



Our West Lancashire – Key Bullet Point Facts for Consultation Responses to the Local Plan Review (LPR) Preferred Options

N.B. If using the online web page <https://westlancs.citizenspace.com> you are asked to make sure you submit your comments against the site and/or policy you wish to comment against. If you wish to comment against more than one site or policy, please make these comments individually do not put them all in the one comment box. Alternatively use the word document proforma supplied, use clear headings and references to policy or paragraph numbers and email your representation to localplan@westlancs.gov.uk

1. The Local Plan Timeframe to 2050 is not justified and unsound due to lack of required evidence

- 1.1. The strategic development requirement for 15,992 new dwellings is not based on sound statistical evidence and is significantly over-inflated by the extension of the end date out to 2050, increasing the housing demand over the current Local Plan (2027) by 215%
- 1.2. None of the West Lancashire neighbouring Authorities have forecast their housing demand beyond 2033 and even professional Government statisticians do not forecast population growth and housing need beyond 2041. *Source: Office for National Statistics, Population Projections.*
- 1.3 The National Planning Policy Framework (NPPF) also considers a planning horizon of 15 years as a reasonable timeframe for realistic and achievable planning (NPPF paragraph 22). We are not aware of any local authority development plan being approved for anything above a 20-year period for the good reason that population projections are not available.
- 1.4 Only 19 out of 48 respondents favoured a plan period to 2050. These were outnumbered by respondents who favoured a plan to 2037 with some of these citing that 2050 was “well beyond the end of the available evidence base”. *Source: Paras 3.8 & 3.9 of WLBC West Lancashire Local Plan Review – Issues and Options – Consultation Feedback Report June 2017*

2. Need for 16,000 houses

- 2.1. Up to date forecasts from the Office for National Statistics forecast that household numbers in West Lancashire will grow from 46,221 in 2016 to 49,030 in 2041. An increase of only 2,809 in 25 years. *Source: Office for National Statistics Household Projections for England Published: 20 September 2018*
- 2.2. The latest household projections from the Office for National Statistics reduce the number of projected households in West Lancashire by more than 1,000. The 2014 statistics (published 12 July 2016) estimate 49,857 households in West Lancashire in 2039. The latest 2016 statistics (published 20 September 2018) estimate only 48,821 households in West Lancashire in 2039. The council’s proposals are based on the out-of-date and higher 2014 statistics. *Source: Office for National Statistics*
- 2.3 Sefton Council achieved approval for their Local Plan in 2017 and confirm that they can meet their housing need to 2030, beyond which they have not been able to quantify any need, but recognise that should such need occur then it is likely to arise on the Southport/Formby settlement boundary. It isn't credible that West Lancashire Borough Council are more capable of predicting

Sefton's housing need out to 2050 than they are themselves, and to then demonstrably locate that need about as far away from North Sefton as it is possible to get.

In June 2012, West Lancashire's Current Chief Executive, Kim Webber wrote to Sefton council saying: *"You will appreciate that we would need to see evidence that clearly demonstrates the need to release land from Green Belt to meet your Borough's future development needs, with a clear explanation with supporting evidence to address the question of why Green Belt land located within Sefton is less suitable for release than any land in neighbouring areas, including West Lancashire"*. This evidence from Sefton was not produced at the time nor subsequently and therefore an additional uplift in housing numbers in 2018 for Sefton's unmet need is therefore pure speculation and unsound in planning terms. Source: <https://www.sefton.gov.uk/media/448409/West-Lancs-response.pdf>

2.4 The removal of Phasing from any of the housing developments (e.g. no safeguarded land) is inappropriate and is not consistent with Section 11 (Paras 117-121) of the NPPF, which promotes an effective use of land and says: "Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land" Without such phasing especially when combined with the excessively long plan period resulting in larger housing numbers than required, the Local Plan Preferred Options would result in a significant release of Green Belt and would undermine the planning protection afforded to Green Belt in the NPPF and would discourage developers from utilising brownfield land opportunities.

