

Chapter General **Plan Order** General Comments **Other Documents**
Policy N/A **Rep does not relate to a policy**
Respondent No 53 **Response Ref** 1 **Representor Name** Angela Gemmill
Organisation Name Marine Management Organisation
Obj/Sup/Com Comment

Summary of Main Issues

The MMO have reviewed the document and have no specific comments to make

Summary of Suggested Changes**Evidence Submitted**

Chapter General **Plan Order** General Comments **Other Documents**
Policy N/A **Rep does not relate to a policy**
Respondent No 64 **Response Ref** 1 **Representor Name** KJ Trainer
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

The flyer for the Local Plan [Champion press] said the Local Plan will benefit everyone. I am 68 and this will not benefit me in any way. Bootle does not have much spare land so Maghull is Bootle's way out particularly with the Peel Holdings proposals [increase containers]. The container vehicles from Seaforth Docks through Switch Island will be tremendous. There are already many accidents a year in this area. Rush hour on Northway is bumper to bumper and if an accident happens it gets completely gridlocked. The roads cannot take any extra traffic. Whilst a new railway station [Maghull North] is proposed this will only be part of the problem. People will still use the surrounding roads to access the stations.

Summary of Suggested Changes**Evidence Submitted**

Chapter General **Plan Order** General Comments **Other Documents**
Policy N/A **Rep does not relate to a policy**
Respondent No 97 **Response Ref** 1 **Representor Name** Joe England
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

I have studied the local plan and I believe it is probably the best that could be devised, taking into account Government demands and regulations. There are changes I could suggest but I am not sure these would improve the plan overall but just introduce a little bit of "not in my backyard". It seems to me the current plan and indeed any plan, is like a jigsaw puzzle, move one bit and 2 others fall out of place. I would like to give my support to the plan and I am sure the local authorities will do the best for Sefton as a whole.

Summary of Suggested Changes**Evidence Submitted**

Chapter General	Plan Order General Comments	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 114	Response Ref 1	Representor Name Barbara Keenan
Organisation Name Lydiate Parish Council		
Obj/Sup/Com Objection		

Summary of Main Issues

It is our view that the Local Plan process has been flawed and inappropriately conducted, a view we share with our MP Bill Esterson. Instead of a community based approach Sefton Council has led the process very much from its Planning Dept. based in Bootle. It feels like an imposed plan rather than one arrived at through genuine community engagement.

Our view is that the Sefton Local Plan needs to go back to the drawing board as it is inadequate, poorly conceived and is not consistent with sustainable development. We also fail to see that a case has been made by the Borough Council to breach its Green Belt and what case it does make seems to be based on population growth projections that have changed with just about every draft of their Local Plan.

Summary of Suggested Changes

Evidence Submitted

Previous sbmissions from 2011 and 2013

Chapter General	Plan Order General Comments	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 114	Response Ref 2	Representor Name Barbara Keenan
Organisation Name Lydiate Parish Council		
Obj/Sup/Com Objection		

Summary of Main Issues

We are concerned at what we see as a lack of genuine and effective cross-boundary working with West Lancashire Borough Council. We have been raising this concern over a long period and have not been reassured by the denials of Sefton Planners. Indeed, the more we think about this aspect of the Sefton Local Plan the more we think that it should have been pursued as joint plan with West Lancashire Borough Council as has happened in other parts of England.

Sefton has a huge boundary with West Lancashire, vastly greater than any boundary it has with Liverpool or Knowsley Councils. Lydiate, for example, is surrounded by West Lancashire on 3 sides with only its southern boundary being connected to the rest of the Borough of Sefton and indeed to Merseyside. Our economic, housing, education, health and social needs are as much if not more connected to those of our neighbouring communities in West Lancashire as they are to those in Sefton/Merseyside. Sefton Council just does not grasp or want to grasp this and seems to adopt an inward looking Merseyside centric approach which works to the disadvantage of communities like Lydiate. This is not a sound approach to a Local Plan process.

Summary of Suggested Changes

Evidence Submitted

Chapter General	Plan Order General Comments	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 125	Response Ref 1	Representor Name Nick Moulton
Organisation Name Amphibian & Reptile Conservation Trust		
Obj/Sup/Com Comment		

Summary of Main Issues

Many thanks for allowing Amphibian & Reptile Conservation to comment on the Local Plan. ARC believe the Local Plan has been positively prepared, consistent with national policy and also highlights recommendations to comply with new regulations. ARC support the findings and recommendations of the Habitats Regulation Assessment and Appropriate Assessment for the Sefton Coast SAC.

Summary of Suggested Changes

Evidence Submitted

Chapter	Plan Order	General Comments	Other Documents
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Policy	N/A	Rep does not relate to a policy
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Respondent No	144	Response Ref	1	Representor Name	Geoffrey Gaskin
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Organisation Name

Obj/Sup/Com

Summary of Main Issues

No comment. Would like to be kept informed.

Summary of Suggested Changes

Evidence Submitted

Policy N/A	Rep does not relate to a policy
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Respondent No 179	Response Ref 1	Representor Name Jacquelyn Fee
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Organisation Name Mono Consultants

Obj/Sup/Com Objection

Summary of Main Issues

We consider it important that there is a specific telecommunications policy within the emerging Local Plan. We consider that the vital role that telecommunications play in both the economic and social fabric of communities merit the inclusion of a policy which refers specifically to telecommunications developments.

National guidance recognises this through Section 5: "Supporting high quality communications infrastructure" of National Planning Policy Framework (March 2012) which provides clear guidance as to the main issues surrounding telecommunications development.

The National Planning Policy Framework (NPPF) at paragraph 42 confirms that; "advanced, high quality communications infrastructure is essential for sustainable economic growth and play a vital role in enhancing the provision of local community facilities and services."

Paragraph 43 of NPPF confirms that;

"in preparing local plans, local planning authorities should support the expansion of telecommunications networks", but should also;

"aim to keep the numbers of radio telecommunications masts and sites for such installations to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used, unless the need for a new site has been justified."

As indicated above, the formulation of policy does not exist in isolation and there are numerous documents which will affect the formulation of any telecommunications policy, the most important of these being NPPF. On this basis we would suggest that a concise and flexible telecommunications policy should be included within the emerging Local Plan. Such a policy should give all stakeholders a clear indication of the issues that telecommunications development will be assessed against. We would suggest a policy which reads;

"Proposals for telecommunications development will be permitted provided that the following criteria are met: -

(i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area;

(ii) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building;

(iii) if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority.

(iv) If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest.

When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology."

We would consider it appropriate to introduce the policy and we would suggest the following;

"Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With the growth of services such as mobile internet access, demand for new telecommunications infrastructure is continuing to grow. The authority is keen to facilitate this expansion whilst at the same time minimising any environmental impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing and siting equipment on existing tall structures and buildings."

Summary of Suggested Changes

We would suggest that a concise and flexible telecommunications policy should be included within the emerging Local Plan.

Evidence Submitted

Chapter General **Plan Order** General Comments **Other Documents**

Policy N/A **Rep does not relate to a policy**

Respondent No 184 **Response Ref** 1 **Representor Name** Paul Erwood

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I wish to formally put on record my objection to the published Sefton Local Plan

Summary of Suggested Changes

Evidence Submitted

Chapter General	Plan Order General Comments	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 212	Response Ref 1	Representor Name Angela McIntyre
Organisation Name Maghull Town Council		
Obj/Sup/Com Objection		

Summary of Main Issues

The largest concern for Maghull residents relates to inadequate infrastructure, followed by concerns over loss of Green Belt and affordability.

In December 2014 Maghull Town Council voted unanimously to forward our concerns to the Government inspector, because there hadn't been substantial change to the Local Plan for Maghull, regarding concerns about infrastructure and risks inherent in the National Policy Planning Framework.

Recently Sefton MBC's Cabinet ratified 18 recommendations proposed by the Infrastructure Working Group which if fully implemented would go some way to addressing the concerns of residents. However there remains considerable concern about the achievement of all infrastructure because of the perceived imbalance in the weighting given to each of the definitions described within 'sustainable development', the economic, the environmental and the social where the 'social' aspect appears to have less weighting than the economic. This is highlighted in published viability studies where greater weighting seems to be given to the profits of developers and landowners than to the needs of the community, e.g. once developers and landowners profits are taken there won't be enough left to cover the necessary 'social' infrastructure'.

This appears to be a problem within the NPPF methodology itself, rather than anything the council has done, who are working within the guidelines within the NPPF. We believe that because of the scale of the Maghull development there is a real risk of dysfunctional planning where we may have development without the necessary social infrastructure being guaranteed.

Concerns relate to the achievement of objective 9 of the Local Plan 'To make sure that new developments include the essential infrastructure, services and facilities that they require are provided in a timely manner. There are concerns related to risks associated with infrastructure providers and whether they will be able to deliver the necessary infrastructure in a timely manner at the right place. This fact brings into question whether Strategic Policy SR7 Infrastructure and Developer Contributions is adequate enough to provide the assurances and guarantees that would alleviate the concerns regarding inadequate infrastructure and mitigation? Particular concerns could include sewage and waste water risk.

Appropriate policies may exist, but without the ability to provide assurances/guarantees that these things will be addressed infrastructure needs may be unmet and mitigation inadequate. Is merely having a policy enough, without any way of ensuring that it has the desired impact? Are planning conditions robust enough to ensure compliance?

We understand that landowners are at liberty to sell their best and most fertile land for development, even when we need to be growing more of our own food and that developers have a right to develop land and make a profit and we do need more homes and jobs but we also believe that the community has rights and these are equally as important. We also understand that Sefton Council has had to produce a plan for the whole of Sefton based on the guidelines within the NPPF However from a Maghull perspective alone the allocations are disproportionate and the scale of proposed developments exponentially increases risks attributable to the issues and concerns outlined herein. We are concerned that the NPPF itself may create unsustainable communities from a social perspective because the social impact/social value of sustainable development isn't given the equal weighting.

There are also concerns regarding the sufficiency of Local Authority resources going forward as a result of austerity and the future of SUDs, including potential resource implications for the council and the lack of clarity regarding who will be responsible for the management, maintenance and the ongoing governance of SUDs and who will pay for this. This is important for the large site to the east of Maghull as part of it is on floodplain 3. Residents who are concerned about loss of greenbelt recognise that the amount of loss of greenbelt across Sefton may only be 3%, but in the area around the east of Maghull over 80% of greenbelt will be lost. We call on the Government Planning inspector to take our issues and concerns into account when considering the Local Plan from a Maghull perspective.

Summary of Suggested Changes

Evidence Submitted

1. The Town Survey, which was conducted in July 2013, was submitted to Sefton MBC following their publication of the Plan at the Preferred Option stage. (Appendix 1)
2. The Additional Sites response which was submitted following the consultation on the proposed additional sites in 2014. (Appendix 2)
3. The Infrastructure Working Group recommendations. Following examination by Sefton Council's Overview and Scrutiny

Committee (Regeneration and Environmental Services) an Infrastructure Working Group was set up to look at the issues and concerns regarding infrastructure which had been raised by the Plan. The recommendations of the group were submitted to Cabinet and approved at the meeting held on 15th January 2015. (Appendix 3)

Chapter		Plan Order	General Comments	Other Documents
Policy				
Respondent No	234	Response Ref	1	Representor Name
Organisation Name				
Obj/Sup/Com				
Summary of Main Issues	No comment. Would like to be kept informed.			
Summary of Suggested Changes				
Evidence Submitted				

Chapter	General	Plan Order	General Comments	Other Documents
Policy	N/A	Rep does not relate to a policy		
Respondent No	241	Response Ref	22	Representor Name Claire Jenkins
Organisation Name	Formby Parish Council			
Obj/Sup/Com	Objection			
Summary of Main Issues	We have come to the conclusion that in its present form the Plan is inconsistent with the needs of the community and the long term economic prosperity of the region. All these matters have been considered in the development of the Formby Neighbourhood Development Plan, which is being developed jointly with Sefton Metropolitan Borough Council and the smaller parish of Little Altar, a smaller but an integral part of the Formby community.			
	The Parish Councillors will be pleased to discuss these and any other matters in more detail. The Parish Council reserve the right to canvas and consult the people of Formby on all matters related to the Local Plan and recommend appropriate action. We ask to be kept up to date with any developments from this consultation as soon as is possible.			
Summary of Suggested Changes				
Evidence Submitted				

Chapter	General	Plan Order	General Comments	Other Documents
Policy	N/A	Rep does not relate to a policy		
Respondent No	241	Response Ref	19	Representor Name Claire Jenkins
Organisation Name	Formby Parish Council			
Obj/Sup/Com	Objection			
Summary of Main Issues	We ask that there is further analysis of the needs of the community.			
Summary of Suggested Changes				
Evidence Submitted				

Chapter General **Plan Order** General Comments **Other Documents**
Policy N/A **Rep does not relate to a policy**
Respondent No 241 **Response Ref** 8 **Representor Name** Claire Jenkins
Organisation Name Formby Parish Council
Obj/Sup/Com

Summary of Main Issues

All landowners, agents, developers and the local authority must accept the need to respect the riparian responsibilities under the Land Drainage Act 1991. The developer cannot be allowed to pass on the drainage problems to a house purchaser, but must be instructed to identify and solve any problems before the sale to the first buyer. All potential risks must be assessed and reported. Any omission or failure to carry out such assessments should carry the full force of the law.

Summary of Suggested Changes

Evidence Submitted

Chapter General **Plan Order** General Comments **Other Documents**
Policy N/A **Rep does not relate to a policy**
Respondent No 241 **Response Ref** 4 **Representor Name** Claire Jenkins
Organisation Name Formby Parish Council
Obj/Sup/Com

Summary of Main Issues

We strongly support the NFU recommendation to appoint a Local Drainage Board to manage the water levels, for the benefit of farmers and owners of residential properties.

Summary of Suggested Changes

Evidence Submitted

Chapter General **Plan Order** General Comments **Other Documents**
Policy N/A **Rep does not relate to a policy**
Respondent No 241 **Response Ref** 9 **Representor Name** Claire Jenkins
Organisation Name Formby Parish Council
Obj/Sup/Com

Summary of Main Issues

Duty to Consult:
Whatever the result of the Local Plan, any schemes should be subject to the agreement of the local parish councils, and where 'considerate contractors disciplines' must be in place.

Summary of Suggested Changes

Evidence Submitted

Chapter General **Plan Order** General Comments **Other Documents**
Policy N/A **Rep does not relate to a policy**
Respondent No 241 **Response Ref** 1 **Representor Name** Claire Jenkins
Organisation Name Formby Parish Council
Obj/Sup/Com

Summary of Main Issues

Formby Parish Council has studied the 'Local Plan Publication Document'. Our aims have always been to take steps to protect the special environment that is Formby, and which requires a robust plan to prevent over-development of this town of some 20,000 people. There are a number of assumptions in the document which Sefton have made, which are incomplete at best and misleading at worst.

Summary of Suggested Changes

Evidence Submitted

Chapter General **Plan Order** General Comments **Other Documents**
Policy N/A **Rep does not relate to a policy**
Respondent No 268 **Response Ref** 3 **Representor Name** Fred Weavers
Organisation Name Sefton MBC
Obj/Sup/Com Objection

Summary of Main Issues

If we are to encourage the growth of Sefton's economy it is essential that we have a well-educated and skillfull workforce. I asked for this to beincluded as an aspiration within the Local Plan, however education is not mentioned.

Summary of Suggested Changes

Evidence Submitted

Chapter General **Plan Order** General Comments **Other Documents**
Policy N/A **Rep does not relate to a policy**
Respondent No 360 **Response Ref** 8 **Representor Name** John Hill
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I wish to object to the local plan proposed by Sefton Council on the following general grounds: The plan is not positively prepared. It does not meet objectively assessed development and infrastructure requirements. There is no evidence of consultation with neighbouring authorities and it is not consistent with achieving sustainable development.

The plan is not justified. There is no evidence that it provides the most appropriate strategy, when considered against reasonable alternatives, based on proportionate evidence. The plan is not effective. It will not be deliverable over its period and there is no evidence that it is based on effective joint working on cross-boundary strategic priorities. The plan is not consistent with national policy. It will not enable the delivery of sustainable development in that it is destructive of the green belt and does not adequately provide affordable housing.

Summary of Suggested Changes

Evidence Submitted

Chapter General **Plan Order** General Comments **Other Documents**
Policy N/A **Rep does not relate to a policy**
Respondent No 366 **Response Ref** 11 **Representor Name** Margaret Anne Hill
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Test of Soundness I think that the Sefton Local Plan does not pass the test of soundness. It has not been positively prepared as it does not meet objectively assessed development and infrastructure requirements, and does not include crossboundary planning. The plan is not justified. It is not the most appropriate strategy for Sefton, when considered against reasonable alternatives referred to above. The plan is not effective. It cannot be delivered over the period. The building numbers are not realistic. The plan is not consistent with national policy. Greenbelt, agricultural land, use of brownfield before greenfield sites, pollution and carbon emissions increase and flooding problems are not consistent with national policy.

Summary of Suggested Changes

Evidence Submitted

Chapter General **Plan Order** General Comments **Other Documents** Consultation General
Policy N/A **Rep does not relate to a policy**
Respondent No 383 **Response Ref** 6 **Representor Name** Malcolm Gore
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

This leads to my final point. The people of Maghull have had no input into the plan. The original consultation was during the summer holiday period and any opposition was ignored. Our Labour councillors freely admit that they are subject to a 100% party whip and as Bootle Labour Party has the majority of Labour councillors, our councillors voted for the plan and against the wishes of those who elected them, they dare not oppose "THE PARTY" That is one reason why Sudell Ward was chosen to be the site of the "Newtown", we only have Labour councillors representing us.

I do hope that during your time in the borough you can visit the proposed East of Maghull site to see for yourself the absurdity of our situation and the voice of sanity will prevail over this debacle.

Summary of Suggested Changes

I do hope that during your time in the borough you can visit the proposed East of Maghull site to see for yourself the absurdity of our situation and the voice of sanity will prevail over this debacle.

Evidence Submitted

Chapter General **Plan Order** General Comments **Other Documents** Consultation General
Policy N/A **Rep does not relate to a policy**
Respondent No 384 **Response Ref** 3 **Representor Name** Stephen and Clare Jones
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I also feel that Sefton council and councillors have been undemocratic in the whole local plan consultation, and have not represented their electorate! They have not listened to residents and have in cases been devious and conveniently poorly communicated information about the local plan to residents, especially in the early stages.

Summary of Suggested Changes

Evidence Submitted

Chapter General **Plan Order** General Comments **Other Documents**

Policy N/A **Rep does not relate to a policy**

Respondent No 407 **Response Ref** 1 **Representor Name** Gordon Ferguson

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

Green belt land should be sacred and not built upon until all browfield land has been exhausted. Sefton population is in decline so we most certainly do not need new houses and most certainly do not need anything destroying our green belt.

Summary of Suggested Changes

Evidence Submitted

Chapter	General	Plan Order	General Comments	Other Documents	NLP Housing Needs Assessment
Policy	N/A	Rep does not relate to a policy			
Respondent No	421	Response Ref	2	Representor Name	Colin Reader
Organisation Name					
Obj/Sup/Com	Objection				

Summary of Main Issues

I consider that one of the disagreeable features of the NLP report is its repetitive nature. Interpretation of the NLP report has been made more difficult by the manner in which the spreadsheet calculations which form the core of the report (NLP Report, Appendix 4) have been presented in the public consultation documents. In the version of the report that was downloadable from the Sefton MBC website, the spreadsheets are presented as a single PDF file which does not allow the calculations embedded in the spreadsheets to be examined. The Local Plan that Sefton MBC are required to produce, addresses the needs of the borough over the period 2012-2030 (i.e. a period of 18 years). Although the Local Plan has to address the wide variety of issues that face the borough during the 'Plan Period', it is the requirements for new housing that have consistently been the most contentious.

The population projections in the NLP Housing Needs Assessment are based on the latest "2012-based SNPP" published by the Office of National Statistics (ONS) in May 2014. The average annual increase in population (276) is significantly less than the recommended annual rate of new house building (615). It is acknowledged that the projections cannot be viewed in such simple terms however, such crude assessments as this are considered to provide a valuable form of reality check in terms of whether the numbers derived from the projections are making sense. The notion and value of reality checks is introduced and acknowledged by NLP in Para 6.1j of their report. The conclusions reached in the 2014 NLP Report are out of step with the findings of their previous studies. Although the latest official ONS population projections indicate a lower rate of population growth, the number of new houses has increased substantially, from 510 to 615 dpa. Whilst the methodology adopted by NLP may have changed, when considered in the context of a 'reality check', it defies logic for a greater number of houses to be built under circumstances in which the rate of population growth is declining.

Due to the projected decline in the population (-314 persons per year), it is clear that the recommended provision of 615 new homes per year in the Borough is not required to address natural change. It follows that the NLP recommendations must be driven primarily by estimates of migration (+590 persons per year). NLP used the official 2011-based statistics on the projected number of households. This represented the most appropriate data set at that time. The data, however, only addressed the period 2012-2021. The Study's 'baseline' assessment (Scenario B) NLP use the latest 2011-based statistics on household numbers for the period 2012-2021 and the 2008-based statistics from 2021-2030. NLP justify this approach in Para 3.51 of their report, in which they note that the 2011-based household projections for the period 2011-2021 are very similar to the trends suggested by the 2008-based data (which covers the period up to 2033). Given that the NLP 'baseline' approach does not seem to present a major 'departure' from what is indicated by the weight of historic data, NLP's approach would appear to be fully appropriate. However, the numbers used in the Scenario B spreadsheet differ significantly from the official data, leading to quite different values in the projected build rate. I suspect this is due to different headship rates being applied, but this is not clear from the evidence.

NLP argue that in the last decade, the formation of new households in Sefton will have been suppressed, largely due to the global recession. One indicator of this suppressed market that is specifically referred to is the tendency for young adults to continue to live with parents because they cannot afford to buy their first house or because they cannot meet the demands of the mortgage market. NLP suggest that as the recession lifts, these 'concealed households' will emerge and these co-habiting young adults will buy their own homes. Consequently, the market will recover and new houses will be needed to meet this increased demand. NLP do not appear to justify this assumption with supporting data. For example, this is not apparent in the 2011 census statistics relating to 'overcrowding, as overcrowding in Sefton has decreased since 2001, unlike the rest of the north west and nationally. Firstly, it indicates that overcrowding is not a particular issue in Sefton – suggesting that overcrowding has not led to a significantly suppressed housing market. Secondly, it identifies that housing trends in Sefton are very different from trends elsewhere.

NLP also appear to link 'headship' to the proportion of different age cohorts within the population. On a number of occasions NLP suggest that the age cohort between 25 and 34 is one of the most significant in terms of first-time house buyers. The latest population data however, suggests that in Sefton, this age cohort will actually decline in numbers during the Plan Period (from 28,700 in 2012 to 27,500 in 2030). This data suggests that in Sefton, there may not be significant pressure on the housing market from first time buyers in this age group. NLP need to more fully explain the household numbers used in their HEaDROOM assessment.

Campaigners seeking to safeguard the valuable agricultural land in Sefton's green belt and to protect Sefton from over-ambitious levels of development that existing infrastructure will be unable to deal with, have been pointing to the fact that at present there are some 6,000 empty homes in the borough. Before we should consider building more houses, efforts should be made to fill empty properties. In accordance with this approach, if say, ca, 10,000 new households are needed, demand for a significant proportion of this can be met by the existing empty homes which will therefore, reduce the contribution from new construction. Yet campaigners have been repeatedly told that these empty houses cannot be considered in the Local Plan calculations. The modelling that has been undertaken by NLP perversely adds the number of empty homes to the projected number of households (to provide a value for 'supply units') and then assumes that the percentage of empty properties in the borough is maintained.

Given that it is the rate of empty properties that is maintained in the calculations, as the population grows (driven only by migration), the actual number of empty properties increases throughout the Plan Period and this has a direct effect on the projected number of new households that are required. NLP acknowledge "The scale of demolitions associated with housing market renewal [HMR] initiatives in Sefton has influenced the net delivery figures significantly" and "...the Borough's housing restraint policy, which operated from 2003 to 2008, constrained the number of dwellings built during this period". These two policies appear to have suppressed the housing market more than the other historic market factors, leading to the potential for criticism that Sefton MBC have 'engineered' the housing market to allow a future 'green belt bonanza' when the planning regime permitted. As a result, there would appear to be little in the way of significant pressure on the housing market in Sefton.

NLP state that "...the scale of adjustment to housing supply over and above demographic-led projections at this time would be moderate" and yet in paragraph 5.54 NLP consider that adding the significant figure of 53 dpa (954 homes over the plan period) to the "...baseline 'accelerated partial catch up'..." scenario is appropriate. NLP appear to be a little confused - The 'baseline' scenario (Model B) is not the same as the 'accelerated partial catchup' model (Model Bd) and yet by using the term "...baseline accelerated partial catch up..." NLP appear to be linking these two scenarios. Furthermore, it is not clear whether the additional 53 dpa that NLP recommend is a result of their assessment of past 'under-delivery' (when compared with the now defunct RSS) or whether the additional 53 dpa is an adjustment to reflect 'market signals'.

To summarise, there can be no justification for the inflated 615 dpa figure that NLP have recommended to Sefton MBC. Page 8 of the SHMA states "The National Planning Policy Framework (NPPF) sets out that Local Plans should seek to meet objectively-assessed development needs in their areas where feasible and should plan to deliver a mix of housing based on current and future demographic trends, market trends and the needs of different groups within the community." My view is that the proposals to build ca. 615 houses a year for 18 years are not feasible – are not sustainable – given the infrastructure and other constraints that exist within the borough.

The NLP report is described as an "Objective Assessment of Need" (OAN), yet it is anything but "objective". Factors (such as overcrowding) that may potentially push housing numbers up have been seized on in the NLP report, even when there is little in the way of statistical data to support such adjustments. Yet other factors that might reduce the demand for new housing, such as declining numbers of couples with children, have been ignored. There are also examples in which some factors appear to have been included more than once in NLP's assessment – leading to indications that 615 dpa is an over-inflated figure. Another indication that the output from the NLP is unrealistic, is the fact that 615 houses a year over 18 years is a huge number and is far greater than any sustained build rate ever achieved in Sefton. On what basis, under the current economic climate can such a large house-building programme be seen as realistic? Furthermore, the NPPF does not imply or explicitly require the OAN to be slavishly adhered to – the Local Plan proposals need to be deliverable and the key to this for Sefton is the provision of infrastructure. I consider that the number of new homes that can be built in Sefton is severely constrained by existing infrastructure and the financial implications of delivering enhanced infrastructure capacity to cope with increased demand. Once the constraints of infrastructure are properly factored into the Local Plan, a realistic housing target that is substantially lower than 615 dpa will result. Infrastructure capacity and investment potential rather than population and household size projections, which sets the real upper-bound limit on the potential growth of Sefton. This Local Plan will lead to brownfield sites that lie derelict, gridlocked roads, flooding and a whole host of other problems. The wrong houses will be built in the wrong places resulting in abandoned and long-derelict brownfield sites, an imploding housing market and a shortage of homes for an increasingly elderly population

Summary of Suggested Changes

Just because the NLP report suggests that 615 new houses a year are needed, it does not follow that these numbers have to be delivered, irrespective of the cost or feasibility of doing so.

Evidence Submitted

Chapter General	Plan Order General Comments	Other Documents Infrastructure Delivery Plan
Policy N/A	Rep does not relate to a policy	
Respondent No 421	Response Ref 7	Representor Name Colin Reader
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

“The Infrastructure Delivery Plan forms part of the evidence for Sefton’s Local Plan. As it is updated it will set out a clear programme of infrastructure needed to support the Local Plan. It will also inform a list of priorities for Community Infrastructure Levy, if this is implemented in Sefton.” This document is considered to be far too preliminary in content to form a useful aid to assist with the detailed infrastructure planning that is required by the Local Plan.

Appendix A of the IDP includes a number of interesting elements. Firstly under the entry “Utilities: Surface water management” the table in Appendix A of the IDP indicates a general requirement of £90/sq m to deal with drainage and surface water issues at all sites. However, the Keppie Massie Viability Study has only costed this at £50/sq m. At a stroke, the fledgling IDP would appear to render the KM Viability Assessment Report as obsolete. What (if any) conclusions, can now be safely drawn regarding the overall viability of the proposed Local Plan?

The other interesting result of the IDP Appendix is that the vast majority of the infrastructure costs that have been identified are to be met by the developer. So, despite the warnings given by Keppie Massie that exposing developers to too many policy requirements and other costs, may result in developers walking away from specific sites, Sefton Council still feel it appropriate to pass the vast majority of the costs associated with this vastly overambitious Local Plan on to the private commercial development companies that will assist them in its implementation. Sefton’s expectation that development costs can and will be passed on to the developers are grossly unrealistic. So who is going to pay for the vast and largely ill-defined infrastructure requirements that are associated with this Local Plan? In these current times of continued austerity and further anticipated cuts in Government spending, that is a very interesting question. Without appropriate infrastructure, Sefton MBC’s proposals for the future of the borough are unsustainable.

Summary of Suggested Changes

The proposals laid out in the Local Plan do not represent sustainable development and should therefore, be rejected.

Evidence Submitted

Policy N/A	Rep does not relate to a policy
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Respondent No 421	Response Ref 6	Representor Name Colin Reader
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Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

This objection relates to the “Sefton Council, Overview and Scrutiny Committee (Regeneration & Environmental Service) Infrastructure Working Group, Final Report, December 2014” (the IWG Report). I consider that the scale of development implied by the Local Plan is vast and will bring about significant changes to the nature and character of many areas within the borough. In order to propose development on this scale, Sefton MBC should have undertaken rigorous and detailed studies to address the needs of the proposed development – particularly to ensure that the proposed scale of development could integrate with the existing infrastructure of the borough. On the basis of the IWG Report however, such assessments appear to be in their infancy.

It is evident that 11,000 new houses need adequate infrastructure provision. The IWG Report can be regarded as little more than a preliminary report which, in terms of addressing the infrastructure requirements associated with the Local Plan proposals, and raises more questions than it provides answers. The IWG Report illustrates the lack of information that Sefton MBC currently hold on infrastructure and the complete lack of any rational plan to ensure that adequate infrastructure provision is in place before future development in the borough (on any scale) is allowed to proceed. It appears that there has been no significant assessment of the impact of the proposed Local Plan on schools and related education services. Some of the issues that the IWG Report leaves unanswered lie at the very heart of the provision of adequate education services.

It appears that Sefton Council have achieved very little in terms of determining the requirements for providing adequate health provision and ensuring that adequate investment is in place. New development on the scale proposed will have huge implications for traffic and transportation, yet there appears at present to be no real understanding of the scale of the problem and no identification of how the associated issues can be dealt with. Public transport provision is in the hands of private companies and therefore, Sefton MBC have no control over bus services etc. I am particularly concerned about the risk arising from lack of spare capacity in the existing surface water drainage system. The word ‘viability’ means different things to different people. For the residents of Sefton, ‘viability’ means delivering a practicable solution. I believe too much emphasis has been placed on profitability and what can be done for the developers, with little if any consideration of what the impact of all these new houses will be on the borough.

Through measures such as Section 106 agreements and Community Infrastructure Levy (CIL), the council can require developers to make financial contributions to such things as essential access roads to allow a development to link into the existing road network or make financial contributions to community buildings. As NPPF para 173 makes clear however, developers can point to issues of ‘viability’ when considering whether to provide the relevant funding. If the costs requested by Sefton Council make a development unviable’ – that is the developers won’t make enough profit – the developer can refuse to accept these cost burdens or can even withdraw from the development altogether.

