on sites within their built-up area. These areas are now beginning to run out of suitable land, but the majority of potential sites in the built-up area still lie within Bootle and Southport.
- 16.3 Much of the land in Sefton's Green Belt is affected by one or more limitations which determine how suitable it is for development. These limitations include nature conservation, flood risk, heritage and high quality agricultural land.
- 16.4 A study assessed all land in the Green Belt for their importance in supporting the purposes of including land in the Green Belt and on the need to promote sustainable patterns of development [Framework, paragraphs 80 & 84]. From a short-list of areas, the study identified those with fewest limitations, or where the limitations could be overcome. The methodology used for this study and the conclusions reached were assessed independently. The sites are currently subject to a Sustainability Appraisal and to a Habitats Regulations Assessment. The purpose of this Assessment is to identify any likely effects of developing the sites on the integrity of internationally important nature sites.
- 16.5 Some parts of the borough are more constrained than others. The built-up part of Southport extends right up to the boundary with West Lancashire in many places. Land west of Formby is protected by international conservation designations and is subject to coastal erosion. Bootle has no Green Belt to extend into and the land

between Netherton, Aintree and Maghull needs to be kept open in order to prevent these settlements from merging into one another. The land around Maghull, Lydiate and Waddicar has fewest limitations, but this is where the quality of agricultural land is highest.

- 16.6 The draft Plan identifies land as being suitable for new homes, both within the built-up area and within the Green Belt. It also identifies safeguarded land in the Green Belt to meet needs beyond the lifetime of the Plan.
- 16.7 The Plan also indicates sites in the Green Belt considered suitable for new business parks. These sites, which will complement largely existing urban employment sites, comprise one for the south of the borough [east of Maghull], two in the north [an extension north of the existing Formby Industrial Estate, and land south of this Industrial Estate, both east of the Formby Bypass]. They will provide new local investment and employment opportunities. These sites will be required to deliver appropriate mitigation and infrastructure. The site to the east of Maghull for example will form a new urban extension with requirements to invest in local infrastructure including new motorway access, public transport improvements, environmental improvements and support for local facilities and services as appropriate, such as an addition to the local school.
- 16.8 In summary, our strategic policy approach will ensure that development in the Green Belt will meet needs as close to where they arise as possible. Our aim is to have as far as possible a proportionate distribution across the Borough taking account of the following: that sites should be sustainable, that they should be the least constrained, and that there is a sufficiently good spread to meet local needs and to ensure they will be able to be implemented. The site allocations also take account of the presence of constraints and the opportunity to provide mixed use sustainable development with the benefits of investment in new infrastructure. It is acknowledged that, taking account of these factors, it is not possible to have an exact proportionate distribution.

## **17 Changes to sites between Preferred Option and Publication Draft Plan**

### Sites included in Publication Draft which were **not** in Preferred Option

- 17.1 A number of sites have been included in the Publication Draft which were not in the Preferred Option. The reasons for adding in sites include the following:
- more land is needed in total as the housing requirement is slightly higher and 'safeguarded land' must also be provided
  - some sites identified at Preferred Option stage are now either considered unsuitable for development or are not viable for the purpose proposed (e.g. land south of Coastal Road, Ainsdale & Crowland Street, Southport).

The following is a list of the changes. All sites have been consulted on previously, either at Options stage in 2011 or as part of the 'Additional Sites' consultation in summer 2014. The size of site/ number of dwellings proposed for these sites is given in Policy MN2, and the sites are shown on the Policy Maps. Where there is a policy for the specific site, that reference is given.