2.5. West Lancashire Borough Council's Infrastructure Delivery Plan (IDP) dated October 2018 indicates in Table 3.1 Infrastructure Priorities, that rail networks (including the hoped-for Skelmersdale link) are "desirable" being outweighed by the needs for household water supply, drainage, sewers, energy infrastructure and communications infrastructure which are deemed "essential". Para 9.26 states clearly that work is still ongoing to try to make the business case for the rail link and concludes "The timescales for the impacts may fall sometime in the future, although WLBC should be aware of the aspirations to include them in plan-making". Since this rail infrastructure is not guaranteed, it is not sound to include housing need growth in the objectively assessed housing need and therefore the housing need associated with the rail station should be removed from the Local Plan Preferred Option until such time as the station and line connection are confirmed and funding guaranteed.

3. Employment Land

3.1. The Liverpool City Region (LCR) SHELMA for Large-Scale Employment dated 2016, confirms that the City Region has sufficient land for Large-Scale B8 [large warehousing] employment. Para 5.70 of the document says: *"Areas like North Sefton and West Lancashire are slightly further from strategic transport accessibility – these areas are outside the 1-hour travel time from the port – and as such the demand for industrial/logistics activity in the area is more limited and focussed on smaller local needs. This is reflected in rental values and development activity in these areas."*

Source: [Liverpool City Region Strategic Housing & Employment Land Market Assessment \(SHELMA\) Consultation Draft Report, January 2017](#)

3.2. The inclusion of additional employment sites in West Lancashire is highly speculative especially when extrapolated to 2050 (beyond the 2037 date that the SHELMA document considers) and is not a sound basis for arguing the release Green Belt now in 2018 when it is largely the best

and most versatile agricultural land being actively used to grow arable crops to feed the populace. Removal of this land from the Green Belt for Employment use at this time would likely result in the early exploitation by developers and will remove the pressure to deliver Brownfield sites. Should the demand for B8 be proven beyond 2037 this would better be serviced by a review of the Local Plan closer to this timeline, thereby enabling the land to be continue to be farmed for the benefit of the Nation.

3.3 Knowsley already has an ‘oven ready’ site on the boundary with West Lancashire. Known as K800, it has planning permission for large scale B8 warehouse and is adjacent the rail interchange providing the multimodal criteria preferred by the Liverpool Super Port Authority. This site has still not been developed as there are significant sites already identified and being developed across the Mersey Gateway to accommodate the Superport’s aspirational expansion. Sufficient brownfield sites and other sites exist across the wider LCR [including 42 acres allocated in Skelmersdale which has lain undeveloped for the past 13 years] for large-scale warehousing. Therefore, additional land is not required and there is no justification provided in the plan to warrant the proposed removal of Grade 1 best and most versatile agricultural land from Green Belt to accommodate the large scale B8 aspiration expressed by the Local Plan Review. **Source:** <https://res.cloudinary.com/drt5ol8ck/image/upload/v1528801213/rllgrtdjo16ltvwoydzj.pdf> and **Liverpool City Region Strategic Housing & Employment Land Market Assessment (SHELMA) Consultation Draft Report, January 2017**

4. Green Belt Release

4.1 The National Planning Policy Framework (NPPF) section 13 *Protecting Green Belt Land* at para. 135 states: *“once established Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.”* Paragraph 137 states that *“before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development and whether the strategy:*

- a) *Makes as much use as possible of suitable brownfield sites and underutilised land;*
- c) *Has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through statement of common ground.”*

The West Lancashire Local Plan Review Technical paper 1: Strategic Development Options Allocations identifies the LCR need for large-scale B8 (logistics) use. However, the SHELMA document identified that no new land is required for allocation to meet large-scale B8 needs. Furthermore, there are further sites identified across the LCR that can meet this need without the necessity to use Green Belt land in West Lancashire. The LPR proposal to use Green Belt land in this situation is therefore contrary to the requirements set out in paragraph 137 c) of the NPPF July 2018 and the Local Plan Preferred Options document is unsound.

4.2 As West Lancashire is part of the Liverpool City Region and a party to the SHELMA review, the NPPF 2018 requires the adjacent local authorities to cooperate to accommodate any unmet housing and employment land requirements before it can conclude that exceptional circumstances

exist to justify changes to Green Belt Boundaries and that it has examined fully all other reasonable options for meeting its identified need for development including informed discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground. The Local Plan review does not demonstrate that all these options have been fully investigated by West Lancashire Borough Council Planning Department.