Summary of Suggested Changes

Evidence Submitted

Policy N/A	Rep does not relate to a policy
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Respondent No 433	Response Ref 12	Representor Name Eric Haworth
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Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

Of critical importance when developing the Local Plan, is the obligation to ensure that proposals accord with the requirements of the National Planning Policy Framework (NPPF). Sefton MBC's proposals to develop 615 houses a year across the borough are neither viable nor deliverable and the reports that have been prepared to support these development proposals are far from robust. The nature of the proposed development and the associated scale of development obligations and policy burdens are considered to be so great that they threaten the overall viability of the Local Plan as well as the future of the borough.

NPPF Paragraph 174 states: "In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle. Evidence supporting the assessment should be proportionate, using only appropriate available evidence."

This Local Plan will lead to brownfield sites that lie derelict, gridlocked roads, flooding and a whole host of other problems. The wrong houses will be built in the wrong places resulting in abandoned and long-derelict brownfield sites, an imploding housing market and a shortage of homes for an increasingly elderly population.

The NPPF places communities at the forefront of the planning process. Throughout the evolution of the Local Plan the views of the majority of Sefton residents – who are opposed to the Plan in its current form – have been ignored.

Lydiate simply does not have the huge housing requirements that this plan is imposing upon it. Its housing needs are of a much smaller scale and very much associated affordable housing which this plan is not seriously addressing. But overriding all this has to be the nature and uniqueness of the high grade agricultural land surrounding our community.

Having reviewed Sefton MBC's Local Plan, together with its supporting documentation, reports, ONS and other related officially published data and the NPPF, we are unable to come to the same conclusions as SMBC. In fact we are of the view that the plan is fundamentally flawed as identified above. From this it is clear that SMBC's Local Plan has more to do with an attempt to plug holes in its budget via the revenue stream generated by such things as the New Homes Bonus than it does with addressing the housing requirement of those who are in most need.

Sefton MBC have gone on record as identifying the area in most chronic need of housing, and affordable housing at that, as being the south of the borough, i.e. Bootle, Netherton, Litherland, etc. However, they not only reneged on their commitment to 30% affordable housing, (which in itself was at least 10% below what was required) but they also aligned themselves with their developers preference for 3, 4 & 5 bedroom executive houses in some of the highest property price areas in the borough, i.e. Lydiate, Formby, Maghull, etc. Therefore, those in most need, remain in most need.

As an example of this, a Bootle community known as the Klondyke consisting of circa 450 houses, provisionally secured a grant directly from central government to refurbish the properties and bring them up to modern housing standards, using local contractors, local suppliers and giving training opportunities in related skills to local young people. What a fabulous scheme, a local community acting for the benefit of their own community, exactly the sort of scheme that was at the heart of the Prime Ministers "Big Society". The only problem was it needed to be sanctioned by Sefton MBC, who had already negotiated a more lucrative "deal" with a property developer to demolish the existing 450 homes, and build 150 shiny new houses that the local residents could not afford, and left a surplus of 300 houses that would now be built on local farmland. This was so cynical that the Planning Inspector may recall that it found its way onto a TV documentary called the Great Housing Scandal.

For a Local Plan to be both sound and sustainable it must satisfy at least three criteria: 1.) The houses must be built for the right reasons. 2.) The houses must be built in the right areas. 3.) The houses must be built in the right numbers. This Local Plan satisfies none of these criteria. This is not so much a sustainable Local Plan, but a Developers Charter, and we would strongly recommend that the Planning Inspector reject this Local Plan as unsound and unsustainable.

Summary of Suggested Changes

Evidence Submitted

Chapter General	Plan Order General Comments	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 468	Response Ref 1	Representor Name David Scott
Organisation Name		
Obj/Sup/Com	Support	

Summary of Main Issues

I would offer my general support for this local plan (subject to the comments below) and I believe is a serious attempt to plan for the challenges and opportunities which face the borough and its people for the plan period.

As far as I can tell local councillors and the planning team have worked within the principles of the NPPF and the constraints imposed by Government policies to achieve a workable plan.

Summary of Suggested Changes

Evidence Submitted

Chapter General	Plan Order General Comments	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 488	Response Ref 2	Representor Name Ian Brodie Browne
Organisation Name Sefton Council Lib Dem Opposition Group		
Obj/Sup/Com	Objection	

Summary of Main Issues

Lack of Sustainable Development:

Since our previous submission [summer 2014 consultation] there have been changes to the plan which in our view put the principle of sustainable development at huge risk. We say this as the Borough Council is now proposing to build more houses and in doing so use more Green Belt and high grade agricultural land to achieve this objective. We are far from convinced that a clear case has been made by the Borough Council to concrete over vast swathes of high grade agricultural land which is presently being used to grow our food on.

Summary of Suggested Changes

Evidence Submitted

Chapter General	Plan Order General Comments	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 488	Response Ref 9	Representor Name Ian Brodie Browne
Organisation Name Sefton Council Lib Dem Opposition Group		
Obj/Sup/Com	Objection	

Summary of Main Issues

Sefton's scrutiny process associated with the Local Plan was poor and the work that was done, especially that of Council's Infrastructure Working Group, seems to have been all but ignored. This working Group raised many questions and concerns but as the Plan went through its final processes within the Council these significant issues were not addressed in a robust way and this leads us to conclude that the scrutiny of the Local Plan was unsound.

Summary of Suggested Changes

Evidence Submitted

Chapter General	Plan Order General Comments	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 488	Response Ref 10	Representor Name Ian Brodie Browne
Organisation Name Sefton Council Lib Dem Opposition Group		
Obj/Sup/Com Objection		

Summary of Main Issues

Our conclusion – Sefton’s Local Plan, not sound, not effective. Sefton Council has done what it has been made to do to put a Local Plan together, but it has not done what it needed to do to put together a Local Plan that passes the test of soundness or that addresses the needs of its diverse communities. The Plan is remote and disconnected from the communities it seeks to plan the future of. The failure to work collaboratively with West Lancs Borough Council has been a huge opportunity missed and it means the Plan is not effective. The Plan is imposed, has little no community support, it is unlikely to deliver the affordable housing that is required. Putting it bluntly it lacks ambition for the Borough and will not help it move forward economically, environmentally or socially.

For context and background information we attach our previous submission [dated 7 Aug 2014] because much of what we said in it still applies: The flawed method of public consultation used by the Council may well have reduced the number of residents who felt able and comfortable to participate in the process.

Summary of Suggested Changes

Evidence Submitted

Chapter	General	Plan Order	General Comments	Other Documents
Policy	N/A	Rep does not relate to a policy		
Respondent No	488	Response Ref	5	Representor Name Ian Brodie Browne
Organisation Name	Sefton Council Lib Dem Opposition Group			
Obj/Sup/Com	Objection			

Summary of Main Issues

Local Plan should have been a joint Plan with West Lancs Borough: We remain concerned at the lack of effective cross-boundary working with West Lancashire Borough Council. This is a matter that we have raised previously and the denials of Planning Officers have not reassured us. We have concluded that the Sefton Local Plan should have been pursued as joint plan with West Lancashire Borough Council as, we understand, has happened in other parts of England. Sefton has a massive boundary with West Lancashire Borough, very significantly greater than its boundaries with Liverpool or Knowsley. The Southport and Lydiate communities, for example, are surrounded by West Lancashire with only their southern boundaries being connected to the rest of the Borough of Sefton. The economic, housing, education, health and social needs of these communities are as much if not more connected to those of their neighbouring communities in West Lancashire as they are to those in Sefton/Merseyside. It is our contention that Sefton Council has failed to work in a progressive way with West Lancashire Borough Council and that it continues to adopt an inward looking Merseyside-centric approach which is to the disadvantage of its diverse communities.

Another concern that we have is basic in terms of planning for the future of transportation to and from Southport. We refer to the significant rail and road problems that the Southport community faces to the east and north of the town. Only recently Sefton Council was successful in pushing Merseytravel to include the Southport-Wigan-Manchester railway line in its Long Term Rail Strategy yet this Local Plan completely fails to address the implications of that positive move. Implications such as the requirement to build a new park and ride station on the outskirts of Southport so to make the line more attractive to Southport residents who work in Manchester. This is a very significant failure in the Plan and fuels our concerns that the development of the Plan has not been community based but imposed on the diverse communities of the Borough by a Bootle and Merseyside-centric Council. But the concerns we express are larger than just rail related as Southport's economy is significantly being held back by its access problems to the east and north of the Town. Road issues also need to be addressed and whilst the solutions are in West Lancashire Borough it is clearly the case that the Local Plan is just the place for Sefton to lay out its ambitions for solving these matters. Of course it also shows why the Local Plan should have been a joint one with West Lancs Borough.

For context and background information we attach our previous submission [dated 7 Aug 2014] because much of what we said in it still applies: Lack of detailed working with West Lancs: We understand that West Lancs Borough Council has some concerns about Option 2 particularly with regard to the reserved sites in Lydiate which if developed will leave too narrow a Green Belt with Aughton. We share this concern. In general we have concerns about the seemingly lack of detailed joint Local Plan development with West Lancs Borough Council. This is evidenced by West Lancs' comments about the Lydiate reserve sites and the lack of detail in either the Sefton or indeed West Lancs plans to address transportation issues (both rail and road) to the east of Southport.

Summary of Suggested Changes

Evidence Submitted

Chapter	General	Plan Order	General Comments	Other Documents
Policy	N/A	Rep does not relate to a policy		
Respondent No	488	Response Ref	1	Representor Name Ian Brodie Browne
Organisation Name	Sefton Council Lib Dem Opposition Group			
Obj/Sup/Com	Objection			

Summary of Main Issues

MP's raise concerns about Local Plan:
Firstly, two of the Borough's 3 MP's have very clearly and publicly expressed great concerns about the Sefton Local Plan. John Pugh MP (Southport) has questioned the reliance of the Borough Council on consultants who have a foot in both camps i.e. developers/land owners and the Council. Bill Esterson MP (Sefton Central) has said the plan should go back to the drawing board because it has not been drawn up in a way that has engaged Sefton's communities.

Summary of Suggested Changes

Evidence Submitted

Chapter	General	Plan Order	General Comments	Other Documents
Policy	N/A	Rep does not relate to a policy		
Respondent No	488	Response Ref	11	Representor Name Ian Brodie Browne
Organisation Name	Sefton Council Lib Dem Opposition Group			
Obj/Sup/Com	Objection			

Summary of Main Issues

For context and background information we attach our previous submission [dated 7 Aug 2014] because much of what we said in it still applies: 7th August 2014: Liberal Democrat response to the 'additional sites' consultation with regard to Sefton Council's draft Local Plan: It may well be useful for us to start with a reminder of the Lib Dem approach to Sefton Council's Local Plan in terms of our previous detailed submission of 26th September 2013. From the headline issues in that earlier submission we will then frame our response to the additional sites for potential development, put forward by land owners and developers. This is what we said in September 2013:- Labour's draft Local Plan for Sefton is inadequate, fails to protect high grade agricultural land and lacks ambition

The Liberal Democrat Group on Sefton Council have major concerns about the draft Local Plan and the preferred 'Option 2' put forward by the Labour administration on Sefton Council.

Our fundamental concerns are:- The draft plan lacks robustness in terms of population predictions and therefore the housing requirements flowing from the data used can't be anything more than vaguely informed estimates. The effect of taking the plan forward based on potentially flawed data means that high grade agricultural land, within Green Belt, will be designated for house building when this may well not be necessary. The seeming lack of detailed working with West Lancashire Borough Council is worrying as they are the local authority that Sefton has by far the largest boundary and most significant community of interest with. The leading references in the draft plan to Merseyside Councils are misleading and unhelpful because the centre and north of the Borough (the majority of the Sefton) rightly expects the Council to be heavily engaged with West Lancashire as a priority with the southern Merseyside Councils being of less significance for two thirds of the Borough's population. The flawed method of public consultation used by the Council may well have reduced the number of residents who felt able and comfortable to participate in the process. The plan is all but silent on some major issues across the Borough that need to be planned for.

Summary of Suggested Changes

Evidence Submitted

Chapter	General	Plan Order	General Comments	Other Documents	Consultation General
Policy	N/A	Rep does not relate to a policy			
Respondent No	488	Response Ref	22	Representor Name	Ian Brodie Browne
Organisation Name	Sefton Council Lib Dem Opposition Group				
Obj/Sup/Com	Objection				

Summary of Main Issues

For context and background information we attach our previous submission [dated 7 Aug 2014] because much of what we said in it still applies: Questionable public consultation process: Before the 12 weeks public consultation was embarked upon (July to September 2013) we and indeed independent environmental campaigners from across the Borough raised such concerns but they were not taken on board. We suggested that the planned method of public consultation was inappropriate and would not engage people fully. What concerned us was the need for members of the public to book an appointment to enable them to express their views on the draft Local Plan face to face. We said this was an unreasonable barrier to the consultation process and that it would effectively hold residents at arms length instead of welcoming them into it. We still hold to that view and are concerned that a true picture of the concerns of residents across the Borough may well not have been obtained. A full copy of our September '13 submission is available to read on our Sefton Focus web site at:- www.tonyrobertson.mycouncillor.org.uk/2013/10/01/lib-dem-response-to-labours-green-belt-grab-for-sefton-sefton-local-plan-draft-should-be-rejected/

Summary of Suggested Changes

Evidence Submitted

Chapter General	Plan Order General Comments	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 530	Response Ref 1	Representor Name J K Hounsell
Organisation Name Thornton Parish Council		
Obj/Sup/Com Objection		

Summary of Main Issues

The Local Plan for Sefton started off in 2011 as a 'Core Strategy for Sefton' and has now reached its final report stage as a 'Local Plan for Sefton. Throughout its journey to maturity, the plan has caused a great deal of acrimony, disagreement and opposition. Whilst most of those who have lived with the plan throughout its journey have also matured to some degree by listening patiently to presentations delivered by key personnel involved in drafting the plan, I do not believe that the concerns of local residents have changed significantly. There is still a great deal of opposition to building on Sefton's Green Belt and a belief that adequate notice has not been made of brown field sites and houses that have lain unoccupied for several years. By the same token, local residents in Thornton and the areas adjacent to it are unable or unwilling to accept that houses can be built on a flood plain which is also part of the green belt despite the reassurances given in the Plan. Equally a new bypass is currently under construction in Thornton on the edge of the flood plain and I am not altogether sure that the Plan recognises the impact of that by-pass on land use now or in the future.

Summary of Suggested Changes

Evidence Submitted

Chapter	Plan Order General Comments	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 534	Response Ref 1	Representor Name Brendan Abbott
Organisation Name		
Obj/Sup/Com		

Summary of Main Issues

No comment. Would like to be kept informed.

Summary of Suggested Changes

Evidence Submitted

Chapter General	Plan Order General Comments	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 550	Response Ref 2	Representor Name Peter Brown
Organisation Name Merseyside Civic Society		
Obj/Sup/Com Objection		

Summary of Main Issues

[The draft plan demonstrates effective working across boundaries], with the exception that the Society is not entirely convinced that some of the housing needs of the borough could not be met within north Liverpool.

Summary of Suggested Changes

Evidence Submitted

Chapter	General	Plan Order	General Comments	Other Documents
Policy	N/A	Rep does not relate to a policy		
Respondent No	550	Response Ref	3	Representor Name Peter Brown
Organisation Name	Merseyside Civic Society			
Obj/Sup/Com	Objection			

Summary of Main Issues

The Society also feels that the draft plan does not sufficiently show the importance of the borough to the sub regional economy and how it can contribute to the wider growth and prosperity of the area.

Summary of Suggested Changes

Evidence Submitted

Chapter	General	Plan Order	General Comments	Other Documents
Policy	N/A	Rep does not relate to a policy		
Respondent No	550	Response Ref	1	Representor Name Peter Brown
Organisation Name	Merseyside Civic Society			
Obj/Sup/Com	Comment			

Summary of Main Issues

Merseyside Civic Society strongly supports the concept of effective local plans, and understands the risks to local interests of not having a good local plan coverage for the sub region. Sefton Council is to be commended for bringing forward the first draft plan across Merseyside, and is generally supportive of the content and ambition of this draft. It is difficult for the Society to decide on its preference for the chosen strategy to guide the scale of development to be provided, but would agree that to provide for the assessed needs of the borough is a reasonable choice. In terms of the requirement to collaborate with other local authorities and agencies, the Society feels that the draft plan demonstrates effective working across boundaries, [with the exception that the Society is not entirely convinced that some of the housing needs of the borough could not be met within north Liverpool].

In summary, the Society welcomes the broad content and thrust of the Draft Local Plan and commends, in particular, the commitment to safeguard the borough's natural environment.

Summary of Suggested Changes

Evidence Submitted

Chapter	General	Plan Order	General Comments	Other Documents
Policy	N/A	Rep does not relate to a policy		
Respondent No	552	Response Ref	2	Representor Name Susan Allen
Organisation Name				
Obj/Sup/Com	Objection			

Summary of Main Issues

I would like to object to the Local Plan and the way the council and councillors have been undemocratic in the local plan consultation and have ignored the residents views and what they have to say.

Summary of Suggested Changes

Evidence Submitted

Chapter General	Plan Order General Comments	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 553	Response Ref 6	Representor Name Alex Naughton
Organisation Name Merseytravel		
Obj/Sup/Com Comment		

Summary of Main Issues

Merseytravel has an agenda under our Merseylearn initiative to support the skills development of transport sector workers across Merseyside and we would ask that reference be made to such skills within the document. This ties directly into many of the key priorities identified within the document itself, including the Liverpool City Region skills base being below the national average, GVA, employment and succession, amongst others. Training front line transport sector staff additionally supports a strong visitor experience and economic regeneration and with approximately 33,000 people employed in this sector such training can serve as an important catalyst to upskill the workforce in line with the Leitch Report recommendations.

Summary of Suggested Changes

Evidence Submitted

Chapter General	Plan Order General Comments	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 553	Response Ref 5	Representor Name Alex Naughton
Organisation Name Merseytravel		
Obj/Sup/Com Comment		

Summary of Main Issues

Merseytravel welcome the adoption in 2009 by Sefton Council of the Transport SPD as part of the Core Strategy and Local Development Framework. However we feel that there needs to be more reference to the Transport SPD in the Local Plan document. The Transport SPD has prepared jointly by the Merseyside partners in order to create a completely consistent approach across Merseyside on these issues as agreed. Merseytravel would expect formal consultation on development around all medium and major transport nodes and interchanges.

Summary of Suggested Changes

Evidence Submitted

Chapter General	Plan Order General Comments	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 553	Response Ref 1	Representor Name Alex Naughton
Organisation Name Merseytravel		
Obj/Sup/Com Comment		

Summary of Main Issues

Merseytravel is the executive body of the Liverpool City Region Combined Authority that is responsible for transport. Merseytravel is politically accountable through the Merseytravel Committee and the Liverpool City Region Combined Authority. The Combined Authority comprises the Liverpool City Region Local Enterprise Partnership and the six local authorities (Wirral, Sefton, Liverpool, Knowsley, St Helens and Halton). West Lancashire Borough Council recently became an associate member of the Combined Authority with observer status.

Summary of Suggested Changes

Evidence Submitted

Chapter	General	Plan Order	General Comments	Other Documents
Policy	N/A	Rep does not relate to a policy		
Respondent No	553	Response Ref	4	Representor Name Alex Naughton
Organisation Name	Merseytravel			
Obj/Sup/Com	Comment			

Summary of Main Issues

Development should be focused in areas that are presently well-served by existing, sustainable transport and the need to travel should be minimised, so as to allow walking and cycling to become much more prominent forms of transport within the city region and Sefton. There should also be an expectation that developers should contribute to cost of providing adequate public transport access in areas that are not well served by existing public transport services. This is especially important for the major housing sites (100 units or more) which should be served by a half hourly bus service to a District Centre. This is also very relevant for the major employment sites which should be served by a regular bus service particularly at times of peak demand (e.g. shift changes etc). The example of the "Land East of Maghull" is a good example of the sustainability ethos we wish to see replicated elsewhere. It is noted that an emerging challenge in the context of the Merseyside's LTP3 is that both traffic volumes and distances travelled are forecast to grow over the next 15 years (on a "do nothing" scenario). The importance of a focused spatial development strategy is particularly important to address this challenge, so as to reduce the distance between work and employment/leisure.

Summary of Suggested Changes

Evidence Submitted

Chapter	General	Plan Order	General Comments	Other Documents
Policy	N/A	Rep does not relate to a policy		
Respondent No	553	Response Ref	2	Representor Name Alex Naughton
Organisation Name	Merseytravel			
Obj/Sup/Com	Comment			

Summary of Main Issues

Merseytravel believes that the strategic direction set by the Local Plan should be a balanced and sustainable development approach towards integrating land use and transport, regeneration and economic development, social inclusion, and help tackle climate change. The Local Plan should be fully interlinked with Local Transport Plan and provide for the integration of land use and transport planning. In relation to the third LTP, a strategic transport model has been developed which allows for the testing of policies and interventions, including spatial options. Similarly, the use of Accession / TRACC software can help to gauge the relative accessibility of sites and premises and its use is encouraged. The Transport Plan for Growth (march 2015) should also be referenced at this point. This doesn't replace the Local Transport Plans (Merseyside and Halton) which remain in force but brings them together and forms a single joint delivery plan for the Liverpool City Region. [See:]

•A Transport Plan for Growth (March 2015) Merseytravel

<http://www.merseytravel.gov.uk/about-us/local-transportdelivery/Documents/8375%20Plan%20for%20growth%20WEB%20FINAL.pdf>

Summary of Suggested Changes

Evidence Submitted

Chapter	General	Plan Order	General Comments	Other Documents
Policy	N/A	Rep does not relate to a policy		
Respondent No	594	Response Ref	1	Representor Name Peter Cushion
Organisation Name	Wirral Council			
Obj/Sup/Com	Support			

Summary of Main Issues

Wirral Council supports Sefton Council's intention to provide for their own identified local needs for housing and employment within their Borough boundary as set out in the Publication Draft Local Plan, without any significant cross-boundary implications for Wirral. Wirral Council welcomes the changes made to the Publication Draft Local Plan to address earlier concerns relating to clarity over the position on the Green Belt, the impact on centres in adjoining authorities and Southport Seafront, but seeks further clarification on a number of issues. I hope that these suggestions are acceptable. For further information I have attached a copy of the Council Report authorising this response. [also attached a Summary Overview]

Summary of Suggested Changes

Evidence Submitted

Chapter	General	Plan Order	General Comments	Other Documents
Policy	N/A	Rep does not relate to a policy		
Respondent No	595	Response Ref	11	Representor Name Jonathan Clarke
Organisation Name	Knowsley Council			
Obj/Sup/Com	Comment			

Summary of Main Issues

Whilst we have raised some detailed points in relation to Sefton's consultation documents, we would stress that these do not relate to the underlying soundness or legal compliance of the Plan, and would be happy to work with Sefton Council to resolve the issues raised.

Summary of Suggested Changes

Evidence Submitted

Chapter	General	Plan Order	General Comments	Other Documents
Policy	N/A	Rep does not relate to a policy		
Respondent No	615	Response Ref	1	Representor Name Rachael Musgrave
Organisation Name	Health and Wellbeing Board			
Obj/Sup/Com	Support			

Summary of Main Issues

The Health and Wellbeing Board believe that the Draft Local Plan is an important mechanism to facilitate an environment that enables the delivery of the Health and Wellbeing Board Strategy. As such the Board is encouraged by the inclusion of policies in the Draft Plan regarding health and wellbeing issues and the provision of sustainable development in the Borough. The Health and Wellbeing Board is keen to ensure that good health is built into all new developments.

Summary of Suggested Changes

Evidence Submitted

Chapter General	Plan Order General Comments	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 635	Response Ref 4	Representor Name Graham Nelson
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

The Plan ignores the increasing problem of 'food security' by targeting some of the best quality farmland in the UK for development. Such land will be needed as basic foods will increase in price as global competition for the same food pushes up prices.

Summary of Suggested Changes

Evidence Submitted

Chapter General	Plan Order General Comments	Other Documents Consultation General
Policy N/A	Rep does not relate to a policy	
Respondent No 635	Response Ref 1	Representor Name Graham Nelson
Organisation Name		
Obj/Sup/Com	Comment	

Summary of Main Issues

I must first raise an issue that I believe is central to the process of creating a Plan: The public consultation process was seriously flawed. The technical reports that form the basis of the Plan are virtually incomprehensible. Because they are not in plain English it is nigh on impossible for all but skilled analysts to understand them. Therefore, probably the vast majority of Sefton's citizens will not have had access to the information they need to judge the validity of The Plan. This means the majority of the borough's citizens have been excluded from the consultation process. Additionally, a high quality opinion survey commissioned by the Council showed 97% of Sefton citizens do not want any developments on the Greenbelt. The Plan ignores the views of a majority of Sefton residents.

Summary of Suggested Changes

Evidence Submitted

Chapter General	Plan Order General Comments	Other Documents
Policy NH1	Environmental assets	
Respondent No 648	Response Ref 1	Representor Name Emily Hrycan
Organisation Name English Heritage		
Obj/Sup/Com	Objection	

Summary of Main Issues

Thank you for consulting English Heritage on the above. This response provides detailed comments on the Local Plan for Sefton and the historic environment. A separate response(Reference 1692) is provided on the Sustainability Appraisal. To summarise our response, the Local Plan for Sefton is considered to be unsound as it does not set out a positive strategy for the conservation, enhancement, improvements and enjoyment of the historic environment including strategic policies to deliver the conservation and enhancement of the historic environment.

Summary of Suggested Changes

Evidence Submitted

Chapter General	Plan Order General Comments	Other Documents
Policy NH1	Environmental assets	
Respondent No 648	Response Ref 28	Representor Name Emily Hrycan
Organisation Name English Heritage		
Obj/Sup/Com Comment		

Summary of Main Issues

English Heritage strongly advises that you engage conservation, archaeology and urban design colleagues at the Council to ensure that you are aware of all the relevant features of the historic environment and that the historic environment is effectively and efficiently considered in the strategic policies, development management policies, in the allocation of any site and in the preparation of the SEA. They are also best placed to advise on local historic environment issues and priorities, including access to data held in the HER. This will ensure that there is joined up and robust approach is undertaken to historic environment issues. If you have any queries about the content of this letter or would like a meeting to discuss anything further, please do not hesitate to contact me.

Summary of Suggested Changes

Evidence Submitted

Chapter General	Plan Order General Comments	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 657	Response Ref 1	Representor Name Robert Burns MBE
Organisation Name		
Obj/Sup/Com Objection		

Summary of Main Issues

The Plan has not been prepared in accordance with legal and procedural requirements, nor is it "sound". I have written to Mr Eric Pickles MP and I am awaiting his reply relating to my challenge that this plan is neither legal nor is it sound. I base this on the following points:

I telephoned the Planning Department on 6th February 2015 around 08:40 seeking clarification in one of the documents relating to a 'selected development plot' adjacent to my property. Whilst talking to the very friendly officer we both agreed there was some confusion regarding the content of this document and she told me she would ask her colleagues to clarify matters. I assumed they would update me but they didn't; however the on-line document was modified at 14:20 the same day! Sometime later they included an apology on this amended document.

I find it rather disturbing that Sefton produce a document which shows the extent of a potential housing development (on green belt) including its associated analysis relating to flood risk, pollution, ecology and size etc. then (after The Plan's publication) they feel they are entitled to change the dimensions and increase its size and introduce new access points for the plot without fulfilling the obligatory 'due diligence' against this 'new plot'. This must surely be contrary to legal and procedural standards?

To compound matters they publish an apology on the associated documents saying 'for clarity the following site area is proposed to be allocated in the publication draft local plan' (a new map is displayed adjacent). I am sorry, but all the analysis, all the consultation, all the supporting evidence which had been undertaken prior to publication suddenly becomes useless and meaningless because they have now introduced a totally different plot.

I would like to receive feedback from the Independent Inspector regarding this point, to ensure it corresponds with Mr Pickles' interpretation.

Summary of Suggested Changes

Evidence Submitted

Chapter General	Plan Order General Comments	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 659	Response Ref 1	Representor Name Stephen and Wendy Blundell
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

The views and wishes of people directly affected by development of greenbelt in the Southport area are being ignored by a majority of Labour councillors based in the south of Sefton. There are two facts which support this. Following the previous consultations the previous draft Local Plan was passed by the Council despite opposition from Southport residents and councillors. With one exception, none of the councillors from Southport supported the option, but it was passed anyway using the majority of Labour councillors who are mostly based in the south of Sefton. In previous votes on Draft Plans and Core Strategies, Southport councillors voted unanimously against proposals – these were also passed using the majority Labour vote which does not represent Southport.

One third of the proposed development of new homes on greenbelt land is in Southport. This will generate significant income for Sefton either through the Community Infrastructure Levy or via the New Homes Bonus (or any succeeding schemes). However the current Draft Plan (para 9.9, on p82) sets out proposals to only allow 15-25% of any income to be spent for the benefit of the local community, a slight improvement over the previous Draft Plan. The previous Draft Local Plan specifically stated three times (in sections 2.7, 3.7 and 8.55) that any income will be specifically allocated 100% to the regeneration of Bootle in the south of Sefton - where the councillors who passed the Draft Plan are based. This shows that passing the current and previous Draft Plans was at the very least partially politically motivated - ignoring the wishes of communities in Southport for the benefit of others where the Labour councillors are based.

Summary of Suggested Changes

Evidence Submitted

Chapter General	Plan Order General Comments	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 665	Response Ref 6	Representor Name Tony Dawson
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Finally, I would suggest that the plan is completely without ambition in respect of the commercial future for Southport and has little of merit in areas which would promote a more sustainable society. The references to alternative energy sites being on the east of the Borough are completely wrong. By far the largest opportunities for alternative energy lie along the coast as well as (solar power) on the roofs of many substantial housing and shop and office developments.

Summary of Suggested Changes

Evidence Submitted

Chapter General	Plan Order General Comments	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 687	Response Ref 2	Representor Name Diana Sayer
Organisation Name		
Obj/Sup/Com	Comment	

Summary of Main Issues

In Sefton's original draft Local Plan it was stated that house builders were not involved in the planning process, in order to maintain the integrity of the study. However comments in the previous consultation responses suggest much closer involvement of the developer with this site.

Summary of Suggested Changes

Evidence Submitted

Chapter	General	Plan Order	General Comments	Other Documents
Policy	N/A	Rep does not relate to a policy		
Respondent No	692	Response Ref	11	Representor Name Peter Harper
Organisation Name	UKIP Sefton Branch			
Obj/Sup/Com	Objection			

Summary of Main Issues

UKIP also strongly supports the common-sense statements made in the document produced by CPRE Sefton

Summary of Suggested Changes

Evidence Submitted

CPRE comments from Core Strategy stage

Chapter	General	Plan Order	General Comments	Other Documents
Policy	N/A	Rep does not relate to a policy		
Respondent No	700	Response Ref	1	Representor Name Kate Wheeler
Organisation Name	Natural England			
Obj/Sup/Com	Comment			

Summary of Main Issues

Natural England has made substantial comments and provided advice to Sefton Council on the preparation of the Local Plan. We are pleased to note that our advice and comments have been taken forward and therefore we have no further substantial comments to make at this stage. We consider the plan to be legally compliant and sound with regard to our interests.

Summary of Suggested Changes

Evidence Submitted

Chapter	General	Plan Order	General Comments	Other Documents
Policy	N/A	Rep does not relate to a policy		
Respondent No	703	Response Ref	1	Representor Name Jackie Copley
Organisation Name	CPRE Lancashire			
Obj/Sup/Com	Comment			

Summary of Main Issues

The Campaign to Protect Rural England works to protect and enhance the countryside for the benefit of future generations. In overview: We wish to support the Council in the adoption of a Local Plan, as soon as possible. But, we believe there are aspects of the PDLP which may be unlawful, and that it could be unsound, principally due to the development of land protected by specific policies in the Framework i.e. Green Belt.

