

Local Plan
Additional Sites
Report of Consultation

December 2014

Additional Sites Consultation

Summary of Consultation Responses

1. Overall Response

During the Local Plan Preferred Options consultation in 2013, a number of additional sites (or extensions to proposed sites) were suggested for development by landowners, developers or agents.

These additional sites have to be considered and assessed against the same criteria as the sites that the Council put forward. This is to ensure that the most sustainable sites are chosen in the Local Plan.

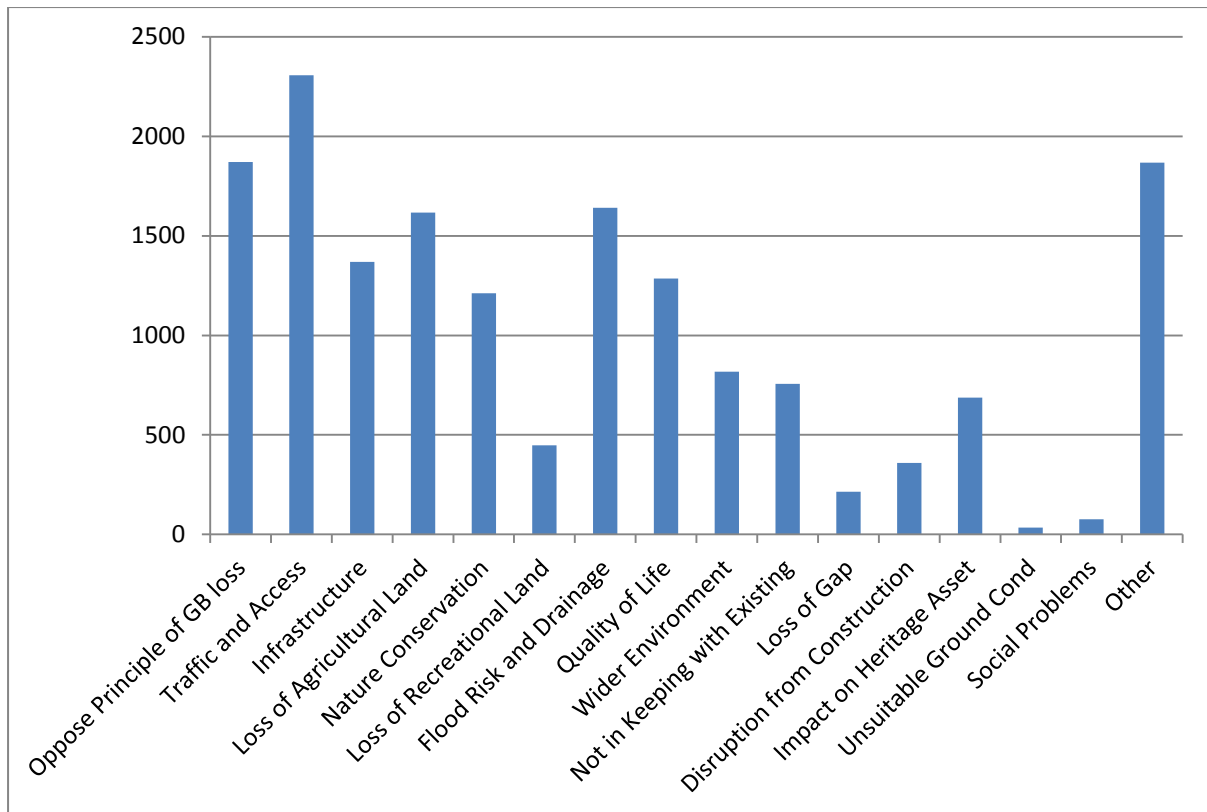
As part of this it is also important to find out what the wider public think of the additional sites. The Council undertook a public consultation on the additional sites for an eight week period during June to August 2014.

During the consultation over 1600 individual responses were received in addition to 6 petitions containing 4132 signatures. This report sets out an overall summary of these responses including the key issues that were raised. It is not intended to be a comprehensive summary of each individual comment.

In terms of objections to the additional sites we classified these into a broad range of common topics. An overall summary of these comments is presented in the chart below. It should be noted that many people commented on more than one site, whilst others commented in general terms, such as 'all the sites in Aintree'. In these cases they were classed as separate comments for each site. This explains why some reasons for objecting, e.g. traffic and access and flood risk and drainage received more comments than individual submissions. This chart does not take into account of petitions which are considered separately.

The most common reason for objecting to the potential allocation of any additional site for development was related to traffic and access issues. In total over 2300 individual comments to sites referred to issues with traffic and access, this equates to over 63% of all comments made. The principle to the loss of Green Belt was a concern for over 1800 individual responses, over 51% of responses to individual sites received.

The next three most cited specific reasons, in order, were flood risk and drainage [45%], loss of agricultural land [44.3%] and the lack of/impact upon local infrastructure and services [37.5%]. There were also over 1800 responses that were classified as 'other'. These were mostly comments relating to the need for new homes and employment land, the perceived underuse of brownfield sites and vacant homes and premises and the consultation process.



2. General Comments

Lack of/poor consultation

Our approach to consultation was questioned, with many people suggesting that we should have written to all residents. People thought the use of site notices was not sufficient advertisement of the consultation and that many residents were probably unaware of the proposals.

A number of people referred back to previous consultation, in 2011 and 2013, and that following this decision was made and sites earmarked. At the time this plan was deemed sufficient to meet housing demands and that putting additional sites out for consultation should not have happened. This was particularly noted for sites that had previously been consulted on, subsequently not taken forward, but have reappeared. People considered that this suggests that previous comments have not been taken on board and there was some frustration that they had to make the same arguments over again.

Oppose to the principle of Green Belt loss

In addition to the individual comments summarised below petitions containing 563 signatures [resubmission from 2011], against building on A1 agricultural land and Green Belt, and another containing 1314 signatures against development in the Green Belt were received. These are not reflected in the chart above which reflects individual comments.

A number of responses objected to proposed development on the additional sites as being contrary to Green Belt policy as set out in the National Planning Policy Framework [specifically paragraph 89]. It was pointed out the new homes are generally considered inappropriate in the Green Belt and that

if the Council were to permit new homes as proposed by many developers this would be contrary to national guidance.

It was also pointed out that Green Belt boundaries, should only be reviewed in exceptional circumstances when a Local Plan is being prepared. The point was made that the [perceived] need for new homes and jobs does not constitute exceptional circumstances. The National Trust stated that

'Since their inception over six decades ago, green belts have been a cornerstone of national planning policy. Their primary purpose is to contain the unrestricted sprawl of the main urban areas and their success and continued relevance are generally acknowledged. One of their important characteristics is their permanence. Green belts continue to serve a valuable purpose and if public confidence in them is to be maintained there must be a compelling case to justify changes to a boundary once formally delineated.'

However the Trust also acknowledges that Sefton cannot meet its housing and employment land requirements for the plan period without incursions into the Merseyside Green Belt. However, it feels strongly that the land take should be restricted to an absolute minimum and advocates a phased release of green belt land and an assessment undertaken at the sub-regional level.

Environment

Concern was made on the sheer scale of the damage to Sefton's physical environment that would ensue if these sites were to be developed. Many people hope that if any of these sites were to go ahead for development that there would be a corresponding removal of equivalent areas from the original plan. Other environmental issues that were raised included an increase in noise and air pollution associated with new development, and increase in carbon emissions, more traffic, impact on habitat and loss of visual and natural landscape.

Lack of infrastructure and services

Many people commented on the lack of infrastructure planning that would be needed to support development at the scale suggested in the consultation. This included the lack of doctors, schools, parking, shops, services that are stretched, emergency services, utilities, sewers etc. Many commentators asked how would infrastructure and services would be increased/improved and who would pay for this. Comments in relation to specific sites/neighbourhoods are included in the site section below.

Loss of agricultural land

A significant proportion of people objected to the loss of the land that is currently or could potentially be used for agriculture. The following comment was made which reflects the key concerns many residents have over the loss of agricultural land,

'We are a country of nearly 60million people and comparatively do not have much land. We need to protect our agricultural land more than ever, with food prices rapidly increasing around the world – our country needs to be as self-sustainable as possible. It is imperative to understand the significant difference between A1 and A2 agricultural land, with green belt land. Only 2% of our country contains A1 agricultural land, and of that 2%, 20% of this A1 land is in Sefton and surrounding areas. What an amazingly important asset this is locally and for our country. If Sefton Council went ahead

and built on the locations they have put proposals forward for, the country could lose approximately 10% of this invaluable land. A1 agricultural land in Sefton produces more crops per acre than anywhere in the country; it would be absolute criminality to concrete over this actively farmed and productive arable land, when there are many brownfield sites available. Food prices are set to rise by 40% over the next decade, with the biggest increase in produce prices being for wheat and grain (The Guardian, 15.06.10). The increases are being driven by global shortages in crops, and demand created by China's rampant economic growth (Telegraph, 15.01.2011), with supermarket prices already increasing at a rapid rate. The new policies being introduced are impulsive and have not considered the impact of building on this farm land and the effects on our future food production.'

Other comments on the loss of agricultural land referred to that some people will be deprived an opportunity to earn a living from the land and that once lost agricultural land can never be reinstated.

The point was made that Green Belt boundaries should only be altered in exceptional circumstances and advises that if it is needed for development, then;

- Non-agricultural land should be used first
- If agricultural land has to be used then the lowest grades be used first
- Finally if the "best and most versatile" land has to be used, then only small areas separate from other agricultural land are to be used to avoid further agricultural loss in the future

Nature Sites

For many, the 'Additional Sites' proposals give grounds for deep concern, involving major incursions into the Green Belt and, in several cases having potentially large but often unquantified impacts on wildlife and wildlife habitats. In particular, the scale of the proposed developments is unprecedented in the region. It was pointed out that many of the proposals are not accompanied by ecological information necessary for objective evaluation. A few of the larger proposed developments have some potential for mitigating wildlife impacts through carefully designed, implemented and managed features. Mitigations may be possible and indeed are required for Water Voles but losses of farmland birds cannot.

Impact/loss of Recreational Space

Housing allocations should avoid adverse impacts on National Trails and networks of public rights of way and opportunities should be considered to maintain and enhance networks and to add links to existing rights of way networks including National Trails.

Quality of Life

People asked whether it is too much to ask that planners actually take into consideration a persons' well being, physically and mentally, when planning new developments. Agenda 21 encourages local councils to balance the competing priorities between economic, social and environmental objectives, within a context of regeneration.

There were many people who expressed a concern that the proposed developments could impact on the value of their home. Some people asked whether the Council would pay compensation for this. Others were concerned that they would lose their view or the setting of their home/ neighbourhood and this would negatively impact on the quality of their lives.

No need for new homes

It was pointed out that since the Draft Local Plan was submitted for consultation the 2012-based Subnational Population Projections have been released by the Office for National Statistics (ONS). These figures suggest that the 2010 data used to inform that Draft Local Plan has significantly over estimated the increase in population in Sefton over the designated time span. It would therefore now be expected that sites be withdrawn from development and that the Council should not be considering any additional sites until a new evaluation is made based on the most up to date figures.

A significant number of respondents questioned the need for new homes when there is such an apparent supply of under-used and vacant brownfield sites. Many would like to see a brownfield first approach to home and employment building. People were concerned that developers were not considering using these sites as they are more costly to redevelop than greenfield sites. Many residents were concerned that profit was being put above sustainability.

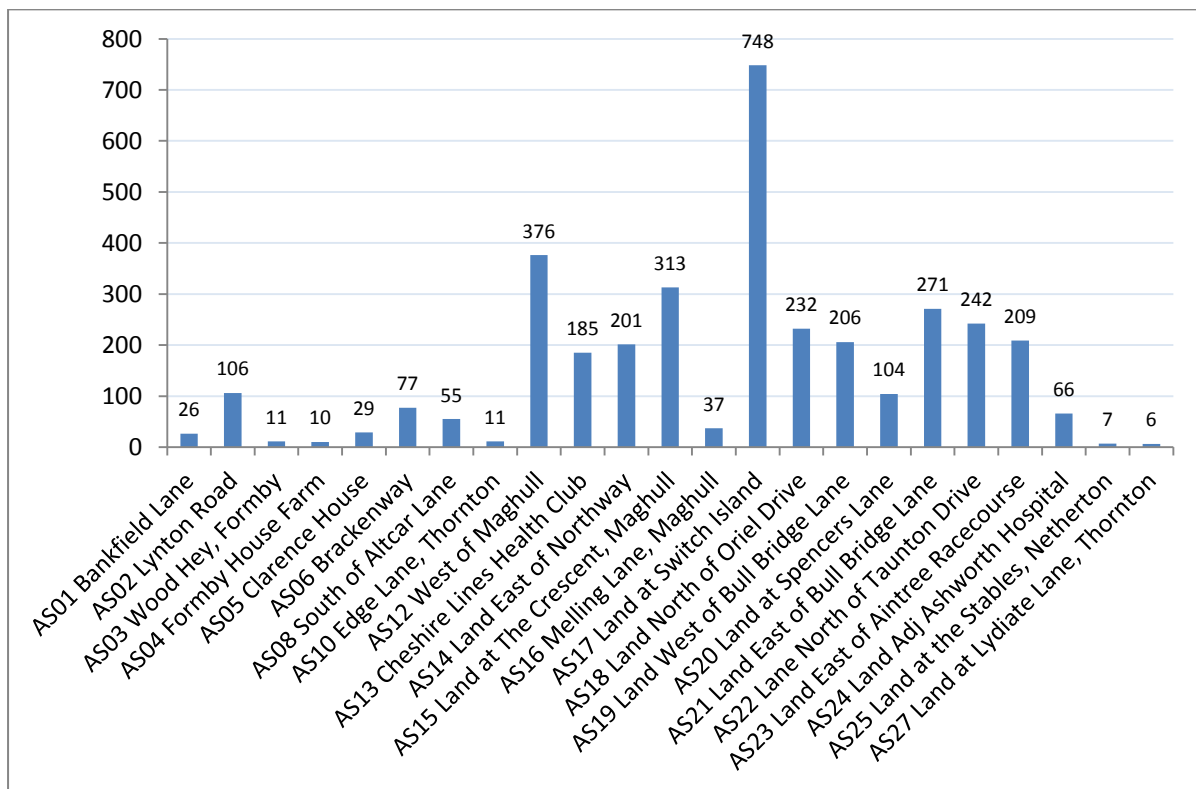
Additionally many respondents referred to a high level of vacant homes in Sefton and that the priority should be to bring these back into use before building new homes. There were similar comments to vacant industrial units.

Social Issues

Some respondents thought that extra homes, including social homes, will certainly bring an increase in anti-social behaviour. People were also concerned that the Local Plan would change the social mix of local areas and this may not be a benefit.

3. Site Specific Comments

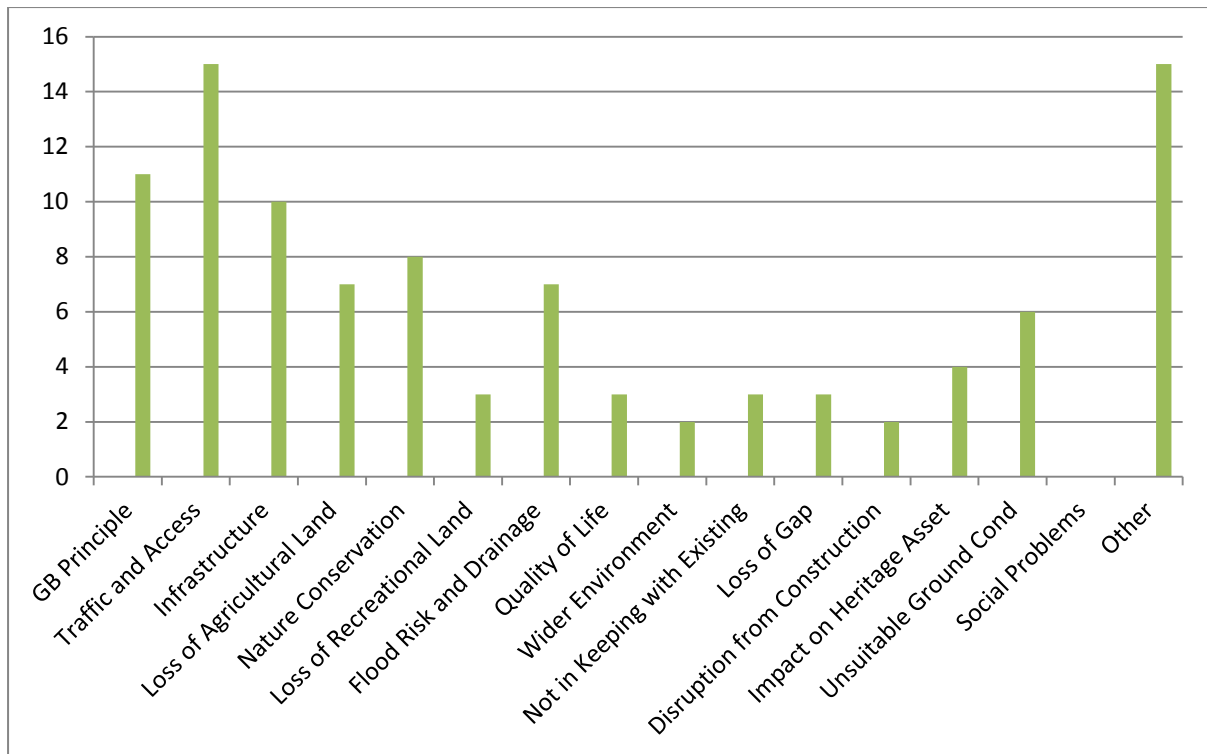
The site which received by far the most individual responses was the site as Switch Island [i.e. Peel Holding proposals for employment land AS17]. This received almost twice as many comments as the second, AS12 Land West of Maghull. This reflects the scale of the proposals, which would impact on a much wider area than many other of the sites, and that there are active resident’s group co-ordinating opposition. Overall the sites around Maghull, Aintree and Melling received considerable number of responses, with many people commenting on several sites within their form/letter/email. Other sites, such as those in Churchtown, Hillside and Formby, despite being much smaller in size, did still attract many individual comments. Note – the chart below shows response rates from individual responses and does not show petitions.