*Employment:*

- Land south of Formby Industrial Estate: this has been added in as the Crowland Street site is no longer being promoted for employment purposes (refer to Policy MN5)

*Housing:*

- Phillips site, Churchtown: had been designated for employment purposes. There is a low level of employment activity on site and it is considered this is not a sustainable longer term use, so it is now proposed for housing (MN2.3).
- Bankfield Lane, Southport: larger site proposed – from 120 to 220 dwellings (MN2.2)
- Crowland Street : whole site now proposed for housing – from 265 to 678 dwellings (MN2.5)
- Park and ride site, Kew : new site (part of MN2.5)
- Lynton Road, Birkdale : new site (MN2.7)
- Land north of Brackenway, Formby : Proposed extension to the site included at Preferred Option stage – from 169 to 286 dwellings (Policy MN6)
- Land at West Lane, Formby : new site (MN2.13)
- Hightown – extended site to south of Elmcroft Lane – from 36 to 120 (MN2.20)
- Turnbridge Road, Maghull : new site (MN2.27)
- Spencers Lane, Melling : new site (MN2.32)
- Peoples site, Bootle : new site (formerly regeneration area) (MN2.43).

*Housing – previously a ‘reserve’ site, now included as a main allocation:*

- Land north of Kenyons Lane, Lydiate – 295 dwellings (MN2.28).
- Land at Powerhouse Site, Phase II – 20 dwellings (MN2.16).

*Housing – safeguarded sites:*

- Land at Lambshear Lane, Lydiate (was reserve, now proposed as safeguarded) (MN8.1)
- Land adjacent to Ashworth Hospital, Maghull (MN8.2).

*Sites for travellers:*

These new sites are listed in section 9 of this report and shown on the Policy Map.

Sites no longer in the Publication Draft which were in the Preferred Option

- 17.2 It is proposed that we do not continue to promote a number of sites which were in the Preferred Option. It is proposed to delete some sites in their entirety, and to reduce the area identified for development on other sites.

These are listed as follows together with reasons for not pursuing these sites:

- Land south of Coastal Road, Ainsdale : Ministry of Defence objected to this site for operational and safety reasons related to Woodvale Airfield
- Land south of Moor Lane, Ainsdale : reduced area to take account of heritage assets – see Policy Map
- Altcar Lane, Formby : reduced area: Council owned site removed because of proximity to sewage works – see Policy Map

- Tanhouse Farm, Thornton : there is a Listed Building on the site which will have implications for the amount of development possible on this site; it is therefore proposed not to allocate this site for housing development but instead include it within the Primarily Residential Area
- Sterrix Lane, Litherland : this site is no longer available
- Our Lady Queen of Peace, Litherland : flood risk reasons & difficulty of providing access.

A number of sites which were proposed as reserve sites in the Preferred Option draft are no longer proposed, as listed below:

- Land at Woodvale Sidings, Ainsdale (no known developer interest)
- Land at Range Farm, Formby (owner did not want to pursue this site)
- Land south of Melling Lane, Maghull (flood risk reasons).

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

- 18.1 Where there are specific impacts on identified sites e.g. affect on nature conservation or flood risk, these can generally be overcome. Loss of habitat can be mitigated or the habitat can be re-created in the near vicinity by way of compensation. Some types of flood risk can be solved within the site through, for example, leaving part of the site open. This space can then provide a number of beneficial functions, including recreation, nature area and drainage.
- 18.2 Concern has been expressed about the loss of high quality [grades 1, 2 & 3a - 'best and most versatile'] agricultural land - once it is developed, it is lost forever. It is not possible to be precise about what proportion of the land proposed for development in the draft Plan is 'best and most versatile', as detailed surveys are not available for every site. Sometimes the survey concludes that sites are a mix of higher and lower quality. Where the surveys indicate a mix of quality, we have assumed that all of it is the higher quality. The total land identified for development in the Green Belt is 4.4% of the total Green Belt, but not all of this is currently in agricultural use.
- 18.3 This is a small proportion of the total Green Belt in Sefton, and in the context of high quality agricultural land at a regional and national level is very small indeed. This loss must also be weighed against the fact that Sefton is required to meet its housing and employment needs. The Framework says that where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.
- 18.4 DEFRA considers 'significant' to be sites greater than 20 hectares in size. Of the sites identified in the Publication Draft Plan, this applies to three sites:
- Land at Crowland Street, Southport - 25.8 hectares (site MN2.5)
  - Land east of Maghull – 86 hectares (site MN2.46)
  - Land at Lambshear Lane, Lydiate – 33 hectares – land proposed to be 'safeguarded' (site MN8.1).