We have reviewed all the Green Belt sites proposed for development in the PDLP and identified twenty-three sites, which we do not believe should be redesignated for residential development, and give detailed justifications. If the Examining Inspector agrees with our conclusions for each of these sites, a corresponding downward adjustment to the Housing Target would be required. The Department for Communities and Local Government published its latest subnational household projection series on the 27th February 2015 which provides 2012-based data to replace the 2011-based interim SNHP data. Growth rates for Sefton are in the lowest category and lower than earlier projections. But these figures have yet to be incorporated – and we are calling for these figures to be used to inform the Local Plan.

CPRE Lancashire held a meetings event on the 19th March 2015 with all the parliamentary candidates for the Sefton Central constituency participating and there was unanimous support for the reuse of previously developed land (brownfield) as a priority, and for land with Green Belt designation to have continued protection. The Local Plan should represent the ambitions of the local electorate. We highlight that Best and Most Versatile (BMV) agricultural land Grades 1, 2 and 3a is a vital asset and should be saved for the benefit of future generations

CPRE thinks brownfield land should be re-used in advance of needless countryside development. Sefton has considerable brownfield land (records show 184.08 hectares), much assessed as suitable for housing (75.43 hectares). Elsewhere in Lancashire, planning authorities are focusing more effort on reusing Brownfield, and we urge Sefton Council, to do more to unlock the potential of brownfield land for future development.

Summary of Suggested Changes

Evidence Submitted

Chapter	General	Plan Order	General Comments	Other Documents
Policy	N/A	Rep does not relate to a policy		
Respondent No	703	Response Ref	2	Representor Name Jackie Copley
Organisation Name	CPRE Lancashire			
Obj/Sup/Com	Comment			

Summary of Main Issues

The Campaign to Protect Rural England (CPRE) wishes to support the adoption of a Local Plan as soon as possible. The Local Plan should ensure land is available to adequately meet Sefton's economic, social and environmental needs over the plan period. But CPRE believes the policies and land allocations can and should do more to ensure the countryside is not only protected but enhanced for the benefit of future generations.

CPRE Lancashire Branch and CPRE Sefton District Group have considered the document in detail. We believe there is an aspect of the PDLP which is unlawful, and that it is unsound, principally because it is not compliant with National Planning Policy Framework Paragraph 14. This states that the presumption in favour of sustainable development (viz. meeting objective assessed need with sufficient flexibility to adapt to rapid change) is not applicable to the development of land protected by specific policies in the Framework by being restricted (as detailed in Note 9.)

Summary of Suggested Changes

Evidence Submitted

Chapter General	Plan Order General Comments	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 722	Response Ref 1	Representor Name Jenny Hope
Organisation Name United Utilities Ltd		
Obj/Sup/Com Comment		

Summary of Main Issues

United Utilities wishes to highlight that we will seek to work closely with the Council during the Local Plan process to develop a coordinated approach to delivering sustainable growth in sustainable locations which are accessible to local services and infrastructure. United Utilities will continue to work with the Council to identify any infrastructure issues and most appropriately manage the impact of development on our infrastructure during the preparation of the Local Plan.

Summary of Suggested Changes

Evidence Submitted

Chapter General	Plan Order General Comments	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 724	Response Ref 8	Representor Name Paula Keaveney
Organisation Name Sefton Central Liberal Democrats		
Obj/Sup/Com Objection		

Summary of Main Issues

Has there been proper scrutiny of this plan? I am informed that scrutiny through the council processes has been poor. Surely to be sound a plan needs to have been properly tested and amendments made where necessary.

Summary of Suggested Changes

Evidence Submitted

Chapter General	Plan Order General Comments	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 724	Response Ref 7	Representor Name Paula Keaveney
Organisation Name Sefton Central Liberal Democrats		
Obj/Sup/Com Objection		

Summary of Main Issues

I am surprised that no mention is made of the ever expanding Edge Hill University which is an increasing source of employment and study opportunities for Sefton residents. Given the University's relevance to the area, it is also surprising that no acknowledgement is made of the drop in frequency in the evening on the Merseyrail service from Liverpool Central to Ormskirk (which also serves Aintree, Old Roan and Maghull).

Summary of Suggested Changes

Evidence Submitted

Chapter General **Plan Order** General Comments **Other Documents**
Policy N/A **Rep does not relate to a policy**
Respondent No 724 **Response Ref** 6 **Representor Name** Paula Keaveney
Organisation Name Sefton Central Liberal Democrats
Obj/Sup/Com Comment

Summary of Main Issues

This plan is already opposed by large numbers of people. Does it really make sense to persist with something which is guaranteed to generate huge amounts of opposition to the various planning applications? A sound plan is surely one for which there is the prospect of its acceptance and reasonably smooth implementation

Summary of Suggested Changes

Evidence Submitted

Chapter General **Plan Order** General Comments **Other Documents**
Policy N/A **Rep does not relate to a policy**
Respondent No 728 **Response Ref** 5 **Representor Name** Martyn Sayer
Organisation Name Churchtown Green Belt Action Group
Obj/Sup/Com Objection

Summary of Main Issues

There are no new emerging industries or significant opportunities for work in Southport. In fact Southport appears to be in decline - as demonstrated by the high level of empty shops throughout the town and particularly evident in Lord Street. Sefton's decision to re-designate land for industrial units in Crowland St to residential housing lends weight to this view. It has also pushed a very large development into an area already heavily loaded with proposed residential developments.

If the developments proceed in the Churchtown area, income raised by Sefton in the first instance, should be used to improve the Churchtown community services, e.g., revitalise the Botanic Gardens (new residents will need places to exercise themselves and their children), rather than funds being siphoned off to benefit south Sefton.

Summary of Suggested Changes

Evidence Submitted

Local Plan Representations, Matthews and Goodman September 2013
Transport & Highways Review September 2013

Chapter General **Plan Order** General Comments **Other Documents**
Policy N/A **Rep does not relate to a policy**
Respondent No 740 **Response Ref** 1 **Representor Name**
Organisation Name Formby Residents Action Group
Obj/Sup/Com Comment

Summary of Main Issues

Profile of Land, Planning Challenges and Natural Heritage in Sefton
Set out in Chapter 1 [pages 4-5], Chapter 8 [page 19] and Chapter 16 [pages 110-111] of the representation.

Summary of Suggested Changes

Evidence Submitted

Chapter General	Plan Order General Comments	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 740	Response Ref 6	Representor Name
Organisation Name Formby Residents Action Group		
Obj/Sup/Com Objection		

Summary of Main Issues

Outline of concerns with a number of the key reports that support the local plan. This includes how questions were answered, information presented and the influence Sefton had on their content.

Set out in Chapter 6 [pages 14-15] and Appendix A [pages 150-191] of the representation.

Summary of Suggested Changes

Evidence Submitted

Chapter General	Plan Order General Comments	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 740	Response Ref 7	Representor Name
Organisation Name Formby Residents Action Group		
Obj/Sup/Com Objection		

Summary of Main Issues

An outline of concerns with how Sefton has met the Duty to Cooperate and how this has influenced the decision to release Green Belt land for development.

Set out in Chapter 7 [pages 16-19] of the representation.

Summary of Suggested Changes

Evidence Submitted

Chapter General	Plan Order General Comments	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 881	Response Ref 1	Representor Name Brian Chesser
Organisation Name		
Obj/Sup/Com Objection		

Summary of Main Issues

The Council have acted 'ultra vires' their powers including inter alia making a 20 year plan instead of a five year plan. This ties the hands of future Councils and its constituents to to an onerous/unreasonable degree.

Summary of Suggested Changes

Evidence Submitted

Chapter General	Plan Order General Comments	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 889	Response Ref 5	Representor Name P Gwyther
Organisation Name		
Obj/Sup/Com	Comment	

Summary of Main Issues

I realise that a Local Plan is a must and I campaigned for Sefton to have one in place. However, this plan needs to go back to the drawing board. It is flawed. The need to build on so much Green Belt, housing numbers, the ability to deliver infrastructure, flooding risk, provision for wildlife needs to be addressed. More public consultation needs to take place. This council needs to listen to its main stakeholders, i.e. its residents. If the council worked with its residents, so much more could be achieved for the Borough.

Summary of Suggested Changes

Evidence Submitted

Extract from Formby Labour website re Parking/Driving outside schools
Extract from Formby Labour website and Formby Champion [1/6/2012] re congestion in Formby
Extract from Southport Visitor re Flooding in Formby [14/2/2014]

Chapter General	Plan Order General Comments	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 895	Response Ref 1	Representor Name Yvonne Irving
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I feel that the council have ignored the voice of the communities and prepared a plan that has shown very little regard for the green belt or its importance to the people of Sefton. They have fallen over backwards to satisfy the rules in the NPPF but have not used the NPPF wisely to support the challenges that Sefton have. The Local Plan says that the council will need to continue to work with local communities to ensure the Local Plan fulfils the aspirations of current and future generations, this is hypocrisy. It also says that as this is a Government led process the council have been unable to influence the size of the housing requirements. And finally they say if they had had more discretion in the process they may have been able to make different choices. This to me says that the Local Plan has not been prepared honestly and it is a flagrant misinterpretation of government policy to put forward a Local Plan that suits the council and not the land and the people that they represent, I hope that anyone examining this Plan can detect this.

Summary of Suggested Changes

Evidence Submitted

Chapter General	Plan Order General Comments	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 915	Response Ref 1	Representor Name Frank Douglas
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Please note I am in complete agreement with all eighteen detailed objections as laid out in the accompanying FRAGOFF petition. In addition I would also ask you to consider the following: for the past several decades politicians, corporations and authorities, both Local and National have conspired to deny any real limits and/ or structural expansion on a finite planet. It is called growth and to any rational mind, it is folly. Growth either locally, nationally, or globally simply cannot be sustained at current levels and it is inappropriate to pursue whether here in Sefton or elsewhere. Sefton Council should take the lead and act responsibly in this regard and refuse to take part in "Growth and Expansion" at any cost. Saving the planet for future generations begins locally.

Summary of Suggested Changes

Evidence Submitted

Chapter General	Plan Order General Comments	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 927	Response Ref 1	Representor Name D Anderson
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

The farm land around Sefton is of the best agricultural land in England and should be kept for growing our own food. Our population has grown enormously . So we need all of our farm land for the future of our children.

Summary of Suggested Changes

Evidence Submitted

Chapter General	Plan Order General Comments	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 931	Response Ref 1	Representor Name Philip Cassidy
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

To have so many local inhabitants wishes thwarted by a cabal of politically motivated councillors is not acceptable in a democratic society. Our local planners need to address the current needs of existing residents rather than the hypothetical demands of future ones. To concur with this plan will drive many worthy citizens from the area.

Summary of Suggested Changes

Evidence Submitted

Chapter General	Plan Order General Comments	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 1011	Response Ref 1	Representor Name WJR Stuttard
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I write to object to the proposed Local plan. I have lived in Southport for forty-nine years, and am well acquainted with the town and the development areas affected by the plan across the town, and the wider Sefton area.

I believe that the plan has not been drawn up in appropriate conjunction with West Lancashire, which we were advised during initial consultation at St Patrick's Church was because West Lancashire's future plans were being completed to an entirely different timescale. I believe this has entirely exacerbated the situation with regard to Sefton's plans. I believe that if the area is considered as a whole, entirely different proposals would result.

Much of the available space which could be released for building in Sefton, as it is currently constituted, is situated along the Eastern border of the Borough, shared with West Lancashire. In Churchtown, the Sefton Boundary is to a large degree defined by Fine Janes Brook and the Three Pools Waterway drainage system. If one were to consider the first half mile wide strip of land along almost the whole of the West Lanes side of the Boundary, there are many more opportunities for releasing Green Belt which are not to the detriment of as many local resident as will be affected by the current Moss Lane plans, and which would offer much better access opportunities for new roads off the existing main roads. In the case of the Eastern side of Southport, this is particularly the case off Town Lane where the major road and local amenities within suitable proximity to the area should make it a much preferred site for development. Elsewhere in Sefton, the new Brooms Cross Road has opened up good road links and offers the opportunity to potentially release land from green belt in proximity to that, both within Sefton and West Lancs.

Summary of Suggested Changes

Evidence Submitted

Policy N/A	Rep does not relate to a policy
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Respondent No 1013	Response Ref 1	Representor Name Daniel Lewis
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Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I have a number of objections to the local plan as it pertains to the whole of Sefton but as a ward councillor for Norwood ward I wish to bring the following specific concerns I have regarding sites in the Local Plan. However firstly I will tackle what I think is a major problem in the local plan with cross-boundary cooperation. Questions have to be raised over whether the council has successfully carried out its Duty to Cooperate. A sensible approach to co-operation would see the largest amount of crossboundary cooperation being with the neighbour who forms your largest boundary. West Lancashire is by far and away Sefton's largest boundary several times longer than the boundaries with Liverpool or Knowsley. However when we read the council's Draft Duty To Cooperate Statement we notice that Liverpool is mentioned over 100 times more than West Lancashire. This is a real concern for me as a councillor of a ward which borders West Lancashire. The draft plan includes putting large sites right on the boundary of West Lancashire and therefore it seems to me there should have been more dialogue with our nearest neighbour. It is the case that no cabinet member in Sefton represents a ward which borders West Lancashire and I feel that, perhaps unintentionally, this has led to a Liverpool-centric approach to the plan.

Summary of Suggested Changes

Evidence Submitted

Policy N/A	Rep does not relate to a policy
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Respondent No 1023	Response Ref 1	Representor Name Derek Baxter
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Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I should say that I was asked to contribute the Formby Residents' Action Group Opposition From Formby (FRAGOFF) objection to the Local Plan, and was happy to do so. I repeat here in my personal objection a summary of my main concerns.

I would like to object to the Local Plan for the following reasons; Sefton MBC suggest that they were unable to work on a joint Local Plan or coordinate more closely with neighbouring authorities on unmet need because adjoining authorities were more advanced in their Development Plans. However this is contradicted by the close cooperation by Sefton in scoping and early studies conducted by neighbouring authorities on green belt release and employment land need. Liverpool the largest neighbouring authority is less advanced in the plan process than Sefton.

Once it was established that neighbouring authorities could not meet their objectively assessed needs within their urban area attempts to cooperate evaporated. This was a missed opportunity as illustrated when West Lancashire Council directed development onto the conurbation of Southport with their land allocations at Newcut Lane Halsall and Fine Jane's Farm Halsall.

Employment land to the south of the borough is increasingly important to the Liverpool City Region (LCR). Despite this, large plots of brownfield land were not included in the local plan due to the weakness of the market in the area. Much of the expansion of our region is based on a very optimistic view of the local market, at least in the medium to long term. Given this, better coordination of derelict land development and cooperation between local authorities in bringing land forward for development may have allowed these sites to be included in a wider cross boundary development plan. As it stands this land risks being rejected due to its inability to be brought forward for development more early in the plan period.

Sefton Council has failed in its duty to cooperate with neighbouring authorities and in doing so have failed to fully explore these options before turning to green belt release.

Seeking to meet objectively assessed development and infrastructural requirements? Sefton Council has from the very beginning of the process misled the public into believing that the authority must meet its objectively assessed needs as neighbouring authorities are unable accommodate our unmet need. In doing this it has it has presented building on the green belt as necessary and unavoidable.

Updated Planning Policy Guidance states very clearly that; [Councils should]....meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the framework taken as a whole, or specific policies in the Framework indicate development should be restricted. Such policies include those relating to sites protected under the Birds and Habitats Directives, and/or designated as sites of special scientific interest; land designated as green belt, local green space, an area of outstanding natural beauty, heritage coast or within a national park or the Broads; designated heritage assets; and locations at risk of flooding or coastal erosion.

In attempting to meet need the Council has adopted unsustainable policies such as green belt release in order to provide affordable homes. The policy of 30% affordable homes on each site over 14 homes is un-ambitious and even this policy is being eroded as the pledge has been watered down on the large development site Maghull east. The Council has been forced into this position because affordable housing is competing with infrastructural demands and remediation costs all being levied against developer profits. In this battle the loser is affordable homes. Many of the green belt sites in Formby particularly, but also in Southport, Thornton and Maghull are prone to flooding and drainage issues. Most of which cannot be improved by additional homes, as the main problem is lack of capacity in our watercourses and the inability of suds to work on saturated ground. Over reliance on Community Infrastructure levy has been described by Keppie Massie as a potential show stopper. Long before it stops the show it will drain Formby of its affordable homes.

Using the current strategy of 30% affordable homes and the proposed building density of 35 homes per hectare, this would require roughly one Kilometre squared slice of green belt per 1000 affordable homes, this is clearly not sustainable and the harm to the green belt is far outweighed by the benefits to the community.

The Plan is economically over ambitious, although on the face of it an ambitious Council is to be encouraged, most of the infrastructure essential for the plan to work will be privately funded through developments. If the investment fails to materialise, or if Tesco pull out (other similar stores are available) as happened in Kirkby this will result in projects failing, or being pushed through on a shoe string. This threatens to leave our local communities bearing the burden of development without any of the benefits, risks being borne by the Council and the benefits going to the private developers.

Sefton's Plan is not consistent with national policy as outlined above it has failed in its Duty to Cooperate with neighbouring authorities as Planning Practice Guidance Points out, this Duty is a Duty to Cooperate not a Duty to agree. Also during the Plan making process the Council has misled the public in claiming that green belt release is necessary in order for our Plan to be found to be "sound" at public inquiry. This misinformation has heavily influenced the development of our plan and prejudiced the judgement and behaviour of our Councillors.

It is clear that this Local Plan will be harmful to the green belt and therefore is inconsistent with Planning Policy Guidance and NPPF Chapter 87 As "with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances".

Planning guidance goes on to say that unmet housing need in an area is unlikely to constitute very special circumstances and outweigh the harm to the green belt. For the reasons above I wish to express my concern and objection to Sefton's Local Plan.

Summary of Suggested Changes

Evidence Submitted

Chapter	General	Plan Order	General Comments	Other Documents
Policy	N/A	Rep does not relate to a policy		
Respondent No	1025	Response Ref	1	Representor Name Eric Woodcock
Organisation Name				
Obj/Sup/Com	Comment			

Summary of Main Issues

This is a generally positive and comprehensive plan for Sefton. The one specific omission I want to draw attention to is that the plan does not consider the economic reach of Greater Manchester. Manchester is unquestionably the most economically important city region in the North of England. It is thus an important location for jobs (especially higher paid, professional jobs) and is within easy commuting distance. On the other hand it is also a source of inbound leisure spending as people from Greater Manchester come to Sefton and spend part of their disposable income.

The plan uses 2011 Census data to indicate commuter flows but in figure 2.2 does not show Greater Manchester flows. My analysis of the 2011 data indicated 700 commuters towards Greater Manchester from North Sefton alone, so including the whole of the borough in the total would undoubtedly yield a significantly higher figure.

More recent primary research by Southport Rail Transport Forum and anecdotal evidence suggests there has been considerable growth in commuter traffic towards Manchester. A survey conducted by SRTF in November 2014 found that some 250 people commuted by rail towards Manchester compared with about 125 in 2011 for example.

As work like that of the RSA City Growth Commission has indicated, peripheral communities – especially like Southport – have a challenge in sharing the benefits that will come from the economic concentration that the growth of major cities will create. Liverpool is very important, but Manchester is the regional capital in all but name.

A powerful way to tackle urban deprivation is to bring income in from outside the borough. That includes making it welcoming for prosperous workers in places like Manchester to choose to live in North Sefton.

Summary of Suggested Changes

Your plan is 'unsound' if it does not consider the growing importance of Greater Manchester for North Sefton and how the borough must find ways to take advantage of that.

I shall be happy to discuss any aspect of this representation with you.

In my view, without this consideration the plan will not be 'Justified' and its execution could not be entirely 'Effective'.

Evidence Submitted

Chapter General **Plan Order** General Comments **Other Documents** SHMA
Policy N/A **Rep does not relate to a policy**
Respondent No 1033 **Response Ref** 1 **Representor Name** Sharon and Alfred Edwards
Organisation Name
Obj/Sup/Com Comment

Summary of Main Issues

Firstly the SHMA. You say this is a draft document therefore is open to change. Once changed, will this still be open for approval and if so will you inform the residents of Sefton?

Summary of Suggested Changes

Evidence Submitted

Chapter 1 **Plan Order** Chapter 1 **Other Documents** Duty to Cooperate Statement
Policy N/A **Rep does not relate to a policy**
Respondent No 360 **Response Ref** 7 **Representor Name** John Hill
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I wish to object to the local plan proposed by Sefton Council on the following general grounds:
The plan is not positively prepared. It does not meet objectively assessed development and infrastructure requirements. There is no evidence of consultation with neighbouring authorities and it is not consistent with achieving sustainable development.

The plan is not effective. It will not be deliverable over its period and there is no evidence that it is based on effective joint working on cross-boundary strategic priorities.

Summary of Suggested Changes

Evidence Submitted

Chapter 1 **Plan Order** Chapter 1 **Other Documents**
Policy N/A **Rep does not relate to a policy**
Respondent No 553 **Response Ref** 7 **Representor Name** Alex Naughton
Organisation Name Merseytravel
Obj/Sup/Com Support

Summary of Main Issues

Paragraph 1.17 the Superport Liverpool initiative comprising the Liverpool City Region Freight & Logistics Hub is a major economic growth priority for the Liverpool City Region. Recently the LEP, on behalf of the City Region, launched a dedicated Superport Liverpool website (www.superport.co.uk) which may be worth referencing in this paragraph. With the Liverpool 2 Container Terminal opening in late 2015 likely to result in a significant increase in activity across the Freight & Logistics Hub in coming years this will create more demand for warehousing and logistics sites across the City Region. Accordingly it is important that Local Plans take this into account or make provision for early reviews of the plan to account for these changes. We welcome Sefton's provision for an early review of the Local Plan to take into account these fast moving changes in the freight and logistics activity in the City Region on the back of the new Liverpool 2 terminal. After all, if the Liverpool City Region doesn't make provision for these activities then there is a risk that the jobs and inward investment will be lost to the Liverpool City Region and go instead to neighbouring areas such as Warrington and Greater Manchester where the sites are already being delivered such as Omega and Logistics North etc.

Summary of Suggested Changes

Evidence Submitted

Chapter 1	Plan Order Chapter 1	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 553	Response Ref 8	Representor Name Alex Naughton
Organisation Name Merseytravel		
Obj/Sup/Com Comment		

Summary of Main Issues

Paragraph 1.20 Note that English Heritage becomes a charity from the 1 April 2015 and its policy remit is taken over by Historic England. Also the Highways Agency becomes Highways England from the same date. Other relevant bodies to include are Network Rail and the Marine Management Organisation for example.

Summary of Suggested Changes

Evidence Submitted

Chapter 1	Plan Order Chapter 1	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 594	Response Ref 2	Representor Name Peter Cushion
Organisation Name Wirral Council		
Obj/Sup/Com Support		

Summary of Main Issues

I can confirm that the Sefton Local Plan Duty to Co-operate Statement January 2015 is a true and agreed statement of Sefton Council's joint working and co-operation with Wirral Council during the preparation of the Plan.

Summary of Suggested Changes

Evidence Submitted

Chapter 1	Plan Order Chapter 1	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 595	Response Ref 9	Representor Name Jonathan Clarke
Organisation Name Knowsley Council		
Obj/Sup/Com Support		

Summary of Main Issues

We welcome reference to the positive joint working that has been undertaken across the sub-region, and specifically between Knowsley and Sefton Councils in relation to their respective Local Plans. Knowsley Council also looks forward to further opportunities for joint working and discussion on further sub-regional evidence studies.

Summary of Suggested Changes

Evidence Submitted

Chapter 1	Plan Order Chapter 1	Other Documents Duty to Cooperate Statement
Policy N/A	Rep does not relate to a policy	
Respondent No 724	Response Ref 2	Representor Name Paula Keaveney
Organisation Name Sefton Central Liberal Democrats		
Obj/Sup/Com Objection		

Summary of Main Issues

The section on the duty to cooperate puts, I believe, too much stress on what other local authorities have said. We are told (page 3 of the plan document) that neighbouring authorities were written to asking whether they would be able to help meet “unmet” housing and employment needs in Sefton. These authorities, we are told, said no. Given that people already move houses between authorities as well as jobs and schools, it would be very odd indeed to put great weight on these statements. However the plan document reads as if considerable weight has been put on these in terms of deciding the options for Sefton. (This links to the statement in the plan on page 27 about boundaries. It is certainly true that some parts of Sefton are near local authority boundaries. However it is simply not realistic to imagine that people in those areas would not ever choose to work in or move to neighbouring areas). This isn’t about saying that people should have to move. It is however about the reality of life which is that people tend to think in terms of localities rather than LA boundaries. The point needs to be made also that the realities of life would have been better represented had the plan authors worked with at least one of the neighbouring authorities.

Summary of Suggested Changes

Evidence Submitted

Chapter 2	Plan Order Chapter 2	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 52	Response Ref 12	Representor Name Ian Cowell
Organisation Name Ince Blundell Parish Council		
Obj/Sup/Com Comment		

Summary of Main Issues

The Local Plan 2.32 states: “However, people in some parts of the borough find the bus network inadequate, particularly for east-west trips, in the south of borough, on the outer edges of the urban area and in the rural areas. There are no east-west passenger rail links in Sefton. It can be difficult for many people to use public transport to get health, leisure or other facilities, especially in the evenings and at weekends”. This applies particularly to residents in Ince Blundell. For many years now the Parish Council has lobbied for a slight deviation of about 1 mile in the route of the Hightown/Blundellsands bus so that residents can obtain access to Hightown’s Post Office, Doctor’s Surgery, Dentist and the Chemist and Hightown Rail Station on the Northern Line rail system but without avail. The Local Plan 2.35 continues “The Council is working with infrastructure and service providers so that any identified infrastructure issues are addressed.” Ince Blundell Parish Council has yet to see any evidence that this is the case!

Summary of Suggested Changes

Evidence Submitted

Chapter 2	Plan Order Chapter 2	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 542	Response Ref 1	Representor Name Jennifer Hadland
Organisation Name Liverpool and Chester Property Company		
Obj/Sup/Com Support		

Summary of Main Issues

For the purpose of the new Local Plan, the Green Belt boundary needs reviewing and new sites are required to be allocated for future development. We therefore support paragraph 2.4 of the Publication document.

Summary of Suggested Changes

None needed.

Evidence Submitted

N/A

Chapter 2	Plan Order Chapter 2	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 553	Response Ref 10	Representor Name Alex Naughton
Organisation Name Merseytravel		
Obj/Sup/Com Comment		

Summary of Main Issues

Paragraph 2.36 Merseytravel in partnership with city region partners and Lancashire County Council continues to explore options for improving rail connectivity between the City Region and West Lancashire including options for the Burscough Curves and a rail link to Skelmersdale. Recently the Northern Electrification Taskforce final report (March 2015) was published outlining options for further electrification of the rail network in Northern England. The Manchester to Wigan/ Kirkby / Southport line has been highlighted by the report as one of the lines which should be considered as a priority for future electrification. [See:]

- Northern Electrification Task Force final report (March 2015)

http://www.railnorth.org/wp-content/uploads/2015/03/EFT_Final_Report_FINAL_web.pdf

Summary of Suggested Changes

Evidence Submitted

Chapter 2	Plan Order Chapter 2	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 553	Response Ref 9	Representor Name Alex Naughton
Organisation Name Merseytravel		
Obj/Sup/Com Support		

Summary of Main Issues

Paragraph 2.26 Merseytravel welcomes reference to the importance of the Port of Liverpool and the new Liverpool 2 terminal for the local economy of the Liverpool City Region. However it would be good if something about promoting multimodal access to the port could be mentioned in this paragraph. The more rail and water can be used to transport goods to and from the port this can help relieve pressure on the road network. But understandably there will still be a major role for road transport depending on the destinations of the cargo being carried to and from the port. The Southern Zone of the Port of Liverpool (south of Alexandra Dock down to Sandon Dock) does not have rail access at the moment. Merseytravel, on behalf of city region partners, has commissioned a rail connectivity study to look into options for reconnecting this part of the port to the rail network. This study is due to complete in late April 2015. Its findings will then be reported up to the LCR Transport Advisory Group (TAG) and the Combined Authority for decisions on the next steps. Therefore we request that the alignment of the Canada Dock Branch rail line from the Bootle Branch should be safeguarded pending further decisions being made on the way forward in light of the study

Summary of Suggested Changes

Evidence Submitted

Chapter 2	Plan Order Chapter 2	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 1037	Response Ref 5	Representor Name Marilyn Griffiths
Organisation Name		
Obj/Sup/Com Comment		

Summary of Main Issues

Fomby "Prime location for executive housing" Planners need to look more closely at sites before allowing "executive housing" witness the Hamptons built on a "non executive " situation and proving difficult to shift the site would have been better for smaller 3or 4 house/ acess to give young people a chance to buy or affordably rent.

Summary of Suggested Changes

Evidence Submitted

Chapter 3	Plan Order Chapter 3	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 446	Response Ref 1	Representor Name Hugh McAuley
Organisation Name Formby Play Sports Ltd		
Obj/Sup/Com Support		

Summary of Main Issues

Paragraphs 3.1, 3.2 and 3.13 should also reflect the fact that the Green Belt has stymied the natural growth and the potential of places like Formby which are some of Sefton's most sustainable settlements. Paragraph 3.8 should indicate the role the private sector will play in the future to deliver new jobs and economic development working with the public sector

Summary of Suggested Changes

Add to the end of paragraph 3.2: 'The plan also needs to ensure that any emphasis on regeneration does not ignore the potential of the Borough's most sustainable settlements as they have a role to play in boosting the economy of the Borough which can obviously contribute towards wider regeneration objectives.' Add to end end of paragraph 3.8: 'As such the Council will look to work in partnership with and encourage the private sector to deliver economic development and related new employment in sustainable locations.' Add to end of paragraph 3.13: 'But it is acknowledged that if the full potential of some of the Borough's most sustainable settlements is to be realised it is inevitable that Green Belt boundaries will need to be rolled back in some locations.'

Evidence Submitted

None

Chapter 3	Plan Order Chapter 3	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 553	Response Ref 15	Representor Name Alex Naughton
Organisation Name Merseytravel		
Obj/Sup/Com Support		

Summary of Main Issues

We welcome reference to the proposed new Maghull North rail station.

Summary of Suggested Changes

Evidence Submitted

Chapter 3	Plan Order Chapter 3	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 553	Response Ref 11	Representor Name Alex Naughton
Organisation Name Merseytravel		
Obj/Sup/Com Support		

Summary of Main Issues

We welcome reference to the importance of the Port of Liverpool to the local economy in Sefton and the Liverpool City Region. May be worth referencing the SUPERPORT LIVERPOOL website here. The Port of Liverpool is an important maritime gateway and is one of the UK's top five container ports alongside Felixstowe, Southampton, Tilbury, and London Gateway. Liverpool's location at the heart of the UK offers a distinct advantage, with over 65% of the population of the UK and Ireland living within a 150 mile radius of the city. 45% of North American trade enters via Liverpool. A significant step change in the Port's capability will come with the opening of the new Liverpool 2 Container Terminal in 2015. Additionally the Port is a major short sea shipping hub for the Irish Sea area with ro-ro ferry services to the Isle of Man, Dublin and Belfast (key operators including Stena Line, Seatruck Ferries, P&O Ferries and Isle of Man Steam Packet) and container feeder services to Dublin, Belfast and Glasgow and from English Channel Ports (including Southampton, Rotterdam, Antwerp and Le Havre) for example. Peel Ports also operate the innovative container ship service from the Port of Liverpool along the Manchester Ship Canal.