4. Southport

AS01 Land at Bankfield Lane, Churchtown [extension to proposed Local Plan allocation SR4.2]

This site was promoted by Wainhomes. It received 26 individual comments all of which were objections. The chart below shows that traffic and access was the most common reason for opposition with over half of people having concerns in this aspect. Other key concerns included the principle of Green Belt loss, lack of infrastructure or services and the impact on nature.



Below is a summary of the key comments. This should be read in conjunction with the overall comments at section 2.

Loss of Green Belt

This site is within the green belt and serves 4 out of five of the purposes of green belt. The developer proposes to build up to the West Lancashire boundary. If West Lancashire decide to build, then there will be unrestricted sprawl.

Following the initial consultation in 2011, Sefton Council had reached a reasonable compromise on the Bankfield Lane site, balancing the need to supply new housing with the protection of the green belt. Site plan SR4.02 neatly fills in the gap between The Crescent (off Rufford Road) and The Grange (off Bankfield Lane). This draws a straight line across the open land between these two developments and doesn't protrude onto the open countryside beyond. The proposal for site AS01 on the other hand, is excessive and intrusive, and if permitted would cause a serious erosion of the Green Belt.

The proposal [as submitted by Wainhomes] contends that the release of the site from Green Belt would not result in the unrestricted sprawl of large built up areas. It states that as the site is constrained by physical boundaries on three sides, it would "assist in safeguarding the countryside from encroachment". It's true that the site is constrained by existing housing and by the border it makes with West Lancs at the Three Pools Waterway, but at its southerly end there is no constraint, other than further Green Belt land. If this proposal was accepted, and the proposal was also accepted for site SR4.03 at Moss Lane, then that would leave a parcel of Green Belt land between these two developments, running alongside Three Pools, which then becomes an obvious candidate for subsequent development. So rather than safeguarding the countryside, this leaves the countryside open to further ingress by developers, who would no doubt make a case in future for

joining these two sites. It seems very odd to claim that they would actually be protecting the Green Belt by building on it. The only way to safeguard the Green Belt is not to build on it at all.

Traffic and Access

The area has had considerable issues with traffic and road accidents and is a very dangerous area. There is a Chief Officers Report for the Southport Area Committee confirming the position and which led to speed bumps being installed finally after years of residents having to endure road traffic accidents, and indeed a recent death of a motorcyclist. However, since the speed bumps have been installed, they have not reduced the speed as large vehicles such as buses and vans and 4x4 jeeps can simply drive over the bumps as they do not affect their vehicles. Also motorcyclists have been weaving in and out of the bumps at speed or driving through the middle.

There is a park entrance on Bankfield Lane, which is also an entrance used by parents taking their children to Churchtown Primary School, so at rush hour and school run time, the road is subject to extremely busy traffic, children crossing, parked cars etc. The Botanic gardens are very busy at the weekends and also during the week, and as a result Bankfield Road is very busy. Bankfield lane is full of cars parked and this adds to the problem. To say that there are no highway capacity issues or safety issues is a complete nonsense and factually incorrect.

The proposal makes the assertion that “there are no local highway capacity or safety issues along the road frontage and the route operates at the posted speed limit”. This is incorrect. The road traffic is already excessive at peak hours, especially in the mornings when the normal commuter traffic coincides with the local school traffic. The number of vehicles might not seem excessive on paper, but the practical situation is a lot different. The addition of on-highway cycle lanes on Bankfield Lane – mentioned elsewhere in the proposal and apparently under consideration by the Council - will only complicate things further.

The proposal also states that there will be a right-turn lane from Bankfield Lane onto Blundell Lane – so we’re now supposed to believe that our standard width two-lane highway will somehow support three lanes of traffic at this point, plus two cycle lanes.

The proposal gives no consideration to the traffic flows at the junction between Blundell Lane and Bankfield Lane. According to the plan this junction will provide the only means for vehicles to enter and exit the site – so potentially there could be up to 360 vehicles queuing at the T-junction to exit this site in the mornings, and then perhaps half this number queuing along Bankfield Lane in the evening to make a right-turn into Blundell Lane from a southerly direction. No allowance has been made in the traffic flow figures supplied, for the proposed parallel development on Moss Lane, Churchtown (site SR4.03). This is a separate proposal for 530 houses and any vehicles leaving that site and travelling northwards would be likely to use Bankfield Lane, as it’s the shortest direct route out of Southport. The impact of existing local businesses, such as the Tree and Shrub nursery on Blundell Lane, have also not been taken account of in the calculations. Any serious joined-up plan must give consideration to the total traffic volumes from all proposed developments. The traffic flows from each proposal cannot be looked at in isolation – it’s the overall impact that needs to be considered – so a much more detailed assessment of traffic flow is required.

Some of the data is based on observations taken on one single day in 2013. Given what is at stake here, it would surely be prudent to commission an independent traffic survey based on up-to-date readings taken across several months. There are seasonal peaks and troughs in Churchtown village, in conjunction with weekend and weekday peaks and troughs, and as traffic flows are a key element to the Local Plan, it is crucial that the data supplied is verified as accurate and statistically significant – which it plainly cannot be from a single observation.

The Sefton Plan document written by Emery Planning Partnership says in Para 3.13 that they undertook 'detailed junction assessments including Bankfield Road and Verulan Road'. No such roads exist. If they can't get these names right it makes you wonder how credible the other content is.

Infrastructure and Services

There is no mention at all of schools in the proposal. There are two local primary schools, St John's Primary School about one mile away, which is a self-proclaimed small and friendly local school, the other, about half a mile away is the over-subscribed and much-extended Churchtown Primary School – already one of the largest primary schools in the country. The closest local secondary schools are Stanley High School at 1.4 miles distance from Blundell Lane, and Meols Cop High School at 2.5 miles distance. Both are already heavily over-subscribed. I would imagine that most of the proposed 300 new homes would be taken up by young couples and families. If you were to average this out at one child per house, that's another 300 children to find places for in nursery, primary and secondary education. There are of course other schools more distant, but the point is that the existing local facilities should be able to cope with the proposed expansion in the number of residents - but in this case they clearly cannot. Even if there were only 100 children across all the new homes, that's 100 too many children for the local schools to handle.

Leisure facilities for children and teenagers are limited. GPs are also over-subscribed and it is difficult to get an appointment already. I live in the vicinity and the water pressure is hopeless in summer – is there a proposal for a new main?

Agricultural Land

The proposal states that "it is Grade 3a agricultural land, which is the lowest category of best and most versatile agricultural land". I feel that this description does it an injustice – the definition should more accurately read "Subgrade 3a – good quality agricultural land: Land capable of consistently producing moderate to high yields of a narrow range of arable crops, especially cereals, or moderate yields of a wide range of crops including cereals, grass, oilseed rape, potatoes, sugar beet and the less demanding horticultural crops". This land is a major agricultural resource and its importance – particularly to future generations - should not be underestimated.

Wildlife and Nature

In the Ecological Survey in several instances reference is made to the need for further survey work. However the developers conclude that there is no constraint in ecological terms for the whole site coming forward for development. So how can any conclusion be drawn without all the evidence?

Also, the backdrop of this is that the land directly across the bank of the Three Pools Waterway has been classified by West Lancashire Council as a NATURE CONSERVATION SITE. It seems peculiar that the land not a metre away should be fit for development.

Ecological and Water Vole surveys have been completed, the latter finding evidence of feeding but no burrows. It is therefore important that this habitat is protected or enhanced. The report of survey concludes that, while suitable habitat for Water Vole is present, the site does not otherwise contain habitats that contribute to the biological interest of the Local Wildlife Site and the proposed development will have no overall negative impact on the Local Wildlife Site. The Lancashire Wildlife Trust remain to be convinced. Various mitigations are proposed as regards the adjacent 3-pools waterway but it is not clear whether these would be sufficient.

Recreation

There are no quality open spaces on the plan. The planned small open space would not provide sufficient amenity and is likely to become a dumping ground.

Flood Risk and Drainage

The area is low-lying and subject to flooding in the winter. If the area is developed this could displace the flooding to existing homes. The existing pumping station regularly fails. If the pumping station on the new development also failed this could lead to a health hazard from a backup of waste.

The land in question serves as a functional flood plain. Ignoring the theoretical statements that the proposers have supplied, practical experience of residents living in the area is that their gardens are frequently covered in surface water. The Green Belt land allows a gradual natural drainage of water away from the properties, and the proposed building work would severely reduce the capacity for the land to recover from localised flooding.

Environment

Although the fields and green belt are flat, the surrounding area is not. This provides for stunning scenery that is enjoyed by residents in the area. Be under no misapprehension, this development will have a considerable negative impact on all who live and work in this area.

Not in keeping with area

The design of the whole block is based on one block on The Mallards development and ignores the vast majority of house types in the vicinity. The area has already had pockets of housing development at 'The Grange' and 'Mallards' which have taken up green spaces and significantly altered the once 'open feel' of the area.

Loss of gap

The development is so large that it starts in Churchtown village and ends up encroaching into Crossens village. The proposal makes the rather sweeping statement that this land "serves no Green Belt purpose". If you look at a map of the area you will see that this land occupies the whole of the Green Belt area at the boundary between Sefton and West Lancashire - meaning that Sefton would be totally reliant on West Lancashire to maintain a Green Belt on their side of the divide.

Ground conditions

The plots will need to be piled – residents would have to endure 10 years listening to a piling rig.

The proposal states that "ground vibration from construction vehicles has been raised by local residents through the previous consultations" and goes on to conclude that "there will be no damage caused to existing buildings from construction vehicle movements associated with the development site". The vibration readings quoted were taken at only three sites in the Churchtown area and a much more detailed investigation of this aspect is required. Since the speed bumps were installed, homes will often shake when a large vehicle or bus passes by causing cracks in walls. If two years of general traffic has this effect then what effect will 10 years of HGV movements have? The construction traffic flow data supplied by Wainhomes proposes that there will be 2 to 4 HGV movements per day for vehicles going to or from the building site. So potentially we are talking 20+ HGV's per week, which equates to 1000+ HGV journeys per year or 10,000+ journeys over the life of the project. I hardly feel that a dozen or so passes of a solitary HGV over a 20 minute period at three selected sites is representative of 10,000+ passes over a 10 year period.

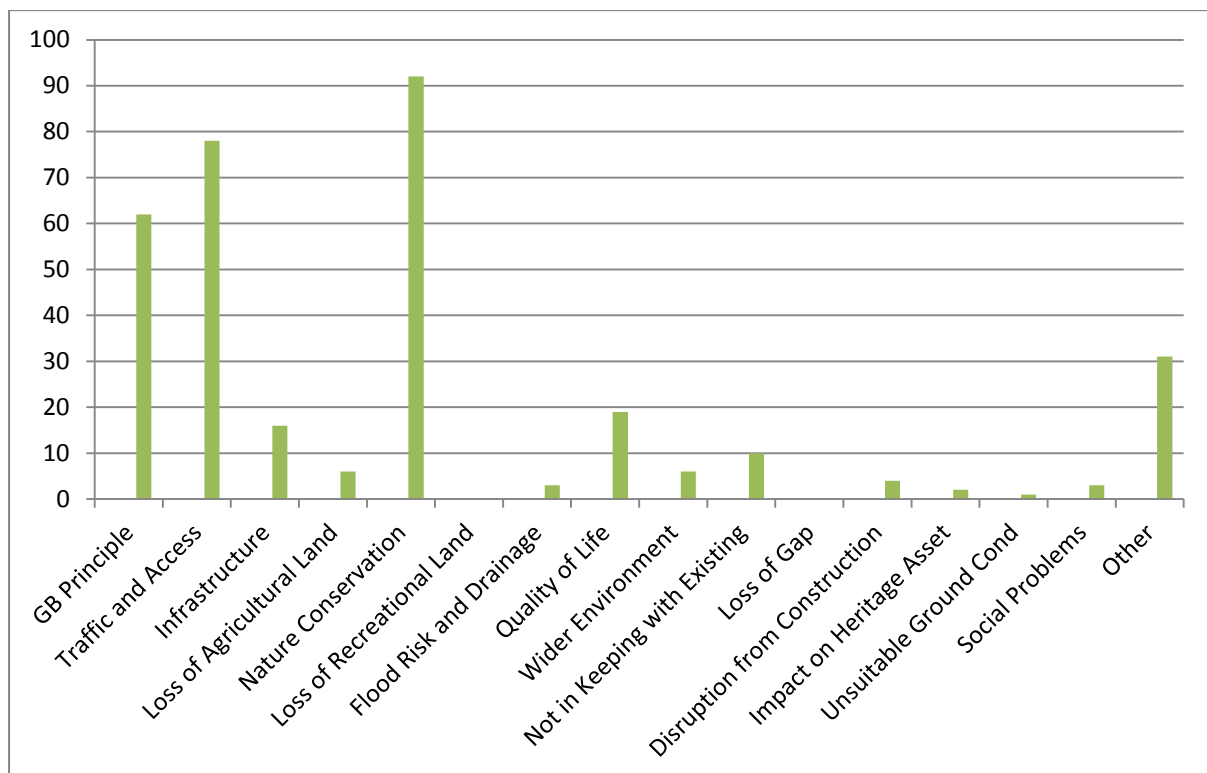
Other

The Phillips site is derelict and could be used instead. It is in a well-established residential area. The office blocks could be converted into 1 bed apartments.

There is not a need to build 350 affordable homes in Southport every year, it is for the whole of the Borough. If the development went ahead there would be 116 affordable houses built on Bankfield Lane alone, regardless of proposals to possibly build on Rufford road, which is less than 100 metres away, so the whole affordable housing for the whole of Sefton is proposed to be built within a 2 mile radius of Churchtown.

AS02 Land west of Lynton Road, Hillside

This site was promoted by Network Rail. It received 106 individual comments of which were objections except those from Network Rail themselves. The most quoted reason for objecting was the impact on nature, whilst traffic and access the loss of a Green Belt site also gained significant comment.



Network Rail submitted representations in support of site AS02. These can be viewed at www.sefton.gov.uk/additionalsites.

Below is a summary of the key comments. This should be read in conjunction with the overall comments at section 2

Traffic and Access

The resulting additional traffic in the area would cause disruption and danger due to the volume of traffic. A particular cause for concern would be traffic filtering onto the main Waterloo Road junction at the top of Lynton Road. This is already a busy main road where there have been several accidents

in the past. We have been assured that the Council would not consider so much extra traffic to be a problem. However there have been two major accidents this year at the junction with Waterloo Road and everyone in the area regards it at the moment as a nightmare crossing. Emergency and Council vehicles would struggle to access site.

Services and Facilities

Network Rail claim a broad range of facilities are readily walkable to the site. The steep steps of the railway station make it unsuitable for the elderly, disabled or people with young children. The bus runs once an hour and not on Saturdays and Sundays. There is nowhere to buy fresh produce and no ATM, Bank or Post Office. There is no doctor, dentist or health centre.

Wildlife and nature issues

The site is a Site of Local Biologic Interest. The nature aspect of this site is very important. Numerous residents have reported sightings of sand lizards, natterjack toads, red squirrels and bats. The site was omitted from the Plan last year due to the above facts. Network Rail commissioned an ecological survey by Wardell Armstrong which stated that the whole area was scrubland and that they did not find any sand lizards. Sand lizards are very secretive and are well known to be difficult to find and photograph. Network Rail's survey states that there are no open sandy areas on the site. Their survey must have been very small and selective in the area which they covered. It is known that they never surveyed the whole site in May 2013 as no disturbance of surrounding brambles.

According to an environmental group (part of Natural England) with a specific interest in monitoring sand lizards in this area, the poor weather during summer 2013 meant that sightings were down on previous years and the emergence of hatchlings was not only less than in previous years but also very late, some sightings not being until mid October last year. It could be argued therefore, that Network Rail have been selective in their investigation period and further, more extensive investigation, is necessary in order to protect this endangered species.

Quality of Life

A number of existing houses on Lynton road that are adjacent to the plot have very small rear gardens, and their borders do not run in parallel to the road. The proposed housing takes no account of this and the new houses will very much impact on the amenity of the householders, in terms of privacy, light, and noise. Most of the Lynton road owners are more elderly and the noise aspect will be not be insignificant.

Not in keeping with existing area

Proposed scheme too dense compared to existing homes. The development is totally inappropriate for the size of plot available and will have a significant detrimental effect on the residents. Development would lead to overcrowding increasing the risk of anti-social behaviour

Other

Site was ruled out last time. No justification for adding it back in. Close to electrified railway lines and therefore dangerous. The fact that Network Rail have managed to purchase No.34 Lynton Road to gain access to the site should have no relevance to the present situation.

5. Formby

AS03 Wood Hey, Southport Old Road, Formby

This site was promoted by Maghull Developments. It received 11 individual comments.

Below is a summary of the key comments. This should be read in conjunction with the overall comments at section 2

Potential for this site being included for possible re-development as it is presently in poor condition with two vacant houses which from the road look dilapidated. Would not object to this site being developed as a facility for the adjacent golf course. Some form of modest development may not conflict with GB policy. Support as long as it doesn't exceed existing footprint. This could be addressed within the current Planning system without necessity to release it from the Green Belt.

There would need to be protection for existing mature trees and provision of adequately sized gardens. Possibility of bats in buildings.

AS04 Formby House Farm [The Piggeries], Southport Old Road, Formby

This site was promoted by Maghull Developments. It received 10 individual comments.