The latter two sites are graded 'best and most versatile'. Because of the distribution of the best and most versatile agricultural land in Sefton (most of the

east of the borough), it is inevitable that some of the higher quality land will be developed.

- 18.5 Since the Framework has been in place, there have been a number of planning appeals where the protection of agricultural land has been given less weight than meeting housing needs. This is a material factor that we must consider when allocating sites for development in the Plan. This has been the subject of Inspectors' decisions in two other local authorities within the past year or so:
- Cheshire East (Sandbach Road North, Alsager: proposal for 155 dwellings, appeal dismissed on 18/10/2013), and
  - East Devon (Harepath Road, Seaton: proposal for residential and employment development, appeal dismissed on 20/01/2014).

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

**19. The Publication Draft Plan is about more than meeting needs for homes and business. What are the other key messages?**

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

- 19.2 The Borough has an increasingly ageing population which presents particular issues including making sure there is appropriate accommodation and health care. The Plan would help to stem this continuing trend by providing more choice of homes and jobs which will encourage families and young people to live and work in Sefton. It would also provide a positive planning framework for development directed specifically at that sector.

- 19.3 Since Preferred Option draft, there have been changes to the affordable housing policy approach based on the 2014 Strategic Housing Market Assessment. The current requirement across most of borough is 30% affordable housing on schemes of 15 or more dwellings, subject to economic viability, for all parts of the Borough apart from Bootle and Netherton. It is proposed to change the 30% currently applied in Netherton to 15%. In Bootle where there is currently no requirement for affordable housing it is proposed to apply a requirement of 15%.

- 19.4 The 2014 Strategic Housing Market Assessment (SHMA) recognises that special needs housing is required, including specialist housing for the elderly. The SHMA finds that 15% of all Borough housing provision should be for extra care housing (around 1,660 dwellings). Policy HC1 on affordable and special needs housing allows for a degree of interchangeability between affordable and special needs housing provision, where the latter meets affordable requirements. This should

help to provide affordable special needs housing, including meeting extra care needs for the elderly.

- 19.5 The Borough needs new and improved infrastructure. Lack of public funding means less investment in infrastructure. The Plan would bring additional investment including new motorway links, a new rail station, new business parks, improved drainage, and investment in schools, recreation and nature areas, and footpath and cycling links. An Infrastructure Delivery Plan has been prepared. This sets out the Borough's priorities for infrastructure and what kind of development in which parts of the Borough might be able to contribute towards this.
- 19.6 The variation in health between different (and sometimes neighbouring) parts of the Borough has long been a concern. The Plan contains a new chapter called Environmental Quality which brings together a number of issues which public health colleagues call 'the wider determinants of health'. These comprise matters such as air quality, access to homes, jobs, facilities and services on foot and by bike as well as by car, opportunities for recreation and access to green spaces. The benefits to many people's health can be improved by having a greater choice of homes, more affordable homes, greater prospects of a job and access to open spaces and leisure. The Plan will provide more opportunities for this.
- 19.7 We want to provide attractive places for people to live, work in and visit. The Plan sets out an approach to design to make sure that development is designed to a high standard. Our policy approach also seeks to preserve important heritage assets in the borough.
- 19.8 Sefton has an outstanding environment which has been referred to regularly in this report. Our policies aim to protect this and to ensure that on the few occasions where there may be no alternative sites for development, any damage to habitat or species can be mitigated or compensated for by providing alternative habitat close by. Opportunities to designate Nature Improvement Areas will be sought to provide areas where this alternative habitat can be provided. This will help to make sure that the amount and quality of Sefton's natural habitat will be at least as good in the future as it is now.
- 19.9 Our approach to urban greenspace needs to change to reflect national planning policy. Many of our larger public open spaces and other outdoor sports and recreation facilities available to the public (such as parks, playing fields, sports club sites and allotments) will continue to be protected in both urban and rural areas. However we will protect fewer amenity green spaces (e.g. highway verges). A revised approach to urban school and college sites and care institutions intends to balance the opportunity to allow some development with making sure features of the sites which are valuable to the wider community are preserved, and development on sites where this use has ceased.
- 19.10 Town and local centres nationally are under pressure with the downturn in the economy and in particular with the rise of internet shopping. Given this and the uncertain future demand for retail floorspace and the potential vulnerability of existing retail centres, the Plan proposes no new major retail allocations and, to complement this, advocates a more flexible approach to uses in our centres, while protecting key parts of our town centres in retail use.