The Liverpool City Region also plays a major role in the offshore wind energy industry as Liverpool and its surrounding coastal region hosts some of the largest offshore wind farms in the UK. As a Centre for Offshore Renewable Engineering - one of only six such centres in the UK - Liverpool sits at the heart of a region where sustainable technologies are devising smarter ways for us all to do business. Our offshore wind industry continues to present a major industry opportunity for turbine manufacturers, installers, infrastructure development and maintenance companies. Liverpool City Region is now at the forefront of the UK's offshore wind industry and a significant global location for offshore wind investment. Liverpool City Region is home to 400 low carbon businesses employing 9,000 staff. The low carbon sector within the Liverpool City Region adds £435 million GVA to local Economy. [See]:

- LCR Offshore Wind Energy Hub

[http://visitliverpool.nmdemo.net/dbimgs/FINAL%20Offshore%20wind%20energy%20hub%20\(2\).pdf](http://visitliverpool.nmdemo.net/dbimgs/FINAL%20Offshore%20wind%20energy%20hub%20(2).pdf)

- Building Offshore Wind in England – CORE Centres for Offshore Renewable Engineering (March 2015)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/405959/CoreBrochure_2015.pdf

Summary of Suggested Changes

Evidence Submitted

Chapter 3	Plan Order Chapter 3	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 637	Response Ref 1	Representor Name Ken Hopkins
Organisation Name Mactaggart & Mickel Homes Ltd		
Obj/Sup/Com Objection		

Summary of Main Issues

A few additional words will give the vision greater clarity and purpose.

Summary of Suggested Changes

Amend paragraph 3.19 as follows: "Sefton has successfully planned for and enabled sustainable development and growth across the borough meeting the housing and economic needs of its communities in full."

Evidence Submitted

N/A

Chapter 3	Plan Order Chapter 3	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 648	Response Ref 2	Representor Name Emily Hrycan
Organisation Name English Heritage		
Obj/Sup/Com Objection		

Summary of Main Issues

The NPPF requires that a Local Plan should contain a positive strategy for the conservation and enhancement of the historic environment. Whilst we welcome reference to nature sites and heritage assets and the need for their enhancement, the policy needs to ensure that they have been conserved or protected (and enhanced) rather than "generally been retained". In line with the requirements of the NPPF. This should also ensure consistency with Objective 9 (page 20).

Summary of Suggested Changes

Suggested amendment:

Important nature sites and heritage assets and green infrastructure have been protected and enhanced and compensation / mitigation provided where losses have occurred.

Evidence Submitted

Chapter 3	Plan Order Chapter 3	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 663	Response Ref 16	Representor Name Alan Hubbard
Organisation Name National Trust		
Obj/Sup/Com Objection		

Summary of Main Issues

It is considered that the approach set out here, and in part across all the Key Issues and Challenges, fails to adequately consider not just the challenges but also the opportunities around Sefton's environmental assets. The Publication Draft does not properly address the overall approach to sustainable development as set out in the NPPF, in particular at paras 6 to 9. In pursuit of economic and social goals, environmental ones have been left trailing a considerable distance behind if not forgotten altogether. Specifically it is unclear how the mutual dependence of these goals has been taken into account and "economic, social and environmental gains (should be) sought jointly and simultaneously through the planning system".

Para 3.13 exemplifies this concern; whilst the heading refers to "protecting and enhancing" the high quality environment the (literally) bottom line ignores enhancement and simply refers to protecting Sefton's environmental assets whilst in the same paragraph acknowledging that those assets will be reduced in extent to accommodate the area's growth demands.

The opportunities here are to a) ensure that the identification of sites for development minimises adverse impacts upon environmental assets, but then more importantly b) secures the enhancement of environmental assets as part and parcel of development activity.

There is a related point that those assets will become more stressed as a result of the increasing pressures that they will come under from a growing population and workforce.

It is notable that the text at para 3.11 is directed at ensuring 'services and infrastructure' are adequate to meet growing demands, but there is no recognition here of how investment will be secured to manage heritage and nature conservation resources.

Summary of Suggested Changes

Re-draft para 3.13 (and 3.11) to explicitly recognise the role that environmental goals will play in Sefton's approach to securing sustainable development; set out the ambition, overall, to not only protect but also enhance environmental assets; and identify the need to ensure those enhancements are brought forward as part of the necessary 'infrastructure' to support new development.

Evidence Submitted

Chapter 3	Plan Order Chapter 3	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 663	Response Ref 15	Representor Name Alan Hubbard
Organisation Name National Trust		
Obj/Sup/Com Objection		

Summary of Main Issues

Para 3.24 is unnecessarily caveated by the use of the word “important” and suggests that there are other environmental assets that don’t need to be protected let alone enhanced; indeed even the “important” assets will only have been “generally retained” suggesting that some higher level assets are capable of sacrifice.

Summary of Suggested Changes

The Vision should ensure that Sefton’s distinctive environmental assets are cherished and wherever possible are not only protected but also enhanced over the Plan period. Their wider role in the achievement of sustainable development and their particular contribution to quality of life for existing and future residents, employees and visitors should be a key element of the Vision.

Evidence Submitted

Chapter 3	Plan Order Chapter 3	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 663	Response Ref 14	Representor Name Alan Hubbard
Organisation Name National Trust		
Obj/Sup/Com Objection		

Summary of Main Issues

The way in which the Vision is now set out is very bitty and does not present an overall approach and planning strategy. Even though the individual bullet points in the previous version were not without criticism at least they had an overarching statement that brought them together and provided a comprehensive statement regarding sustainable development. The series of paragraphs now presented do not amount to an overall Vision, and particularly not one that reflects the distinctive qualities of Sefton.

The intrinsic merits of Sefton’s environmental assets such as its heritage resource and the landscape/seascape qualities of its coast are not encapsulated, let alone a Vision for how their condition and contribution to sustainable development at the end of the Plan period. Whilst it is appropriate (para 3.31) to make the most of Sefton’s natural resources the example given is questionable, in particular in the context of the landscape qualities of the coast – consideration of recreation/health/well-being/nature conservation benefits are probably all higher on the list of roles that the coast can play than wind energy. At the same time energy from other natural resources would be equally valid, e.g. the tidal power opportunities or other innovative proposals such as marine source heat pumps – last year National Trust installed the largest in Britain at Plas Newydd on Anglesey.

Summary of Suggested Changes

The Vision should ensure that Sefton’s distinctive environmental assets are cherished and wherever possible are not only protected but also enhanced over the Plan period. Their wider role in the achievement of sustainable development and their particular contribution to quality of life for existing and future residents, employees and visitors should be a key element of the Vision.

Evidence Submitted

Chapter 3	Plan Order Chapter 3	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 663	Response Ref 13	Representor Name Alan Hubbard
Organisation Name	National Trust	
Obj/Sup/Com	Objection	

Summary of Main Issues

It is surprising, and indeed inappropriate, to have one objective relating to a very specific location, the Port – especially when there are no other site specific objectives. Of greater concern still is the lack of any objective relating to the Sefton’s landscapes, and in particular its coast. The coast is a defining feature of Sefton and plays a multi-functional role as well as being under significant attack in places as a result of coastal processes.

Summary of Suggested Changes

Evidence Submitted

Chapter 3	Plan Order Chapter 3	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 665	Response Ref 2	Representor Name Tony Dawson
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

The Plan has no vision, particularly for Southport. There has been no attempt to engage sensibly with the population about what they might consider appropriate steps to take over the planning period.

A Plan with vision would include a clearly-defined approach by the Local Authority towards providing the appropriate housing types in the appropriate numbers which would include social and other low cost housing. Such developments in the centre of conurbations could provide thousands of homes. Hundreds could be provided in the area between Tulketh Street and London Street (including over the railway) alone. There is a crucial flaw also in that the plan for Sefton includes the assumption that people want to have and should have extra housing within the Borough of Sefton. There should be far more housing of the appropriate type in central areas of Liverpool, and possibly Bootle, closer to the centres of employment.

Summary of Suggested Changes

Evidence Submitted

Chapter 3	Plan Order Chapter 3	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 707	Response Ref 2	Representor Name Matthew Good
Organisation Name	Home Builders Federation	
Obj/Sup/Com	Support	

Summary of Main Issues

The vision is considered sound as it aims to provide a positive planning framework for the plan area. The HBF particularly welcomes the sections highlighted below;

‘Sefton has successfully planned for and enabled sustainable development and growth across the borough, meeting the needs of its communities..... There is a wider selection of quality and affordable homes for all of Sefton’s residents. Sefton has made the most of its assets to attract jobs and investment...’

The following elements of the strategic objectives are also welcomed; To help meet the housing needs of Sefton’s changing population for market and affordable housing; homes for families, the elderly, people with other special housing needs and others. To promote economic growth, tourism and jobs creation and support new and existing businesses. To meet the diverse needs for homes, jobs, services and facilities, as close to where they arise as possible’.

It is, however, considered that these positive statements are diluted by plan policies. This is most apparent with regards to the overall housing requirement identified within policy MN1. If the Council truly wish to provide a boost to the economy it will need to provide a sufficient quantum of new housing to ensure this occurs. The Council’s proposed housing requirement is dealt with in greater detail below.

Summary of Suggested Changes

Evidence Submitted

Chapter 3	Plan Order Chapter 3	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 712	Response Ref 4	Representor Name Andrew Pepper
Organisation Name	Persimmon Homes	
Obj/Sup/Com	Objection	

Summary of Main Issues

Persimmon broadly supports the Council’s objectives for the Local Plan. It supports Objectives 2 and 4 which seek to meet the housing needs of Sefton’s population. However, it will be very difficult for these objectives to be met because the Council’s housing land requirement is not based on the most up-to-date evidence. The Local Plan will be able to meet these Objectives because they are not justified and are not consistent with National Policy, and as a result, these Objectives must be found unsound.

Summary of Suggested Changes

In order to make the Plan sound, Persimmon considers that the Council must reconsider its housing requirement (set out in policy MN1) to meet the objectively -assessed needs of the Borough.

Evidence Submitted

Chapter 3	Plan Order Chapter 3	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 712	Response Ref 3	Representor Name Andrew Pepper
Organisation Name	Persimmon Homes	
Obj/Sup/Com	Objection	

Summary of Main Issues

Persimmon considers whether the Vision should be a more concise and focused. There is duplication between the Objectives and the Vision for Sefton. A much more concise Vision would avoid any duplication with the Objectives.

Summary of Suggested Changes

Evidence Submitted

Chapter 3	Plan Order Chapter 3	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 713	Response Ref 1	Representor Name Debbie Fifer
Organisation Name	Canal & River Trust	
Obj/Sup/Com	Support	

Summary of Main Issues

The Canal & River Trust (the Trust) fully supports the Vision that "the Leeds & Liverpool Canal has become vibrant and valued as a corridor for leisure, recreation and sustainable transport throughout Sefton" (para. 3.26) by the end of the plan period. The Trust is satisfied that the Vision can be achieved through the implementation of the following policies:

Policy ED5 - Tourism, which allows for tourism development adjacent to the canal;

Policy IN1 - Infrastructure and developer contributions, which states that "social, environmental and physical infrastructure will be protected, enhanced and provided where there is an identified need to support sustainable communities";

Policy IN2 - Transport, which states that "the Council's general priorities for the transport network include ... maintaining, improving and extending the walking and cycling network";

Policy EQ1 - Planning for a Healthy Sefton, which states that "development should help maximise opportunities to improve quality of life to make it easier for people in Sefton to lead healthy, active lifestyles, by ... encouraging people to take physical exercise by providing opportunities for walking, cycling, outdoor recreation and sport";

Policy EQ2 - Design, which states that "development will only be permitted where it is of a high quality design that responds positively to the local character and distinctiveness of the surroundings." The explanation further states that "generally development should be designed with high quality, attractive frontages onto public spaces. Examples include shopping areas, larger roads in residential areas, major transport routes, green spaces and the Leeds and Liverpool Canal" (para. 10.12);

Policy EQ3 - Accessibility, which states that "new development must be located and designed to encourage walking and cycling both within, to and from the site";

Policy EQ9 - Provision of public open space, strategic paths and trees in development, which identifies and protects the canal towpath as a strategic path;

Policy NH1 - Environmental assets;

Policy NH5 - Protection of open space, which recognises the canal as a form of open space and green infrastructure. (NB. reference to the "Canal and Waterways Trust" at para. 11.28 should be corrected to "Canal & River Trust"); and

Policies NH9, NH10, NH11 and NH14 - Heritage.

Summary of Suggested Changes

Evidence Submitted

Chapter 3	Plan Order Chapter 3	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 713	Response Ref 2	Representor Name Debbie Fifer
Organisation Name Canal & River Trust		
Obj/Sup/Com	Comment	

Summary of Main Issues

To achieve the above vision for the Leeds & Liverpool Canal and to ensure that the waterway maximises its potential contribution to the objectives of the above policies, it is essential that developer contributions are secured where necessary to maintain and enhance the condition of the waterway infrastructure, including the towpath and means of access to it. The Trust is satisfied that necessary improvements to the canal and towpath can meet the paragraph 204 tests for planning obligations as being necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. For example, where large-scale development is proposed, the canal towpath can provide a sustainable transport route for walking and cycling to and from the site, provided the towpath and means of access to it are in a suitable condition to accommodate the increased use. If this is not the case, a developer contribution towards appropriate enhancements would clearly meet the statutory tests for planning obligations.

Summary of Suggested Changes

Evidence Submitted

Chapter 3	Plan Order Chapter 3	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 715	Response Ref 2	Representor Name
Organisation Name Countryside Properties (UK) Ltd and Persimmon Homes Lancashire		
Obj/Sup/Com	Comment	

Summary of Main Issues

On page 19 of the Local Plan, the Council sets out over 14 paragraphs its Vision for Sefton in 2030. Persimmon and Countryside consider whether the Vision should be a more concise and focused section which sets out the Vision for the Borough in general terms. Persimmon and Countryside consider that this comment does not go to the heart of the soundness of the Local Plan, but it is more intended to be a helpful suggestion to reduce the size of the document and to make it easier for the public to read and understand.

In terms of the 12 objectives, Persimmon and Countryside broadly supports the Council's objectives for the Local Plan. They support Objectives 2 and 4 which seek to meet the housing needs of Sefton's population. However, they have concerns over whether the housing requirement is correct for the reasons set out in Section 2 of these representations.

Summary of Suggested Changes

Evidence Submitted

REPRESENTATIONS SUBMITTED [on behalf of the Land East of Maghull Consortia] TO THE SEFTON CORE STRATEGY OPTIONS PAPER AND EVIDENCE BASE (JULY 2011).

Representations to the Local Plan Preferred Option (July 2013) on behalf of Countryside Properties (UK) Ltd; Persimmon Homes and P Wilson & Company LLP [September 2013]

Chapter 3	Plan Order Chapter 3	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 716	Response Ref 6	Representor Name Robert Swift
Organisation Name Robert Swift and family		
Obj/Sup/Com Objection		

Summary of Main Issues

There is duplication between the Objectives of the Local Plan and the Vision for Sefton. They consider that the Vision should be a much more concise section which would then avoid any duplication with the Objectives. We broadly support the Council's objectives for the Local Plan, including Objectives 2 and 4 which seek to meet the housing needs of Sefton's population. However, we have concerns over whether the housing requirement is correct.

Summary of Suggested Changes

In order to make the Plan sound, in this regard, the Council must reconsider its housing requirement to meet the objectively-assessed needs of the Borough.

Evidence Submitted

Chapter 3	Plan Order Chapter 3	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 716	Response Ref 4	Representor Name Robert Swift
Organisation Name Robert Swift and family		
Obj/Sup/Com Objection		

Summary of Main Issues

VISION
The Vision should be a more concise and focused. Paragraph 3.19

Summary of Suggested Changes

Evidence Submitted

Chapter 3	Plan Order Chapter 3	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 717	Response Ref 1	Representor Name
Organisation Name TR Silcock Ltd, DWH & Barratt Homes		
Obj/Sup/Com Support		

Summary of Main Issues

TR Silcock Ltd, David Wilson Homes and Barratt Homes support the Local Plan's vision and objectives. They consider the vision to be sound, providing a positive and aspirational framework for the borough. They particularly welcome the recognition and importance within the vision placed upon successfully planning for sustainable development, the requirement to meet the needs of the borough's communities and the need to provide a wider selection of quality and affordable homes for all of Sefton's residents. My clients also welcome the reference within the vision to the need for the borough to make the most of its assets and to attract jobs and investment.

The following strategic objectives are also welcomed: To help meet the housing needs of Sefton's changing population for market and affordable housing; homes for families, the elderly, people with other special housing needs and others. To promote economic growth, tourism and jobs creation and support new and existing businesses. To meet the diverse needs for homes, jobs, services and facilities, as close to where they arise as possible. However, they consider that the positive messages provided within the vision and the strategic objectives are currently diluted by some draft plan policies.

Summary of Suggested Changes

None required.

Evidence Submitted

Chapter 3	Plan Order Chapter 3	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 723	Response Ref 1	Representor Name Laurence Rankin
Organisation Name Sefton Green Party		
Obj/Sup/Com Objection		

Summary of Main Issues

The key vision for any local authority should focus on the health, happiness and well being of its population. The drive for economic growth has been shown to be a flawed method for increasing well being in that our most deprived communities are in fact being left behind as the gap between the haves and the have nots grows. The pre eminent principles of the UK Sustainable Development Strategy are Ensuring a Strong Healthy and Just Society, and Living within Environmental Limits; and the three building principles to achieve the top two are Achieving a Sustainable Economy, Promoting Good Governance, Using Sound Science Responsibility, i.e. it is important to recognise that the first 2 are what we are aiming for and the last three are the supporting means of achieving.

To this end I would suggest the following; The health, happiness and well being of all the residents of Sefton puts the borough within the top quartile for health and life expectancy. All development is sustainable in achieving first aim. i.e. that regenerates our borough, particularly in Bootle and Central Southport, in a way that promotes healthy and fulfilling lifestyles, in an enhanced and valued environment, through appropriate economic stimulus, not based solely on consumption. We celebrate the distinct communities of Sefton while embracing cultural diversity. Sefton plays a positive part in the Liverpool City Region and the North West of England.

In achieving this we have; Promoted and ensured innovative and high quality sustainable development, that champions healthy lifestyles, and resource efficiency, with safety and security. Preserved and enhanced Sefton's natural and built environment. Ensured that quality infrastructure, services and facilities have been provided that are genuinely attractive and accessible to all sectors of the population. Reduced overall reliance on cars for access to employment and services through the provision and/or promotion of innovative spatial and transport options such as car clubs, bike provision, free buses, remote working initiatives. Mitigated and adapted to the effects of Climate Change, and encouraged re-use of resources, land and buildings and reduced Sefton's carbon footprint. Made Sefton a Zero Waste authority. Ensured we provided sustainable and appropriate homes, meeting Sefton's affordable and special housing needs. Promoted an economy that supports sustainable employment in existing and new businesses and in volunteering. Particularly supported the development of the Green Economy and intermediate employment opportunities. Maximised the contribution of the Port as a driver for improvements in the local environment and the quality of life of local communities.

Summary of Suggested Changes

Evidence Submitted

Chapter 3	Plan Order Chapter 3	Other Documents
Policy		
Respondent No 732	Response Ref 1	Representor Name
Organisation Name Bellway Homes Ltd		
Obj/Sup/Com Support		

Summary of Main Issues

Bellway are supportive of the objectives 2,3,4,7 and 8 of the Local Plan which also reflect the principles contained within Local Plan Policy SD2

Summary of Suggested Changes

Evidence Submitted

Chapter 3	Plan Order Chapter 3	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 737	Response Ref 1	Representor Name
Organisation Name		
Obj/Sup/Com Support		

Summary of Main Issues

Our clients (the owners of site MN2.5) agree with the Authority's key issues, challenges, vision and objectives. In particular, "there is insufficient land to meet Sefton's employment and housing needs within the built up area for the fifteen years of the plan" (Local Plan Publication Version). As the "undeveloped areas are designated as Green Belt and much of this is either of international nature value, subject to flood risk, affected by a heritage designation or high quality agricultural land" meeting the Borough's needs for new homes is clearly a major challenge for the plan.

Summary of Suggested Changes

Evidence Submitted

Chapter 3	Plan Order 3.22	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 553	Response Ref 13	Representor Name Alex Naughton
Organisation Name Merseytravel		
Obj/Sup/Com Comment		

Summary of Main Issues

We welcome reference to the importance of the Port of Liverpool to the local economy in Sefton and the Liverpool City Region. May be worth referencing the Superport Liverpool website here in this section.

Summary of Suggested Changes

Evidence Submitted

Policy N/A

Rep does not relate to a policy

Respondent No 359

Response Ref 10

Representor Name Catherine Fraser

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

This brings me to the Greenbelt. The framework document says the following: The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. Green Belt serves five purposes: to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The Labour leader of Sefton Council is on record in saying that he wants an early review of the Greenbelt boundary by 2016? Consequently there is no mention of permanence in the Local Plan. In fact Peel Holdings want to take a large slice of Sefton's Greenbelt to build a huge logistics hub on the Flood Plain of the river Alt, diverting the river in the process. As yet they have no idea as to how this will affect the river and possible flooding. Peel Holdings along with Sefton consistently over estimate the amount of jobs the port expansion is going to create. They confuse the increase in tonnage handled by the port with the likely increase in the number of workers required to handle it. The inspector needs to look into whether Sefton's policy of demolishing houses in Bootle has been a deliberate policy of bringing about an artificial shortage in supply in order to justify its policy of building on the Greenbelt. Secondly is Sefton deliberately hoarding brown field sites instead of developing them for either industrial or housing use?

I would argue that the Local does not follow the framework because it does not protect the greenbelt. Maghull is likely to merge into Liverpool. Developments MN2.12, Mn2.48, MN2.49, MN2.16, MN2.17 and MN2.19 will reduce the openness of the countryside around Formby even the council's own landscape studies admit this. However, more importantly because the Local Plan doesn't make clear that the new Greenbelt boundary has some permanence we know this is the beginning of an unrestricted sprawl. Sections 4.42 — 4.43 will allow them to renege on the Local Plan making a nonsense of the whole consultation and planning process. The changes the council make will not be about flexibility but development they are already planning to make. Sefton will do whatever Peel Holdings ask them to do! The council have no intention of protecting the greenbelt in the future. Therefore it is in breach of the planning framework. Personally I do not think the plan is justified because it is based on a model of housing demand that is totally irrelevant to Sefton. The consultants used by Sefton NFL were also working for David Wilson Homes one of the developers with an interest in building on the greenbelt.

Summary of Suggested Changes

Protect the Green Belt from development. There should be no early review.

Evidence Submitted

Chapter 4	Plan Order Chapter 4	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 406	Response Ref 5	Representor Name Peter Richards
Organisation Name West Lancashire Borough Council		
Obj/Sup/Com Support		

Summary of Main Issues

West Lancashire Borough Council ("the Council") wish to express their support for the over-arching strategy set out in chapter 4 of the Sefton Local Plan, in particular paragraphs 4.37 and 4.39-4.44 on p.26. The development requirements of 11,070 new dwellings and 84.5 ha of employment land over the Plan period are appropriate given the evidence available and what requirements have been adopted / proposed in adjacent authorities, including West Lancashire. The Council would especially support the strategy in that Sefton are seeking to meet their objectively-assessed development needs within their own boundaries, as all other authorities in the Liverpool City Region have thus far sought to do in their Local Plans. Related to this point, the Council can confirm that, at this time, it would not be appropriate to meet any element of Sefton's development needs in West Lancashire, given that the Sefton Local Plan identifies how these needs can be met within Sefton and the fact that West Lancashire's recent Green Belt Study identified that all but two parcels of land in West Lancashire's Green Belt continue to fulfil at least one purpose of the Green Belt, as set out in NPPF paragraph 80.

The Council also supports the wisdom of Sefton's commitment to an early review of their Local Plan, given the significant constraints on deliverable land for development within the borough and the lack of a wider Liverpool City Region evidence base and strategy at the current time on managing the development requirements (for both housing and employment land) associated with the potential economic growth in the City Region associated with the Atlantic Gateway and SuperPort proposals. For this reason, the Council would support Sefton's Local Plan in that it does not seek to allocate additional land for employment / port-related uses associated with the growth of the Port of Liverpool at this time, as the distribution of these facilities is a cross-boundary strategic matter that needs addressing in partnership with all City Region authorities when the appropriate evidence is available to ensure a sustainable and strategically planned approach to addressing the needs of this growth.

The Council, therefore, also supports the references within paragraphs 4.42-4.44 on p.26 of the Local Plan related to various sub-regional elements of work that West Lancashire are keen to see move forward and which will form part of the ongoing fulfilment of the Duty to Co-operate for the authorities in the City Region, including West Lancashire.

Summary of Suggested Changes

N/A

Evidence Submitted

Chapter 4	Plan Order Chapter 4	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 446	Response Ref 2	Representor Name Hugh McAuley
Organisation Name Formby Play Sports Ltd		
Obj/Sup/Com		

Summary of Main Issues

Paragraph 4.2 would benefit from reference being made to making the most of Sefton's most sustainable settlements so as to meet the development needs of the Borough. The representor supports the Council's decision to go with option 2. The need to develop greenfield land should be referred to in paragraph 3.18 as well as 3.40. The representor supports the provision of 15 ha of employment land in Formby.

Summary of Suggested Changes

Amend paragraph 4.2 as follows: '..... The challenge is how to accommodate these needs in a way which makes the most of the Borough's resources, most sustainable settlements/locations and other assets but to minimise harm.....'

Evidence Submitted

None

Chapter 4	Plan Order Chapter 4	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 492	Response Ref 4	Representor Name
Organisation Name Craig Seddon SIPP		
Obj/Sup/Com Support		

Summary of Main Issues

The Publication Draft Local Plan identifies that in order to accommodate new development it will be necessary to make alterations to the Green Belt boundaries within Sefton. This approach, set out in paragraphs 4.33 and 4.34 is supported.

Summary of Suggested Changes

Evidence Submitted

Chapter 4	Plan Order Chapter 4	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 595	Response Ref 1	Representor Name Jonathan Clarke
Organisation Name Knowsley Council		
Obj/Sup/Com Support		

Summary of Main Issues

Knowsley Council fully supports the spatial strategy of the emerging Sefton Local Plan, which appropriately aims to meet Sefton's objectively assessed needs for housing and employment over the proposed Plan period. It is consistent with Knowsley's emerging Local Plan: Core Strategy, which seeks to meet Knowsley's own development needs via a mix of urban sites and Sustainable Urban Extensions and does not make any provision to cater for any unmet needs arising in Sefton. The strategy is based on robust evidence and co-operation on strategic matters with neighbouring authorities, including Knowsley.

Summary of Suggested Changes

Evidence Submitted

Chapter 4	Plan Order Chapter 4	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 595	Response Ref 3	Representor Name Jonathan Clarke
Organisation Name Knowsley Council		
Obj/Sup/Com Support		

Summary of Main Issues

The sites proposed for release from the Green Belt in the emerging Sefton Local Plan are based on the joint Knowsley and Sefton Green Belt Study. This used an agreed methodology to identify sites with potential to be released from the Green Belt for development in each authority. This methodology is robust, as confirmed by the Interim Findings of the Inspector who is currently examining Knowsley's emerging Local Plan: Core Strategy. These findings identify that the sites identified for removal from the Green Belt in Knowsley's Plan are sound and none of the alternatives proposed by representors warrant inclusion in the Plan (see paragraph 11, Inspector's Interim Findings). We note and support the fact that Sefton Council has also, using this methodology, not taken forward alternative sites which were promoted by third parties at earlier stages. This is specifically important where alternative sites were proposed in areas that could impact on the preservation of 'essential gaps' as identified by the joint Knowsley and Sefton Green Belt Study.

Summary of Suggested Changes

Evidence Submitted

Chapter 4	Plan Order Chapter 4	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 595	Response Ref 10	Representor Name Jonathan Clarke
Organisation Name	Knowsley Council	
Obj/Sup/Com	Support	

Summary of Main Issues

Sefton's recognition of the need for future sub-regional employment and housing market assessments is noted and welcomed. This future work, together with any further review of Green Belt boundaries which could potentially flow from the outcomes of this work, should be developed on a consistent basis across the Liverpool City Region. Once complete this evidence will inform future reviews of individual and/or joint Local Plans as appropriate. Knowsley Council is committed to working collaboratively on these assessments and looks forward to working with Sefton and the other Liverpool City Region authorities on these studies. Sefton's acknowledgement of the potential need for an early review of its plan (subject to the findings of future sub-regional working) is also welcomed. This is considered the most appropriate way for Sefton to deal with any emerging development requirements that cannot currently be evidenced, whilst allowing Sefton to progress its current plan to maintain a robust policy framework to guide development in the interim period. To delay Sefton's Local Plan until the sub-regional studies are undertaken could undermine Sefton Council's ability to meet its objectively assessed needs in the meantime.

Summary of Suggested Changes

Evidence Submitted

Chapter 4	Plan Order Chapter 4	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 595	Response Ref 2	Representor Name Jonathan Clarke
Organisation Name	Knowsley Council	
Obj/Sup/Com	Comment	

Summary of Main Issues

We note that Sefton's annual average housing target of 615 dwellings seeks to meet Sefton's identified needs and we support Sefton's approach to deriving this target. The impact of the Department for Communities and Local Government (CLG) 2012 based household growth projections published in February 2015 will no doubt be considered as part of the examination process for Sefton's Local Plan.

Summary of Suggested Changes

Evidence Submitted

Chapter 4	Plan Order Chapter 4	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 637	Response Ref 4	Representor Name Ken Hopkins
Organisation Name	Mactaggart & Mickel Homes Ltd	
Obj/Sup/Com	Objection	

Summary of Main Issues

The housing requirement figures set out in paragraphs 4.37 - 4.38 need to be updated to take account of the 2012 household projections. The concept of identifying safeguarded land is supported. However the trigger for its development, according to the Local Plan, is meeting longer term needs beyond the end of the current plan period. The trigger should be when there has been a persistent under delivery of housing and the lack of a 5 year housing land supply as required by paragraph 47 of the NPPF.

Summary of Suggested Changes

The following sentence should be added to the end of paragraph 4.38: "However, if there is persistent under delivery of housing land in the Local Plan period, safeguarded land should be allowed to come forward within the plan period." This or similar wording should also be included in paragraph 6.8.

Evidence Submitted

Chapter 4	Plan Order Chapter 4	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 637	Response Ref 3	Representor Name Ken Hopkins
Organisation Name Mactaggart & Mickel Homes Ltd		
Obj/Sup/Com Support		

Summary of Main Issues

Mactaggart & Mickel support paragraphs 4.23 - 4.32.

Summary of Suggested Changes

None required

Evidence Submitted

Chapter 4	Plan Order Chapter 4	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 702	Response Ref 6	Representor Name
Organisation Name The Peel Group		
Obj/Sup/Com Objection		

Summary of Main Issues

The Sefton Local Plan has concentrated on Sefton specific growth in housing needs and on employment land requirements based upon past take up rates – clearly insufficient when considering a transformational investment opportunity such as SuperPort and in particular Liverpool2. The impact of SuperPort and Liverpool2 has not been accounted for in this context, except within the operational port area. Hence, there is a gap in policy formulation that does not enable the Plan to deal with this specific nationally important issue. At present the Plan suggests that such a gap would be addressed by an early review.

Summary of Suggested Changes

New Policy to firm up the early review process – to be inserted at Paragraph 4.42

The Council will undertake an Early Review of the Local Plan to fully address employment land and other implications of SuperPort which is a key priority of the Liverpool City Region and Sefton Council. The Early Review will set a positive development context for the growth of SuperPort over the next 15 years and beyond. The Early Review will address the issues raised by the LEP SuperPort Market Analysis Land and Property report (2014), specifically any shortage of strategic sites for logistics and related supply chain uses.