Below is a summary of the key comments. This should be read in conjunction with the overall comments at section 2

This site is difficult to view from the road and apparently consists of a substantial collection of unused agricultural buildings. May not object to some redevelopment provided it was in character with the local area.

Some form of modest development may not conflict with GB policy. Redevelopment of this site may be acceptable if this stays within the footprint of the existing structures and hard standings. This could be addressed within the current Planning system without necessity to release it from the Green Belt.

There would need to be protection for existing mature trees and provision of adequately sized gardens to accommodate wildlife i.e. housing not too dense.

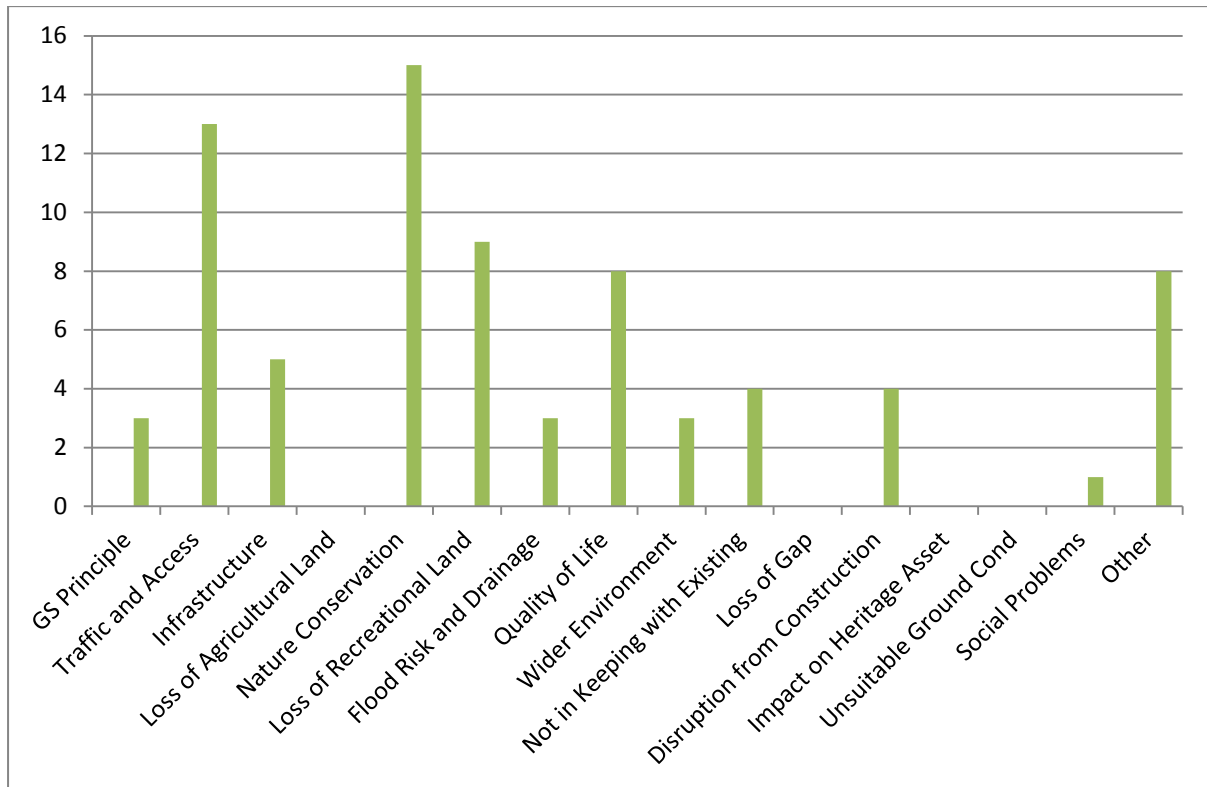
This would be a small step of joining gap between Formby and Ainsdale through ribbon development.

AS05 Clarence House, Brewery Lane, Formby

This site was promoted by Nugent Care. It received 29 individual comments. The two key issues that were raised by those objecting to the site for homes were nature conservation and traffic and access implications [see chart below].

In addition to the individual responses a petition containing 40 signatures was received rejecting the proposed development of site AS05, Clarence House, Brewery Lane, Formby. The summary of this petition was 'we believe the proposed housing development to be unnecessary destruction of green

space and wildlife. We also believe the noise pollution, air pollution, dirt and disturbance to residents would be unacceptable. We feel the character of the area would be ruined and therefore vehemently oppose selling of this land to housing developers’.



Below is a summary of the key comments. This should be read in conjunction with the overall comments at section 2.

Traffic and Access

I do not think the local roads would be able to take the additional traffic that would be created if building took place. We live in a quiet neighbourhood, where children are able to play safely near, or occasionally, on the road. The significant increase of cars/trucks would be a danger to children/walkers/cyclists. The roads are neither designed nor wide enough to take an increase in traffic. Construction vehicles would be dangerous for primary school children.

Nature

The land and trees are used by rare local animals, such as red squirrels and Natterjack Toads, tawney owls, shrews, greater spotted woodpeckers and others. A Tree Preservation Order on the site should be considered. All this would be permanently destroyed if building work took place there. This site is close to a SSSI's, and I suspect these would be disturbed if there was building work.

There is a significant area of grassland that could have ecological interest, being on acid links sand. It is important that this site is the subject of ecological survey and assessment.

Recreation Land

Brewery Lane has a riding school. Horse riders will be put at risk. It takes away a playing field.

It is noted that over the past few years Nugent Care have neglected to keep the playing field part of the site up to standard. This now appears to be a deliberate ploy to enable them in their proposal to state that it can no longer be used as a playing field. Prior to this it was regularly used by the local community for junior football training.

Quality of Life

We would not wish to be overlooked by the new development. The sun sets over the field, and any buildings would inevitably reduce the amount of time the sun shines on homes and gardens.

Not in keeping with existing

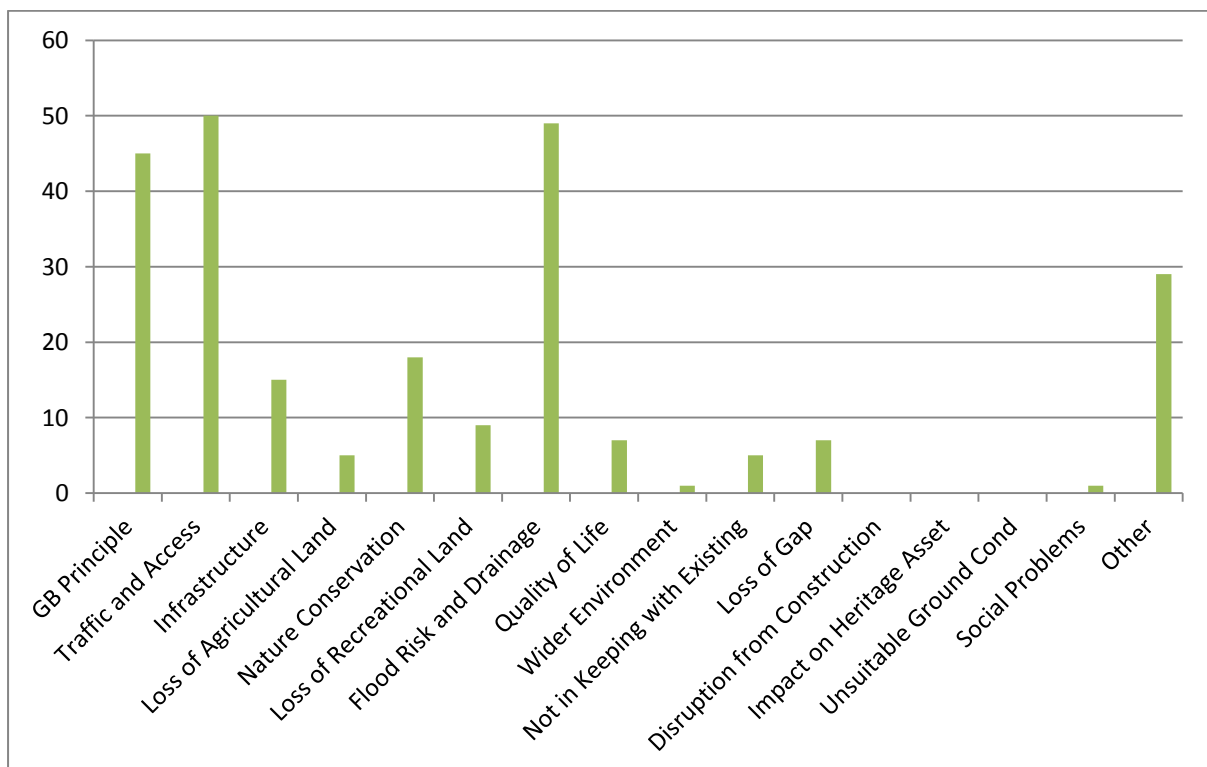
An assessment will have to be made of the contribution of the urban greenspace to the character and appearance of the locality. Freshfield seems to be disproportionately affected by the local plan and this will affect the character of the area. Unique character of the rural community should be preserved. There have been other developments very close by (Old Lane) which are unsightly and were developed poorly by having too many houses on a small plot of land.

Social Issues

Special needs school children can cause problems and police are often called. Is it right that they are put next to a care home? Should be for nursing homes and sheltered accommodation.

AS06 Land North of Brackenway [extension to proposed Local Plan allocation SR4.11]

This site was promoted by Taylor Wimpey. It received 77 individual comments all of which were objections except that submitted on behalf of the developer. The key issues that were raised by those objecting to the site for homes were flood risk and drainage, traffic and access implications and the principle of Green Belt loss [see chart below].



A detailed supporting representation was received on behalf of the developer, Taylor Wimpey UK. This can be viewed at www.sefton.gov.uk/additionalsites.

Below is a summary of the key comments. This should be read in conjunction with the overall comments at section 2.

Green Belt Principle

Site serves 4 out of 5 GB purposes. This issue has been debated previously in 1982 and at subsequent Unitary Development Plan enquiries. The issues have not changed since then so why is this site being reconsidered for development?

Traffic and Access

Roads are already congested. 700 new homes would cause congestion chaos. Deansgate Lane North narrows considerably on the approach to this site, Hawksworth Drive also has insufficient access. Another access point onto the Formby Bypass would be dangerous. All the local schools are already full and contribute to traffic congestion at dropping off times during the school term. No local buses.

Nature

This is a natural haven for Herons, Skylarks, Pheasants, Shrews, Water Voles, Mice, Owls, Bats, Foxes and many more species some of which are on the red list of the most endangered species we should not be destroying their habitat. This is one of the few remaining localities where Snipe breed and also has Natterjack Toads. The Skylark has also been seen in this area and their population is on the decline.

Housing development near nature reserves will always result in greater pressure on the reserves. The nearby Dune Heath is one of the rarest habitats in the UK.

Flood Risk and Drainage

The area is considered of high risk of surface water flooding according to the Environment Agency (EA) and is also at risk of flooding from "Rivers and Sea" once again by the EA. The inability of this land to drain due to water logging and water locking has led to properties in Hawksworth Drive flooding and also contributes to surface water flooding in Longton Drive, Hawksworth Close, Turnacre and Lingdales. Development on this site will increase likelihood of flooding elsewhere contrary to NPPF Paragraph 100. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.

The land floods regularly, and holds groundwater back from Hawksworth Drive which regularly suffers from groundwater excess. It is deemed a hot spot in the flood management plan. Eight Acre Brook and Wham Dyke are not sufficient to deal with the runoff from the land as it stands currently. To hard cover that land will place additional strain onto those water ways, which are recognised as being under strain at times of severe weather.

If the site is raised this will possibly cause flooding to existing homes.

The proposition does mention improved flood protection with cleaning out, deepening and building up the banks of Acre Lane Brook together with SUDS drainage scheme. Children could drown in the SUDS, which appear to be a sop to environmentalists.

Loss of Gap

The individuality of Formby would be lost as this is the first step towards Formby merging with Ainsdale. This site helps create a definitive boundary between Ainsdale and Formby.

Not in keeping with existing

Development would alter character of the area by intensifying the amount of housing. Loss of view across fields from the existing public footpath.

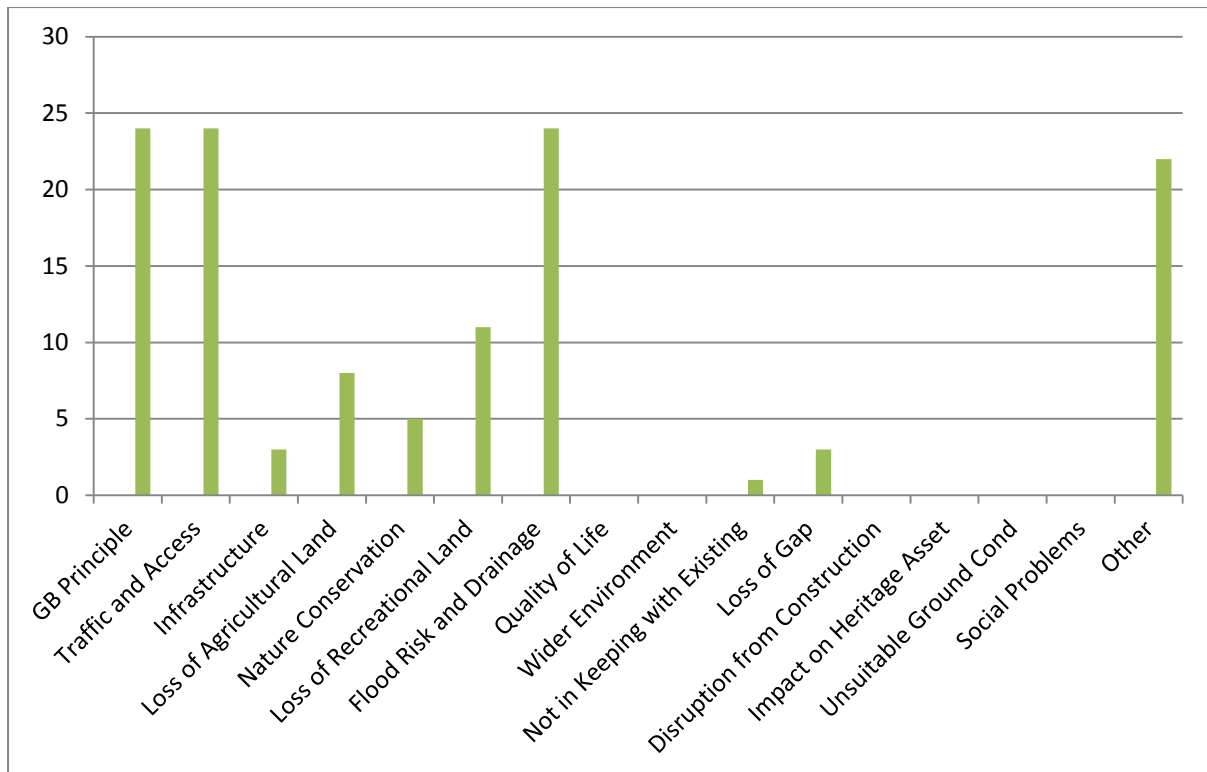
Other

Need to consider the impact of lighting on night-time operation of RAF Woodvale. The proximity of any new dwellings on that land would be challenging to MOD safeguarding. Woodvale aerodrome is due for expansion and increase in usage in the near future

Whilst not objecting to the development of the site, MOD would like account taken of the likelihood that new wetland habitats may attract large and/or flocking birds. These can be hazardous to air traffic and the design of the habitat will need to consider this.

AS08 Land south of Formby Tesco, south of Altcar Road, Formby

This site was promoted by Formby Play Sports. It received 55 individual comments. Within these comments the site received 13 supporting comments, almost one quarter of all comments, by far the highest proportion of support of any of the additional sites. The key issues that were raised by those objecting to the site for employment and recreation were the loss of Green Belt, traffic and access implications and flood risk and drainage [see chart below].



A detailed supporting representation was received on behalf of the developer, Formby Play Sports. This can be viewed at www.sefton.gov.uk/additionalsites.

Supporting comments

Installing 3G pitches will reduce the number of days when the weather has cancelled usage of normal pitches, reduce maintenance costs and help develop skills. It is in a good location that is easy for a lot of people in Sefton to reach. Very exciting proposal; will bring people from other areas to Formby.

Below is a summary of the key comments. This should be read in conjunction with the overall comments at section 2.

Green Belt

This site is within the green belt and serves 4 out of five of the purposes of green belt. This represents a 'tipping point' in urban sprawl regarding Formby, which up till now has largely been confined to the west of the Formby bypass.

Traffic and Access

This land has access problems, almost all visits to this site will involve increased traffic movement through the A565 Formby Bypass/ Altcar Rd Junction. This area is already congested at peak traffic times. Pedestrian access is also poor.

There has been no mention of Road Safety measures being made to improve the crossing on the busy by-pass so young people can cross this road in safety. Also no mention of Road Safety measures to be installed at the Tesco Round-a-bout leading into the store. The volume of traffic this store

generates at the time when young people are to be encouraged to use the playing fields is detrimental to road safety.

Agricultural Land Quality

This site is of the best and most versatile agricultural land.

Ecology

Ecological surveys will need to be carried out. The site is not designated for its wildlife interest, though it is adjacent to Downholland Brook and the River Alt where Water Voles have been recorded in recent years. The masterplan allows for new habitat/wildlife areas to be created, including a fishing lake and balancing pond on the eastern boundary. There is a proposed nature trail along the bank of Downholland Brook. No particularly adverse impacts on nature conservation interests are envisaged and it is claimed that some aspects could be beneficial. The immediate vicinity of this site has breeding Barn Owl, Corn Bunting, Grey Partridge, Reed Bunting and Yellowhammer, together with large numbers of wintering Pink-footed Geese, all these having various levels of protection. A breeding and wintering bird survey and ecological assessment are therefore required.