- 19.11 Climate change is a major issue for all local authorities. The Local Plan tries to address this in a number of ways e.g.
- directing development away from areas of flood risk
  - ensuring development is accessible by means of transport other than the private car,
  - encouraging the reuse of existing resources such as land and buildings, and
  - encouraging energy efficiency and the use of renewable energy in new developments.

## **20. Monitoring**

20.1 Monitoring is important to ensure that we can see if our planning policies are being implemented. We are suggesting a range of indicators to monitor the performance of the Local Plan. These are provided as an appendix to the Local Plan.

### **20.2 2013-14 Local Plan Monitoring**

The 2013-14 Authority Monitoring Report covers the period up to March 31st this year. Its approval will bring the monitoring in relation to strategic planning up to date. This is available to view at [www.sefton.gov.uk/amr](http://www.sefton.gov.uk/amr).

Some of the headline points from the monitoring that was undertaken for this period include:

- The net additional dwellings completed during this year were 312. This was achieved through 323 gross completions minus 11 demolitions.
- Of the 323 completions 274 were new build and 49 of these were conversions.
- There were 82 affordable housing completions during 2013-14, 30% of all new build housing completions for the year.
- Permission was granted for four additional pitches on the Red Rose Traveller site at Broad Lane, Formby.
- There was 3523m<sup>2</sup> of business premises completed during 2013-14.
- As of March 2014 there are just over 65 hectares of employment land available for development in Sefton. Over 45 hectares of this is located within the Bootle Parliamentary Constituency area.

### **20.3 2013-14 Waste Local Plan Monitoring**

The Merseyside Joint Waste Local Plan was adopted in July 2013. This was co-ordinated on behalf of the Merseyside authorities (and Halton) by the Merseyside Environmental Advisory Service (MEAS). The Waste Local Plan also needs to be monitored. MEAS will publish a report monitoring the policies in the Waste Local Plan. This will be published early in 2015 and be made available on the Council's monitoring webpage [www.sefton.gov.uk/amr](http://www.sefton.gov.uk/amr). Some of the key findings from the emerging Waste Local Plan monitoring report are:

- In Sefton no waste applications were received on the 4 allocated sites but this is only year one of a 13 year plan
- Sefton's sub-regional site allocation (F1) at Alexandra Dock, Bootle has permission for an Energy from Waste facility
- Across Merseyside and Halton 142,000 tonnes of new waste management capacity was granted permission
- Waste applications which have been granted permission will provide 94 new jobs for Merseyside and Halton
- 30% of all applications received were in Areas of Search identified in the Waste Local Plan, 100% of which were granted permission
- Waste arisings across all sources of waste continue to fall. Local Authority Collected Waste reduced by 2.4% between 2011/12 and 2012/13.
- The Waste Local Plan is making progress in terms of balancing the amount of waste exported with that imported into the region.

## **21. Evidence supporting the preparation of the Plan**

21.1 The draft Plan has been subject to a Habitats Regulations Assessment to identify possible impacts on sites which are internationally protected for nature conservation. The Plan has been amended to take account of the recommendations of this Assessment. A Sustainability Appraisal of the Plan has also been carried out. This is an appraisal of the Local Plan and considers its social, economic and environmental impacts. The conclusions of the Appraisal have been incorporated in the report.