The Council recognises the need for prompt action to address the implications through the Local Plan process. The Early Review will therefore commence in 2016 immediately following adoption of the Local Plan and will be completed in 2017.

The Council will seek to work jointly with other local authorities in a sub-regional approach through the duty to cooperate. The Council will also engage with local businesses, developers and infrastructure providers to understand market and locational requirements.

The Council recognises that strategic employment land supply for SuperPort is constrained, that such development has particular locational requirements and that there is a likelihood of such a review requiring the release of Green Belt land. The Council will as necessary undertake a further targeted Green Belt review exercise, and will apply national policy in respect of the exceptional circumstances required for any such Green Belt loss.

Evidence Submitted

39 documents listed in the Compendium of Evidence.

Chapter 4	Plan Order Chapter 4	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 707	Response Ref 3	Representor Name Matthew Good
Organisation Name	Home Builders Federation	
Obj/Sup/Com	Objection	

Summary of Main Issues

Paragraphs 4.23 to 4.32

In common with our comments upon policies MN1 and MN8 the HBF considers the scale of Green Belt release to be unsound as it will not be sufficient to ensure an appropriate housing requirement can be met nor will the new boundaries endure well beyond the current plan period. In this regard the plan is not considered positively prepared or justified.

The Council's approach to amending Green Belt is generally supported. The HBF agrees with the Council that the requirements to allocate sufficient land for the market and affordable housing, and for employment development to meet identified needs constitute exceptional circumstances that justify the alteration of Green Belt boundaries through the preparation of the Local Plan. Indeed it is noted that without such releases the amount of new development that could be planned would be low, this would lead to significant reliance upon neighbouring authorities agreeing to take any unmet needs. Given that neighbouring authorities have indicated they are unable to assist Sefton in meeting any of its needs, the exceptional circumstances test is considered to be met.

The HBF does, however, have concerns with regards to the quantum of Green Belt released and the lack of safeguarded land provided within the plan, particularly in relation to comments made against Policy MN1 below. This is likely to require further Green Belt releases at the end of the plan period, this issue is explored in greater detail against Policy MN8 below.

It is recommended that the Council consider undertaking a comprehensive Green Belt review and identify sufficient land, including safeguarded

Summary of Suggested Changes

Evidence Submitted

Chapter 4	Plan Order Chapter 4	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 712	Response Ref 5	Representor Name Andrew Pepper
Organisation Name	Persimmon Homes	
Obj/Sup/Com	Support	

Summary of Main Issues

Persimmon supports the Council's intention to seek to meet its needs using land within the Green Belt. It considers that additional land currently within the Green Belt should be allocated for residential development in policy MN2 including its land at Mill Farm, Aintree.

Summary of Suggested Changes

Evidence Submitted

Chapter 4	Plan Order Chapter 4	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 715	Response Ref 3	Representor Name
Organisation Name Countryside Properties (UK) Ltd and Persimmon Homes Lancashire		
Obj/Sup/Com Support		

Summary of Main Issues

Support the Council's intention to seek to meet its housing requirement using land also within the Green Belt. They support the identification of the Maghull East Site as a Strategic Allocation.

Summary of Suggested Changes

Evidence Submitted

REPRESENTATIONS SUBMITTED [on behalf of the Land East of Maghull Consortia] TO THE SEFTON CORE STRATEGY OPTIONS PAPER AND EVIDENCE BASE (JULY 2011).

Representations to the Local Plan Preferred Option (July 2013) on behalf of Countryside Properties (UK) Ltd; Persimmon Homes and P Wilson & Company LLP [September 2013]

Chapter 4	Plan Order Chapter 4	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 716	Response Ref 7	Representor Name Robert Swift
Organisation Name Robert Swift and family		
Obj/Sup/Com Objection		

Summary of Main Issues

We support the Council's intention to seek to meet its housing requirement using land also within the Green Belt. However, for the reasons set out in its representations to other Sections of the Local Plan, it objects to the housing requirement and also objects to the proposed housing land allocations.

Summary of Suggested Changes

Additional land currently within the Green Belt should be allocated for residential development including land at Melling Lane, Maghull.

Evidence Submitted

Chapter 4	Plan Order Chapter 4	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 723	Response Ref 15	Representor Name Laurence Rankin
Organisation Name Sefton Green Party		
Obj/Sup/Com Comment		

Summary of Main Issues

Little regard is made for the real value of the environment to the economy and social well being. This is particularly true with the proposals to build half of new houses on the Green Belt. We need to prevent all build on the Green Belt to protect farm land and natural habitats. Particularly in those parts of Sefton which represent existing secondary habitats, or potential habitats, for protected species such as Natterjack Toads and Red Squirrels. The figures used for housing need are also challengeable and Sefton recognise this. However the intention to revise figures in future will be of little value if Green Belt land has already been released for development. The NPPF states that Green Belt should only be used in "very exceptional circumstances", a definition which, according to recent statements by Eric Pickles, (Ministerial Comments are Material Planning Considerations) does not include housing need. If there is no way to avoid use of some Green Belt, a rational approach would be to release land sequentially with need recognising that this would challenge current planning law/practice, which requires full release at the beginning of the process.

Summary of Suggested Changes

Evidence Submitted

Chapter 4	Plan Order Chapter 4	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 724	Response Ref 3	Representor Name Paula Keaveney
Organisation Name Sefton Central Liberal Democrats		
Obj/Sup/Com Objection		

Summary of Main Issues

There are statements or remarks in the plan that do not appear properly supported. Page 26 for example includes the remark that it is “good practice” to add in a 5 per cent buffer when identifying land for projected housing needs. This is an unsupported remark. Good practice according to whom?

Summary of Suggested Changes

Evidence Submitted

Chapter 4	Plan Order Chapter 4	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 724	Response Ref 4	Representor Name Paula Keaveney
Organisation Name Sefton Central Liberal Democrats		
Obj/Sup/Com Objection		

Summary of Main Issues

I am concerned about the phrasing used at times when referring to the Green Belt. On page 27 of the plan (4.49) there is a suggested approach which includes identifying land in the Green Belt by selecting sites which “cause least harm to the purposes of the Green Belt”. The use of the word “purposes” here is worrying. It is not defined in this section and so could allow considerable latitude to decision-makers in a way that might downplay the importance of the existing Green Belt.

Summary of Suggested Changes

Evidence Submitted

Policy N/A

Rep does not relate to a policy

Respondent No 738

Response Ref 1

Representor Name Charles Smith

Organisation Name CP&S Ltd

Obj/Sup/Com Objection

Summary of Main Issues

THIS IS A SUMMARY

Paragraph 4.20 and 4.46 of the Publication draft state that the key objective underpinning the spatial strategy is the recognised need 'to meet the diverse needs for homes, jobs, services and facilities, as close to where they arise as possible'. However, CP & S do not feel that the spatial strategy reflects this aim.

Aintree is a suburban area, which functions as a commuter settlement for the Liverpool City Region. Aintree is clearly separated from settlements to the north, including Maghull, due to the presence of the physical barriers of the M57 and M58 and Green Belt land which is located between the two motorways. Furthermore, Maghull is recognised in the Publication draft Local Plan as a 'free-standing town'. However, despite the distinctions between Aintree and Maghull, as recognised in the Publication draft Local Plan, the two are frequently perceived as one homogenous area in the Council's evidence base and spatial strategy, as part of the 'Sefton East parishes' area. This has resulted in inadequate housing provision in Aintree specifically.

The allocation of only 25 dwellings in Aintree falls significantly short of meeting this need. Identifying additional allocations in Aintree, such as our site (Land north of Oriel Drive - LPA reference AS18) would allow the provision of housing for commuters to Liverpool and other neighbouring authorities. This would help to mitigate the issues associated with the ageing nature of Sefton's population, as although many people work outside Sefton they will be able to remain living within Sefton.

Figure 4.2 of the Publication draft Local Plan details the number of homes completed in the last 30 years within each area. Within Sefton East Parishes 1,839 dwellings were completed between 1984 and 2014, which equates to 11.7% of the total supply. This is the second smallest contribution to the borough total, after Formby. This relatively low level of delivery could have increased demand within this area, which is exemplified through the higher house prices in the Maghull/Aintree area (Figure 5.12 and Figure 5.13 of the Strategic Housing Market Assessment, 2014). The SHMA demonstrates that Maghull/Aintree has the second highest rents and house prices of the borough, after Formby. Subsequently, the SHMA identifies the Maghull/Aintree area as having the second highest net need for affordable housing (Figure 7.10, SHMA 2014) and the highest net need per 1,000 population (Figure 7.11, SHMA 2014). Providing more housing in this area in the future plan period will counter the past low level of delivery and may increase the affordability of housing in the area.

Summary of Suggested Changes**Evidence Submitted**

Chapter 4	Plan Order Chapter 4	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 738	Response Ref 2	Representor Name Charles Smith
Organisation Name CP&S Ltd		
Obj/Sup/Com Objection		

Summary of Main Issues

In order to establish the spatial strategy, Sefton Council has applied the methodology detailed in paragraph 4.49 of the Publication draft Local Plan. Although CP&S Ltd agree with the methodology, from a review of the proposed housing allocations, it appears that the methodology has been incorrectly applied. In terms of the approach to Green Belt sites, the Council states that sites which cause less harm to the purposes of the Green Belt; have the fewest constraints; and provide the most benefits have been proposed as allocations. As demonstrated in the accompanying Development Statement, the site at Oriel Drive fulfils the above criteria.

The Oriel Drive site performs poorly against the five purposes of the Green Belt and its release and subsequent allocation for housing development would represent a logical rounding off to the existing urban area, which adjoins the site. Furthermore, the strong boundaries around the site would prevent future encroachment into the Green Belt, particularly to the north, where the site is bounded by the M57 motorway.

Regarding development constraints, numerous studies have been conducted in relation to the Oriel Drive site which identify potential constraints and propose mitigation which would ensure that the site was developable without adversely affecting the local environment or existing and future residents. Therefore, the development of the Oriel Drive site would be in accordance with paragraph 4.34 of the Publication draft Local Plan, which requires allocations to have the least possible impact, including impact upon the Green Belt and potential site constraints.

Furthermore, in line with paragraph 4.36 of the Publication draft Local Plan, the allocation of the Oriel Drive site would contribute towards the Council's aim of preserving the 'best and most versatile' agricultural land from development. The site is no longer in agricultural use, and as detailed in the Council's Agricultural Land Study (2012) is not suitable for intensive agriculture. It continues that if the site were to be brought back into agricultural use, the quality of the land would be downgraded to Grade 4 or 5.

Figure 4.3 of the Publication draft indicates that the Sefton East Parishes area will provide 2,685 homes over the plan period, which represents 22.8% of the total housing proposed in Sefton. This is the second highest proportion, following Southport. However, as detailed earlier, the inclusion of Aintree and Maghull within the same sub-area (Sefton East Parishes) is not considered appropriate, due to the different characteristics and functions of the settlements. CP&S Ltd believe that the creation of this sub-area, combined with the need for establishing a 'good distribution' of sites across Sefton, has prevented the allocation of required housing sites in Aintree. Due to the significant amount of housing proposed in Maghull, the distribution in the Sefton East Parishes area looks significant (forming almost a quarter of total supply). However, Aintree only contributes 25 of the 2,661 new homes proposed through allocations in the Sefton East Parishes area, over the plan period. This equates to just 0.9% of housing provision in the Sefton East Parishes. Therefore, the spatial strategy does not demonstrate a good distribution of development.

Summary of Suggested Changes

The release of the site at Oriel Drive from the Green Belt for the development of approximately 350 dwellings would assist in addressing the imbalance of housing provision in the Sefton East Parishes area and would contribute towards meeting the housing needs of Aintree over the plan period.

Evidence Submitted

Development Statement summarising the findings of the technical studies conducted in relation to Oriel Drive. The technical studies are available on request.

Chapter 5	Plan Order Chapter 5	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 723	Response Ref 14	Representor Name Laurence Rankin
Organisation Name Sefton Green Party		
Obj/Sup/Com Comment		

Summary of Main Issues

Sustainable Development: Regrettably the NPPF is somewhat casual in its use of Sustainable Development and Sustainable "Growth" whatever that might mean. Sefton need to ensure that they apply the valid test for SD i.e. that of development which does not compromise the future.

Summary of Suggested Changes

Evidence Submitted

Chapter	5	Plan Order	Policy SD1	Other Documents
Policy	SD1	Presumption in favour of sustainable development		
Respondent No	417	Response Ref	1	Representor Name Lerato Marema
Organisation Name	Sainsbury's Supermarkets			
Obj/Sup/Com	Support			

Summary of Main Issues

Policy SD1 (Presumption in Favour of Sustainable Development) Sainsbury's support this policy and the inclusion of NPPF guidelines regarding the presumption in favour of sustainable development.

Summary of Suggested Changes

Evidence Submitted

Chapter	5	Plan Order	Policy SD1	Other Documents
Policy	SD1	Presumption in favour of sustainable development		
Respondent No	655	Response Ref	1	Representor Name
Organisation Name	Nuffield College			
Obj/Sup/Com	Support			

Summary of Main Issues

This policy reflects the aims and objectives of NPPF and is supported.

Summary of Suggested Changes

Evidence Submitted

Chapter	5	Plan Order	Policy SD1	Other Documents
Policy	SD1	Presumption in favour of sustainable development		
Respondent No	712	Response Ref	6	Representor Name Andrew Pepper
Organisation Name	Persimmon Homes			
Obj/Sup/Com	Support			

Summary of Main Issues

We support Policy SD1.

Summary of Suggested Changes

Evidence Submitted

Chapter	5	Plan Order	Policy SD1	Other Documents
Policy	SD1	Presumption in favour of sustainable development		
Respondent No	715	Response Ref	4	Representor Name
Organisation Name	Countryside Properties (UK) Ltd and Persimmon Homes Lancashire			
Obj/Sup/Com	Support			

Summary of Main Issues

Support this Policy, as it is consistent with National Planning Policy Framework (NPPF).

Summary of Suggested Changes

Evidence Submitted

REPRESENTATIONS SUBMITTED [on behalf of the Land East of Maghull Consortia] TO THE SEFTON CORE STRATEGY OPTIONS PAPER AND EVIDENCE BASE (JULY 2011).

Representations to the Local Plan Preferred Option (July 2013) on behalf of Countryside Properties (UK) Ltd; Persimmon Homes and P Wilson & Company LLP [September 2013]

Chapter	5	Plan Order	Policy SD1	Other Documents	
Policy	SD1	Presumption in favour of sustainable development			
Respondent No	716	Response Ref	8	Representor Name	Robert Swift
Organisation Name	Robert Swift and family				
Obj/Sup/Com	Support				

Summary of Main Issues

Support this Policy, as it is consistent with National Planning Policy Framework (National Planning Policy Framework).

Summary of Suggested Changes

Evidence Submitted

Chapter	5	Plan Order	Policy SD1	Other Documents
Policy	SD1	Presumption in favour of sustainable development		
Respondent No	717	Response Ref	2	Representor Name
Organisation Name	TR Silcock Ltd, DWH & Barratt Homes			
Obj/Sup/Com	Comment			

Summary of Main Issues

Whilst TR Silcock Ltd, David Wilson Homes and Barratt Homes welcome the emphasis placed upon the presumption in favour of sustainable development in policy SD1, they request that the wording of Policy SD1 be amended to reflect the clarity provided within paragraph 14 of the Framework, that development which is sustainable can be approved without delay.

Summary of Suggested Changes

The wording of Policy SD1 should be amended to reflect the clarity provided within paragraph 14 of the National Planning Policy Framework, that development which is sustainable can be approved without delay.

Evidence Submitted

Chapter 5	Plan Order Policy SD1	Other Documents
Policy SD1	Presumption in favour of sustainable development	
Respondent No 726	Response Ref 1	Representor Name
Organisation Name	Royal London Mutual Insurance Society Ltd	
Obj/Sup/Com	Support	

Summary of Main Issues

Draft Policy SD1 reiterates the 'presumption in favour of sustainable development' as set out within the National Planning Policy Framework ("the Framework"). It confirms that planning applications which accord with policies in the Local Plan (and, where relevant, policies in Neighbourhood Plans) will be approved, unless material considerations indicate otherwise. Where there are no relevant policies or relevant policies are out-of-date, the Council will grant permission unless material considerations indicate otherwise; taking into account whether any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits (when assessed against the Framework taken as a whole), or specific policies in the Framework indicate that development should be restricted.

The supporting text confirms that the Council "will take a positive approach" when considering development proposals and "will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible" (Paragraph 5.4).

This approach, and the inclusion of the Framework's presumption in favour of sustainable development within the Development Plan, is strongly supported.

Summary of Suggested Changes

Evidence Submitted

Chapter 5	Plan Order Policy SD1	Other Documents
Policy SD1	Presumption in favour of sustainable development	
Respondent No 732	Response Ref 3	Representor Name
Organisation Name	Bellway Homes Ltd	
Obj/Sup/Com	Support	

Summary of Main Issues

Bellway is supportive of this policy as it is consistent with paragraph 14 of the National Planning Policy Framework.

Summary of Suggested Changes

Evidence Submitted

Chapter 5	Plan Order Policy SD2	Other Documents
Policy SD2	Principles of sustainable development	
Respondent No 361	Response Ref 2	Representor Name A D Fraser
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Broadly speaking I am in favour of promoting sustainable development. However, this plan promotes development and not sustainable development. It is therefore not consistent with national policy. The plan fails to deliver sustainable development in the following Key Areas; It fails to ensure the Vitality of Town Centres. It fails to Protect the Green Belt Land. It fails to Build a Strong competitive Economy. It fails to Deliver a wide range of quality homes. It fails to Meet the Challenge of climate change, flooding ,etc. It fails to Promote Healthy communities. It fails to support a prosperous rural Economy. It fails to Promote sustainable transport

Summary of Suggested Changes

The plan should be found unsound.

Evidence Submitted

Chapter 5 **Plan Order** Policy SD2 **Other Documents**
Policy SD2 **Principles of sustainable development**
Respondent No 417 **Response Ref** 2 **Representor Name** Lerato Marema
Organisation Name Sainsbury's Supermarkets
Obj/Sup/Com Support

Summary of Main Issues

Support the main aims of the policy in ensuring the vitality and viability of Sefton's retail centres.

Summary of Suggested Changes

Evidence Submitted

Chapter 5 **Plan Order** Policy SD2 **Other Documents**
Policy SD2 **Principles of sustainable development**
Respondent No 648 **Response Ref** 3 **Representor Name** Emily Hrycan
Organisation Name English Heritage
Obj/Sup/Com Objection

Summary of Main Issues

The NPPF requires that Plan Policies contain a positive strategy for the conservation and enhancement of the historic environment. In particular it should contain strategic policies for the conservation and enhancement of the historic environment. Although we welcome the sustainable development principle for heritage assets, it needs to recognise that assets can be affected by development within their setting. The Plan needs to be amended to include this.

Summary of Suggested Changes

The Plan should be amended to read:

"To protect and enhance Sefton's natural and heritage assets and their settings".

Evidence Submitted

Chapter 5 **Plan Order** Policy SD2 **Other Documents**
Policy SD2 **Principles of sustainable development**
Respondent No 663 **Response Ref** 12 **Representor Name** Alan Hubbard
Organisation Name National Trust
Obj/Sup/Com Objection

Summary of Main Issues

As it is largely based around the proposed Objectives this Policy is susceptible to the same issues raised in relation to the objectives. In that context attention is drawn to the objection to Objective 6 and its undue emphasis on the Port whilst failing to recognise the need to appreciate, safeguard and enhance the landscape qualities of Sefton's coast (and beyond) and the range of functions that it undertakes for Sefton people.

Summary of Suggested Changes

Replace the sixth bullet point with:

"To promote the distinctive character of Sefton's landscapes, and in particular the unique coastal landscape; recognising the multifarious roles that the coast plays and ensuring that whether it is in addressing coastal processes, providing for recreation, or contributing to the local economy and jobs through the Port, that its distinctive qualities are respected and reinforced."

Evidence Submitted

Chapter 5 **Plan Order** Policy SD2 **Other Documents**
Policy SD2 **Principles of sustainable development**
Respondent No 712 **Response Ref** 7 **Representor Name** Andrew Pepper
Organisation Name Persimmon Homes
Obj/Sup/Com Objection

Summary of Main Issues

Persimmon considers that this policy duplicates the objectives set out in chapter 3 of the plan. The principles go above and beyond 'sustainable development' principles set out in the National Planning Policy Framework and are very prescriptive.

Summary of Suggested Changes

Persimmon considers that policy SD2 should be deleted as it is not consistent with national policy and is not sound.

Evidence Submitted

Chapter 5 **Plan Order** Policy SD2 **Other Documents**
Policy SD2 **Principles of sustainable development**
Respondent No 715 **Response Ref** 5 **Representor Name**
Organisation Name Countryside Properties (UK) Ltd and Persimmon Homes Lancashire
Obj/Sup/Com Objection

Summary of Main Issues

This policy duplicates the objectives set out earlier in the plan and considers that these principles do not provide anything additional over and above what is set out there. In addition, the principles go above and beyond 'sustainable development' principles and in this way, they are very prescriptive. As there is no basis for it in national planning policy and it only serves to increase the size of the Local Plan, consider that policy SD2 should be deleted as it is not consistent with national policy and in this regard, is not sound.

Summary of Suggested Changes

As there is no basis for it in national planning policy and it only serves to increase the size of the Local Plan, consider that policy SD2 should be deleted as it is not consistent with national policy and in this regard, is not sound.

Evidence Submitted

REPRESENTATIONS SUBMITTED [on behalf of the Land East of Maghull Consortia] TO THE SEFTON CORE STRATEGY OPTIONS PAPER AND EVIDENCE BASE (JULY 2011).
Representations to the Local Plan Preferred Option (July 2013) on behalf of Countryside Properties (UK) Ltd; Persimmon Homes and P Wilson & Company LLP [September 2013]

Chapter 5 **Plan Order** Policy SD2 **Other Documents**
Policy SD2 **Principles of sustainable development**
Respondent No 716 **Response Ref** 9 **Representor Name** Robert Swift
Organisation Name Robert Swift and family
Obj/Sup/Com Objection

Summary of Main Issues

This policy duplicates the objectives set out earlier in the plan and considers that these principles do not provide anything additional over and above what is set out there. In addition, the principles go above and beyond 'sustainable development' principles and in this way, they are very prescriptive.

Summary of Suggested Changes

Policy should be deleted as it is not consistent with national policy and in this regard, is not sound.

Evidence Submitted

Chapter 5 **Plan Order** Policy SD2 **Other Documents**
Policy SD2 **Principles of sustainable development**
Respondent No 717 **Response Ref** 3 **Representor Name**
Organisation Name TR Silcock Ltd, DWH & Barratt Homes
Obj/Sup/Com Support

Summary of Main Issues

TR Silcock Ltd, David Wilson Homes and Barratt Homes support the principles identified in policy SD2 and consider that these reflect the overall vision and the objectives identified for Sefton.

Summary of Suggested Changes

None required.

Evidence Submitted

Chapter 5 **Plan Order** Policy SD2 **Other Documents**
Policy SD2 **Principles of sustainable development**
Respondent No 722 **Response Ref** 2 **Representor Name** Jenny Hope
Organisation Name United Utilities Ltd
Obj/Sup/Com Objection

Summary of Main Issues

United Utilities supports the inclusion of Policy SD2, which seeks to apply the principles of sustainable development. However we would suggest the inclusion of the following bullet point to the body of the policy, as a principle that the Local Plan will apply:

“To ensure that all new development addresses flood risk mitigation and explores all methods for mitigating surface water run-off. Wherever possible, developers should include an element of betterment within their proposals to reduce further the risk of flooding in the area.”

New development should manage surface water run-off in a sustainable and appropriate way. Developers should look at ways to incorporate an element of betterment within their proposals. This approach is in accordance with paragraph 103 of the NPPF.

Summary of Suggested Changes

Evidence Submitted

Chapter 5 **Plan Order** Policy SD2 **Other Documents**
Policy SD2 **Principles of sustainable development**
Respondent No 732 **Response Ref** 2 **Representor Name**
Organisation Name Bellway Homes Ltd
Obj/Sup/Com Support

Summary of Main Issues

Bellway are supportive of the objectives 2,3,4,7 and 8 of the Local Plan which also reflect the principles contained within Local Plan Policy SD2.

Summary of Suggested Changes

Evidence Submitted

Chapter 5	Plan Order Policy SD2	Other Documents
Policy SD2	Principles of sustainable development	
Respondent No 738	Response Ref 3	Representor Name Charles Smith
Organisation Name CP&S Ltd		
Obj/Sup/Com Objection		

Summary of Main Issues

CP&S Ltd support Policy SD2, Principles of sustainable development, of the Publication draft Local Plan. In order to adhere to these principles, the Council has established Policy MN1, Housing and employment requirement, following the completion of several studies relating to housing requirements. Although we agree with the above principles, it is not felt that the resulting proposed policy is effective, or positively prepared, and therefore is not sound.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Chapter 6	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 160	Response Ref 1	Representor Name Lee Hammond
Organisation Name		
Obj/Sup/Com Objection		

Summary of Main Issues

I vehemently oppose the building of new housing and developments on Green Belt land. There is sufficient eye-sore 'brown belt' land within the Sefton Borough boundaries, that will not only assist in meeting the 'quota;' that SBC need to reach for 'new housing', but it will also help regenerate these areas and make the areas more attractive. There is solace to be found in the peaceful surroundings of the countryside. But there's no respite if that countryside is out of reach! Once green belt land is built upon it is effectively lost forever!

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Chapter 6	Other Documents Infrastructure Delivery Plan
Policy N/A	Rep does not relate to a policy	
Respondent No 359	Response Ref 1	Representor Name Catherine Fraser
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I object to the local plan in its present format for a number of reasons. Firstly I do not believe the plan is sound because the council will not be able to deliver the necessary infra-structure in terms of both general provision and specific site mitigation. The council's own infrastructure working group produced a report (Dec 2014). I quote "An area of concern is the degree and extent of the implementation of enforcement measures, for example, how Sefton will meet the Local Plan objective 'To make sure that new developments include the essential infrastructure, services and facilities that they require'. There are concerns related to risks associated with infrastructure providers and whether they will be able to deliver the necessary infrastructure in a timely manner at the right place. Does this fact bring into question whether the policy relating to Infrastructure and Developer Contributions is adequate enough to provide the assurances and guarantees that would alleviate the concerns regarding adequate infrastructure and mitigation? Appropriate policies may exist in the Plan, but without the ability to provide assurances/guarantees that these things will be addressed, infrastructure needs may be unmet and mitigation inadequate. Is merely having a policy enough, without any way of ensuring that it has the desired impact? Are planning conditions robust enough to ensure compliance?"

The infrastructure working group also highlights the need for significantly greater enforcement powers to prevent the local plan from collapsing. I do not believe the council has the resources to adequately monitor over 40 developments some quite complex occurring in a short space of time. A recent development in Formby has resulted in considerable damage to the main sewer and a lot of inconvenience and environmental damage. The council has failed to enforce the good neighbour policy agreed with the developer.

Thirdly I am not reassured about the capacity of the NHS to deliver the necessary GP's and community care. At the time of writing the local hospital trust has become insolvent (see The Formby Champion 6/2/15). There is already a problem in many areas of Sefton in terms of GP appointments. Developers such as Bellway Homes are seeking to attract elderly homebuyers (see their advertising site) surely this could make matters worse. It seems obvious to me that development on the scale envisaged by the local plan could force the local NHS services into meltdown. The council says that they consulted the Hospital Trust well the Trust have hopelessly underestimated the current demand for their services let alone any future expansion.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Chapter 6	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 553	Response Ref 17	Representor Name Alex Naughton
Organisation Name	Merseytravel	
Obj/Sup/Com	Comment	

Summary of Main Issues

There is clear evidence that the Functional Economic Area comprises the six Liverpool City Region authorities (Wirral, Sefton, Liverpool, Knowsley, St Helens and Halton) and West Lancashire. However in transport terms there is a wider Travel to Work Area that extends beyond the six LCR authorities to include neighbouring areas such as West Lancashire, Wigan, Warrington, West Cheshire and parts of North Wales.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 52	Response Ref 13	Representor Name Ian Cowell
Organisation Name Ince Blundell Parish Council		
Obj/Sup/Com Objection		

Summary of Main Issues

According to Government statistics, the UK population is projected to grow from approximately 65 million today to about 75 million in 20 years' time. In England alone the number of households is projected to grow to 27.5 million in 2033, an increase of 5.8million (27%) over 2008 or 232,000 household per year. In 1981 the average household consisted of 2.9 persons and today is now 2.4. persons.

However these national figures do not appear to be reflected in Sefton. According to the Local Plan (para 2.3) the population of Sefton has declined slowly from a peak of 300,100 in 1981. It is currently 273,700 and for the first time in 30 years has stabilised and this trend is expected to reverse. The population is now expected to rise to about 280,000 by 2037. Indeed the government's latest population projections suggest limited growth for Sefton between 2012 when it will be 273,697 and 2031 when it will rise to 278,873; an overall population increase of approximately only 5,200.

Over a similar period (2012 -2030) paras 6.13 and 6.14 indicate a housing need of 615 dwellings a year resulting in 11,070 being built i.e. (615 x 18). So for an overall population increase of 5,200, or just under 2% over the plan period (people from elsewhere moving into the Borough para 4.15) Sefton will need 11,070 houses or approximately 2 dwellings per person.

In the view of Ince Blundell Parish Council if these figures and projections are anywhere near correct then it is illogical to contemplate building at a rate of 615 houses a year and the figure should be much lower. Now Sefton will contend that since 1980 the average household has dropped from 2.9/household to 2.4/household today. Moreover, that since 1980 Sefton has had a build rate of 470 houses/year.

Furthermore, there is a need for catch-up and a need to build in a figure for economic growth though how this can be so with an ageing population is perplexing. Indeed, according to paragraph 3.3.The greatest projected growth will be in the over 65's age group, by about 22,200 or 37.6% , while the over 85 age group is projected to increase by around 6,900 of 87% by 2031. None of this gets over the logic of building more houses than needed by the modest population projections and it is the firm view of the Parish Council that the figure of 615 houses a year is excessive.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 55	Response Ref 1	Representor Name Fergus Molloy
Organisation Name		
Obj/Sup/Com Objection		

Summary of Main Issues

The Local Plan is not justified because the population growth estimates provide by NLP, and the figures quoted in paragraph 3.3, are in direct contradiction to what has actually happened, namely that Sefton's population fell by 3.2% between 2001 and 2011. Projections are therefore no more than speculation and should be accorded no weight. In light of falling population, the need for additional land to be dedicated to housing, if there is any need at all, is far less than the plan assumes.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents**
Policy MN1 **Housing and employment requirement**
Respondent No 57 **Response Ref** 3 **Representor Name** Joyce Scott
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I have concerns over the amount of houses planned. The increase in population using our roads would bring chaos, with too many cars at rush hour trying to travel to work and school. The roads are too busy now. I understand the Council has a responsibility to plan for the future but the amount of homes proposed appears out of proportion to the wants our our local community. I have spoken to many friends and neighbours and I cannot find any who want this huge development to go ahead. I think the town [Maghull] would be too big. I welcome an Independent Planning Inspector examining these plans and rely on the Inspector to consider the wishes of the local residents. I'm not against some new homes but I'm worried about what seems an excessive amount.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents**
Policy MN1 **Housing and employment requirement**
Respondent No 108 **Response Ref** 1 **Representor Name**
Organisation Name The Cowell Family
Obj/Sup/Com Objection

Summary of Main Issues

It is accepted that if the Council is to meet the development needs of the Borough to 2030, there will be a need to release Green Belt land. However, the release of Green Belt land should, as advised by the NPPF, not be taken lightly. There are further opportunities to utilise non Green Belt land for development within settlements identified as being suitable for growth. Paragraphs 6.7 and 6.8 must make it clear that all opportunities to maximise the use of non Green Belt land have been made and that Green Belt release required to meet identified housing and employment needs, is the most appropriate location.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents** NLP Housing Needs Assessment
Policy MN1 **Housing and employment requirement**
Respondent No 131 **Response Ref** 1 **Representor Name** William Honeyman
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

The housing requirements for Sefton are now incorrect.