Recreation

No real improvement on the sports facilities that Formby Play Sports already provide. Not convinced a real sports offer. More a way of creating a super sized Tesco. Part of the site was developed as a sports park but has rarely functioned as one. Formby FC no longer plays there and the rugby club no longer exist. There is no need to use the site for employment. Already adequate sports playing fields in Formby.

Flood Risk

Believe if the land was raised it would cause flooding problems to homes to the west of the bypass.

This land is at risk of surface water flooding according the EA flood mapping and as it is considerably lower than Downholland brook and there for at risk of flooding from "Rivers" according to EA flood mapping. The current owner of the land has found it difficult to keep the land flood free having to dig a large drainage channel along the edge of the football pitches and we have evidence of over pumping into the River Alt as the existing watercourse of Boundary Brook is already failing to drain the existing site due to water-locking. Large scale development of this site will cause parts of Formby's drainage system to fail. This land acts as a soak/buffer between housing and the river, making the water slow down on its route to the river. Boundary Brook takes water from Philips Lane, Liverpool Rd, Lytles Close, Hawthorne Crescent, Formby Fields, Ditchfield, Whalley Drive, Redgate, Redgate Drive, Friars Walk, Crowland Way, Byland Close, Alt Rd, Cartmel Drive and Tesco Car Park (and other roads in the vicinity of those named). If the ditch becomes overloaded with any further development, it will cause repeats of property flooding in those roads that happened in 1989 and further occasions since then.

Other

No need for another employment area. Unrealistic assumptions on the relationships between housing, population and jobs. Tesco already large enough. Could damage the town centre.

The reasons put forward by the landowner that the Land to the North of Formby Industrial Estate is not considered to be as suitable for an employment allocation as the Land to the South of Altcar Road are unfounded. The Land to the North of Formby Industrial Estate remains the best option for employment development within Formby, providing a realistic and deliverable opportunity to meet the need for additional employment land in North Sefton. It is accessible, unconstrained and available for development. Its release would meet the criteria in national Green Belt policy and its allocation for employment uses would not conflict with local land use planning objectives.

On the contrary the development of the proposed Site AS08 Land to the South of Altcar Road will have a greater impact on the openness of the Green Belt. No evidence has been provided by the developer in terms of the need for either additional employment land to be allocated in Formby or the requirement for improved sport and recreation facilities that would be considered exceptional circumstances to release the site. The proposed enabling development relates only to a small section of the site which could be developed without the need for the proposed employment uses to the south.

As the Council already has plans to extend the industrial estate there would seem no reason for this extra site seeing as Formby is a residential area.

6. Crosby/Thornton/Netherton

AS10 Land at Edge Lane, Thornton

This site was promoted by Craig Seddon SIPP. It received 11 individual comments of which all but one on behalf of the landowner were objections. Below is a summary of the key comments.

The consultant promoting this site on behalf of the owner commented that the consultation did not make it clear that housing was not sought on all of the site and the remainder is proposed to be retained open for other uses such as renewable energy. This response can be viewed at www.sefton.gov.uk/additionalsites.

Below is a summary of the key comments. This should be read in conjunction with the overall comments at section 2

This site is within the green belt and serves 4 out of five of the purposes of green belt

At present the planners have not made it clear how the extra traffic generated by the new housing developments will be accommodated, i.e. more road building.

Proposed for residential development opposite the northern end of the Rimrose Valley and there may therefore be impacts on the adjacent Rimrose Valley LNR/LWS. The documentation claims "little ecological value" but no details are given. The land is not designated for its wildlife interest but the surrounding area has breeding Barn Owl, Corn Bunting, Grey Partridge, Linnet, Reed Bunting and Yellowhammer, while wintering Pink-footed Geese occur in small numbers. Water Vole is also recorded in the vicinity but it is not known whether it occurs on the site. An ecological survey is therefore essential.

The proposed additional site leaves very little green space for people of Thornton to roam freely. The consideration of recreation land for use as a wild area, cycle path, a traffic free walk way would be a beneficial resource to the locality.

This land is also prone to surface water flooding and properties that bound this extended site already flood (Runnell's Lane). There are concerns that if this land is developed it will place added pressure on an already failing drainage system and risk exacerbating flooding that already occurs to properties in Newfield Rd, Stanny Field Rd, Halifax Crescent, Water Street, and Hartdale Rd.

Concern is that building on this large area of land would effectively join Thornton and Netherton together.

AS25 Land at the Stables, Chapel Lane, Netherton

This site was promoted by the owner of the property. It received 7 individual comments, all objections. Below is a summary of the key comments. This should be read in conjunction with the overall comments at section 2

This site is within the green belt and serves 4 out of five of the purposes of green belt. Developing this site will reduce the essential gap between Maghull and Netherton. Note that there is brown field land nearby [the former Z block sites] and these must be used before any green belt land is developed.

AS27 Land at Lydiate Lane, Thornton [extension to proposed Local Plan allocation SR4.23]

This site was promoted by Hallam Land management and Nuffield College as an extension to the proposed Local Plan allocation SR4.23. It received 6 individual comments, all but one, on behalf of the developer, was an objection. Below is a summary of the key comments.

A supporting comment was received by the developer. This can viewed at www.sefton.gov.uk/additionalsites

Below is a summary of the key comments. This should be read in conjunction with the overall comments at section 2

This site is within the green belt and serves 4 out of five of the purposes of green belt. Developing this site will reduce the essential gap between Thornton, Sefton and Maghull.

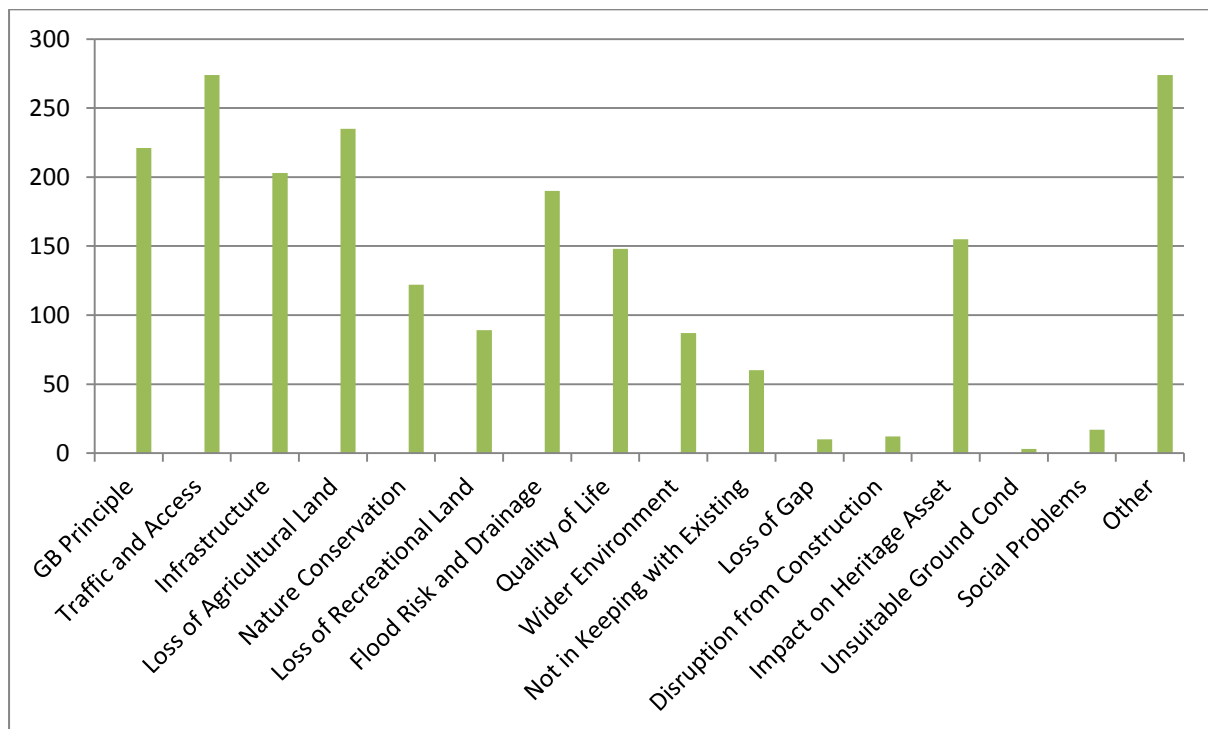
No relevant environmental documentation is provided and, as elsewhere, ecological investigations are required.

The site already suffers from surface water drainage problems as shown on the EA flood maps. Building here will have a negative impact on existing land drainage problems experienced by the Crematoria and neighbouring properties.

7. Maghull/Lydiate

AS12 Land west of Maghull, between Bells Lane and South Meade

This site was promoted by Plan It by the Landowning Trust. It received 376 individual comments of which just two were supportive. This site received the second most comments of all. The key issues that were given with objections were traffic and access issues, loss of agricultural land, loss of Green Belt, lack of local infrastructure and services and flood risk and drainage. These issues all gained over 200 responses except flood risk which was a little under.



Below is a summary of the key comments. This should be read in conjunction with the overall comments at section 2

Green Belt Principle

This site is within the green belt and serves 3 out of five of the purposes of green belt. Would in effect be a massive urban extension that would cause urban sprawl and take Maghull right to the boundary with West Lancashire.

Traffic and Access

Disagree with submitted evidence that it won't impact on current traffic levels; inadequate access via single lane swing bridge. Access routes for the parcel of land AS12 at Green Lane are not suitable. 800 new homes would create 1600 new cars. The roads could not cope with the extra traffic. In addition, the area is 2Km from Maghull rail station and away from the main arteries (M57 and M58). Traffic already comes to a standstill if there is a crash or broken down vehicles. Traffic and parking is chaotic in the area during the school run time.

There is no pavement in Green Lane, so increased level of cars from new developments would be very dangerous, especially to the bikers and horse-riders who use it. The current Green Park estate roads were built for a set number of houses and cars, with more homes this will become unviable.

South Meade cannot cope with any more traffic as it can take quite a while to turn right at South Meade / Green Lane junction and traffic is already too fast on South Meade.

The canal roads and their bridges on Green Lane and Bell's Lane are not suitable for high traffic. Liverpool is promoting the use of the canal which periodically closes the roads to barges. Has a forecast been made of the future use of the canal? Narrow bridges. Significant boat traffic. Bridges with weight limits. Often can't be used by delivery lorries.

Cannot see why the circular bus which comes through the Square cannot continue down to the large roundabout.

The technical documents on your website [submitted by the developer], which deal with transport and access, seem questionable. For example, the preferred suggestion to access Phase 3 of the proposal (some 70 dwellings) by means of South Meade when the South Meade development (already around 200 dwellings) has only a single access/egress to Green Lane is clearly out of line with typical housing estate design standards and would not usually be accepted by the emergency services. Furthermore, in the documents, standard trip rates are used and amended without regard to their applicability here, walk distances to facilities of at least a mile (to the doctors, if you are ill, or to the supermarket with heavy shopping) are taken as acceptable, assumptions and assertions used in the junction capacity analysis can be challenged and promotion of sustainable travel seems to depend on the developer making a long term commitment to fund a bus service as a social obligation together with residents responding to the promotion of Travel Awareness by means of a Welcome Pack. The evidence presented in the documents can only be viewed as speculative.

Infrastructure

Hospitals, medical services, schools, police, emergency services would be unable to cope. In addition the extra strain on the delivery of services such as Gas, Electric, Water, Drains, Sewers, Bin collection, gritters, Bus services etc would be costly. In the current economic climate is it appropriate to further strain these resources. Who will pay? Rail and bus routes can barely cope with current passenger demand.

There are 2 schools enjoying a semi-rural area, any building would urbanise these schools. In 2012 there were 3 places left in both the schools put together. If you built new houses you could have another 250 more children in the area, which would mean you would have to spend millions doubling the size of the two schools. You might state in your green belt study that there are schools and doctors within a certain distance, but these have not got endless capacity, and it is current residents that will suffer if you overload these areas.

Have to consider the cumulative effect of additional sites with existing Local Plan sites.

The infrastructure is already struggling to manage at its current level. The proposed housing levels within the Preferred Option are giving residents and the Town Council considerable concern as to

how that increase may be managed given the current problems with flooding, hydrologic failure within the drainage system etc. Additional housing will push the infrastructure to breaking point; at the moment we have no concrete assurances/guarantee of how will Sefton secure the essential infrastructure, services and facilities that they require. There are risks associated with infrastructure providers and whether they will be able to deliver the necessary infrastructure in a timely manner at the right place.

Agricultural Land

This area is Grade One agricultural land, the most productive land for growing crops and as such is a precious resource, if this land is concreted over there is no going back.

Wildlife and Nature

A recent survey highlighted the increase in the bird population, notably pink footed geese which have started to frequent the area due to the recent wet winters and flooding in the area.

Very close to this area you are trying to build a flood plain and create wetlands to encourage wildlife and birds, why would you build new housing so close. The wildlife in this area is amazing, and we are so lucky to live in such a semi rural place. We have the most unusual and rare birds, horses in the fields, bats that fly around, owl, sparrows, foxes, colourful/rare moths and butterflies, pond life, hedgehogs, rabbits, pheasant, etc. Why would you needlessly want to ruin this crucial habitat in the favour of giving developers more money. What environmental studies have you completed of this area?

The SA acknowledged that the area was a possible Pink-footed Geese feeding area and contains a number of EU and UK protected species. Water voles in the area. The W&C Act 1981 protects these.

The documentation claims a net gain in biodiversity though the creation of "substantial ecology areas". This is a major proposed incursion into the Green Belt in an area known to support Barn Owl and other farmland birds. The area, though not necessarily the site itself, is used in winter by small numbers of Pink-footed Geese. An ecological assessment is therefore required.

Recreation area

The country fields in Green Lane, are the biggest leisure amenity we have in the area, and is the main access route for the Trans- Pennine trail. You only have to go down there to see the large number of Sefton residents that use it. In Maghull, we have always suffered with lack of leisure amenities as the council have always wanted to build houses on every little land left. We did our own survey of numbers of people using Green Lane for jogging, walking, dog-walking, horse-riding, and on average there was 40 people every hour, more people than use the local gym. The local schools use it for nature walks, and walking groups often use it.

Flood Risk and Drainage

Maghull Brook crosses the site - needed for drainage. The site is very close to this area you are trying to build a flood plain and create wetlands. It has been suggested the River Alt should be allowed to go back to its natural state and the soil is at saturation point. Are these really suitable sites for house building?

This land is also prone to surface water flooding and flooding from rivers and main watercourses. Development of this land risks exacerbating existing surface water flooding problems in The Round Meade, West Meade, Airegate, Stangate, Green Lane, South Meade.

No guarantee can be given by United Utilities that they will be able to improve the sewerage and drainage system in time for the development currently proposed. Any additional housing will merely exacerbate the problem.

Not in Keeping with Existing

The proposal is disproportionate to the size of Maghull; When the planners built the Green Park estate, they managed to get it right with the size of the estate, the mix of housing and the open plan frontage to homes. This site is vast and would in effect be a massive urban extension. We fear that the consequence of approval of AS12 will be that the former track bed of the Cheshire Lines Railway will, by default, become the boundary of housing to the west of Maghull and the semi-rural nature of the community in that part of the Town will be lost for good. Consultants misrepresent current character of the Green Park Estate as it is not an example of a Radburn Estate.

Heritage

One of the biggest archaeological finds in UK history was made in 2012 in this area see <http://www.theguardian.com/science/2012/nov/19/stone-age-nomads-merseyside-dwellings>. Our town [Maghull] has a significant historic classification. Listed building - farmhouses of Mercer Court and Altcar Lane.

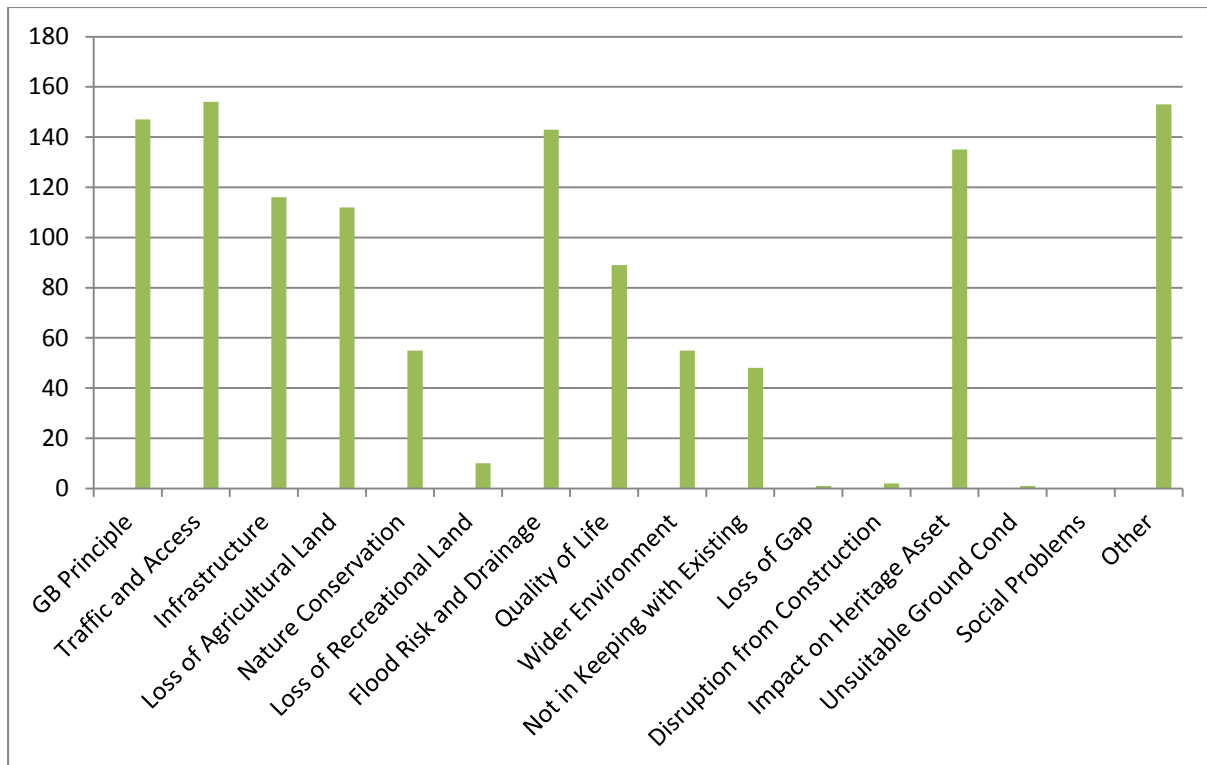
Other

Needed 4m piled foundations for a garage – likely that significant piling will be needed for new homes. Not enough car-parking at Central Square. Object to fracking on this land.