5. Best & Most Versatile Agricultural Land

Section 15 Paragraph 170 of the NPPF states:

Planning policies and decisions should contribute to and enhance the natural and local environment by:

..... including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

The Local Preferred Options proposals include no financial assessment of the economic loss of best and most versatile agricultural land. The Sustainability Appraisal at section 9.7.2 concedes the potential negative effects of *“Loss of prime agricultural land, an important regional and, arguably, even national resource.”* and goes on in the following paragraph 9.7.3 to say *“Ultimately, however, the proposed levels of development and the proposed Local Plan timescale are going to lead to loss of currently undeveloped land, and this is not possible to mitigate to any great extent.”*

Not carrying out a financial assessment of the loss of an [arguably] national resource where mitigation is not feasible, is a glaring weakness in the evidence base.

6. Edge Hill University is contracting not growing

6.1 The Council have commissioned no independent research into the student housing market. In an email dated 19 September 2018 Kim Webber, Chief Executive said, *“In relation to the evidence base on student accommodation, we have not received the report from Edge Hill University yet, so we cannot publish it. However, the proposals in the Local Plan Preferred Options reflect the fact that the University have confirmed that student numbers will be staying broadly the same or declining over the next 10 years.”* Indeed, student numbers at Edge Hill fell every year between 2013 and 2017 from 18,483 in 2013 to 15,220 in 2017. Source: <https://www.edgehill.ac.uk/about/facts-and-figures/>

6.2 On 23 September 2018, on one website alone (RightMove) there were 44 student properties still advertising for students this current academic year. 185 rooms were available. Some purpose built student accommodation is currently only partially full. Why is the council proposing a further 1000 bed spaces on green belt land?

6.3 In the face of falling student numbers, the council must commission proper evidence of the current student housing market because their proposal for 1,000 bed spaces of purpose-built campus-style student accommodation on green belt cannot currently be objectively justified and makes the plan proposal unsound.

7. Traffic Assessment

7.1 Traffic Data from St Helens Council was not forthcoming and so the impact of growth in Rainford, Eccleston and St Helens have not been factored into the traffic analysis. This would have a significant impact on traffic using the A570 and especially at the junction with the A580 (East Lancs Road). Assessment of the major road intersection at Switch Island has also not been considered in this report. **Source: Paragraphs 1.3.1 and 1.3.3 of the West Lancashire Local Plan Transport Assessment - A Review of Current and Future Traffic Conditions, White Young Green, 12 October 2018**

7.2 All links into Ormskirk town centre will be exacerbated by Local Plan growth. Traffic volumes will increase by 13,700 vehicles per day on St Helens Road and 9,400 vehicles per day on Wigan Road notwithstanding the shortcomings in the assessment detailed at 7.1 above. Even more rural roads will see significant increases in vehicle movements e.g. 5,000 extra vehicle movements per day on the A5209 through Newburgh. **Source: Figures 18 and 20 of the West Lancashire Local Plan Transport Assessment - A Review of Current and Future Traffic Conditions, White Young Green, 12 October 2018**

7.3 The Local Plan Preferred Option will result in 8 of 11 priority junctions being subject to flows exceeding their capacity, leading to queuing and delays. Additionally, 8 out of 13 of the principal roundabouts will experience queuing and will have demand greater than capacity. **Source: Point xv, Page 7 of West Lancashire Local Plan Transport Assessment - A Review of Current and Future Traffic Conditions, White Young Green, 12 October 2018**

7.4 Even with the omission of this key data, the Transport Assessment concludes that: *"the operation of the network is likely to be COMPROMISED as a result of future growth"*. **Source: Para. 7.1.1 West Lancashire Local Plan Transport Assessment - A Review of Current and Future Traffic Conditions, White Young Green, 12 October 2018**

8. Environment & Wildlife

8.1 West Lancashire's designated nature reserves accommodate significant proportions of the world's population of certain species and along with the adjacent farmland provide overwintering and feeding grounds for these migrating flocks. In relation to the strategic housing sites covered by Policy SP8 (Altys Lane, Blackmoss Lane, Parrs Lane) the Habitats Regulations Assessment Report states *"The Project level Appropriate Assessment concluded that there was the potential for likely significant disturbance effects on pink-footed geese using adjacent functionally linked land."* **Source: Table 24 West Lancashire Local Plan Review Preferred Options Habitats Regulations Assessment Report, October 2018**