Summary of Suggested Changes

Review housing requirements.

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents** NLP Housing Needs Assessment
Policy MN1 **Housing and employment requirement**
Respondent No 140 **Response Ref** 1 **Representor Name** Ian Harvey
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

The statistics Sefton council are using to justify the plan are flawed: The plan is based on estimated figures that bear no relation to the real world. I am a mortgage surveyor working in the sefton area, and the number of houses for sale, the price structure of the houses and time it takes to sell indicate that the housing demand in the area, at the current pricing, is satisfied. There is no evidence to suggest that this will increase to such an extent that over 2,000 additional properties will be needed in Maghull in the next 15 years.

Summary of Suggested Changes

Character and appeal of the towns and villages surrounded by green belt are protected. They should be proposing less houses, based on current figures, not estimates provided by a government department that are based on national requirements, not local needs. They should provide a draft plan that takes into account the views of the local people in the towns and villages that could be affected.

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents**
Policy MN1 **Housing and employment requirement**
Respondent No 241 **Response Ref** 13 **Representor Name** Claire Jenkins
Organisation Name Formby Parish Council
Obj/Sup/Com Objection

Summary of Main Issues

The Local Authority believes it needs extra development to cope with demand despite the population of Sefton projected to be lower than it was ten years ago. We do understand the changes taking place in our community and we believe that the figure of 470 dwellings per year (the level of building in the last 30 years) can be provided elsewhere in the Borough [than Formby] , away from the green spaces of the Borough, where areas can be revitalised.

Summary of Suggested Changes

Evidence Submitted

Policy MN1

Housing and employment requirement

Respondent No 361

Response Ref 7

Representor Name A D Fraser

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

In order to promote sustainable development the Local Plan must help create a strong competitive economy. The Gross Value Added (GVA) figures for Sefton are truly shocking. The main drivers of economic growth are (1) population (2) technical progress which in turn effect labour productivity and ultimately GVA. Here are the figures for the LCR The relatively low figures for Sefton can be accounted for by the fact that output generated by commuters is included within the Liverpool data. Nevertheless if we look data showing changes we see a picture of relative decline. Latest data suggests no change in relative performance.

The relative decline in GVA is driven by two factors (1) An Ageing population (2) Industrial Structure

Industrial Structure:

Sefton has a predominantly service sector economy, with 89% of employment in producer and consumer services, and 6% in manufacturing. Banking, finance and insurance, distribution, hotels and restaurants account for the largest number of business units in Sefton, whilst public administration, education and health sector hold the greatest share of employment. Some 39% of employment is within the public sector, which compares with just 27% for the UK. 5.7.3 Sefton has a relatively high share of jobs in lower productivity (and therefore lower paid) sectors such as public administration, defence, health, distribution, hotels and restaurants: and the productivity of workers in each of these sectors is also slightly below their national counterparts¹¹.

A key factor in raising GVA is the Development of the Knowledge Economy. The Local Plan is a missed opportunity. The development of Strategic Employment Locations Policy MN2 could have been part of an overall strategy to encourage the Knowledge economy coupled with a New Vision for Sefton. Instead because of viability constraints the likelihood is that we will see more poorly paid retail and service industry jobs. Low wages lead to poor life chances and lower well being.

Low wages make it difficult for people to save, get a mortgage and buy a house even with shared ownership. The housing affordability gap" will never be closed no matter how many houses are built on the greenbelt. Since these houses will always be out the price range of people in low paid jobs. The Local Plan does not address this problem. Bank lending criteria for mortgages is becoming far more stringent this is bound to effect demand for housing.

Summary of Suggested Changes**Evidence Submitted**

Policy MN1

Housing and employment requirement

Respondent No 361

Response Ref 5

Representor Name A D Fraser

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

Sefton argue that they need to build: 500 dwellings per annum between 2012-2017 and 660 dwellings per annum between 2017 and 2030. Furthermore, they argue that these houses have to be built on Greenbelt. In order to justify this they have used the Nathaniel & Lichfield Partners Headroom model and then finessed the required outputs by making certain assumptions about factors such as

- A Strategic Housing Market Assessment
- Housing Need
- A notional Requirement for Economic Growth
- A so called "shortfall" in house construction

The NLP model was chosen by Sefton largely because they consider it an effective way to get their Local Plan past the Inspector (see HEaDROOM Update Report Review of the Objectively Assessed Need for Housing in Sefton Sefton Metropolitan Borough Council p. 2). Sefton argue that this approach is transparent. The plan should "the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements" However we cannot assess the objectivity of the NLP model

because Sefton won't or cannot give us the spreadsheet to analyse the model. The NLP model may generate demographic outputs which are sound but it must be borne in mind that population trends are stochastic by nature and there will always be error terms in such projections (i.e variances between trend lines and actual data. If NLP then generate trend lines based on this data they will effectively be regressing error terms on error terms (error terms should be random and normally distributed around a mean of Zero) otherwise you cannot carry out a proper statistical probability testing which is important for any assessment of a model. This is particularly salient in the case of the latest 2014 data curve where the variables in the model have been suppressed to make the data fit current (and perhaps temporary trends lasting less than time line for the long run projection (source. Testing methodological changes to the household projections model Research report CLG 2014). Changes to cohort weightings seemed to have produced significant changes to the long run trend which line has been altered to fit the data which must raise questions about using it to predict future events.

Once you drill into the methodology used by the CLG statisticians the whole process is less "cut and dried" than at first it appears. Any model is only as good as its inputs but the model must be available to be objectively tested we need NLP's spreadsheet to test it.

In terms of the national picture Sefton with Average increase 399 had the 14th lowest growth in households in the country. Liverpool was the 6th lowest at 321 whilst the Wirral was the 9th lowest with 318 (Household Interim Projections, 2011 to 2021, England p.7).

According to these figures Average Change is 0.53 according to the 2011 - 21 projection to 0.53 still low by national standards and low by national standards an lower than for the LCG as a whole (3.06) . On this projection Sefton need to build 530 houses per annum not 660 houses as suggested by Sefton.

In the case of Sefton population change has a particular relevance to the Housing market. The projected change in the population is the main driver of the increase in households, accounting for 98 per cent of the total increase in England between 2011 and 2021. The extent to which population growth translates into increases in households depends on the age structure, sex and marital status composition of the population. (Household Interim Projections, 2011 to 2021, England p.12). This is a point also made by NLP in their report. The consultants used by Sefton NPL were also working for David Wilson Homes one of the developers with an interest in building on the greenbelt. The NPPF requires evidence to be objective. This clearly brings the integrity of the plan making process into question.

The above chart shows how projections forecast in 2010 differ from those in 2011. 2010 population projections estimated that Sefton's resident population would increase (to the nearest 1,000) from 275,000 in 2011 to 280,000 in 2021 (1.9%). While 2011 projections show a rise from 274,000 to 277,000 (1%). This is as a result of actual births, deaths and migration during the periods used as a basis for projections. (Sefton's Population — Business Intelligence and Performance Team, Sefton Council) Sefton's population has fallen by 3.2% in the last ten years, according to figures published by the Office for National Statistics. The 2011 Census results show that Sefton is one of just 17 local authorities across the country to see its population fall. Sefton's population analysis makes the following conclusions:

- Despite a reduction in population overall Sefton population projected to rise by 1% between 2011 and 2021 (274,000 to 276,800)
- Predominantly this is due to a 16% rise in residents aged 65 and over (57,400 to 66,500)

- Over the same 10 year period the working age population (18-64 year olds) is projected to fall by 4% from 162,400 to 155,700
 - Projections for younger people also show increases with the number of under 18's set to increase slightly from 54,200 to 54,600
 - This is largely as a result of an 8% increase (31,300 to 33,700) in residents aged 10 and under
- Increases in Sefton's population are largely as a result of internal migration from other areas of England with an estimated 77,600 people migrating in compared to 74,000 migrating out to other areas of England.

This population data taken together suggests that there is no compelling evidence to justify the scale of house building on Sefton's greenbelt proposed by the Local Plan. The population data does suggest Sefton should make sure each development includes a sufficient amount of housing to meet the needs of the elderly in Formby and elsewhere as opposed to large expensive family houses.

The Housing Market:

The NLP model takes the current state of the housing market into consideration. I find its conclusions difficult to reconcile with experiences on the ground. The Practice Guidance defines an HMA as the geographic area at which around 70% of local moves are self-contained. I agree with the statement "Housing Market Assessment, the Borough has a self-containment rate of above 70% and can be considered a single HMA for the purposes of this study. It is, however, recognised that there remain strong linkages between Southport to the north of the Borough and West Lancashire District to the east, as well as strong commuting linkages with Liverpool City generally" (NLP Headroom update report p6.).

The Practice Guidance identifies that longer term changes in house prices may suggest an imbalance between the demand for and supply of housing. In general by looking at median prices within the HMA to assess the relative level of market shortfall NLP says that Sefton needs to add an extra 10% (52 dpa). This it argues is evidence of a major evidence of a past shortfall. I see no real evidence of this both in terms of practical experience and in terms of hard data.

Consider the table below:-

Savills UK produces the most influential data on the UK property market both residential and commercial. Property values in W. Lancs appear to be stagnating. Sefton is not much out of step with the rest of the LCR. Knowsley and St. Helens have relatively smaller populations and therefore less significant in terms of housing demand. Sefton has 6000 empty properties. A new development in Formby, the Hamptons has never been finished due to lack of demand.

Once again there is no compelling argument of a major imbalance in Supply and Demand between Sefton and its neighbouring areas.

Housing need The main problem is affordability but this is largely a problem associated with low productivity leading to low wages. There are no sign of a major increase in wages particularly in the LCR. Interest rate and growth trends suggest relatively anaemic economic growth. This will be further exacerbated by economic policy after the general election as both major parties are wedded to a policy of austerity which will particularly affect Sefton because of the regions relatively high dependence on government expenditure. Hence NLP's assumptions about economic growth could well prove to be illusory. There might be large numbers of people on the housing waiting list or forced to rent. Indeed many houses are now rented in Formby at all levels of the price range but the only demand that counts in a market system is "effective demand" and since social housing is off the agenda building so called "affordable housing" will make very little difference here because average wages are too low.

"Affordable" houses in Formby will be double the price for the same type of property in Bootle and therefore they are not going to be affordable to people on low wages in Formby. The problem of housing need has not been helped by Sefton's policy of demolishing houses in Bootle. Many people displaced cannot afford the new houses that have been built to replace them. The south end of Sefton has large areas of empty brown field sites but Sefton has taken the conscious decision to build so called "affordable housing" on greenbelt land instead. This approach is completely at odds with the concept of sustainable development and will not meet the needs of those who need affordable housing.

In the south of England the housing market is characterised by a major supply side problem whereas in Sefton we have a predominantly demand side problem³ intensified by Sefton's reckless house demolition program. I suggest the inspector speaks to the former secretary of state Nick Boles who witnessed this at first hand on his visit to Sefton in February 2014. I suggest like Nick Boles the inspector does a tour of the area to see for himself the sheer scale of the amount of derelict land. Sefton's strategy of building on the greenbelt is a supply side solution which will not solve the problem of housing need. Indeed the Local Plan's is extremely weak in terms of sound economic analysis.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents**

Policy MN1 **Housing and employment requirement**

Respondent No 363 **Response Ref** 2 **Representor Name** John Lemon

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

A housing studies document published by the Council in early 2014 concluded that Sefton was still housing its population although the rate of loss was reducing. Another report stated that there were approx. 5,822 empty homes in the borough (the second highest on Merseyside by 0.01%) and that despite house building, the percentage of empty houses over the last ten years from 4.6% to 4.44%, yet Sefton is pursuing a bizarre policy in building on Green Belt land to meet a projected housing shortfall. It would thus appear that the "increase" in population would depend on a large increase in migration from well outside the area.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents** SHLAA

Policy MN1 **Housing and employment requirement**

Respondent No 366 **Response Ref** 4 **Representor Name** Margaret Anne Hill

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

There are sufficient brownfield sites and empty properties in Sefton to accommodate a sensible and achievable rate of building to increase housing. The empty properties and brownfield sites exist to create/build 6,000 affordable homes where there is already appropriate infrastructure in place. It is essential that all brownfield sites and empty properties are brought into full use first before there is any irreversible damage done to Sefton and Maghull in particular, by building on greenbelt and/or agricultural land. In this respect the plan is not justified

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents** NLP Housing Needs Assessment

Policy MN1 **Housing and employment requirement**

Respondent No 366 **Response Ref** 3 **Representor Name** Margaret Anne Hill

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

The target number of houses chosen by Sefton Council is unrealistic. The target number of houses of 11,000 chosen by Sefton Council appears to be the maximum of the forecast range of figures. It is only this senseless and unrealistic choice of maximum target housing number which requires the intrusion into greenbelt and agricultural land. No-one pretends that it is possible to forecast accurately the housing needed in 2030, so why choose now a number which will cause the maximum damage to Sefton and to Maghull in particular. The plan will change many times over that period, so why go for the big bang approach from day 1 and allow irreversible damage to Maghull to start now when it may not be necessary at all.

The whole Local Plan is based upon this unrealistic choice of target house numbers. The major damage resulting from this choice will occur in Maghull. The plan should choose a target house build number at the lower end of the forecast range, say around 6,000 in the first instance. In this respect, the plan has not been positively prepared it is based on an unrealistic assumption of inward migration and employment growth.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents**
Policy MN1 **Housing and employment requirement**
Respondent No 376 **Response Ref** **Representor Name** Michael Gradwell
Organisation Name Network Rail
Obj/Sup/Com Comment

Summary of Main Issues

Network Rail have concerns over whether the Local Plan accurately reflects the most recent update of analysis of housing needs within Sefton Borough, the Review of the Objectively Assessed Need for Housing in Sefton (December 2014). This document identifies a requirement for between 600 and 800 dwellings per annum. The Local Plan aims for the provision of an average of 615 dwellings per annum, which is consistent with the findings of the 2014 review.

However, the independent report (para 1.30) raises the question of consistency with the Council's economic objectives and affordable housing needs. Recent Local Plan examinations, including the Cheshire East Local Plan, have highlighted the importance of both of these considerations. It is therefore Network Rail's case that the average annual housing requirement of 615 should be adequately justified in the context of emerging case law and Inspector decision.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents** NLP Housing Needs Assessment
Policy MN1 **Housing and employment requirement**
Respondent No 380 **Response Ref** 2 **Representor Name** Ian Gent
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I must question the validity of the Council's housing needs projection which suggests that some 11,070 homes are required. Given the number of empty houses across the Borough (as of September 2014 this stood at c5,800) I do not agree that there are 'special circumstances' at play to justify the use of greenbelt for development purposes. I'm also concerned whether developers will actually provide the affordable / sustainable housing which the Local Plan suggests would be required.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents** NLP Housing Needs Assessment
Policy MN1 **Housing and employment requirement**
Respondent No 383 **Response Ref** 1 **Representor Name** Malcolm Gore
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Sefton Council plan to build 11,070 houses up to 2030. Using the D.C.L.G. figures of 2.3 P.H – this is enough for a 25,461 increase in population, even at two people per household it's enough for an increase of 22,000. Sefton is one of the few boroughs with a declining population and according to the O.N.S. the projected population increase to 2030 is 5,000. I realise there are various other considerations to factor in the equation but a 500% increase due to "other items" is hard to understand. There should be "checks and balances" used in these preparations, which are missing. The fact that Nathaniel Lichfield and Partners acted both for the council and the developers here is questionable.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents** NLP Housing Needs Assessment
Policy MN1 **Housing and employment requirement**
Respondent No 384 **Response Ref** 2 **Representor Name** Stephen and Clare Jones
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

We don't need many more new houses, official population figures have shown that population in Sefton is on the decline, so how can you warrant so many new homes.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents**
Policy MN1 **Housing and employment requirement**
Respondent No 405 **Response Ref** 1 **Representor Name** Michael Perkins
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

The people of Sefton need to know how and with what justification, the reasoning and calculations made by the UK Government and given to Sefton to determine the amount of housing needs over the next 15 years has been arrived at – instead of just accepting these targets without any proper interpretation. I am told that some of these housing target figures have now been disputed.

If the population is increasing nationally, but decreasing locally, why can't the construction figures be adjusted to allow a reduction in the Sefton area? Why can't the population decline naturally?

All things considered, Option 1 Urban Containment in the original Sefton Core Plan, coupled with restoration of brown field properties, would be least destructive of the environment and most suitable for the area concerned. A further review could take place around the year 2020.

"Boundary Mentality" as always prevails and worsens the problem – West Lancashire proposes to build properties close to the Sefton boundary, putting pressure on our known schools and other resources. There is a strong case for North Sefton and West Lancashire to be merged into a more viable single authority, which follows more natural travel and population patterns. This could increase green belt availability and should lead to improved public transport services. The housing requirements could then be re-examined.

The reasons given don't give any reasonable case for defiling Southport and Ainsdale's sparse and often beautiful green belt areas. It would surely help the jobs situation in this economic climate to consider refurbishment in brown field areas, rather than placing protected land into the hands of eager developers. And could we please have a more detailed interpretation of the government's housing target figures as I believe these are definitely not an accurate prediction of growth needs in our area? Please look after our environment and think again!

Summary of Suggested Changes

Evidence Submitted

Summary of Main Issues

Housing Requirement: The main influence on the future housing requirement is the projected change in population, and as defined in Para 3.23 of the NLP report, their projections were based on the “2012-based SNPP” published by the Office of National Statistics (ONS) in May 2014. Which was defined in Para 3.34 of the NLP report, as being less than indicated by previous projections and stands at 276 persons per year. Which in itself raises questions on the soundness of this Local Plan when SMBC were proposing significantly less houses previously, when the projected population was greater, as neither of these things equate.

Furthermore, given that the average annual increase in population in Sefton is projected to be 276 persons per year, and the indigenous population of Sefton is projected to fall by 5,650 persons during the Plan Period, which is equivalent to an annual average decrease of 314 persons per year. This difference of 590 is merely explained away as Inward Migration, when there is no officially published data that supports this staggering figure which bears no relation to previous trends. This is another example where the soundness of this Local Plan is found wanting. Because it’s impossible to reconcile the falling indigenous population and the reduced estimates for migration that are indicated by the current official data releases, with the increased number of new houses recommended in the latest NLP report and being proposed by SMBC.

This Local Plan is totally unsound when you consider that the average annual increase in population, (276) is significantly less than the recommended annual rate of new house building (615). In very simple terms, and on the basis of these figures alone, there are 2.2 new houses for each and every new individual addition to the population, which is complete and utter nonsense. It is therefore clear that the recommended provision of 615 new homes per year in the Borough cannot be found to be warranted by either Natural Change or Migration and it follows that this Local Plan must be found to be unsound.

By appearing to deviate from the official statistics for the number of households in this way, the official data shows that for every year of the Plan Period, the numbers of households assumed by NLP in their calculations differ from the number of households given in the official data. This variance in the data used leads to a significant increase in the proposed buildrate. Consequently, It is notable that NLP do not justify this assumption with supporting data.

On a number of occasions in their report, NLP suggest that the age cohort between 25 and 44 is one of the most significant in terms of first-time house buyers. The relevant thinking is that as the economy improves and the market becomes more buoyant, this sector of the population will drive the increased demand for new houses. The latest population data however, suggests that in Sefton, this age cohort will actually decline in numbers during the Plan Period (from 28,700 in 2012 to 27,500 in 2030). This data suggests that in Sefton, there may not be significant pressure on the housing market from first time buyers in the 25 to 44 age group.

Given the implications for the projected build-rate for Sefton, together with an apparent lack of evidence for significant suppressed households and little in the population projections to suggest that the 25-44 age cohort in Sefton will drive a resurgent housing market, NLP need to more fully explain the household numbers used in their HEaDROOM assessment. NLP should be asked for further clarification of the correlation between ‘headship’ and the rate of household formation that is suggested in their Para 6.3c, with an explanation of the factors such as suppressed households and first time buyers in the 25-44 age group, and how they influence their numerical assessments.

Some unexplained upward adjustment to the official figures appears to have been made by NLP. By assuming a more rapid market recovery from 2016 onward than is assumed in the official 2011-based statistics, further increases the numbers of new houses. Bizarrely, despite the fact that as stated in Para 3.44 of the NLP report, the 2011-based official projections supersede the 2008-based projections (at least until 2021), NLP have disregarded the official 2011-based household projections beyond 2015 and have based their assessment on the 2008 data from 2016 onwards. This approach significantly raises the projected number of new houses that are required to meet this assumed future demand.

It is inappropriate for NLP to abandon the official data and use the superseded 2008-based data for the period 2016-2021. Furthermore, an accelerated market represents an unrealistic model for the recovery of the housing market in Sefton, particularly when as discussed above, two of the key factors which NLP consider will drive this recovery (overcrowding and population increases in the 25-44 year age group) do not appear to be significant in the borough.

NLP should more fully justify: why the figures for household size used in their ‘baseline’ assessment (Model B) exceed the official data for each of the years modelled, on what basis they consider it appropriate to abandon official post-2015 data in their Model B and use superseded data from the 2008 statistics for the period 2016-2021 to give a significantly inflated number.

Perhaps in an attempt to retain some professional dignity in their RSS review NLP all but inserted a disclaimer by stating that although they acknowledged that there has been a steady and irreversible declining population over the past three decades, what they modelled was something altogether different at the specific instruction of Sefton MBC in their brief, (Clause 3.12). However, they nevertheless confirmed that "Past Trends", (which is the only tangible measure that can be used, as anything else is purely subjective) & the most recent demographic projections published by the ONS. Both came up with annual housing projections significantly less per annum, than those that SMBC are endeavouring to force through in their Local Plan.

The changing population in Sefton during the Plan Period is only 276 persons per year (including migration). Official Government data factors in for issues such as 'headship' to derive a figure in the order of 400 dpa that is required to satisfy the demands of the evolving population of Sefton. Therefore the series of further 'adjustments' that have been made by NLP, are an unnecessary repetition of the same considerations of market-driven 'pressures'. Given the absence of data to support the concept of suppressed households in Sefton, the reducing proportion of 29-44 year olds in the demographic, the lack of negative market factors and the obsolescence of the RSS, there can be no justification for the inflated 615 dpa figure that NLP have recommended to Sefton MBC. On this basis it is difficult to see how a demand for 615 new houses per year can be justified, and therefore the Sefton MBC Local Plan should be considered unsound and thus be rejected.

Summary of the NLP and SHMA Reports

Paragraph 6.19 of the SHMA exemplifies the factors that lead to the conclusion that the housing provision of the Sefton Local Plan is over-inflated. Paragraph 6.19 states: "A number of key themes were evident for all of these scenarios and are central to future housing provision in Sefton:

1. An Ageing Population, with the number of over 85s in particular increasing at a very high rate;
2. The number of residents of working age is forecast to decline sharply over the Plan period;
3. Natural change is a negative demographic driver in the Borough, with deaths increasingly exceeding births over the Plan period; and
4. Although out-migration is likely to continue, overall net migration is positive over the Plan period."

The 'headline' factors of a markedly aging population and falling numbers of working age residents (=house buyers) are not consistent with the assumptions made by NLP and JG Consulting when deriving the projected housing demand for Sefton of 615 dpa. The demand that Sefton's consultants have identified relies on new households entering the market from a background of suppressed households and overcrowding. The only case that has been presented for the existence of the suppressed households is a subjective one which relies almost entirely on the opinion of the consultants involved and is not supported by data.

The data on average household size might be a factor which would suggest a need for increased future housing provision however, it is argued that household size is not the key factor, as it is driven by other elements of the demographic. These other elements (the ageing population, the lack of overcrowding, statistics on childless couples etc) suggest that within the self-contained housing market area of Sefton, there are few drivers toward an increasing housing market of the scale suggested by 615 dpa.

Average household size cannot reduce forever and the possibility needs to be considered that rather than being on an ever-decreasing trajectory, because of the unusual demographic, the population of Sefton is further along a downward asymptotic trajectory than is the case elsewhere. If this is the case, average household size may not reduce as rapidly as assumed by the various assessments that have been undertaken by Sefton's consultants or indeed, in the official data. Nevertheless, on the basis of the data presented by NLP and in the SHMA, except perhaps for affordable housing there appear to be few significant drivers towards a need for substantial numbers of new houses in the borough. This is consistent with recent trends, as evidenced by a significant number of empty homes in the borough, low house prices etc.

Some unexplained upward adjustment to the official figures appears to have been made by NLP. By assuming a more rapid market recovery from 2016 onward than is assumed in the official 2011-based statistics, further increases the numbers of new houses. NLP should be asked to justify their use of inflated household numbers in their spreadsheets. The numbers used by NLP are significantly larger than those given in the official data releases and result in an increase in the recommended number of houses that are needed from ca 400 to 562 dpa (before other market factors are considered and excluding any policy-driven measures to reduce vacancy rates).

NLP frequently use a duplicitous tactic in which many of the housing market signals are compared with average values for the highly urbanized county of Merseyside rather than with the country as a whole, against which Sefton appears to have fewer negative market indicators. NLP's Report is not 'objective' in that the available data has not been used in an even-handed equitable manner.

The NPPF requires that the Local Plan should be evidence-based. See NPPF para 158 "Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence" On this basis it is difficult to see how a demand for 615 new houses per year can be justified, and therefore the Sefton MBC Local Plan should be considered unsound and thus be rejected.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents NLP Housing Needs Assessment
Policy MN1	Housing and employment requirement	
Respondent No 433	Response Ref 3	Representor Name Eric Haworth
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Except for a brief mention in passing in Para 1.25, there is one other factor that is included in the NLP spreadsheets but is not discussed in detail until Para 6.3 of the NLP report – this is vacant homes. Campaigners seeking to safeguard the valuable agricultural land in Sefton’s green belt and to protect Sefton from over-ambitious levels of development that existing infrastructure will be unable to deal with, have been pointing to the fact that at present there are some 6,000 empty homes in the borough. The logic adopted by campaigners has been that before we should consider building more houses, efforts should be made to fill empty properties. In accordance with this approach, if say, ca, 10,000 new households are needed, demand for a significant proportion of this can be met by the existing empty homes which will therefore, reduce the contribution from new construction. Yet campaigners have been repeatedly told that these empty houses cannot be considered in the Local Plan calculations. In fact when questioned on this the council referred to a “letter” from the government specifically excluding the refurbishment of vacant properties from Local Plan calculations, even though this is contrary to the provisions of the NPPF. But when asked to produce said letter, it had mysteriously disappeared, and to date they have still failed to produce it.

According to NLP Appendix 4, Scenario B, there were 5,744 empty homes. This number of empty but perfectly serviceable homes is taken as further evidence that there is no significant market pressure in Sefton. If there was a demonstrable demand for housing, these houses would not stand empty.

Instead of considering the available empty houses as a resource that can absorb an element of the demand for new homes however, the modelling that has been undertaken by NLP perversely adds the number of empty homes to the projected number of households (to provide a value for ‘supply units’) and then assumes that the percentage of empty properties in the borough is maintained. Given that it is the rate of empty properties that is maintained in the calculations, as the population grows (driven only by migration), the actual number of empty properties increases throughout the Plan Period and this has a direct effect on the projected number of new households that are required.

Also there are some other unexplained upward adjustments to the official figures that appear to have been made by NLP. By assuming a more rapid market recovery from 2016 onward than is assumed in the official 2011-based statistics, this further increases the numbers of new houses.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 437	Response Ref 1	Representor Name Emma Winstanley
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Housing figures do not give 'special circumstances' for building on greenbelt or green spaces. I insist on a Brownfield-first policy in the local plan.

Summary of Suggested Changes

More consultation with, and listening to, the local population.

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents**
Policy MN1 **Housing and employment requirement**
Respondent No 446 **Response Ref** 3 **Representor Name** Hugh McAuley
Organisation Name Formby Play Sports Ltd
Obj/Sup/Com

Summary of Main Issues

The representor supports this policy and is pleased to note that a number of sites/opportunities are identified to meet the need for new employment development, particularly strategic employment locations. Whilst the representor supports the policy it is noted that the employment land requirement is derived from the 2012 Employment Land & Premises Study Refresh, which is mainly based on analysis of the rate at which land was developed for employment in the past. Obviously this will have had to take into account recessionary years, plus the fact some older/less well located employment sites in the Borough are less attractive to potential investors than newer/better located and profiled sites – in essence that demand for good quality sites/land/property might exhaust this figure before the plan end period is reached. Accordingly, whilst the policy is supported, the representor suggest that there should be some flexibility regarding the planned requirement for employment over the plan period, and as such they feel that it would make sense to simply refer to the 84.5 ha figure as a minimum.

Summary of Suggested Changes

Proposed change to Policy MN1, paragraph 3 as follows: ‘During the period 2012-2030 provision will be made for not less than 84.5 ha of employment land.’

Evidence Submitted

None

Chapter 6 **Plan Order** Policy MN1 **Other Documents**
Policy MN1 **Housing and employment requirement**
Respondent No 488 **Response Ref** 8 **Representor Name** Ian Brodie Browne
Organisation Name Sefton Council Lib Dem Opposition Group
Obj/Sup/Com Objection

Summary of Main Issues

We remain highly sceptical of the Councils view that large numbers of new houses are required and feel they have not produced robust evidence of such need. However, where Sefton does have a housing need is within the affordable/social housing sector and the plan does not indicate a sustainable way of providing such housing. Indeed, through drafts of the plan Sefton has backed away from targets for affordable housing.

The plan’s preferred Option 2 will mean that each year 510 houses will be built in the Borough – this is a remarkably similar figure to the target of 500 houses per year which was previously imposed on the Borough via the last Labour Government’s Regional Spatial Strategy.

Bearing in mind that after the RSS figure was imposed the UK entered into and is still suffering from the effects of a massive economic recession and that the draft plan is allegedly built upon new economic and population data etc. the similarity of the proposed house building figures is at best questionable.

It is also the case that the draft plan seems to indicate a much higher figure (above 660) of houses ‘need’ be built per year. In another context the Council’s public statements say that 5,000 houses need to be built in the existing urban areas. These figures are at best confusing.

We have great concern about the quality and accuracy of the data used in the production of the options within the plan. This point is made in the context of the Council’s lead consultants, NLP, openly saying at a Local Plan Stakeholder meeting in May of 2013, at Bootle Town Hall that the Borough’s year on year declining population is suddenly going to go into reverse and significantly rise again. What’s more they said to this forum that the rise would be caused by inward migration. When questioned to explain this statement they said that the migrants would be made up of people moving into Sefton from other parts of the UK, people returning to Sefton who had moved away and migrants from outside the UK. To date we have not seen what we accept as credible data to robustly back up these assertions.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents**
Policy MN1 **Housing and employment requirement**
Respondent No 488 **Response Ref** 4 **Representor Name** Ian Brodie Browne
Organisation Name Sefton Council Lib Dem Opposition Group
Obj/Sup/Com Objection

Summary of Main Issues

Shaky and ever changing population projections:
We continue to have grave doubts over the population projections that the Borough Council is using especially as Sefton's population has been on a downward trend ever since the Borough was set up in 1974. What's more the figures have changed with every iteration of the plan and the advice from consultants has changed with it.