Do not understand why this piece of land is being examined again, after being regarded as unsuitable by Sefton Council in an earlier phase of the consultation.

AS13 Cheshire Lines Health Club, Sefton Lane, Maghull

This site was promoted by Cass Associates on behalf of the landowner. Despite being a small site it received 185 individual comments, due in part that many people commented to Maghull sites in general. Just three of the comments were supportive. The key issues that were given with objections were traffic and access issues, loss of Green Belt and flood risk and drainage. As people commented on Maghull sites in general, this site has a high number of objections attributed to it on the loss of agricultural land despite not being agricultural land.



Below is a summary of the key comments. This should be read in conjunction with the overall comments at section 2.

Redevelopment of this site may be acceptable if this within the footprint of the existing structures and hard standings. This could be addressed within the current Planning system without necessity to release this land from the green belt.

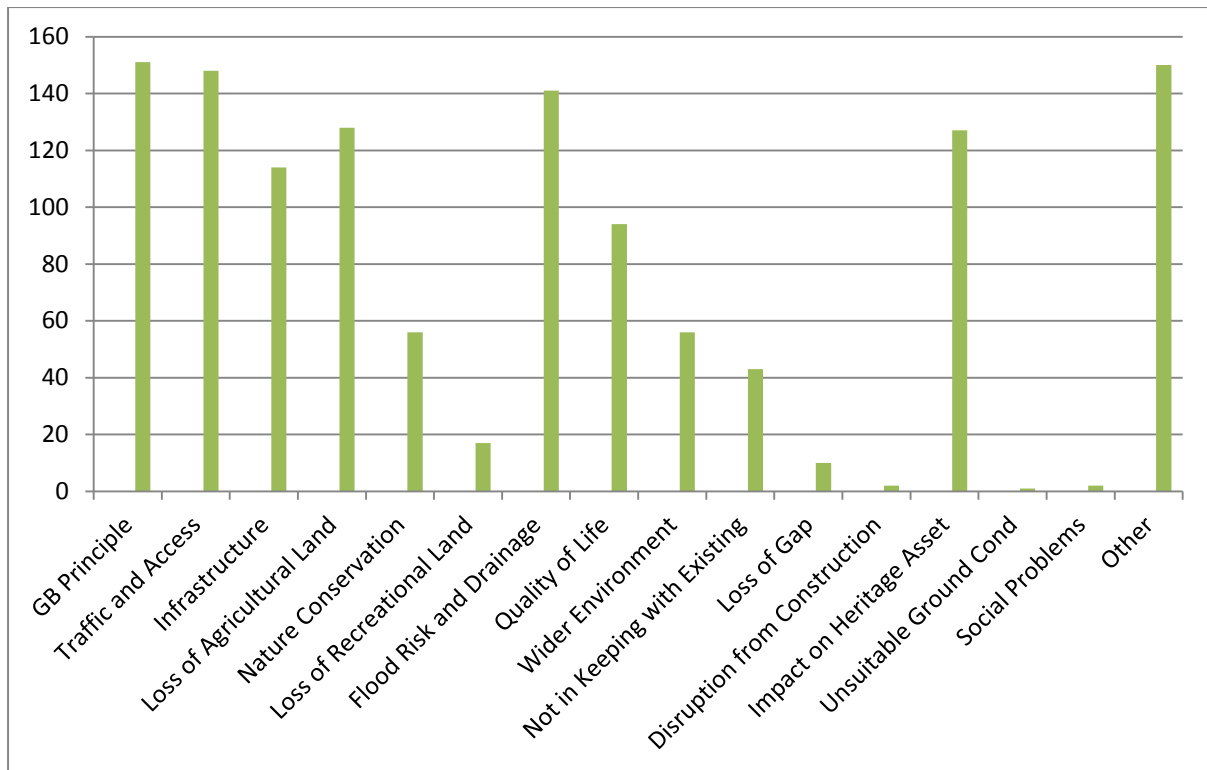
That land is in an area that is prone to surface water and fluvial flooding, existing properties in this area already flood so we would question the merit of building additional homes here.

Loss of trees will be damaging to health and aesthetic reasons

AS14 Land east of Northway and north of Kenyons Lane, Lydiate

This site was promoted by Spawforths on behalf of the landowner. It received 201 individual comments, of which just four were supportive. The key issues that were given with objections were loss of Green Belt, traffic and access issues, flood risk and drainage, loss of agricultural land and heritage impact. As people commented on Maghull sites in general, this site has a high number of objections attributed to it on the loss of agricultural land despite not being agricultural land.

A supporting comment was submitted by Spawforths on behalf of the landowner. This can viewed at www.sefton.gov.uk/additionalsites. Other supportive comments considered this a more preferable site to other sites in the locality due to its proximity to the road network and it having a less impact on Lydiate.



Below is a summary of the key comments. This should be read in conjunction with the overall comments at section 2.

Green Belt Principle

This site is within the green belt and serves 4 out of five of the purposes of green belt. No set boundaries that could contain development, which would result in urban sprawl. Building here would significantly close the gap between Maghull and Aughton.

Wildlife and Nature

The general area has breeding Barn Owl, Corn Bunting, Grey Partridge, Linnet, Reed Bunting, Tree Sparrow and Yellowhammer, while small numbers of Pink-footed Geese occur in winter. There are also recent Water Vole records in surrounding water-courses. Unfortunately, the documentation provides no details about the site's ecological interest; The Lancashire Wildlife Trust therefore recommends that an ecological survey is carried out.

Flood Risk and Drainage

This land is recognised as a flood zone by the EA for both surface water and fluvial flooding. There are considerable problems with existing drainage particularly of Suddell Brook which has led to properties downstream experiencing drainage problems and developing this site will increase the risk of flooding to existing properties.

Not in keeping with existing

Loss of scenic countryside. Would change semi-rural character. This site, AS12 and the existing Local Plan sites, will result in a huge extension to Lydiate and Maghull of considerable proportions. Lydiate would grow by nearly 80% if this development went ahead.

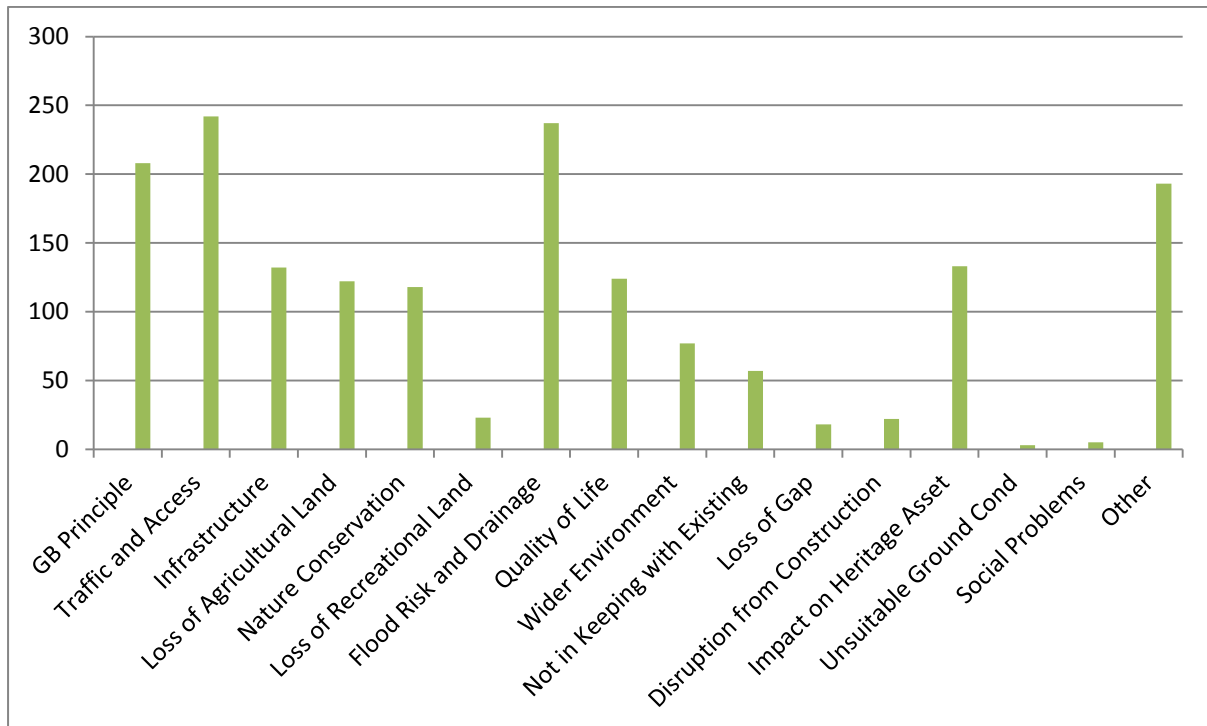
Loss of Gap

Development would take Lydiate to the West Lancashire boundary

Site AS14 lies in the Green Belt to the north of Maghull, across the A59 from sites proposed as Reserve Sites SR4.47 and SR4.48 in the Sefton Local Plan Preferred Options. West Lancashire objected to the proposed release of these Reserve Sites from the Green Belt as this would close the strategic Green Belt gap between Maghull / Lydiate and Aughton / Holt Green. On the same basis, West Lancashire BC would object to site AS14.

AS15 Land south of the Crescent, Maghull

This site was promoted by Priory Asset Management. It received 312 individual comments, all but one of which were objections. The key issues that were given with objections were given with objections were traffic and access issues, flood risk and drainage and loss of Green Belt.



Below is a summary of the key comments. This should be read in conjunction with the overall comments at section 2.

Green Belt Principle

This site is within the green belt and serves 4 out of five of the purposes of green belt

Traffic and Access

Liverpool Road [South] junction is very dangerous. There will be an increased flow of traffic through The Crescent from Liverpool Road South via both entrances to The Crescent. Parking is bad in the area from businesses using this street. Potential problems for emergency services accessing the road.

If this were to proceed, then there would be a considerable increase in traffic, which would impact on our daily life. The Crescent is a small side road that already has too much traffic, speeding traffic and the road is too narrow. Plan would potentially bring 100+ additional cars onto a small access road which can be difficult to get out of at peak times.

Flood Risk and Drainage

The area is in part on a flood plain. Inadequate drainage has already caused major flooding in Fouracres when Dovers Brook flooded recently. Many residents have already experienced issues with insurance companies not willing to provide cover for flooding.

Sewerage not designed to take excess overload. Can UU guarantee that 50 additional homes can discharge into the old system?

We also have concerns that the developers are considering re-contouring the land and there is a suggestion of raising it in places, this will alter surface water flows and land drainage and is likely to make existing flooding issues worse.

Not in Keeping with Existing

No thought given to impact on existing residents; 2 and 3 storey houses behind bungalows. Adjacent properties are bungalows with short back gardens and will be overlooked by new properties.

Loss of Gap

The development of this site will start Maghull and Netherton to merge.

Wildlife and Nature

This land has a Local Wildlife Site designation. The citation describes it as one of the largest neutral grassland habitats left in Sefton and mentions 130 plant species recorded. The surrounding area supports breeding Barn Owl, Corn Bunting, Grey Partridge and Reed Bunting, while Pink-footed Geese winter in large numbers, though the latter are unlikely to use the site itself. It is also contiguous with the former Cheshire Lines, an important wildlife corridor. At the very least, therefore, this area should be re-surveyed and its current value for nature conservation assessed.

Other

54 houses is just the beginning - more development may take place in the future.

Plan shows the access through no33 without knowledge of the owner.

This site was not included in previous consultation

AS16 Land adjacent to Maghull Station, Melling Lane, Maghull

This site was promoted by Maghull Developments. It received 37 individual comments, all but one of which was an objection. Below is a summary of the key comments. Below is a summary of the key comments. This should be read in conjunction with the overall comments at section 2

Network Rail's concern is where will the access point for the development be? Will residents turn straight onto the level crossing at Maghull Railway Station? The map in the policy consultation does not indicate the entrance.

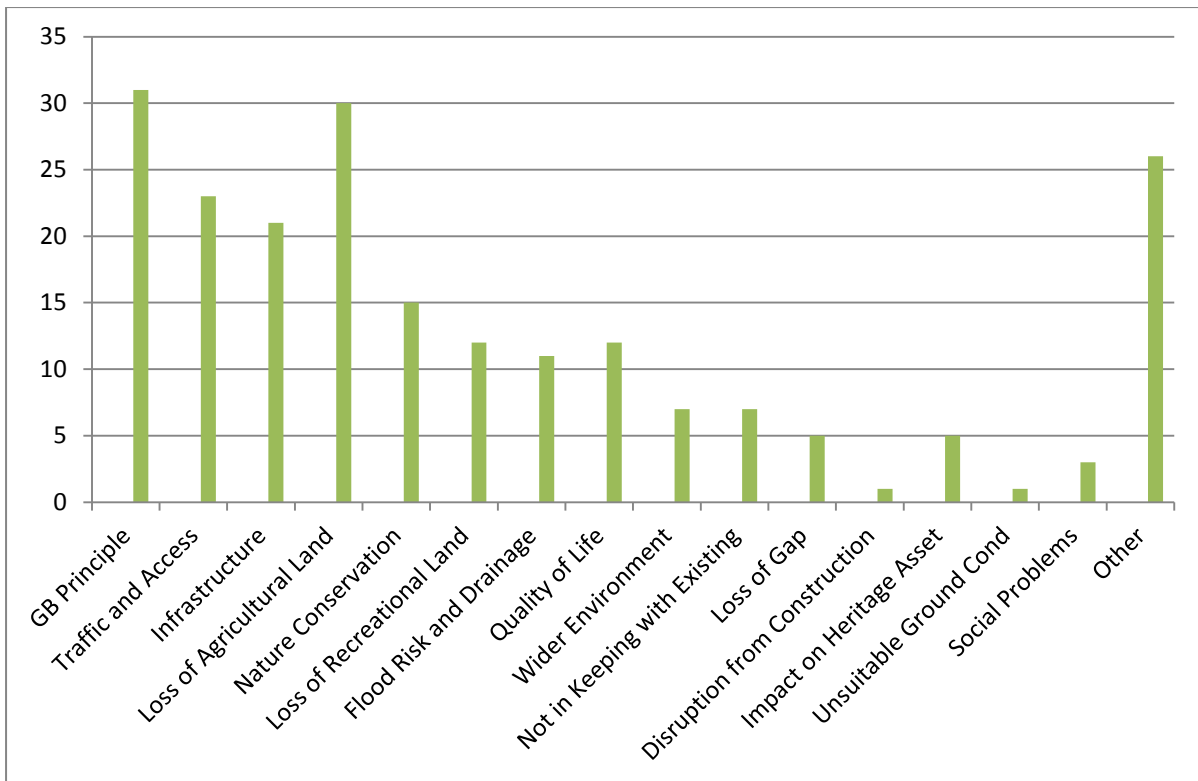
In the 2005 Local Plan, and a subsequent appeal by the owners, this site was then designated as a site of Biological Interest, and it is also important as part of a corridor for wildlife moving along the railtrack and should be preserved as such, and serve as an area of woodland enhancing the whole neighbourhood, rather than sustaining 14 houses. Wildlife on the site includes stoats/weasles, hedgehogs, squirrels, toads, moles, dormice, and rats, together with usual garden birds, and some not so usual.

Site is not well drained; developing this area could have drainage implications for surrounding properties. This land was owned by British Rail or its antecedents from about 1835, when topsoil and clay subsoil was removed to form embankments along the railway. The land was then 3 to 4 metres lower than the fields surrounding it. This depression was left as a drainage pit, accepting ground water from the adjacent fields and gardens.

In 2002 or thereabouts, the fence on Melling Lane was replaced with one of 2 metres high and public access was prevented. In 2006 United Utilities build a sewage tank on the land with a locked gate from Melling Lane by which UU have access. The litter on the site which cannot be eliminated by any development is on land retained to Rail Track for maintenance purposes, and is removed by the Maghull Station Volunteers via a wicket gate retained for that purpose.

AS24 Land adjacent to Ashworth Hospital between School Lane, M58 and Old Prescott Close, Maghull

This site was promoted by Mersey Care NHS Trust. It received 66 individual comments, of which all but two were objections. The key issues that were given with objections were given with objections were traffic and access issues, flood risk and drainage and loss of Green Belt.



Below is a summary of the key comments. This should be read in conjunction with the overall comments at section 2.

This site is within the green belt and serves 4 out of five of the purposes of green belt

The roads are already congested at the moment. More traffic will bring the town to a standstill. Research from the Ashworth development indicates that the number of additional journeys will be in the region of 283 per day. If we apply this to the larger site and the business park it will increase exponentially. The assumption that an additional spur on the M58 will reduce congestion is only partially true. This will do nothing to reduce the increased traffic flows into Maghull and parents undertaking the school run.

This area of 18.5ha lies south of the hospital and adjacent to junction 1 on the M58. The site was the subject of a Phase 1 Habitat Survey in connection with an earlier application but details are not given. The developer suggests that, while there may be some ecological interests, these can be mitigated. Watercourses around Ashworth Hospital are known to support Water Voles, so an ecological survey and assessment is required.