21.2 This is one of the documents which contains evidence which supports the preparation of the Plan. Members are asked to approve the Sustainability Appraisal for consultation alongside the Local Plan.

21.3 Members are also asked to approve the following documents for consultation which have influenced the content of the Local Plan

- Infrastructure Delivery Plan (as referred to section 8.7)
- Economic Viability Study of Development for the Local Plan (as referred to in section 9.8).
- Review of the Sefton Housing Requirement, 2014
- Strategic Housing Land Availability Assessment, 2014
- Landscape Study, 2014
- Local Plan Site Selection Methodology, 2014
- Assessment of Transport Assessments, 2014
- Sustainability Appraisal of the Local Plan, 2014
- Equalities Impact Assessment, 2014
- Habitats Regulations Assessment, 2014.

## **22 Publicity**

22.1 The Plan will be published for a period of eight weeks beginning late January. The statutory period is six weeks but the Council's own Statement of Community Involvement has a standard of eight weeks. This period is specifically not 'consultation' as the Council is not expected to make significant changes in response to people's comments at this stage. All comments will be forwarded to a Government appointed independent Inspector for consideration at examination (see para 2.3).

- 22.2 A report will be taken to the Public Engagement and Consultation Panel in January outlining our approach to publicity. We are planning a 'wraparound' of the Champion newspaper, and this will be delivered even to those homes which do not normally receive the Champion, thereby achieving full Borough coverage. There will also be adverts in the Trinity Mirror group of papers.
- 22.3 The Council web-site will be kept up-to-date (e.g. with answers to frequently asked questions), and we will use the Council's Twitter feed.
- 224 We will make it clear that the only way people will be able to have their views considered by the Inspector is for them to make their comments in writing even if they have made representations previously at earlier stages of the Plan preparation process.

### **23. Next stages**

- 23.1 As we finalise the Plan for publication there may be a need to make minor changes e.g. to correct minor errors and to simplify the wording without changing its meaning. The document can also be presented in a way which makes it easier for people to read and understand e.g. through adding a glossary, and more illustrations such as maps and diagrams. Authority is requested to make such minor editorial changes before the document is printed.
- 23.2 The Habitats Regulations Assessment is forwarded to Natural England and Natural Resources Wales for a statutory three week period for comment which will end in mid-January. Any comments which may result in changes to the draft Plan will be reported to Council.
- 23.3 After the eight week publication period which is due to end in late March, the Council must collate the responses it receives and then forward them to the Planning Inspector. It normally takes a few weeks to prepare the comments in the format required by the Inspector. There is an option at this stage of reporting back to Council if any significant new issues emerge during the Publication period. Alternatively the Plan may be submitted direct for examination.
- 23.4 It would normally take a few months between submitting the Plan and the examination. Depending on the timing and length of the examination, it is possible the Plan could be adopted by the end of 2015.

### **24. Conclusions**

- 24.1 The Publication Draft Plan is a key stage in the preparation of the Local Plan for Sefton. The Government's support for sustainable development is clear.
- 24.2 There is potential conflict between development and the benefits which flow from it, including the likely environmental impact for the Borough. However, not to identify land in the Green Belt for development would ultimately not protect the Green Belt. Sefton has a duty to provide land to meet its needs. If it does not provide this land, sites in the Green Belt could be released for development in any case. This would not happen through the co-ordinated approach of the Local Plan, but piecemeal through individual applications for development. These may not be

in the most sustainable locations or on sites that would contribute most positively to existing communities.