For context and background information we attach our previous submission [dated 7 Aug 2014] because much of what we said in it still applies:

Why is 500 the answer?:

The plan's preferred Option 2 will mean that each year 510 houses will be built in the Borough – this is a remarkably similar figure to the target of 500 houses per year which was previously imposed on the Borough via the last Labour Government's Regional Spatial Strategy.

Bearing in mind that after the RSS figure was imposed the UK entered into and is still suffering from the effects of a massive economic recession and that the draft plan is allegedly built upon new economic and population data etc. the similarity of the proposed house building figures is at best questionable.

It is also the case that the draft plan seems to indicate a much higher figure (above 660) of houses 'need' be built per year. In another context the Council's public statements say that 5,000 houses need to be built in the existing urban areas. These figures are at best confusing.

Concerns about the quality and accuracy of data:

We have great concern about the quality and accuracy of the data used in the production of the options within the plan. This point is made in the context of the Council's lead consultants, NLP, openly saying at a Local Plan Stakeholder meeting in May of 2013, at Bootle Town Hall that the Borough's year on year declining population is suddenly going to go into reverse and significantly rise again. What's more they said to this forum that the rise would be caused by inward migration. When questioned to explain this statement they said that the migrants would be made up of people moving into Sefton from other parts of the UK, people returning to Sefton who had moved away and migrants from outside the UK. To date we have not seen what we accept as credible data to robustly back up these assertions.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents**
Policy MN1 **Housing and employment requirement**
Respondent No 488 **Response Ref** 21 **Representor Name** Ian Brodie Browne
Organisation Name Sefton Council Lib Dem Opposition Group
Obj/Sup/Com Objection

Summary of Main Issues

Demand for housing in Sefton and indeed in other Boroughs surrounding Liverpool has been ratcheted up by the city's ever declining population over many generations since the Second World War. Whilst Liverpool has stemmed that loss it needs to rebuild its lost population and use up brownfield sites across the city for housing. The longer it takes to address this issue the greater the pressure will be on Sefton to sanction the building of houses on its high grade agricultural land. This is a sub-regional matter that urgently needs to be addressed.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 492	Response Ref 2	Representor Name
Organisation Name Craig Seddon SIPP		
Obj/Sup/Com Objection		

Summary of Main Issues

As Sefton has under-delivered on its housing target for all bar one of the past 12 years, this must be described as 'persistent under-delivery', in which case a 20% buffer must be applied.

In seeking to justify this persistent under delivery, the Council argue that net housing completions have been depressed by the historically exceptional demolition programmes and that between 2003 and 2008 the Council strictly applied a housing restraint policy. Whilst this may be the case, this does not justify or take account of the other five out of six years, since 2008, within which the Council under delivered. It is considered that this still demonstrates a 'persistent under delivery'.

It is suggested that, moving forward the Council adopt a 20% buffer given the 'persistent under delivery' of housing. Based on the requirement set out within the SHLAA 2014 this equates to 695 dwellings per annum (5 years requirement of 3,475 dwellings / 5 years). 'Option Three' set out within the Publication Draft Local Plan was for 700 dwellings per annum. This was deemed to be 'optimistic household growth' by the Council, however, given the above, it is considered that there is reasonable justification to adopt this figure.

The Publication Draft Local Plan sets out that the total housing requirement over the Plan period is 11,070 dwellings. This figure does not include a 5% or 20% buffer. In line with our suggestion above, were a 20% buffer applied this would equate to the necessity for an additional 2,214 dwellings ($11,070 \times 0.2$) over the development plan period, which would mean a requirement to deliver 738 dwellings per annum ($11,070 + 2,214 / 18$).

Summary of Suggested Changes

Based on the need for a 20% buffer to be added to the Council's housing requirement, the annualised housing requirement should be increased to 700 dwellings per year, which is broadly in line with the Council's Option Three. The total requirement should be between 12,510 and 13,284.

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 505	Response Ref 1	Representor Name Keith Lewis
Organisation Name		
Obj/Sup/Com Objection		

Summary of Main Issues

I agree there is a housing shortage in the UK, in the South East and South of England but not here in Sefton. There are around 2,000 properties of various sizes on the market that are not selling, and lack of employment opportunities are deterring people from moving to the area and creating a demand. A stable population should not require as many houses as the plan proposes.

Summary of Suggested Changes

Evidence Submitted

Chapter General	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 541	Response Ref 1	Representor Name Nigel Ashton
Organisation Name Meols ward councillors		
Obj/Sup/Com Objection		

Summary of Main Issues

1. We do not consider that the population estimates that underpin the Local Plan publication draft are sound. There are assumptions about sudden increases in inward migration that are simply not backed up by credible evidence. The figure of 615 houses a year seems to us to be a considerable over-estimate of the actual need.
2. Producing a Local Plan based on flawed assumptions means that Green Belt land, including high grade agricultural land, is being wrongly designated for housing.
3. Some of the actual need for housing can be met by measures such as reducing the number of empty properties to the national average, taking into account existing brownfield sites earmarked for development, and encouraging 'flats over shops' and 'shared accommodation'.
4. We believe that there are existing brownfield sites that can be used for housing without impacting on the prospect for jobs in the future

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 542	Response Ref 3	Representor Name Jennifer Hadland
Organisation Name Liverpool and Chester Property Company		
Obj/Sup/Com Objection		

Summary of Main Issues

We contend that the Council has not been flexible in terms of the extent of housing sites it is promoting. Over the past few years household growth has been suppressed because of the economic downturn. We question this final figure of 615 dwellings a year (11,070 across the plan period). When considering the net delivery of housing over past years, we suggest that a 20% buffer is more appropriate in respect of the 'buffer' suggested by the Framework. Paragraph 47 of NPPF advises that any under delivery must be addressed and a 20% buffer should apply to authorities which have underperformed. Since the Council has underperformed since 2010, we do not consider this in line with the requirements of The Framework.

We question the Council's proposal to have a reduced rate at the early stages of the plan (500 units during years 2012 – 2017 and 660 units from 2017 - 2030). We consider that the Council should be looking to provide higher numbers throughout all stages of the plan period, particularly the early years. Whilst the Council identifies two reasons for the lower rates for delivery in paragraph 6.13 of the Publication document, it is considered that this is not in line with the Framework. Furthermore, any backlog should be met within the first 5 years of the plan (Sedgefield Approach).

Summary of Suggested Changes

1. A 20% buffer is more appropriate in respect of the 'buffer' suggested by the Framework.
2. By bringing the backlog forward over the next five years, the housing requirements for the early phase of the Plan period (next 5 years) should be increased from 500 dwellings to 1,135 dwellings.

Evidence Submitted

None

Chapter 6 **Plan Order** Policy MN1 **Other Documents**
Policy MN1 **Housing and employment requirement**
Respondent No 548 **Response Ref** 4 **Representor Name** Michael and Julie Corbitt
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Sefton already has circa 6,000 empty homes of all types across all locations, and this number has increased recently – how can this extra demand be validated, noting it is derived from modelled statistics (that used incorrect data)?

Summary of Suggested Changes

Confirm that the housing demand (if required) is appropriate to the right type of housing proposed, such as affordable homes.

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents**
Policy MN1 **Housing and employment requirement**
Respondent No 550 **Response Ref** 16 **Representor Name** Peter Brown
Organisation Name Merseyside Civic Society
Obj/Sup/Com Comment

Summary of Main Issues

Reservations about the need for such a large housing land allocation.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 576	Response Ref 2	Representor Name J David Chambers
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Need for more housing. The published Plan states that the current population of Sefton is 273,300, projected to rise to 280,000 by 2037. The Plan sets out to address the need for housing for these extra 6,700 people, and aims to do so by 2030. In section 2.3 it is stated that Sefton's population in 1981 was 300,100, but makes no suggestion as to the whereabouts of the housing once occupied by these 20,100 people; this housing must have existed at least in 1981; maybe it was demolished? If this is the case, the formerly built upon sites must still exist and be available for re-development. Section 2.15 points out that as of April 2014 there were 5,800 vacant homes in the area (2,632 of which were long-term vacant). Thus it appears there are already sufficient homes in the Borough to accommodate an expected increase of population of 6,700 by 2037. Indeed, in section 4.47 it is noted that an extra 15,680 homes were constructed between 1984 and 2014 – despite reducing population levels. These statistics are seemingly at variance with reality. In Section 4.3, the Plan outlines 3 possibilities for development of the new housing it deems to be necessary. Option 1 (rejected) provided for 210 extra homes per year over the Plan lifetime. Option 2 (approved), provides 510/year and Option 3 (rejected), 700 dwellings/year. It is stated that in addition to 510 new dwellings per year, Option 2 will add a 5% buffer and some 'backlog needs which have not been met since 2003', i.e. 594 dwellings/year: resulting in 10,700 new dwellings by the end of the Plan period in 2030. Section 1.3 indicates a backdated Plan start date of 2012, meaning that the Plan lifetime is 18 years (2012 to 2030). Should Plan option 2 be approved, the actual build rate for 10,700 homes over the 15 remaining years will be closer to 713/year, in other words about the same as the rejected Option 3. By section 6.11, the number of homes required has been inflated further, to "a minimum of 11,070", and by section 6.17 an extra 720 homes has been required (extra 6.5%), bringing the grand total to 11,790. This represents a build rate of 786/year, assuming building starts in 2015. In other words, Option 2 provides for over three times the build rate as the more conservative Option 1. We note from the information given in the Plan document, that it has been decided that an extra 11,790 new dwellings will be needed by 2030. This is to apparently to house 6,300 extra people, and even this population increase is not projected to have occurred until 7 years after the Plan ends. We assume these extra people will be very happy because they will have almost an extra 2 homes per person! Note, this does not even take into account the existing 5,800 vacant properties in the region.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 590	Response Ref 3	Representor Name Sheila Brown
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I would also like to question the population growth forecast that seem to change with every draft of the plan? Sefton's Local Plan needs to go back to the drawing board.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents**
Policy MN1 **Housing and employment requirement**
Respondent No 612 **Response Ref** 1 **Representor Name** Pamela Holmes
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I believe the plan is flawed as the population in Sefton has been decreasing year on year and in our case building on this scale is totally unnecessary.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents**
Policy MN1 **Housing and employment requirement**
Respondent No 625 **Response Ref** 3 **Representor Name**
Organisation Name Wainhomes Developments Ltd
Obj/Sup/Com Objection

Summary of Main Issues

The housing requirement is at the lower end of the range identified in the NLP Housing Requirement Study. There is also inconsistency in the way that the 5% buffer has been applied (paragraph 4.37) as it is not the same as the 5% buffer required by the National Planning Policy Framework. It is acknowledged that the Council has not been able to take into account the 2012 based projections and the Satnam judgement. These suggest a higher housing need. However this should not stop the Council from submitting its Local Plan. This can be dealt with at a subsequent review. The key point is for the plan to be adopted and to start delivering new homes.

Summary of Suggested Changes

None needed.

Evidence Submitted

None

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 627	Response Ref 1	Representor Name C&S Belsham
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

S.4.37 states - The housing requirement over the Plan period is calculated at 11,070. This is based on S.4.12 which states - The figure of 615 dwellings includes an assessment of 'pent up' housing need based on the Census. The total requirement over the Plan period is 11,070 (615 x 18 = 11,070). This is based on S.4.14 which states - The Strategic Housing Market Assessment update (November 2014) provides one key part of the housing evidence:

It concludes that Sefton is a reasonably self-contained housing market for planning purposes over which to assess and meet the housing requirement. It endorses a borough housing requirement of 615 dwellings per annum. It identifies a net need for up to 434 affordable dwellings a year in Sefton, equivalent to a need for 7,815 affordable dwellings over the Plan period. This need is highest in Southport (i.e. in terms of total need), and in Sefton East Parishes and Formby (i.e. in terms of need per thousand households). The majority of affordable housing need is for social rented/affordable rented housing, with a balance for intermediate housing. It recommends that 15% of all Borough housing provision over the Plan period (i.e. about 1,660 dwellings) should be for special needs 'extra care' housing for older people, reflecting Sefton's ageing population. It recommends that the majority of new market housing should be 3 bedroom family accommodation. The majority of new affordable housing should be for 1 and 2 bedroom accommodation.

Objection 1. - The figures quoted by SC do not add up as shown in the following:-

From S.4.14, affordable dwellings = 7815 units; if they are 1 bed it = 7815 people; if they are 2 bed = 15630 people with market housing = 3255 units at 3 people per dwelling = 13020 giving a total provision of between 20835 and 28650 persons, which is completely at odds with the growth figure for the Borough of 5200 (see section 3.3 below).

Therefore the number of new houses suggested by SC as being required is miscalculated and therefore not sound and neither is it justified.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 627	Response Ref 4	Representor Name C&S Belsham
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

S.3.4 states - Whilst not all older people will need support or specialist accommodation, these changes are likely to result in the need for more health and social care/support and provision of specialist accommodation including private and affordable housing. The 2014 Strategic Housing Market Assessment estimates that around 15% of new housing provision should be specifically for older people, with a particular need for additional 'extra care' provision.

S. 4.15 states - It is important to understand the nature of the anticipated population change in Sefton through to 2030. Although the population is projected to increase, the greater part of this is expected to be as a result of people moving in to the Borough, many of whom will be older people, and not through an increase in births.

Objection 4. - The claimed increase is clearly speculative and cannot be supported by data. It is also the case that people moving into the Borough should be expected to move into the existing housing stock, which Objection 1 shows is more than sufficient to accommodate them.

Proposed development in Sefton should not be based on pure speculation.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents**
Policy MN1 **Housing and employment requirement**
Respondent No 627 **Response Ref** 3 **Representor Name** C&S Belsham
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

S.3.3 states - The government's latest [2012 based] Population Projections suggest limited population growth for Sefton between 2012 (273,697) and 2031 (278,873); an overall increase of around 5,200 or just under 2% over the plan period. The greatest projected growth will be in the over 65s age group, by around 22,200 or 37.6%, while the over 85 age group is projected to increase by around 6,900, or 87.0% by 2031. Correspondingly, the number of adults of working age is due to fall by 17,207, or 11.4%. The projected growth in the number of very elderly people (i.e. over 85s) is greater than the anticipated overall population increase in Sefton. The highest proportions of those over 65 will continue to live in Formby and especially Southport.

Objection 3. - The projected increase in population at 2031 of 5176 (SC's 5200) remains significantly below the population at 1981 thus showing that no further housing is needed.
This does not justify building more houses.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents**
Policy MN1 **Housing and employment requirement**
Respondent No 627 **Response Ref** 2 **Representor Name** C&S Belsham
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Based on Sefton's figures there are currently 26400 fewer people in Sefton than in 1981. As there has been no large scale demolition of housing and in fact more houses have been built since 1981, the housing available currently for the population must far exceed 26400. Additionally, if the projected figure for 2037 is correct (see Objection 4 below) there will be 20100 fewer populous than in 1981.

This does not justify building more houses.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents**
Policy MN1 **Housing and employment requirement**
Respondent No 629 **Response Ref** 2 **Representor Name** Richard Simmons
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I wonder why we need so much more accommodation when our local population has been declining and so many empty houses are up for sale?

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents** NLP Housing Needs Assessment
Policy MN1 **Housing and employment requirement**
Respondent No 635 **Response Ref** 2 **Representor Name** Graham Nelson
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

The housing targets were produced by an obscure mathematical formula that no one understands. They accepted them from their consultants entirely on trust. Council officers insist that the public should accept the same. When members of the public, including myself, have requested them to supply the formula, they have refused to provide it. Similarly, the officers have avoided providing the figures for the data that was input into this formula. This means the public have been unable to verify the accuracy of the data that is used, and the accuracy of the formula, and therefore, deprived of their right to arrive at a fully informed decision about whether they accept or reject the housing targets.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents**
Policy MN1 **Housing and employment requirement**
Respondent No 637 **Response Ref** 5 **Representor Name** Ken Hopkins
Organisation Name Mactaggart & Mickel Homes Ltd
Obj/Sup/Com Objection

Summary of Main Issues

The policy should be updated now that the 2012 household projections have been published by the CLG. Mactaggart & Mickel calculate that from 2017 - 2030, the requirement should rise to 711 units a year from 660.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents**
Policy MN1 **Housing and employment requirement**
Respondent No 637 **Response Ref** 2 **Representor Name** Ken Hopkins
Organisation Name Mactaggart & Mickel Homes Ltd
Obj/Sup/Com Objection

Summary of Main Issues

The 2012 household projections were published in February 2015. Mactaggart & Mickel Ltd believe the housing land requirement should be 11,745 units, which equates to 653 units each year before a buffer of 5% or 20% is added. The household projections should be updated in order that the plan meets the tests of being positively prepared, effective and consistent with national policy.

Summary of Suggested Changes

The housing requirement set out in policy MN1 should be updated.

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 655	Response Ref 2	Representor Name
Organisation Name Nuffield College		
Obj/Sup/Com Objection		

Summary of Main Issues

Our clients key areas of objection relate to the following:

1. The housing requirement of 11,070 new homes over the plan period does not reflect the Full Objective Assessed Need (FOAN) when taking account of the 2012 based Household Projections;
2. The housing requirement is insufficient to address affordable housing needs which the 2014 SHMA identifies as 7,815 homes over the plan period or 434 dwellings per year;
3. The Council's approach to addressing historic undersupply by applying the 'Liverpool Approach' directly conflicts with NPPF given there has been underperformance over the last 12 years with the exception of 2007/8. There is a clear record of persistent under supply of housing in the borough.

As written, this policy cannot be regarded as Justified or Consistent with National Policy given the FOAN cannot be achieved with this approach.

In addition to the above points, the explanatory text at Paragraph 6.13 should be included within the policy to make it clear the range of completions can be exceeded and these targets are not regarded as a restrictive phasing policy.

Summary of Suggested Changes

1. The housing requirement needs to be re-assessed to take full account of the 2012 based Household Projections and affordable housing requirements. The resultant FOAN (when taking full account of these considerations) will reflect the requirements set out at Paragraph 47 of NPPF.
2. The historic undersupply should be addressed within the first five years of the plan. A 20% buffer is appropriate and in full accordance with National Planning Policy Framework.
3. The supporting text at Paragraph 6.13 should be incorporated into the policy.

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 661	Response Ref 1	Representor Name
Organisation Name PSA Developments		
Obj/Sup/Com Objection		

Summary of Main Issues

The Plan is not based on fully objectively assessed needs, and as such it provides for nowhere near enough housing or employment land to accommodate the Borough's future needs and to deliver a sustainable future for Sefton. In addition to the need for more housing to allow for the 20% buffer as the Council does not have a 5 year housing land supply and has not met its housing needs when compared to the Regional Strategy requirement over the period 2003 - 2013, the Council needs to plan for economic growth within the wider Liverpool City Region.

Summary of Suggested Changes

The housing requirement should be increased to reflect Sefton's full objectively assessed needs.

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 668	Response Ref 1	Representor Name Andrew Thompson
Organisation Name	Morris Homes and Ballygorryveg Ltd	
Obj/Sup/Com	Objection	

Summary of Main Issues

Morris Homes Northern Ltd and Ballygorryveg Development Ltd do not consider that the housing requirement set out in policy MN1 is sufficient for the following reasons:

- (i) The household projections as outlined in NLP's 'Review of Objectively Assessed Need for Housing in Sefton' (2104) are not based on the most up to date available data, as the 2012 based SNHP dataset has been released. This is considered to be of particular importance because the 2012 SNHP has identified a higher household projection for Sefton borough: the interim 2011 forecast an increase in the number of households in Sefton by approximately 3,993 households; however the 2012 forecasts an increase of approximately 6,036 households over the same period.
- (ii) By seeking to adopt a housing requirement of only 615 dpa, which is at the lower end of the assessed need, the Council is not seeking to accommodate a sustainable amount of economic growth in the Borough, which may result in loss of jobs, increasing out-commuting and population decline.
- (iii) It is acknowledged in the introductory chapters of the Local Plan that the impact of the expansion plans for the Port of Liverpool, and other port related development in the City Region over the plan period has not been taken into account (Local Plan paragraph 1.17), and as a result early review of the Local Plan would take place. Morris Homes Northern Ltd consider that the Council should also take into consideration the potential impacts of the Liverpool Waters scheme and other port related development within the Liverpool City Region. Given the close proximity of this port related development to Sefton Borough, and the scale and nature of investment committed and growth envisaged, it is likely to have a significant impact on housing needs in Sefton. Further evidencing that the housing requirement for the Borough should reflect the higher end of the identified range in NLP's 2014 report, alongside also putting in place appropriate guarantees for an early review of the Local Plan.
- (iv) There is a significant need for affordable housing in Sefton, which is calculated as being 434 dpa in the Strategic Housing Market Assessment (SHMA) (2014). Delivery of 615 dpa as proposed in Policy MN1, will only provide 42.5% of the annual affordable housing need, where 30% of all dwellings provided will be affordable.

Moreover emerging Policy HC1 applies a variable affordable housing target to reflect viability and affordable housing needs across Sefton whereby affordable housing provision in Bootle and Netherton is reduced to only 15%. Whilst this approach is supported in principle, it further diminishes the amount of affordable housing that will potentially be provided over the plan period, leaving a greater unmet need for affordable homes. One way to meet this need, without bringing into jeopardy the deliverability of sites on viability grounds, would be to increase the housing requirement. This is acknowledged in the NLP study at paragraph 9.6.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 676	Response Ref 2	Representor Name Salam Kenyani
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I do not agree with the housing figures and do not see how they can be justified.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents**
Policy MN1 **Housing and employment requirement**
Respondent No 685 **Response Ref** 2 **Representor Name**
Organisation Name Taylor Wimpey
Obj/Sup/Com Support

Summary of Main Issues

TWUK support SMBC's approach to phasing as set out at paragraph 6.13 of the publication draft.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents**
Policy MN1 **Housing and employment requirement**
Respondent No 685 **Response Ref** 3 **Representor Name**
Organisation Name Taylor Wimpey
Obj/Sup/Com Objection

Summary of Main Issues

TWUK has concerns about the staged approach to housing delivery proposed by the Council. It is considered that a flat rate of development should be applied across the Plan period which reflects the OAN for the area and other policy considerations. With there being no phasing and with a number of sites proposed for Green Belt release it is highly likely that there will be a high number of planning applications on sites early in the plan period which will translate into housing delivery. As a result a flat rate of housing should be proposed across the Plan period.

Summary of Suggested Changes

The housing requirement will met at the following average annual rates (To be recalculated based on the revised minimum housing target and a flat approach across the Plan period as described at paragraph 3.15 of this representation):

* 2012-2030: xxxx dwellings per annum

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents**
Policy MN1 **Housing and employment requirement**
Respondent No 685 **Response Ref** 1 **Representor Name**
Organisation Name Taylor Wimpey
Obj/Sup/Com Objection

Summary of Main Issues

At the Housing Market Partnership workshop held by SMBC on 4 March 2015, Officers announced that a review of the 2012 household population projections would be undertaken in relation to the Council's Objectively Assessed Need (OAN) prior to the submission of the Local Plan. The Council must satisfy itself that the housing requirement for Sefton of 11,070 dwellings over the Plan period, as established in draft policy MN1, addresses its OAN having regard to the 2012 household projections. In addition, the following considerations should be taken into account by the Council.

It is unclear whether the Council has taken into account policy considerations in determining its housing requirement or whether it has opted for the lowest possible OAN figure plus a 10% uplift. The Council needs to satisfy itself that the plan is positively prepared taking into account the 2012 population projections.

Summary of Suggested Changes

During the period 2012 – 2030 provision will be made for the development of a minimum of xxxxx new homes in Sefton (to be recalculated taking into account the recently published 2012 household projections and the considerations set out at paragraph 3.12 of this representation).

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 692	Response Ref 3	Representor Name Peter Harper
Organisation Name UKIP Sefton Branch		
Obj/Sup/Com Objection		

Summary of Main Issues

A steadily and consistently falling population in Sefton over the last few decades indicates that there is demonstrably no requirement for any building on Sefton's Green-Belt. In the 1980s, Sefton's population was a little over 300,000, but this had fallen to just under 283,00 by the time of the 2001 Census, with the fall in numbers continuing, so that Sefton's population was 273,000 by the time of the 2011 Census, i.e. a 9% fall in population from its peak.

Sefton Council's insistence on making use of the 2001 Census figure in place of the (much lower) 2011 Census figure has no legitimate basis and presents the clear suggestion that the people who are in position to make the decisions are strongly motivated to press for more building than is truly required. Since, by definition, the 2011 Census provides the more recent figures, those figures should be used in place of the 2001 figures.

Apart from the fact that Sefton's population has already fallen substantially in recent years, consideration should clearly also be given to the fact that those years have seen a large and continuing trend for a fall in Sefton's population: even if the population ceases to fall, there appears to be no reason why it should suddenly rise again, let alone that it should rise so markedly as to massively exceed the capacity of the previously vacated accommodation to house the increase.

The current existence of a large number of properties for rent, for which tenants cannot be found, clearly indicates that the supply of local housing already exceeds demand. How does Sefton Council explain this contradiction?

Measures should be put in place to ensure that currently-vacant residential properties across the Borough – of which there are a large number - are brought back into use and inhabited before the Green Belt gets carved up.

Where are all of the people who are supposedly waiting to fill the proposed huge number of new properties going to come from? Where are they now?

The current existence of large areas of both vacant and derelict commercial land and properties across Sefton, for which occupying businesses cannot be found, clearly indicates that the supply of such land and properties already exceeds the relevant demand. No evidence has been put forward that would indicate from where all of the new demand will come. Only once all of the available land has been taken up should the creation of further such sites be countenanced - especially where that would require concreting over Green Spaces and Grade 1 Agricultural Land.

The basis upon which the figure of 510 per year has been reached is very unclear. The consultation exercise is thus considered by many as being nothing more than a sham exercise, doing nothing more than fulfilling mandatory legal requirements. Robust and truly independent evidence should be - and should have been - used. The fact that knowledgeable and diligent representatives of Sefton's residents – including members of Formby Residents' Action Group (FRAG) and of the Campaign for the Protection of Rural England (CPRE) - have been denied access to key meetings and data suggests that Sefton Council has failed to conduct the collation of evidence in an impartial manner. The input of Sefton residents' knowledgeable and interested representatives - such as people in FRAG and in the CPRE – should not only have been allowed, but should have been actively sought. From this point onward, it is vital that the views of these people are sought and that they are properly considered before final decisions are reached by Sefton Council.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 693	Response Ref 1	Representor Name Michael Eccles
Organisation Name Liverpool City Council		
Obj/Sup/Com Support		

Summary of Main Issues

Liverpool City Council acknowledges that Sefton has identified a housing figure of 615 dwellings per annum based on evidence developed for them by consultants NLP with which to meet their calculated Objectively Assessed Need (OAN). Liverpool further recognises that this figure reflects the spirit of the subregional strategy embodied in the North West Plan the Regional Spatial Strategy (RSS). RSS, though revoked in May 2013, placed great emphasis on the role of Liverpool as a regional centre and by reflecting this; the Sefton Local Plan is also compatible with Liverpool's housing and economic growth agenda. Liverpool further notes that Sefton is meeting its OAN in full and will not require assistance from neighbouring authorities to meet its needs. Liverpool with Sefton and the other districts in the Liverpool City Region have acknowledged that while current and emerging Local Plans are meeting their own needs for new housing this position will be kept under review. Liverpool City Council will therefore welcome the opportunity to undertake a joint study into the City Regions requirements for new housing and for new employment use land and will support the commissioning process for such a joint study commencing in 2016.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 696	Response Ref 1	Representor Name Robin Buckley
Organisation Name Redrow Homes Ltd		
Obj/Sup/Com Objection		

Summary of Main Issues

Redrow Homes Ltd does not consider that policy MN1 has been positively prepared or is based on a current objectively assessed need for the area. It is evident that the Full Objectively Assessed Need (FOAN) projections undertaken by NLP underestimated the rate of household formation in Sefton. The higher housing growth anticipated in the 2012-based projections together with only a modest adjustment for the past under-delivery of housing and no account for an increase in economic activity leads to the conclusion that the FOAN is too cautious. A further corollary is that the level of housing growth set out in the Local Plan would only provide for less than half of the affordable housing needs as set out in the Strategic Housing Market Assessment (SHMA). The 2014 SHMA identifies a net shortfall of 434 affordable homes per annum (around 7,800 affordable homes over the period 2012 to 2030).

Summary of Suggested Changes

None suggested.

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 698	Response Ref 2	Representor Name Anthony Swift
Organisation Name	Anthony Swift and Kipros Pittaris	
Obj/Sup/Com	Objection	

Summary of Main Issues

Whilst Paragraphs 6.12 – 6.14 of the Local Plan provide an explanation as to basis upon which such requirement and provision has been made, it is considered that insufficient regard has been had to the 'HEaDROOM Update Report – Review of the Objectively Assessed Need for Housing in Sefton' (16 December 2014) produced for the Council by Nathaniel Lichfield & Partners. That report states that "if asked to express a preference, NLP would consider that a figure of around 615dpa would be most appropriate". Nevertheless Paragraph 9.1 of that Report states that having assessed all the scenarios tested it is NLP's recommendation that an objective assessment of housing need and demand for Sefton Borough, falls within the broad range 600pa. to 800 dpa, equivalent to between 10,800 and 14,400 net additional dwellings over the plan period 2012 to 2030".

The 615dpa housing figure is therefore right at the lower end of that 'broad range'. In terms of meeting the Council's affordable housing needs (as identified in the 2013 SHMH), the lower end of that range would only deliver 50% of the Council affordable housing target. Given the importance which the Council attaches to the provision of affordable housing, it is considered that the Local Plan should specify a higher housing requirement than 615dpa.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 699	Response Ref 2	Representor Name P O'Hanlon
Organisation Name	Maghull and Lydiate Action Group	
Obj/Sup/Com	Objection	

Summary of Main Issues

The Maghull and Lydiate Action Group are not opposed to development and recognise the need for additional housing in the Borough. However, development on the scale proposed by Sefton Council — a total of 11,070 houses in the life of this Plan enough for 24,354 people at 2.2 people per house - is ludicrous when the population increase is predicted at 5,000. Sefton Council have declined a "brownfield first" policy but admit that there are sufficient brownfield sites in the Borough to build 6,000 houses. A further 6,000 houses lie empty in Sefton. There is no valid reason whatever to encroach on our agricultural land which has been identified as being the best agricultural land in this country.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 701	Response Ref 2	Representor Name Brian Rostron
Organisation Name	S Rostron Ltd	
Obj/Sup/Com	Support	

Summary of Main Issues

S Rostron Ltd support policy MN1.

Summary of Suggested Changes

Evidence Submitted

Summary of Main Issues

The Local Plan and evidence base has continually identified the need for and acute shortfall of employment land in and around the port, and shows the implications and aspirations of Liverpool2 and the SuperPort concept. However, the employment and logistic land requirements have not been properly addressed in the Local Plan for Sefton Publication Draft.

The Sefton Economic Strategy 2012-2022 identifies that 'in short' the creation of more jobs is a priority to drive overall wealth in the borough and to push aggregate demand in the economy. The SuperPort (including the Liverpool2 'Post Panamax' improvements) is shown to be a key economic driver, with some 21,000 possible employment opportunities predicted by 2020.

The Sefton Employment Land and Premises Study (2012) (CD14.0) uses past take-up rates to predict future requirements. It generally identifies a need for industrial premises far outweighed that for offices. The report's recommendations specifically state that a Green Belt release should be considered for employment land especially around south Sefton and that: 'The Council should continue to exclude port-related land from the identified land supply. The Council also needs to maintain a dialogue with Peel Ports regarding its land needs at the Port of Liverpool.'