Developing this site will reduce the essential gap between Maghull and Kirkby.

This is split into two sites that seemingly share the same reference number. The smaller (westerly site) has mostly been developed in previous times so is not problematic. Indeed, it shares a similar status to the Ashworth South site (SR4.26). The larger (easterly) site has not been subject to previous development and therefore should not be released for development.

West Lancashire BC would have no objection to the inclusion of this site in the Sefton Local Plan if Sefton Council wished to do so, given its direct proximity to Junction 1 of the M58 and the fact it is bounded by existing development to the north that lies between the site and the borough boundary.

8. Aintree/Melling

Many people commented in general terms to the sites in the Aintree and Melling areas. The following section sets out some of the key general points that are relevant to all the sites in the area.

If all the sites, as shown on the Aintree and Melling areas plan, were allowed to be built up it will do an excellent job of creating urban sprawl. It is an extensive area of land in the Aintree and Melling area. This is too great an area of Green Belt to be given up. We believe that Sefton's draft Local Plan was right to exclude these sites and we urge the Council to maintain that position. If there is any additional need for housing (and we doubt the demographics support that) then brownfield sites should be explored.

Sites AS17, AS18, AS19 and AS21 are either contiguous or in very close proximity to each other, and are clearly of considerable scale both cumulatively and (particularly in the case of AS17) individually. The sites also all fall wholly or partly within an "essential gap" which runs alongside the M57 between the existing settlements of Maghull, Aintree and Waddicar as defined in the Sefton Green Belt study. Some of the sites also appear to have weakly defined boundaries. The inclusion of all or the majority of the land covered by these sites in the Plan (particularly those which have the greatest impact on the "strategic gap" as set out in the Green Belt study i.e. sites AS17 and AS21) would clearly represent a major departure from the emerging strategy for the Sefton Local Plan and the methodology of the Green Belt study, both of which have previously been agreed between the two authorities. This would in turn be likely to undermine the robust and sound joint co-operation which has taken place between Sefton and its neighbours in undertaking this study and more generally in the current round of Local Plan preparation.

Local traffic infrastructure is currently extremely congested, by way of example, it can often take 10 minutes at weekends to queue for access to A59 from Altway / Aintree lane, the construction of more homes within these plans does not really cater for increased traffic, one report mentions traffic on Bullbridge Lane/Altway but does provide an adequate solution. The switch island junction is generally extremely busy at peak times, with the addition of the Thornton bypass late 2014 and increased traffic from Liverpool 2 expansion the junction will already be dealing with more traffic even without additional homes within Aintree. Aintree is landlocked by canal, river Alt and motorways, additional housing will add to an already busy traffic area.

There is a serious concern that a developer could exploit our natural resources by introducing 'fracking' which would have a most detrimental impact upon the lives of those who live in and around that particular sites(s).

Knowsley would expect that any considerations would ensure that the full highways implications of the potential development of these additional sites are fully appraised, in relation to both the M57 and the local highway network within Knowsley, and appropriate mitigations proposed.

This is an area of outstanding natural beauty where people want to bring up their children without noise and pollution.

Aintree will just become one large built-up area. These developments would essentially make Aintree urban sprawl; and double the size of the parish. Melling and Aintree would essentially become one. The developments would ruin the rural aspect of Melling Village.

Are the council aware of the diverse wildlife which rely on all the sites in this area, including water voles, great crested newts, otters on the Alt, nesting sites for thousands of birds, goldcrest, sparrowhawks, buzzards, species too many to mention many endangered & protected.

Social problems from youths from affordable housing combined with overcrowding in the villages.

Pollution/Health issues/Environmental Damage will increase (noise, dust, light), not only during the construction phase, due to the amount heavy construction wagons in the area in the construction phase, (Aintree has high recorded figures for Asthma), but long term, with the amount of extra domestic vehicles, if all the housing developments go ahead, in what is a actually very small residential area of land.

Are these sites really necessary? Where will they work? Why so many in the Aintree, Melling and Maghull area? Stick with Preferred options sites and review in 5 years. We believe that Sefton's draft Local Plan was right to exclude these sites and we urge the Council to maintain that position.

There is a serious concern that a developer could exploit our natural resources by introducing 'fracking' in this area which would have a most detrimental impact upon the lives of those who live in and around this area.

Developer submission refers to Aintree library but this has closed. Also no bank, nor dentist. Poor bus service. There are only 2 primary schools, not 3, and these are over-subscribed.

The public sewers both in terms of surface water drainage and, foul discharge, are currently well known, to be inadequate. Significant surface water flooding in the Wango Lane area, close to the Hancock's (canal) Bridge and on the other site of the canal.

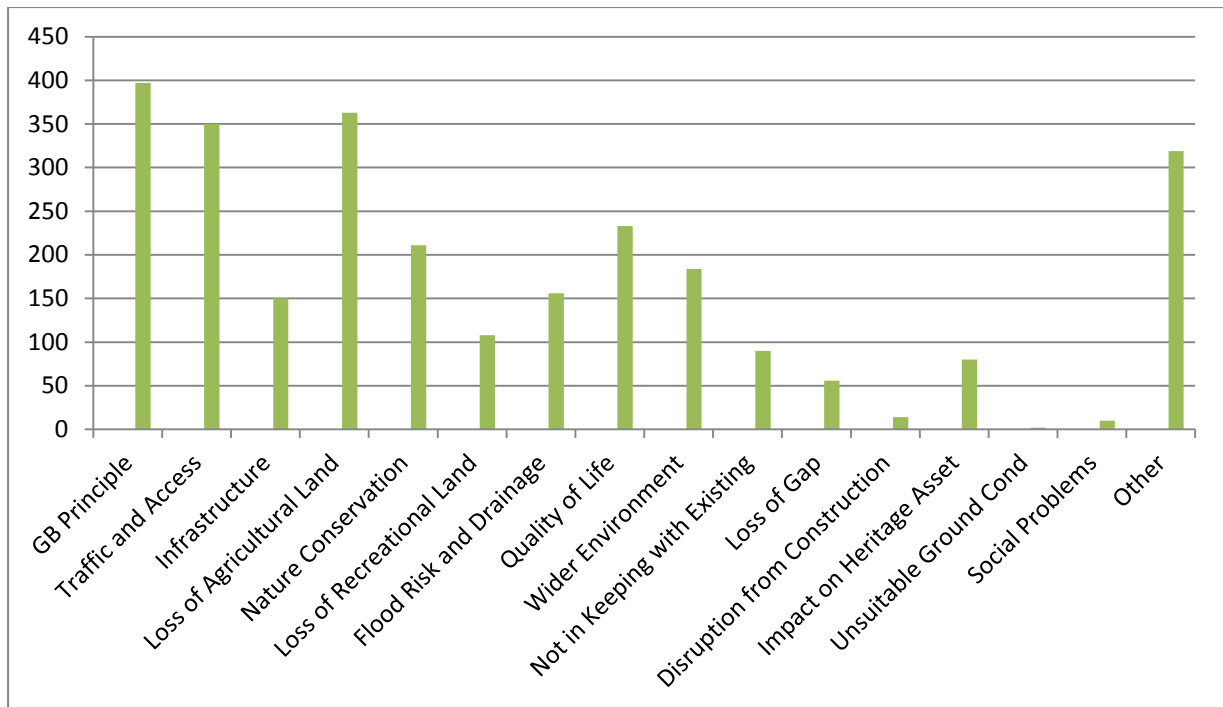
Should not rely desktop study to amend flood risks areas as it is not clear how building homes will affect this.

AS17 Land at Switch Island north of M57 between Aintree, Maghull and Melling

This site was promoted by Peel Holdings. It received 748 individual comments which was comfortably the highest response rate of all the additional sites. All but two, one of which was the developer, objected to the site. The key issues that were given with objections were given with objections were traffic and access issues, flood risk and drainage and loss of Green Belt [see chart below].

Two petitions were received in respect of this site. A petition, containing 609 signatures, to support the protection of Sefton Borough's Green Belt and oppose Peel Holdings' plan to build industrial units on over 100 acres of prime, protected farmland was received. An online petition was also submitted in support of 'Melling, Maghull and Aintree Against Peel' [MMAAPP] in objecting to Peel Holdings' proposal to build industrial facilities at site AS17. This contained 1490 signatures and was primarily concerned with the destruction of the Green Belt and top grade agricultural land.

NJL Consulting, on behalf of Peel Holding, submitted representations in support of site AS17. This included a range of supporting studies including an ecological appraisal, landscape and visual appraisal, agricultural land quality appraisal, flood risk advice and others. These can viewed at www.sefton.gov.uk/additionalsites.



Below is a summary of the key comments. This should be read in conjunction with the overall comments at section 2 and the Aintree/Melling comments at section 8.

Green Belt Principle

This site is within the green belt and serves 4 out of five of the purposes of green belt. Strongly object to wiping out 120+ ha of Green Belt - should continue to be protected; important buffer between Maghull, Melling and Aintree. It is an extensive area of land in the Aintree and Melling area. This is too great an area of Green Belt to be given up.

Believe that the loss of green belt land ought to be avoided at all costs I think that if the land must be sold for financial reasons then suggest that sympathetic housing would be preferable. There is a lack of affordable housing in this area [1 resident].

Traffic and Access

The announcement that Peel Holdings is now being allowed to bring in Post Panamax container ships into Seaforth docks will only further add to the traffic problems in this area. These vessels can carry between 5,000 to 10,000 containers per ship. That could mean up to 10,000 extra HGV's on the A5036 from Seaforth docks, towards the M57/M58 motorways, per ship that docks. There is also no suggestion from this company as to how else these containers are to be moved from the docks.

Switch Island is already grossly overloaded. Heavy traffic will inevitably route through Spencers and Brewery Lane causing hazard for pedestrians and cyclists. Switch Island will be put under greater pressure. Dunning's Bridge Road is already very busy. Village lanes not suitable

The highway infrastructure could not cope with the additional traffic, let alone heavy goods vehicles which will inevitably visit and leave the site around the clock, thus adding to general pollution, as well as noise pollution around the clock.

Development of this type needs to be on the motorway network e.g. at Warrington

What will happen to Brewery Lane? Will it become a dead end? Not clear how the site will be safely accessed.

No doubt there will be pressure to widen some of the narrow lanes in Melling to provide emergency and staff access together with "works" access while the facility is being constructed. Similarly Waddicar, Maghull and Aintree may also be faced with additional traffic on roads which pass through largely residential areas, giving rise to health and safety issues. Peel's claim that this development will "support and complement" the Port of Liverpool may hint at a lack of capacity at the docks in terms of warehousing, container handling which due to the lack of a rail connection could result in more heavy lorry traffic on an already strained Dunning's Bridge Road.

Switch Island is already congested and further lights would result in traffic backing up. Traffic to and from industrial units will use narrow country roads making them even more congested.

The cumulative impact of traffic not taken into account

Not clear what rail links would be provided - commercial or passenger - and no guarantee these will happen. The modern way of moving containers is by rail, one train of containers will remove seventy five lorries off the congested motor ways: there is no railway line in Melling.

When the M57 was in the planning stage the residents of (a much smaller) Melling were asked if they wanted a slip road to the village, the response was a resounding NO. There are rumours that a slip road will be provided from the M57 Spencers/Brewery Lane. To build a slip road anywhere near Melling would cause unprecedented amounts of traffic

Peel Holdings may have carried out work proposing the road structure can cope with the extra volume but I can only assume they have not moved into the area and tried to live with the current traffic volume. Doing surveys on a couple of days does not represent current experiences.

Knowsley MBC would expect that any considerations would ensure that the full highways implications of the potential development of these additional sites are fully appraised, in relation to both the M57 and the local highway network within Knowsley, and appropriate mitigations proposed.

Agricultural Land

Peel seeks to develop "best and most versatile" land — this is amongst the UK's most productive prime agricultural land and it's being farmed to capacity. This is a rare national asset and if this proposal is allowed then, when concreted over, it will be gone forever.

The UK can't afford to give up any best and most versatile land. This site is not a small area nor is it isolated from other agricultural land. It is a large parcel piece of land comprising the southern section of a very extensive agricultural belt spreading across Melling and Maghull towards Bickerstaffe and Aughton.

The economic benefits of maintaining the agricultural businesses will be of more benefit than industrial space. These farms are of great importance to the local economy.

Nature

The documentation provides little detail but this area is known to support breeding Barn Owl, Linnet, Grey Partridge, Reed Bunting, Yellowhammer and Lapwing, while wintering Pink-footed Geese sometimes occur in large numbers. There are also many recent records of Water Vole. The scale of the proposed loss of agricultural land would inevitably have a significant impact on a suite of key farmland breeding birds and, possibly, internationally important populations of Pink-footed Geese, for which both Martin Mere and the Ribble and Alt Estuaries have been designated as Special Protection Areas. A detailed ecological assessment is therefore justified and, depending on the outcome of such a survey, the Lancashire Wildlife Trust may lodge a formal objection to the proposed development.

Loss of habitat for migratory bird. There are Conservation Projects along the River Alt and numerous protected species such as Frogs, Newts, Birds such as Kingfishers and these would all be affected by the development of this land.

Peel has indicated that they will be re-planting trees but will have to remove a number of established plants etc - why if this development is not necessary. Are the council aware of the diverse wild life which rely on the land and the River Alt, such as water voles, great crested newts, otters, goldcrests, sparrowhawks, buzzards etc

Loss of recreation area

There would be loss of amenity. Sefton people walk, cycle and ride horses on the lanes, footpaths and towpaths of the area Peel want to develop. They enjoy the open space, the wildlife and countryside environment. This land is part of the good balance Sefton identified is needed to meet our community's housing, commercial and leisure needs.

Canal barges use the canal link. The development of the site will prevent this. The Trans-Pennine Way will also be affected.

Flood Risk and Drainage

The area would face additional flooding problems due to the already high water table and the flood plain of the River Alt.

Due to the current unsettled weather and climate change several areas of Britain have been experiencing recent flooding for the first time. The low lying area around the River Alt may experience some flooding even if this not been a problem previously. With increasing rainfall and a change in the course of the river it may no longer have sufficient capacity to clear the extra flow. Also at present the ground is able to absorb the rainfall, when the ground is covered with an impervious layer for traffic and buildings where is this surface water going, into the already inadequate drains, flood the land or where?

This land is prone to surface water flooding as acknowledged on the EA flood maps and fluvial flooding. Developing this site risks putting more pressure on an already failing drainage system as this site cannot be kept flood free at green field drainage rates (as show as it already floods at a green field undeveloped rate of drainage).

Wider Environment

Important though it is, this is not just about loss of Green Belt. AS17 would have a massive environmental impact too. Aintree/Melling/Maghull are dormitory areas — largely non-commercial and Sefton's Local Plan expressed the aim of maintaining that position.

Peel's plan will undoubtedly increase traffic in an already pressured and congested bottleneck

- increasing pollution
- making the roads more dangerous for our children
- making it harder to get around
- c02 levels
- water course pollution.

Not convinced that industrial units can be sympathetically blended into landscape. This is an area of outstanding natural beauty where people want to bring up their children without noise and pollution.

The site Peel wishes to develop straddles a length of the R. Alt between Switch Island and Spencers Lane. It is highly visible from the M57/58 and railway being a gentle landscape of high grade agricultural land in a shallow valley of broad arable fields, small cottages, barns , farmhouses, narrow lanes, hedgerows and trees culminating in the hill top hamlet of Melling overlooked by the tower of St. Thomas's church The homogenous quality of the landscape and its buildings attest to centuries of good farming practice and decades of local authority green belt planning policies which have contributed to the openness and permanence of a landscape which separates the suburban communities of Maghull , Kirkby/Waddicar and Aintree. Judging by the scale of similar" logistics facilities" at nearby Axis Business Park at Junction 5 on the M57 and the recent structures on the Omega North site Warrington on the M62 ,the large warehouses and lorry parks and roads proposed will do little to enhance the quality of the green belt landscape nor the vista towards Melling from the motorway as they will be very large "sheds" closing the gap between communities by encroaching into the greenbelt.

Not in keeping with existing

Melling is a village, not a big town. This will spoil the look of the village. Sefton Council must differentiate between Melling, Maghull , Aintree as separate towns in a similar manner to Knowsley. The Borders between Halewood, Huyton and Prescot have always been protected and so should our own.

Historic villages are no places to put large industrial units. Melling is a beautiful historic village with buildings dating back to 1640

Loss of gap

This site has been described by the government as strategically endangered. This area provides a buffer zone between Aintree, Maghull and Melling.

Quality of Life

Community life in Maghull will breakdown completely. This proposed development is far too large and intrusive for the site in question, its close proximity to residential areas will have a devastating impact upon all who live in the area. This will prove to be far too intrusive for existing residents.

Noise, air pollution, storage of hazardous substances loss of landscape noise. Loss of enjoyment of home.

There is obviously going to be a noise and light impact from the facilities. Light pollution as the development will be near to residential area and be clearly visible after dark. This will be a factor in winter months and all year round if the site has 24 hour operation.

Other

The scale of AS17 goes way beyond the commercial provision proposed by Sefton in the Local Plan and permitting AS17 would represent a significant shift away from the balance sought. We're not persuaded that Peel will attract investment to Sefton that would increase the number of jobs on offer.

Even if there is the prospect of inward investment that would do no more than siphon jobs from other parts of Sefton there is no evidence that can only be achieved on AS17. There are alternative brownfield sites nearby, for sale and with equally good motorway access.

Would contest Peel's assertion that development will create 1000 jobs. This development doesn't provide a boost to employment in the area as warehousing and distribution centres provide low density employment. Not guarantee jobs will be for local people.

Peel already marketing the land which it doesn't own; landowner lives in Aughton;

Houses on Spencer's Lane will be destroyed. Some residents concerned that plans seem to include their home.