- 24.3 The Government has issued unequivocal guidance to local planning authorities to meet 'objectively assessed needs' or work with adjoining authorities to meet needs in their boroughs. Adjoining authorities are not able to help us and so Sefton must meet its own needs. The approach proposed in the Plan to calculating housing needs is well accepted by Planning Inspectors and is the most likely way to lead to a 'sound' Plan.
- 24.4 The Council could choose to promote a higher housing requirement. However, it is considered that Sefton's residential/commuter function within the City Region and its significant environmental constraints would not support a higher level of housing. The level of development proposed is not much greater than the average house-building rate in Sefton for the past three decades when the population was falling. Now that this trend is reversing, the proposed level of house building is likely to lead to major benefits for the wider community of Sefton including meeting some of the Borough's needs for affordable housing and providing much needed specialist housing for older people.
- 24.5 Sefton will benefit from the fact that this Draft Plan provides for a range of homes, jobs and infrastructure which will encourage more families and younger people to live and work in Sefton. This approach will strike a balance between promoting growth and protecting the most important environmental assets. Neighbouring authorities support this approach too. This factor is important as Sefton has a legal duty to co-operate with adjoining authorities as well as with other organisations.
- 24.6 The draft Plan helps us address many of the issues and challenges facing Sefton. It offers opportunities for achieving planned, quality sustainable development which responds sensitively to Sefton's valued environments. It will require appropriate investment in the future of Sefton and in its assets, for residents and businesses alike. It also represents the approach which is most likely to be found sound by an Inspector at a future examination of our Local Plan.

## Annex A

### Sefton Local Development Scheme 2015

<b>Title:</b>	<b>Sefton Local Plan</b>
<b>Content:</b>	<p>The Local Plan sets out Sefton Council's planning strategy for the Borough over the period from 2012 to 2030. It identifies key proposals, allocates land for development and sets out detailed policies which the Council will use to determine planning applications.</p> <p>The Local Plan has been prepared under the planning system introduced under the Planning and Compulsory Purchase Act 2004 as amended by the Planning Act 2008, the Localism Act 2011 and the Growth and Infrastructure Act 2013. These Acts require planning policies to be prepared through a Local Plan. It is produced in accordance with the Government's National Planning Policy Framework (2012) and has had regard to National Planning Practice Guidance.</p>
<b>Management:</b>	Local Plan team led by Local Plan Manager. Council will approve the Publication, submission and Adoption of Local Plan
<b>Community Involvement:</b>	<p>Consultation has [to date] included a range of methods at each different stage of production based on the standards set out in the Statement of Community Involvement. Particular emphasis was placed on early consultation with all appropriate groups.</p> <p>Early consultation was split into a number of distinct phases:</p> <ul style="list-style-type: none"> <li>- consultation on <b>Issues</b> was undertaken during <b>2009</b>. This involved a number of workshops, discussion groups, newsletters and presentations.</li> <li>- consultation on <b>Options</b> was undertaken during <b>2011</b>. This involved drop in sessions, discussion groups, presentations, and consultation documents available for comment</li> <li>- consultation on the <b>Preferred Option</b> was undertaken during the summer of <b>2013</b>.</li> <li>- consultation on '<b>Additional Sites</b>' [further sites proposed during the Preferred Option consultation] was undertaken during June to August 2014.</li> </ul> <p>These stages were advertised widely and documents available in locations throughout Sefton. At the Options and Preferred Options stage we also gave presentations and feedback sessions to a range of groups and organisations and ran numerous events when members of the public could discuss emerging plans with officers.</p> <p>At Publication stage we will also widely advertise and make documents available for comment for an eight week period.</p>
<b>Monitoring and Review:</b>	Objectives of the Local Plan will have linked indicators that will be monitored annually through the Authority Monitoring Reports.

<b>Start of Preparation:</b>	January 2009*
<b>Early Consultation:</b>	To August 2014
<b>Pre-Submission Publication:</b>	January 2015
<b>Submission to SoS:</b>	May 2015
<b>Pre-Hearing Meeting:</b>	Summer 2015
<b>Examination Hearing:</b>	Late Summer 2015
<b>Receipt of Inspector's Report:</b>	Late 2015
<b>Adoption:</b>	Late 2015

\*The official starting point is at the point statutory bodies were consulted on the scope of the Sustainability Appraisal