8.2 Housing development is planned immediately adjacent to Fairy Glen and Delf House Wood in Appley Bridge; Ruff Wood in Ormskirk and Dickets Brook Wood site in South Lathom. These are Biological Heritage Sites with ancient woodland. These important heritage site could be negatively impacted or seriously damaged by any major housing developments given the proximity of the developments. **Source: Biological Heritage Sites Partnership (LCC, Wildlife Trust for Lancashire & Natural England) 9/3/2011**

8.3 Policy GI1: Provision of Green Infrastructure of the LPR states at v) that the council will seek through the LPR to "Promote the creation of new, and the enhancement of existing Ecological

Networks". The development of housing immediately adjacent to the three Biological Heritage sites detailed in 8.2 above runs contrary to this proposed policy. **Source: Page 157 of the LPR Preferred Options Document**

9. Air Quality

9.1 The LPR at paragraph 13.1.3 identifies that traffic congestion around Ormskirk town centre is a major problem and that the only Air Quality Management Area (AQMA) in existence in West Lancashire is on Moor Street, Ormskirk. The LPR has no proposals or solutions to address this while the Transport assessment highlights that an additional 1,900 vehicles daily will use Moor Street as a consequence of the local plan proposals. NPPF at paragraph 181 states:

"Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas." Clearly the additional vehicles on Moor Street with no documented measures to address this is contrary to NPPF para 181 and makes the LPR unsound. **Source: Figures 18 and 20 of the West Lancashire Local Plan Transport Assessment - A Review of Current and Future Traffic Conditions, White Young Green, 12 October 2018**

9.2 The council's Sustainability Appraisal (SA) identifies a moderately negative impact on air quality from the housing developments in Ormskirk, Aughton, South Lathom and Bickerstaffe. The SA also identifies that the alternative 2 to Policy SP2 (para 3.19 Page 23 of the LPR Preferred Options) would be more sustainable in relation to air quality because this approach would result in less development overall in the Borough. Therefore, there should be less vehicular emissions which have the greatest impact on air quality. **Source: Para 13.6.3 of the WLBC Sustainability Appraisal September 2018**

10. A Plan for the big house builders

This is a plan for the big house builders. Almost all the proposed development sites are large. NPPF para 68a requires 10% of the Local Plan housing requirement to be made up of smaller sites of no more than one hectare. The Local Plan Review Preferred Options only allocates small sites that can accommodate 164 houses – only just more than 1% of the 15,992 houses to be delivered by the plan. The council say there is a lack of deliverable and / or developable small housing sites in West Lancashire yet their own Strategic Asset Management Plans have identified many such sites.

11. Flooding

11.1 Technical Paper 1 clearly shows that the Altys Lane site has a section of it which is assessed as Flood Zone 3. This is land assessed as having between 1 in 100 or greater annual probability of river flooding. However, in the Appendix A Summary Site Assessments OAA018 it states that drainage would need to be carefully planned and that land for Sustainable Urban Drainage Systems (SUDS) 'may' need to be set aside for this purpose.

Considering the topography of the entire Altys Lane Site and the route that Hurlston Brook takes through culverts under the railway, down Dyers Lane and through Coronation Park in the centre of Ormskirk, it is a matter of concern that the LPR is proposing development on such a large area of land that has recent experience of extensive flooding.

If any of this land is developed the rain water runoff rate will be increased significantly and this is likely to increase with climate change. This will need to be contained within the Altys Lane site before it goes into the existing culverts which already restrict the flow of Hurlston Brook. This will certainly require a substantial SUDS to be designed and installed which would entail a substantial loss of land and must call into question the viability of the entire site.

Source: Technical Paper 1 Strategic Development Options and Site Allocations -September 2018 - Site Assessments OAA018 Land at Altys Lane

11.2 The Council's own Flood Risk Assessment says of the Altys Lane site: *"It may be prudent for more consideration to be given to the impact that future development at Altys Lane could have on existing flood risk."* **Source: Preliminary Strategic Flood Risk Assessment Level 2 West Lancashire Borough Council (October 2018)**

Closing Date for Representations Thursday 13th December.

Our West Lancashire

Putting Residents First and Foremost

16/11/18

Tel: 01695 351361 email: office@ourwestlancashire.com Web: www.ourwestlancashire.com