Site is not proposed for homes which is what was assumed what Local Plan was all about. Not convinced merit of new proposed linear park which would be through an industrial estate.

The Council's own proposals were controversial enough without adding more sites. Peel have permissions for Liverpool and Wirral Waters and this should be the priority in the area before allowing additional development.

Object to this site being used for fracking. The proposal of a waste water treatment works is ludicrous. Do we really want millions of viewers of the Grand National to see huge logistic warehouses so close to the racecourse and visitors to smell the treatment works.

It is a sham and Peel want to grab land for eventual homes.

Even though it does not lie close to the borough boundary between our two Authorities, West Lancashire BC also wish to comment on Site AS17. West Lancashire support the growth of the Port of Liverpool and the wider Superport proposals but are concerned that the provision of such large logistics hubs is actually a sub-regional matter and should be guided by a City Region wide vision for managing and planning for the growth in demand for logistics and manufacturing space that will

emerge as the Port of Liverpool and Superport concept grows. As such, were Sefton Council to include site AS17 in their Local Plan outside of the supporting context of a City Region vision that plans for this growth, there is no way of knowing whether this location is among the most suitable locations for such logistics hubs, and therefore what the relative impact of releasing this land for development would be in comparison to alternative locations across the City Region and beyond.

Therefore, West Lancashire would wish to express some concern about the inclusion of site AS17 in the Sefton Local Plan, if that is what Sefton Council ultimately decided upon, without a wider piece of work across the sub-region to identify and assess potential locations for Superport-related business hubs to support its allocation.

Knowsley note that there is a need to ensure that objectively assessed housing and employment needs are met, and also that the significant benefits and implications of the anticipated growth of the Superport will need to be fully taken into account by all the City Region authorities in their future Plan making activities. However we are aware of no evidence which would justify Sefton fundamentally departing from its current strategy in developing its current Local Plan.

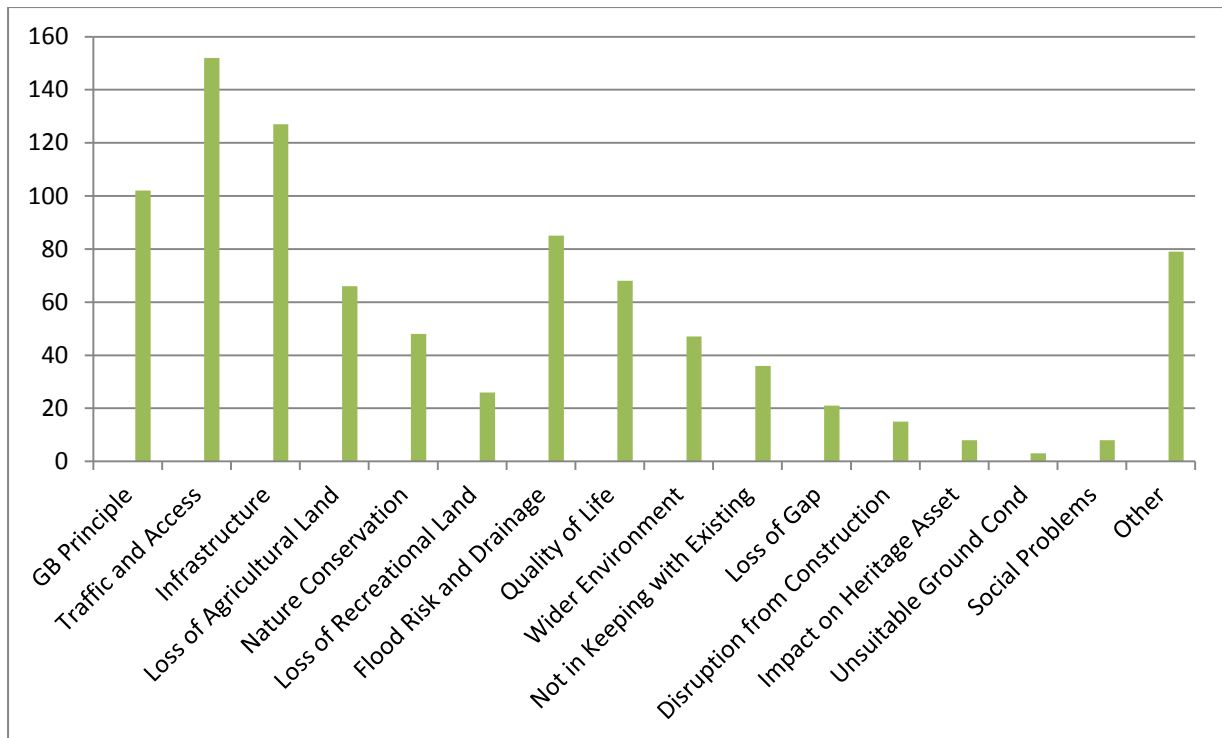
The site AS17 also fails several of the “key principles” for development i.e.

- Development should be close to where the need arises (no need locally for a logistics site),
- New development in rural area to closely relate to urban area,(no building groups nearby)
- New development to be on sites with fewest environmental constraints ...sites are best and most versatile land, have a river and wildlife.

The Dunningbridge Rd corridor from Netherton Way to the Leeds Liverpool Canal offers over 500,000 square ft of underused opportunities in terms of warehousing/industrial space at Atlantic Park, the Allied Bakery site, former switch island car sales, the Heysham/Bridle Rd sites together with at least 40 acres of developable land. The development of the greenfield Switch Island site will reduce the impetus to build on these brown field sites or the conversion of unused/underused buildings to new uses. On the Knowsley Business Park sites just off the M57, there is currently over 1,000,000 sq ft of modern warehousing being advertised for immediate use. The Liverpool Enterprise Partnership has also reported that there is sufficient land for 5 years but more will be needed in the Region as the “Superport” grows and generates business in the area. Peel own 50ha+ of brownfield land adjacent to the Port in the North Docks for which no active development proposals are being brought forward .It seems logical that this area should also include more “port centric” development rather seek to develop green field sites. Also Peel Logistics are now marketing the former Sonnae site on the Kirkby Industrial Park adjacent to the rail head as a site suitable for 700,000 sq ft as a design and build package. In many ways an ideal logistics site....so why take green belt land?

AS18 Land north of Oriel Drive, Aintree

This site was promoted by CP&S. It received 232 individual comments, all of two which objections. The key issues that were given with objections were traffic and access issues, lack of local infrastructure and services and loss of Green Belt.



Below is a summary of the key comments. This should be read in conjunction with the overall comments at section 2 and Aintree/Melling general comments at section 8.

Green Belt Principle

This site is within the green belt and serves 4 out of five of the purposes of green belt. Aintree is almost completely covered with house as it is. Loss of Green Belt site would harm the special setting of Aintree historic village.

Traffic and Access

The traffic analysis is facile - Altway and Aintree lane have become commuter roads from other suburbs to the shopping malls of Ormskirk Road making the present levels of traffic almost intolerable for the resident population. To suggest that the addition of around 600-700 additional vehicles travelling up/down Sedbergh Avenue (say around 3000 vehicle movements / day) can be accommodated by remodelling of the A59 junction is inconceivable. The foregoing comments take no account of the increasing traffic flows likely to arise from further current developments in the Ormskirk Road shopping malls.

With regards Sedbergh Avenue, would the principle of a site access in the approximate location suggested be acceptable from a highways engineering viewpoint? Maybe not engineering issue but assume that Sefton would be likely assessing the transport implications before approving any site access.

Would the suggested access point have the minimum visibility splays required to both sides of this type of vehicular access and could this be achievable having regard to land ownerships – would there be loss of properties? Unless there is a compulsory purchase order how can properties be lost?

The site access junction should have a minimum width? Would this be achievable? Could Altway accept the additional cars to this area.....a traffic impact study would need to be undertaken and information would need to be taken during "term time" when the traffic is at its peak. Sefton will likely have the necessary traffic counts to hand, as this is a busy junction and there are wider schemes proposed for the strategic network. Cumulative impact of traffic not taken into account.

Sedbergh Avenue has had stress issues over the years leading to holes appearing in the road. A collapse (the carriageway sinks) would mean it's structurally unsound. Bradfield and Sedbergh Avenue are not suitable access points for development site.

What car parking solutions would be available for residents? Normally impacted residents would have footway crossing supplied free of charge, or resident's schemes introduced. If residents have their parking taken away the Council will normally ensure that provision is made elsewhere.

Junction at Old Roan is at capacity and it is almost impossible to get across lights currently.

Infrastructure and Services

At present there is only one GP surgery that struggles to cope with the demand from existing residents never mind the demand of new housing/residents. Aintree Davenhill is not in a position to meet a sudden and significant rise in the school roll. Would imagine the same would apply at Holy Rosary (Aintree Village) and schools in Melling, Maghull and Lydiate. Sewerage will be unable to cope. 25 min walk to rail station. Bus down Altways stops at 6.30pm. Supermarket too far to walk and people will drive.

Agricultural Land

Would object in the strongest possible terms to the assertion that "the owner has no intention of bringing the land back to agricultural use". He wouldn't would he. The land has been allowed to deteriorate.

Nature

It would appear from the Developers current proposals, that no full surveys have been conducted to date. These include: Badger Survey, Bat activity survey, Breeding bird / ground nesting bird surveys, Great Crested Newt survey, Reptile Survey, Water vole survey. As these will be undertaken as part of a planning application for the site, it cannot be said that this site is now suitable.

Recreation

Footpaths within the site will need to be re-routed. This area should be opened as community woodland. Surely there is a lack of this also in the borough. Over the years the site has been used for numerous activities by the local children.

Flood Risk and Drainage

This area is formally classed as flood plain. How then is it possible to even consider building properties in such an area? Not only would the area require extensive preparation and considerable drainage works to be carried out but this would certainly place the surrounding areas/properties in greater danger of flooding. Surely if you fill an area with concrete that was previously a flood zone,

then the potential displaced water has to go somewhere, such as neighbouring properties. This then begs the question; who is going to pay for the increased cost that would inevitably arise following the reclassification of our properties as being at risk of flooding?

The development of this land, according to the SFRA report that was only completed in March 2013, 'should not be permitted if there are reasonably available sites appropriate for the purpose of development in areas with a lower probability of flooding.' It additionally states that 'it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh the flood risk. It must also be demonstrated within a site specific FRA (flood risk assessment) that the development will be safe for its lifetime without increasing flood risk elsewhere and where possible reducing flood risk overall.'

Site development - for the 1st time the GVA report Clause 6.40 (rightly) makes reference to raising of land levels to overcome flood risk. This will definitely be a requirement. Most of the land floods via groundwater flooding (not river flooding as is the subject of the EA Flood maps) for about 6 months of every year. I built my own house on land adjoining the site, which I raised by around 700mm to stay above groundwater flood levels. I monitored groundwater levels via an exploratory borehole for a period of 1 year and for 6 months the borehole was discharging under pressure about 200mm above ground level demonstrating that groundwater flooding is the issue on this site. To raise levels by even 500mm will require importation of a net material thickness of 700mm allowing for prior topsoil removal of about 200mm. This equates to a requirement of around 1.3 tonnes of hardcore per sqm of land (density of hardcore 1.8t/cu.m). For a site of 19.32Ha this equates to $193200 \times 1.3 = 251000$ tonnes of hardcore to be brought on to the site. This equates to around 16000 wagon loads (15t/wagon) or 32000 wagon movements up/down Sedbergh just to prepare the site before any building starts! This is staggering and could not be contemplated in this confined residential context. It would result in harm to health, probably injuries and possible death of children. Normal life would cease.

Quality of Life

We should have a guarantee that the electric pylons do not cause a health hazard. Extra fumes will impact on health, particularly pupils at school which backs onto development. What would be the impact of constructing any proposals here? It would create chaos if this went ahead, causing major H&S issues for residents during construction over 10 years.

Environmental Issues

Cannot find any mention at all of the Environmental Impact with regard to noise pollution, air pollution or light pollution. Cannot understand why only Visual Impact seems to be worth consideration. In winter stillness, thick mists accumulate on this land which is low lying in the River Alt valley. My house is around 130m from the motorway and air quality is frequently adversely affected.

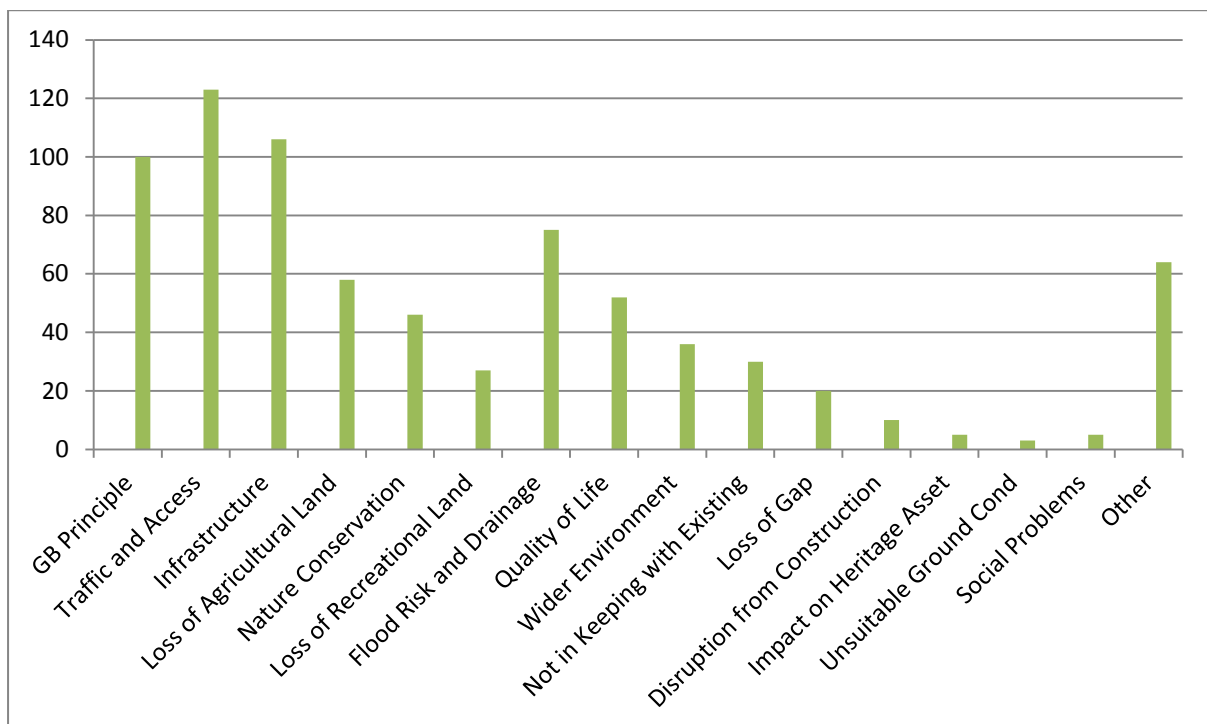
Other

It would be naïve to think developer would restrict scheme to 350 homes and this would inevitably increase to 500. Works to Sedbergh Avenue would be contrary to a covenant placed on the area in 1938 by the Earl of Sefton. Prefer to see that site used for allotments.

AS19 Land west of Bulls Bridge Lane, Aintree

This site was promoted by PSA Developments. It received 206 individual comments, all but one of which was an objection. The key issues that were given with objections were given with objections were traffic and access issues, lack of infrastructure and services and loss of Green Belt.

This site was subject to a planning application [DC/2014/01216] during the additional sites consultation period for 100 homes. The applicant [PSA Developments] asked that the evidence submitted for the application be considered as part of the additional sites consultation.



Below is a summary of the key comments. This should be read in conjunction with the overall comments at section 2 and Aintree/Melling general comments at section 8.

Green Belt principle

This site is within the green belt and serves 4 out of five of the purposes of green belt.

Traffic and Access

Roads can't handle extra traffic; we need more roads already. Cumulative impact of traffic not taken into account.

The Traffic assessment is flawed as it was done 26 July to 1 August, i.e. the school holidays. Study needs to be done during school term when more realistic data will be found. The data is therefore unfair and biased.

This site leads onto a bridge where traffic already speeds. Proposed 97 houses (194 cars) emerging onto a section of Spencer's Lane.

Agricultural Land

Land deliberately not farmed to circumvent planning laws.

Wildlife and Nature

Until recently, it was arable farmland (Grade 2/3b) but is now semi-improved neutral grassland with frequent ruderal plants. The site is not designated for its wildlife interest, though three Local Wildlife Sites occur within 1km. The documentation includes a detailed Extended Phase 1 Habitat Survey. This shows that the area is relatively rich in species, though the habitats are considered of fairly low to moderate ecological value. A large number of mitigations is proposed. The developer maintains that building can be accommodated without undue harm to wildlife interests and recommends the creation of a managed "ecological corridor" along the R. Alt. There are recent Water Vole records in the immediate vicinity and appropriate mitigations will be required if this proposal goes ahead.

Flood Risk and Drainage

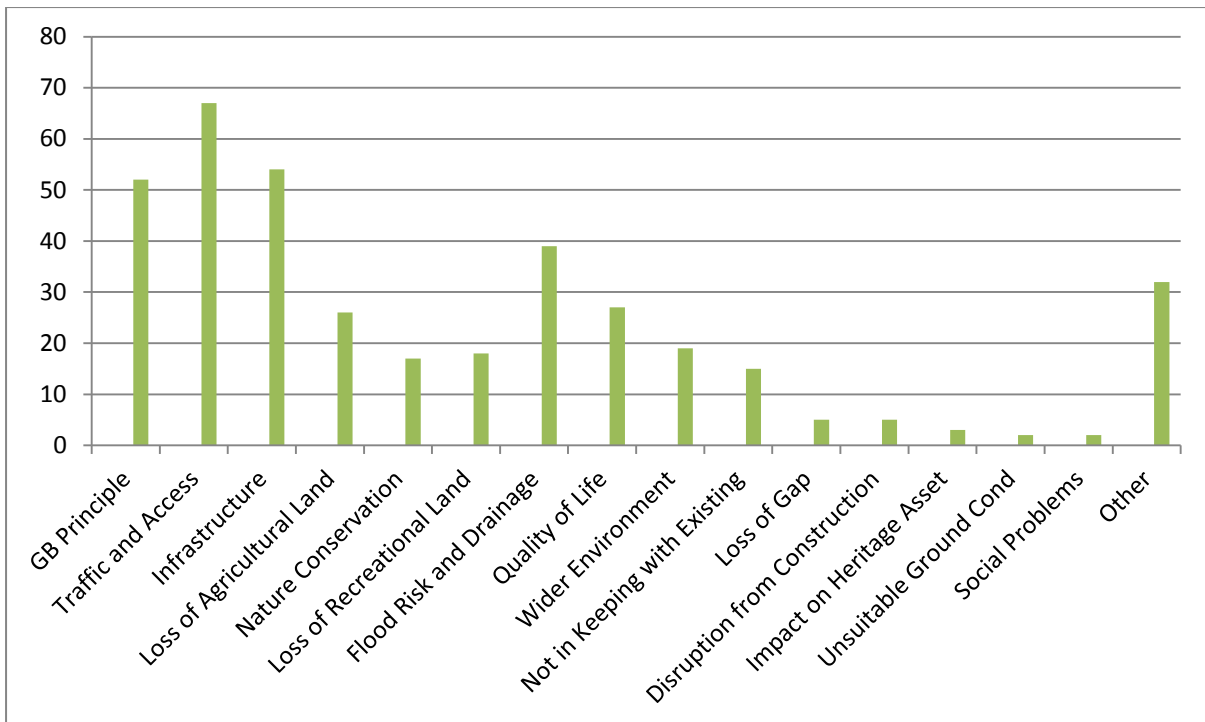
The land suffers from surface water flooding at green field runoff drainage rates, for this reason it would be difficult to develop without increasing the speed at which run off water reaching the river Alt. Are the areas in the flood plain?

Not in Keeping with Existing

I believe that the Character and nature of the existing housing stock will not accommodate the new build properties and in diminishing the unique character of the area will also reduce the value and aesthetic presence.

AS20 Land at Spencers Lane, Melling

This site was promoted by the Emery Planning Partnership. It received 104 individual comments, all of which three were objections, despite being a small site. This is due to a large amount of people comments against Green Belt sites in the Melling area in general. The key issues that were given with objections were given with objections were traffic and access, loss of Green Belt and lack of local infrastructure and services.



Below is a summary of the key comments. This should be read in conjunction with the overall comments at section 2 and Aintree/Melling general comments at section 8.

Around half of this site is already marked as being within the urban area; the request is for a neighbouring strip of land to be released to make the site larger? We feel that perhaps this site could be addressed within the current Planning system.

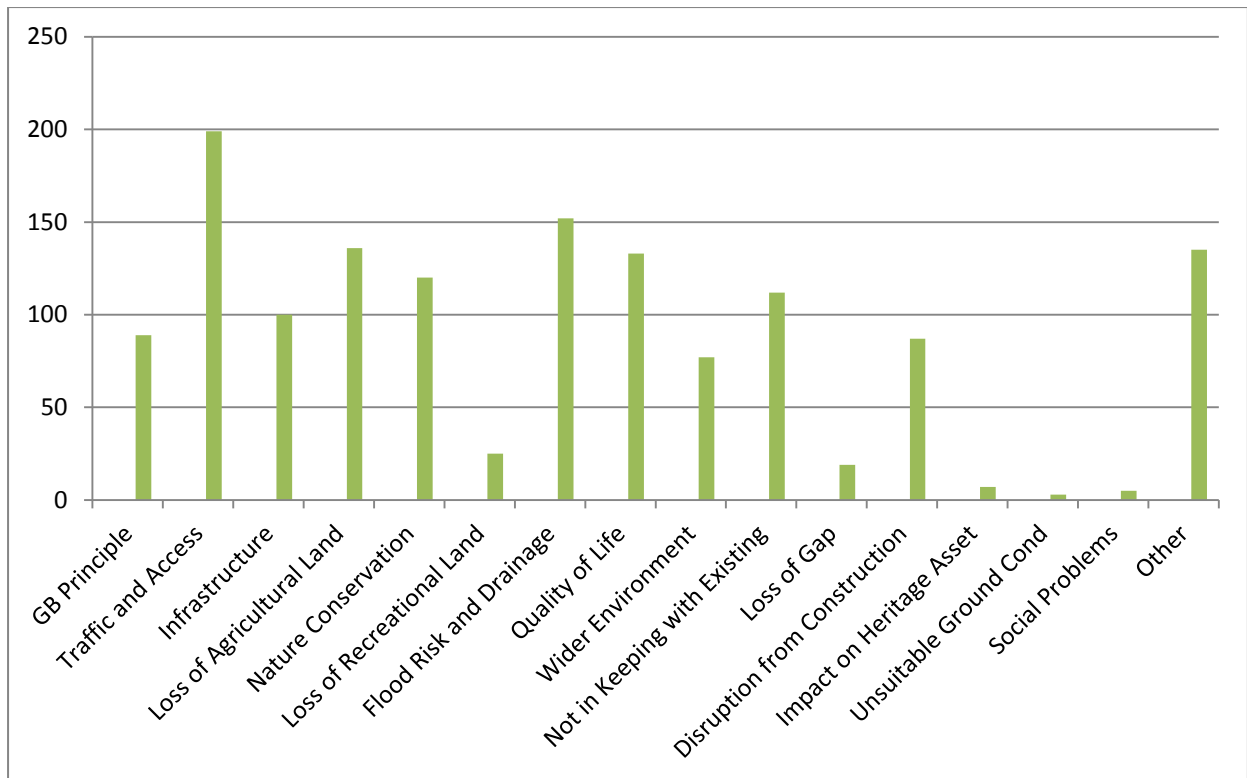
14 houses- 28 cars emerging at a section of Spencer's Lane, which has had 4 people killed at this site alone. Further up the Spencer's Lane at the junction of Brewery Lane/Spencer's Lane, numerous accidents here where Spencer's Lane goes over M57 motorway bridge, one person killed there.

AS21 Land east of Bulls Bridge Lane, Aintree

This site was promoted by Smiths Gore on behalf of the Liverpool and Chester Property Company. It received 271 individual comments, all but three of which were objections. The key issues that were given with objections were given with objections were traffic and access, flood risk and drainage, loss of agricultural land and impact on the quality of life [see chart below].

Supporting comments to this site were received by Smiths Gore on behalf of the Liverpool and Chester Property Company and Turleys on behalf of Barratt Ltd. These are available to view online at www.sefton.gov.uk/additionalsites.

A petition of 116 signatures, objecting to the potential future planning applications on a number of sites in the Aintree area, including this site, was received.



Below is a summary of the key comments. This should be read in conjunction with the overall comments at section 2 and Aintree/Melling general comments at section 8.

This site is within the green belt and serves 4 out of five of the purposes of green belt.

An unknown number of houses, but in comparison to the size of site AS19 this site will have a significant larger number of cars emerging onto Bull Bridge Lane.

Hancocks Bridge is already a bottleneck.

The disturbance to protected species in the area, such as water vowels and, long stand colonies of nesting birds.

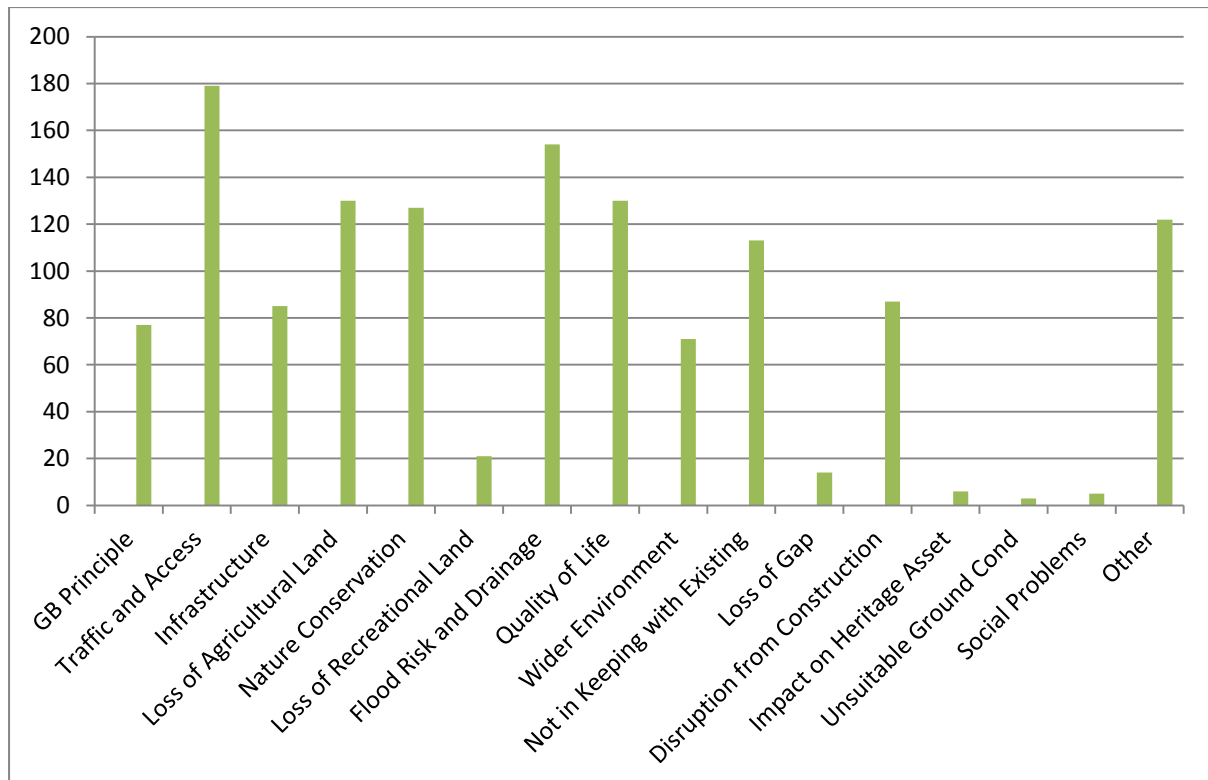
The development of this site, will without a major infrastructure upgrade, just exacerbate the situation. Also the rising foul discharge main to Melling WwTW, from Wango Lane pumping station, frequently blocks, at least up to at least 6 times a year, under current load at the pumping station. Again the proposed development will make matters worse with a significant increase in foul loading both to the main and Melling WwTW. The proposed sites are on or close to a flood plain, houses already built in the late 1950's and 1960's are on concrete rafts and, the ground levels particularly around were AS21 is planned, which were actually increased in the late 1950's, these are now proposed to be to be reduced. So dramatically enhancing the risk of flooding to both new and existing properties either side of Wango Lane, from the River Alt busting its banks.

Developing this site will close the essential gap between Aintree and Waddicar.

AS22 Mill Farm, east of Bulls Bridge Lane and north of Taunton Drive, Aintree

This site was promoted by Persimmon Homes. It received 242 individual comments, all of one which was an objection. The key issues that were given with objections were traffic and access, flood risk and drainage, loss of agricultural land, nature conservation and impact on quality of life.

A petition of 116 signatures, objecting to the potential future planning applications on a number of sites in the Aintree area, including this site, was received.



Below is a summary of the key comments. This should be read in conjunction with the overall comments at section 2 and Aintree/Melling general comments at section 8.

The proposed access area to the site is essentially a death trap for incoming drivers. The proposed junction would not only sit at the bottom of a hill, on a bend, over a river, but it would mean that TWO mini roundabouts would be within around 50 yards of each other- a fact which the appraisal seems to be unable to comprehend by claiming the distance is nearer to 110 yards.

Proposal for entrance at Bull Bridge Lane would not be feasible or safe.

It is ridiculous to access the site from Taunton Drive or Wango Lane.

This land was raised to its current level and the river straightened to allow building of Taunton Drive many years ago - flooding risks were reduced by raising the land to its current level and by straightening the course of the river, moving it to a suitable distance away from the current buildings. The current plan would involve lowering the river banks to previous levels and building houses closer to the river, thus leaving the new and existing houses at increased flood risk.

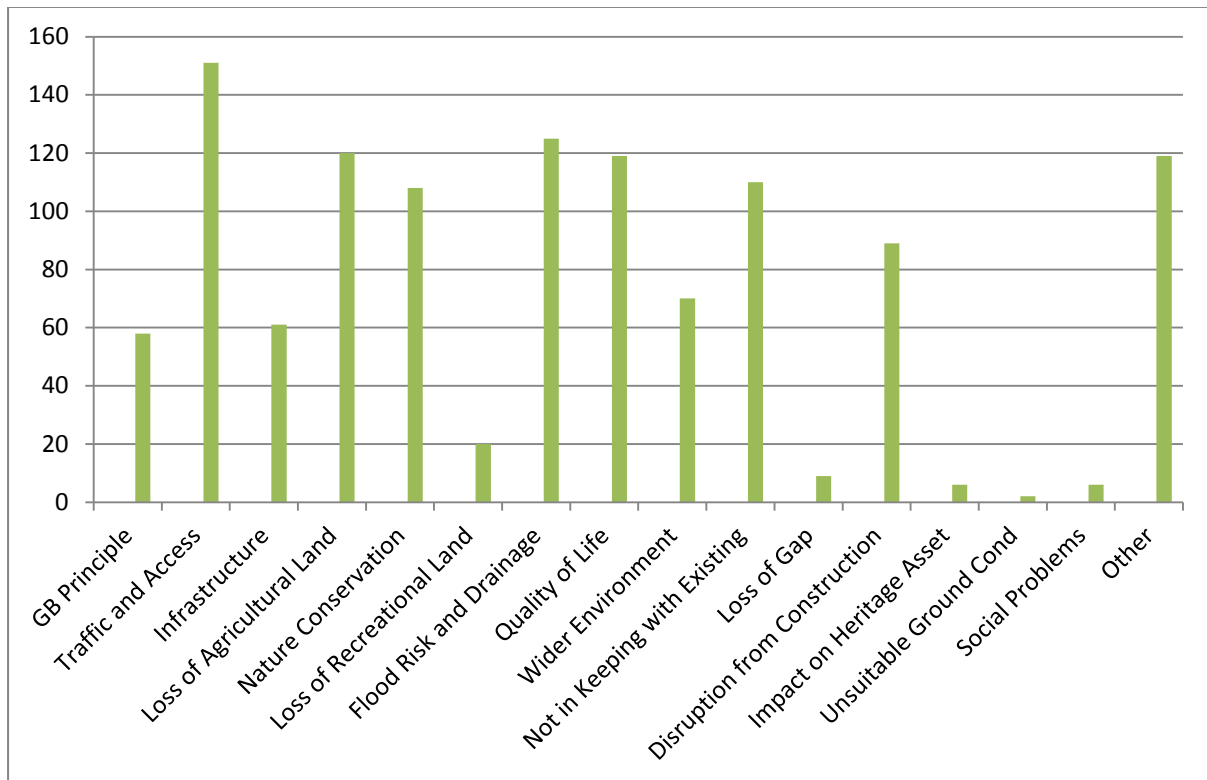
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The canal side site is a beauty spot and needs to stay like that.

AS23 Land east of Aintree Racecourse, Wango Lane, Aintree

This site was promoted by Clark Planning Consultants Ltd. It received 209 individual comments, all but three were objections. The key issues that were given with objections were given with objections were traffic and access, flood risk and drainage, loss of agricultural land and impact on quality of life.

A petition of 116 signatures, objecting to the potential future planning applications on a number of sites in the Aintree area, including this site, was received.



Below is a summary of the key comments. This should be read in conjunction with the overall comments at section 2 and Melling/Aintree general comments at section 8.

Currently the land is quite heavily wooded, so there will be a loss of trees and habitat.

The paths over the land form part of the alternative route to the Trans Pennine Trail.

The public sewers both in terms of surface water drainage and, foul discharge, are currently well known, to be inadequate. Significant surface water flooding in the Wango Lane area, close to the Hancock's (canal) Bridge and on the other side of the canal.

We would observe that this land does seem to screen residents from the railway, and Race Course,

The proposal must not impact the safety, operation, integrity or performance of the railway both during construction works on site and as a permanent arrangement. Whilst Network Rail is supportive of developments that seek to provide business or residential opportunities in the area we must assess these proposals against the potential to impact the railway.

Network Rail would be concerned that a marina will necessitate excavation and earthworks adjacent to the railway line as well as drainage works and water features. We would object to any proposal that had the potential to impact our infrastructure and therefore we are highlighting this to the council and request that the plans are approved by our Asset Protection Team. A BAPA may be required to facilitate works on site.

Network Rail also highlight that with a change of use of the land from green belt to residential and leisure that greater numbers (including minors) will be using the site. Therefore we would request that the developer erects at their own expense a minimum 1.8m high trespass proof fence adjacent to the boundary with the railway. Any proposed residential development imports a risk of trespass onto the railway, which we would remind the council, is a criminal offence (s55 British Transport Commission Act 1949). As the applicant has chosen to develop a proposal next to the railway, they are requested to provide a suitable trespass proof fence to mitigate any risks imported by the proposal. Network Rail is a publicly funded organisation with a regulated remit; it would not be reasonable to require Network Rail to fund boundary works, fencing and boundary enhancements necessitated by third party commercial development adjacent to the railway.

9. Next Stages

The comments during the 'additional sites' consultation will be used to inform the site selection for the Local Plan Publication draft. Whilst some the sites had been consulted on previously, for others this was the first opportunity the public and others had an opportunity to make comments. We consider know that we have a good overview of the key concerns for the all the sites that potentially could be proposed for development in the Local Plan.