This clearly recognises that Sefton currently has a lack of employment land over and above the lack of specific sites identified within and adjoining the port. Excluding port-related activities from local supply outlines the national importance of the Port and also provides an opportunity to consider sites which otherwise would not have been considered.

Sefton's Economic Strategy (first performance monitoring report – March 2013) identified that a key objective was to grow existing businesses and stimulate the economy. This would be achieved by working with the City Region on its key transformational sectors.

The 2nd Performance Monitoring Report (September 2013) showed that InvestSefton was working to bring forward a key investment scheme in Sefton as a direct result of port expansion. The scheme would see approximately 500,000ft² of warehousing developed on Atlantic Park, Netherton.

The 4th Performance Monitoring Report (April - September 2014) showed a decline in employment led activity from Port activities and showed that a 500,000ft² requirement for Distribution Centre is still live; however there was no longer adequate space on Atlantic Park to accommodate it. The report goes on to identify the shortage in supply: 'With regards to inward investment we have a shortage of suitably sized sites to accommodate larger distribution and logistics uses. Without a land supply, Sefton cannot expect a proportionate share of the 20,000 jobs forecast in the sector by 2020.'

The investment by Peel Ports in Liverpool2 (port facilities) is happening and will be open for business in December this year. Its effect on the distribution network, from port-centric operations to wider distribution requirements will be immediate. However, there has been no rapid response in terms of land use planning to assist in delivering necessary facilities outside of the immediate port zone. The need to recognise and attract private sector employment to support port activities needs to be identified in the local plan. The agenda is very clearly set for the Sefton Local Plan to address this issue. Unfortunately, the Publication Draft consultation does not adequately respond, potentially leaving a major gap in the Local Plan. This gap needs to be plugged if the benefits of SuperPort are to be realised.

The LEP study (NAI Global, March 2014) which assessed the land implications arising from the expanded Port of Liverpool concluded that Liverpool2 will have a "game changing" impact on the Logistics sector in the north of England, creating a significant new demand of logistics space. The report identifies a requirement of between 634ha and 793ha over the next 20 years, including 400ha of high quality over and above the existing supply.

It does not provide a breakdown by local authority. However, Sefton, as the heart of the maritime economy (and host to the new Liverpool2 investment), with local socio-economic challenges to address, but with no strategic sites to support, must make some contribution. Other local authorities are releasing land and the overall extent to which the strategic need will be met is unclear and is likely to remain so until local plans are in place. An appropriate approach would be for each authority to proactively identify what contribution it can make through Local Plans through joint working, rather than requiring a sub-regional study before Local Plans can proceed.

Beyond the key sites within the port estate which are largely immediately deliverable in the short term, there is no further long term supply of strategic sites within or adjacent to the port estate. As such the strategic land reserve for growth in/around the port over the medium to longer term, essentially as evidenced by the LEP study, will be compromised. It is necessary to find additional land in areas with good connections to the port.

Market advice from Total Logistics suggests that the Switch Island site is best suited to port-centric import and processing, potentially for the food and/or retail sector. It is potentially also suited to a bespoke inward investor such as an automotive or other manufacturer requiring a strategic gateway site near the port, with available labour and good highway access. Such occupiers cannot be known at this stage and cannot be attracted until the principle of development is supported by planning policy. This creates a catch 22 situation unless the site is removed from the Green Belt or given specific policy support.

What is needed is a range of large sites, with proximity to the port, the transport network, the market catchment and available workforce. The Switch Island site would meet demand from occupiers who need to be close to the port and associated maritime cluster, on the strategic inland transport network and with access to available employment. It would be differentiated from other sites in the region which are typically further inland and more remote to the port cluster. Switch Island would effectively extend the port cluster to the end of Dunning's Bridge Road.

In Sefton however the opportunities for additional port employment are limited. Switch Island is the only site that has been put forward through the Local Plan process. It is the only site capable of accommodating large scale logistics/supply chain activities in an expanded port cluster that stretches up Dunning's Bridge Road and would terminate with a strategic gateway site at Switch Island. Other draft allocated employment sites in Sefton are peripheral, being not located near the port or on the strategic highway network, and are not close to the largest area of economic need in South Sefton. There are no feasible alternatives. Importantly the site would be brought forward by Peel who could utilise synergies with the port.

The Council has already accepted that exceptional circumstances exist to release land for housing and employment in the Local Plan from the Green Belt. The principle is therefore agreed. The issue is effectively the exceptional circumstances to justify the scale, nature and location of employment land required as part of the Green Belt review. The evidence presented shows that these circumstances exist. In summary they are:

- I. National, regional/city-regional and local policy on the need to support economic growth; innovation; private sector employment creation to meet local needs; sectoral growth in transport, logistics and associated supply chains; economic self-sufficiency; and business competitiveness;
- II. Industry evidence of the trends and demand drivers in logistics and supply chains, critically the need for large sites for large scale logistics operations close to transport networks and available labour;
- III. The shortage of land for these requirements within the urban area
- IV. The urgency of the issue, with no immediately available large scale logistics sites in the Borough, at a time that demand is evident and likely to grow when Liverpool2 opens later this year;
- V. The absence of an alternative route or vehicle for meeting this policy and market need;
- VI. The substantial benefits which can arise from meeting the need, in terms of job creation, financial revenues and environmental opportunities.

Summary of Suggested Changes

The land at Switch Island should be allocated as a strategic site to meet that development need. Identification of Switch Island as a Strategic Employment Location – to be inserted at Policy MN2 after MN2.49 "MN2.50 Land to the East of Switch Island – 48 ha (subject to criteria Policy MN9)".

In addition, a clear criteria based policy is also considered necessary so that proposals arising from the impact of the SuperPort can be appropriately judged. This also allows for decisions to be taken on such large scale proposals at any time rather than through a later review of the Plan (see representation to policy MN2 for details of the proposed policy).

Peel recognises that the Council has committed to undertaking an 'Early Review' of the Local Plan to address SuperPort employment land. In the event that such a course of action is to be followed, Peel considers that the following policy changes need to be made to the Local Plan, to ensure the issues are promptly and positively addressed. The suggested changes are provided to help resolve the issues which have been identified.

Evidence Submitted

39 documents listed in the Compendium of Evidence.

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 703	Response Ref 36	Representor Name Jackie Copley
Organisation Name	CPRE Lancashire	
Obj/Sup/Com	Comment	

Summary of Main Issues

The Council has an aspirational policy to maintain the current level of employment in Sefton, which will increase the Housing Target; we defer further comment on this aspect pending publication of the Council's revision of the PDLP in the light of the recently published DCLG SNHP.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 704	Response Ref 1	Representor Name A Donnelly
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

The housing requirement is at the lower end of the range identified in the NLP Housing Requirement Study. There is also inconsistency in the way that the 5% buffer has been applied (paragraph 4.37) as it is not the same as the 5% buffer required by the National Planning Policy Framework. It is acknowledged that the Council has not been able to take into account the 2012 based projections and the Satnam judgement. These suggest a higher housing need. However this should not stop the Council from submitting its Local Plan. This can be dealt with at a subsequent review. The key point is for the plan to be adopted and to start delivering new homes.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 706	Response Ref 1	Representor Name Mike McComb
Organisation Name		
Obj/Sup/Com	Support	

Summary of Main Issues

The housing requirement is at the lower end of the range identified in the NLP Housing Requirement Study. There is also inconsistency in the way that the 5% buffer has been applied (paragraph 4.37) as it is not the same as the 5% buffer required by the National Planning Policy Framework. It is acknowledged that the Council has not been able to take into account the 2012 based projections and the Satnam judgement. These suggest a higher housing need. However this should not stop the Council from submitting its Local Plan. This can be dealt with at a subsequent review. The key point is for the plan to be adopted and to start delivering new homes.

Summary of Suggested Changes

Evidence Submitted

Market Signals

The 2014 OAN report discusses market signals in section 4. This is a fundamental element of determining the objectively assessed need for housing (NPPG ID 2a-019-20140306) and a worsening trend in any of market signals will require upward adjustment to planned housing numbers (NPPG ID 2a-020-20140306). The HBF agrees with the analysis within the 2014 OAN report that many of the signals appear low with the exception of rate of development and affordability.

In terms of the rate of development the Council has failed to meet its housing requirement in all but one year since 2003/4. This has led to under-delivery of 962 dwellings at 2012, in such cases the NPPG advises;
'If the historic rate of development shows that actual supply falls below planned supply, future supply should be increased to reflect the likelihood of under-delivery of a plan.' (ID 2a-019-20140306)

The 2014 OAN report notes that affordability has been almost identical to the national rate for many years despite having much lower house prices. The affordability issues are further highlighted by the 2014 SHMA which identifies a need for 434 affordable dwellings per annum, or 7,815 over the plan period (figure 7.9). This represents approximately 70% of the overall housing requirement, this level of affordable housing will not be achieved by the proposed housing requirement (see comments upon policy HC1 below). In such cases the NPPG advises that;
'An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes'. (ID 2a-029-20140306)

In conformity with the 2014 OAN report the HBF therefore considers that there is a strong case for an uplift above the demographic starting point to take account of market signals. The 2014 OAN report considers that the market signals are of a moderate nature and as such recommends an uplift of approximately 10%, or more accurately 53dpa which directly correlates with the under-supply prior to 2012 spread over the 18 years of the plan. The HBF considers that a more pronounced uplift could be justified given the significant affordability issues experienced within Sefton.

Economic aspirations

A further point for consideration is economic growth. The 2014 OAN report makes no uplift for economic growth but does note in paragraph 7.67 that;
'...Sefton Council will need to consider Sefton's economic role within the sub-region and whether there is a realistic prospect of this changing through the application of policy. This is particularly the case in the light of the significant growth projected in the economically inactive population, in particular those over the age of 85.'

The 2014 OAN report further notes that Sefton is not pursuing a 'jobs-led' plan but that stabilisation or increasing the workforce would require an increase in the housing requirement. Albeit this statement is made in recognition of the complex relationships between jobs growth and housing.

Whilst the HBF agree that the plan does not set any jobs targets, the plan clearly aspires to provide jobs and employment growth as outlined within its vision and objectives. It is also notable that the LEP anticipates jobs growth within Sefton, it is therefore considered inconsistent not to include an element of jobs growth within the assessment of housing needs.

The 2014 OAN report considers a number of jobs growth scenarios. All, with the exception of the scenario I (Past trends in jobs growth), which would lead to a decline in population and workforce, suggest a housing requirement greater than the current proposals of 615dpa. Whilst the HBF considers the 1,122dpa requirement identified in scenario E (Sefton Experian) to be unlikely to be achieved other jobs-led scenarios, including the LEP scenarios F (686dpa) and scenario G LEP 'policy on' (873dpa) are considered realistic.

Housing requirement conclusions

The HBF considers that a housing requirement which achieves jobs growth consistent with the range provided by the LEP scenarios (F and G) to be a realistic. This level of housing supply would not only promote economic growth and job creation but would also take account of the 2012 SNHP, past under-delivery and go some way to meeting the affordability issues inherent within Sefton. The HBF consider that this level of housing provision would accord with the NPPF requirements to boost significantly housing supply and align the Council's economic and housing strategies.

Stepped requirement

The plan identifies a stepped housing requirement is needed due to high level of demolitions early in the plan period and lead in times on large sites. Whilst the HBF acknowledges that demolitions will undoubtedly have impacted upon delivery it is noted that since the commencement of the plan period they have significantly reduced to 53 in 2012/13 and 11 in 2013/14 (2013-14 AMR) or 8% and 2% of the average annualised requirement respectively. The HBF do not consider this so significant that the plan requirement should be reduced.

The HBF agree that there will be a lead in time for large sites. However, the Council is promoting a wide range of sites through the plan which will assist in meeting the requirement within the earlier years. The fact that there are several larger sites is not considered adequate justification to discount delivery early in the plan period. The HBF does not support a stepped housing requirement and recommends a flat housing requirement.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 712	Response Ref 2	Representor Name Andrew Pepper
Organisation Name Persimmon Homes		
Obj/Sup/Com Objection		

Summary of Main Issues

The 2012 ONS sub-national populations projections (SNPP) are considered to significantly under-estimate net international migration to the UK over the 25 year period 2012 - 2037. This directly affects the 2012 CLG household projections. The household projections for Sefton should therefore be considered conservative in nature.

The Planning Practice Guidance (PPG) states "Household projections published by the CLG should provide the starting point estimate of overall housing need."

The 2012-based detailed household headship rate have not yet been published. Although they are expected to show some return to the long - term pre-recession trends of the 2008-based projections, they will incorporate suppression in household formation, particularly in younger age groups, created by the severe recession experienced between 2008 and 2013. It is not expected that the CLG 2012-based headship rates will show the same low level of suppression, however the recession will have contributed to them being suppressed in some part.

The constrained CLG 2012-based household projections would not therefore be a prudent basis from which to set a housing target in Local Plan preparation, as it would not be considered to be 'positively prepared' in the context of the National Planning Policy Framework (paragraph 182) or to 'significantly boost' housing supply.

Notwithstanding the caution which should be applied to them, the 2012-based CLG household projection shows growth of 580 households per annum in Sefton, 2012-2030. Application of vacancy rates (4.59%) would result in a dwelling requirement of 606 dwellings per annum. However, Annual growth of 606 dwellings would result in a declining working age population.

The Council's NLP 'Headroom' report also suggests an uplift of approximately 50 dwellings per annum to alleviate worsening market signals. Its assessment of economic-led growth indicates a requirement for 800 dwellings per annum just to ensure that there is no decline in jobs over the Plan period. To meet job growth forecasts the figure could be in excess of 1,100 dwellings per annum. These two figures could potentially increase once the new CLG 2012-based detailed headship rates (not yet released) are applied.

From an analysis of the latest publicly available information, official ONS and CLG projections, and the Council's evidence base, it is therefore considered that OAN for Sefton is a minimum of 800 dwellings per annum, however to meet forecast job growth in full the evidence of the NLP report suggests approximately 1, 100 dwellings per annum.

Summary of Suggested Changes

Persimmon considers that the objectively assessed need must be a minimum of 800 dwellings per annum.

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 715	Response Ref 6	Representor Name
Organisation Name	Countryside Properties (UK) Ltd and Persimmon Homes Lancashire	
Obj/Sup/Com	Objection	

Summary of Main Issues

The housing requirement of 11,070 net additional dwellings over the plan period 2012-2030 is unsound for the reasons set out in Section 2 of this report. Persimmon and Countryside consider that the objectively assessed need must be a minimum of 800 dwellings per annum.

The housing requirement is not based on the most up-to-date or robust evidence base and would not help to meet the economic growth aspirations of the Local Plan. Persimmon and Countryside consider that the housing requirement must be 800 net additional dwellings per annum at least, based on the most up to date and robust evidence.

As such, we consider that the Policy is unsound, as it is not consistent with NPPF and is not justified.

Summary of Suggested Changes

Evidence Submitted

REPRESENTATIONS SUBMITTED [on behalf of the Land East of Maghull Consortia] TO THE SEFTON CORE STRATEGY OPTIONS PAPER AND EVIDENCE BASE (JULY 2011).

Representations to the Local Plan Preferred Option (July 2013) on behalf of Countryside Properties (UK) Ltd; Persimmon Homes and P Wilson & Company LLP [September 2013]

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 716	Response Ref 2	Representor Name Robert Swift
Organisation Name	Robert Swift and family	
Obj/Sup/Com	Objection	

Summary of Main Issues

THIS IS A SUMMARY

The housing requirement is not based on the most up-to-date or robust evidence base and would not help to meet the economic growth aspirations of the Local Plan. The Council's proposed housing target of 615 dwellings per annum, 2012-2030, is in line with the 'starting point estimate' – official CLG household projections – following the release of the 2012-based projections on 27 February 2015. The new projections show growth of 606 dwellings per annum. However, the 2012-based household projections are conservative in their projected growth due to issues with the ONS 2012-based SNPP they are underpinned by. Annual growth of 606 dwellings would result in a declining working age population.

The NLP 'Headroom' report also suggests an uplift of approximately 50 dwellings per annum to alleviate worsening market signals. Furthermore, NLP's assessment of economic-led growth indicates a requirement for 800 dwellings per annum just to ensure that there is no decline in jobs over the Plan period. To meet job growth forecasts the figure could be in excess of 1,100 dwellings per annum. These two figures could potentially increase once the new CLG 2012-based detailed headship rates (not yet released) are applied.

From an analysis of the latest publicly available information, official ONS and CLG projections, and the Council's evidence base, it is therefore considered that OAN for Sefton is a minimum of 800 dwellings per annum, however to meet forecast job growth in full the evidence of the NLP report suggests approximately 1,100 dwellings per annum.

Summary of Suggested Changes

The housing requirement for Sefton should be a minimum of 800 dwellings per annum. If the forecast job growth were to be met in full the evidence of the NLP report suggests approximately 1,100 dwellings per annum are required.

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 717	Response Ref 4	Representor Name
Organisation Name TR Silcock Ltd, DWH & Barratt Homes		
Obj/Sup/Com Objection		

Summary of Main Issues

THIS IS A SUMMARY

TR Silcock Ltd, David Wilson Homes and Barratt Homes are generally supportive of the methodology employed within the evidence base, however they do have a number of concerns in relation to how the evidence base has been translated into the policy approach proposed and the extent to which this will ensure the local plan is positively prepared and in compliance with the growth ambitions of the NPPF.

Demographic analysis - The Council's emerging housing requirement is based upon their assessment of need arising from the 2014 HEaDROOM report. This report concludes that the objective assessment of housing need is within the range 600 to 800dpa. recommends that a requirement of 615 dpa be regarded as the objectively assessed need for housing within Sefton.

Following the publication of the 2014 OAN report DCLG released the 2012 based sub-national household projections (2012 SNHP). National planning guidance (PPG) is clear that these updated figures now represent the most up to date estimate of future household growth and should be used as the starting point for determining objectively assessed housing need.

Importantly, the DCLG dataset implies a higher demographic 'starting point' than that identified within the 2014 HEaDROOM Report of 560dpa. Given that the 2012 SNHP is based on past trends and, therefore, will also have been heavily influenced by the recent economic recession and a period of under-delivery within Sefton an uplift against the 2012 SNHP is also likely to be required.

Economic aspirations - Policy MN1 fails to demonstrate a coherent approach between the proposed housing requirement and the policy approach to the allocation of employment land. It is clear from the Council's evidence base that the proposed housing requirement will translate to a reduction in the number of jobs within the borough, a position which is directly at odds with the emerging plan's vision and objectives. The 2014 HEaDRoom report identifies the full objectively assessed need to be 800dpa, reflecting a 'jobs stabilisation' position, which whilst not aspirational this would appear reasonable.

Phased approach - The plan identifies a phased housing requirement is needed due to high level of demolitions early in the plan period and lead in times on large sites. Whilst my clients acknowledge that demolitions will have impacted upon the delivery of new homes it is clear that since the beginning of the plan period they have reduced considerably to 53 in 2012/13 and only 11 in 2013/14 (2013-14 AMR). It is therefore not considered that demolitions should be cited as a basis for the requirement to be reduced.

Whilst my clients agree that there is a lead in time associated with bringing large sites forward (such as the strategic allocation East of Maghull), the Council is promoting a wide range of sites through the plan that will be capable of meeting the requirement within the early part of the plan period. The fact that there are several larger sites is therefore not considered adequate justification to discount delivery early in the plan period, particularly since the emphasis in the Framework is to boost significantly the supply of housing (paragraph 47). On this basis my client objects to the phased (stepped up) approach to the housing requirement and would strongly recommend a flat housing requirement for the duration of the plan period.

Unless the Council takes appropriate action, its current approach is likely to result in a failure to meet the objectively assessed housing needs of the borough or to boost significantly the supply (and delivery) in the short term.

Summary of Suggested Changes

Increase the housing requirement to ensure that sufficient provision for new housing development is made to deliver the Vision and Objectives of the Publication Draft Local Plan and to accord with national planning policy.

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents**
Policy MN1 **Housing and employment requirement**
Respondent No 721 **Response Ref** 3 **Representor Name** Andrew Thompson
Organisation Name Morris Homes
Obj/Sup/Com Objection

Summary of Main Issues

THIS IS A SUMMARY

Morris Homes have some concerns over whether the Local Plan accurately reflects the most recent update of analysis of housing needs within Sefton, the December 2014 Review of the Objectively Assessed Need for Housing in Sefton. This states: "A full objectively assessed need for housing range of between 600 dpa and 800 dpa has been identified for Sefton Borough over the period 2012 to 2030 on the basis of taking the latest household and population projections as the starting point for identifying full objectively assessed need; accelerating household formation rates to anticipate a return to growth over the longer term; and uplifting the requirement further as an appropriate supply-side response to allow for adverse / worsening market signals, affordable housing requirements and economic / employment needs." (para 1.32).

Whilst the Council's stated aim for the provision of an average of 615 dwellings per annum falls within this broad range, the independent report (parag. 1.30) raises the questions of consistency with the Council's economic objectives and affordable housing needs. The importance of these two considerations is highlighted in the interim views of the Inspector for the Cheshire East Local Plan. He indicated that the plan as submitted could not be found sound due, amongst other considerations, to a mismatch between housing and economic strategies and because the Plan does not specifically increase the housing requirement to address the shortfall in affordable housing. More recently, the Satnum judgement (Ref: [2015] EWHC 370 (Admin)) states that affordable housing need should be expressed or included as part of Objectively Assessed Need and that an increase in the total housing figures should be considered where it would help deliver the required number of affordable homes.

Morris Homes are therefore concerned that the average annual housing requirement of 615 within the range of 600 to 800 should be adequately justified in the light of emerging practice and case law.

Morris Homes would be opposed to the staged housing requirement if this were to be a device to lower the 5 year requirement and so prevent appropriate development sites from coming forward. However, we are assured that the housing requirement is a minimum and by the explicit statement that no phasing is proposed. The approach is therefore not necessarily inconsistent with the Government's intention to boost significantly the supply of housing.

Summary of Suggested Changes

None suggested.

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents** NLP Housing Needs Assessment
Policy MN1 **Housing and employment requirement**
Respondent No 723 **Response Ref** 2 **Representor Name** Laurence Rankin
Organisation Name Sefton Green Party
Obj/Sup/Com Comment

Summary of Main Issues

The Review of Housing Requirements document predicts a range of need from less than 300 to more than 1100 new homes per year, with the preferred option stating a requirement of 480 homes (now revised up to 615?) per year over the next 15yrs. The 2014 Housing Market Assessment (SHMA) is quoted in the local plan (see further comments below). It arrived at a figure of 500 for housing need, itself somewhat inventive, but this has been further extrapolated to 615 in the plan! Para 11.4 seems to suggest that the overall housing need 11,070 is based on a multiplier of the annual housing need, rather than the other way around.

Demographic information suggests a reduction in household size. We need to have a more flexible approach to housing provision given that the nos, and types required, will actually fluctuate year to year. Sefton should promote a number of innovative developments with housebuilders such as car free communities, zero carbon communities, retirement communities, young people communities with the emphasis on community creation rather than on individual house building, and then, with developers, aggressively "sell" these across the region. New homes could be created by the creative "splitting" of existing large dwellings enabling older people to live in their own home while creating a new home for a family. Sefton could act as an "honest broker" for such initiatives.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 724	Response Ref 1	Representor Name Paula Keaveney
Organisation Name	Sefton Central Liberal Democrats	
Obj/Sup/Com	Objection	

Summary of Main Issues

I do not believe the local plan is sound because I believe the need for new housing has been overestimated and the extent to which brownfield sites and existing (but unused) housing can contribute has been underestimated. This means that the plan proposes unnecessary building on Green Belt land.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 727	Response Ref 1	Representor Name
Organisation Name	Harrison and Sons	
Obj/Sup/Com	Objection	

Summary of Main Issues

The spatial strategy should meet the need for urban expansion to meet objectively identified housing need and reflect inward migration. Paragraph 159 of the National Planning Policy Framework clearly states that LPA's should have a clear understanding of the housing needs in their area which meets household and population projects, taking account of migration and demographic change. Harrison and Sons consider that the figure of 615 dpa recommended in Sefton's Review of the Objectively Assessed Need for Housing in Sefton (NLP, 2014) does not reflect an appropriate baseline figure for demographic change. Given that the 2012 Household Projections are heavily influenced by the recent economic recession and a period of under-delivery within Sefton, it is considered uplift against the 2012 projections is required. Harrison and Sons remain to be convinced that the housing requirement is consistent with the National Planning Policy Framework requirement "to boost significantly housing supply".

Whilst we support the notion of Green Belt release advocated in the emerging plan, the Council has only identified the minimum amount of land required for the development needs set out within this plan plus 5%. Harrison and Sons consider that the 5% buffer referred to in Policy MN1 does not reflect the Council's recent difficulties in achieving its housing requirement. Consistent with the NPPF this buffer should be increased to 20% to account for non-delivery or under-delivery and would provide the Council with greater opportunity to achieve its overall plan requirements.

A number of sites have been considered as part of the Council's Green Belt Study and additional sites consultation, some of which have been dismissed based on their impact on the Green Belt. These should now be considered for housing allocation to meet the Council's housing requirement. If further sites are not considered, the plan will be considered unsound.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 729	Response Ref 1	Representor Name Alison Jordan
Organisation Name Mersey Care NHS Trust		
Obj/Sup/Com Objection		

Summary of Main Issues

THIS IS A SUMMARY

Object to policy MN1 on the grounds that it fails to fully respond to the indicators of need and demand and fails to take account of the core planning principles (National Planning Policy Framework Paragraph 17) and the requirement to plan positively for growth. It also fails to accord with the requirement of the Framework to take steps to 'significantly boost housing supply'.

We do not have a fundamental criticism of the approach taken in the preparation of the evidence base underpinning the proposed housing policy approach, which considers a range of alternative realistic scenarios of population and household growth in accordance with the PPG. We do, however, have a number of concerns around the proposed policy approach and its justification in the context of the evidence base on a number of counts. This challenges the extent to which the Local Plan is positively prepared and in compliance with the underlying growth ambitions of the NPPF.

The analysis has identified a number of areas for which we consider further justification is required through the updating or re-interpretation of the evidence. On the basis of the evidence currently presented, the housing policy approach within the emerging Draft Plan is not considered to be sound as:

- An update is required to take into account the release of the 2012 SNHP.
- It fails to demonstrate alignment between the proposed housing requirement and the policy approach to the allocation of employment land under Policy MN1. It is apparent from the Council's evidence base that the housing requirement will lead to a substantial fall in jobs. This pessimistic approach is at odds with the latest economic evidence as well as a substantial component of the evidence compiled by the Council including the two LEP forecasts cited in the HEaDROOM Report.
- It proposes a phased policy approach to housing provision which backloads provision to the latter half of the plan period. This approach is not justified in the context of evidence of existing market need, including the current evidenced need for affordable housing, and has the potential to have significant detrimental impacts on the operation of the local housing market and economy. On this basis, this element of Policy MN1 must be removed for it to be considered sound.

Equally on the basis of a number of the points above, Policy MN1 in relation to the scale of housing to be provided does not ensure, that there is 'sufficient flexibility to adapt to rapid change'.

Summary of Suggested Changes

1. Increase the housing requirement to ensure that sufficient provision for new housing development is made to deliver the Vision and Objectives of the Publication Draft Local Plan and to accord with national planning policy.
2. Delete the phased requirement for housing provision set out in part 1 of policy MN1.

Evidence Submitted

Housing Evidence Review (Turley Economic, March 2015); The Ashworth Estate: Mersey Care NHS Trust (March 2015); Site Advocacy Document (March 2015)

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 730	Response Ref 2	Representor Name Gerry O'Brien
Organisation Name Nextdom Ltd		
Obj/Sup/Com Objection		

Summary of Main Issues

We believe that the overall employment land requirement should be higher than 84.5ha, in order to meet employment needs over the plan period. Paragraph 21 of the National Planning Policy Framework (NPPF) states that local planning authorities should set criteria, or identify strategic sites, in order to '...match the strategy and to meet anticipated needs over the plan period'.

Therefore, the NPPF states that it is not sufficient to just meet anticipated needs. Instead, local authorities should also allocate sites to match the economic strategy, which may require additional allocations which exceed anticipated need. This is relevant to Sefton as the sub-regional strategy for Merseyside focuses on the growth of the economy, especially in light of projects associated with SuperPort and the Atlantic Gateway. Therefore, in order for Sefton's Local plan to be sound and compliant with the NPPF, there should be additional land allocated for employment uses, including the provision of more strategic sites. This will ensure that Sefton successfully plans to meet anticipated needs and match the strategy.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 730	Response Ref 1	Representor Name Gerry O'Brien
Organisation Name Nextdom Ltd		
Obj/Sup/Com Objection		

Summary of Main Issues

The explanation of Policy MN1 references that the employment requirements identified are based on a full objective assessment of the needs of businesses in the Borough, within the 2012 Employment Land and Premises Study (ELPS) Refresh.

The ELPS considers a range of alternative models for estimating future land requirements over the plan period including historic take-up rates, employment forecasts, labour supply, and a 'policy on' position. The requirement in MN1 is linked to the largest of these – being historic take-up rates. We support this approach to estimating future requirements.

However, we do raise concern as to the extent to which these historic take-up figures (and therefore the requirement established in MN1) has full regard to economic strategy across Sefton and the Liverpool City Region (LCR). Whilst paragraph 2 of the ELPS Executive Summary references that regard has been had to the "identified expansion needs of the Port of Liverpool", this is not filtered through in relation to the historic land take-up model. This is clear in paragraphs 8.6 to 8.9 of the ELPS which presents a simple extrapolation of past trends.

The significance of this is presented in paragraph 8.31 of the ELPS, which does consider the potential impact of a 'policy on' approach above and beyond baseline econometric forecasts. Specifically the 'policy on' approach clearly projects a more positive economy in terms of job growth, and in particular a positive employment growth in manufacturing activities over the plan period. What is particularly notable here, in relation to how this translates into the land take up projections, is the nature of the projects included within this additional scenario. At paragraph 8.3 of the ELPS these are listed to include SuperPort, Liverpool Waters and Liverpool Airport Expansion. For SuperPort and Liverpool Waters, it is clear that these are projects of unprecedented scale with clear potential impacts for the Sefton economy (positive impacts).

For example, in reference to the Port specifically, the main land based routes to and from the Port are located in Sefton; direct and indirect job creation is in Sefton; and the main operational area of the Port is within Sefton. Policy ED1 of the Local Plan relates to the expansion of the port in Sefton. When completed, the River Terminal will double the port's existing container capacity, making it one of the country's best equipped and connected terminals (para. 7.13).

On this basis, we believe that the 84.5 hectare requirement should be treated as a minimum figure over the period – taking into account the land requirements relating to SuperPort and Liverpool Waters, which we believe will exceed historic trends (given their unprecedented nature and scale).

Whilst provision is made in the plan for 'early review', if required, in light of impact of the Port of Liverpool expansion, at page 26, we believe this renders the plan ineffective as it does not meet the objectively assessed need for the whole of the plan period.

Further to these concerns regarding the overall quantum of employment land requirement identified within the emerging plan, we would draw attention to the nature of demand and supply identified within the ELPS evidence base. Specific reference is made to conclusions drawn in paras 10.27, 10.28, 10.66 and 11.28 of the ELPS.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 732	Response Ref 4	Representor Name
Organisation Name Bellway Homes Ltd		
Obj/Sup/Com Support		

Summary of Main Issues

THIS IS A SUMMARY

Bellway is supportive of the Council’s approach in seeking to meet its full housing requirement through its proposed housing allocations plus a contingency buffer, and therefore broadly supportive of its stated total housing requirement, albeit as a minimum requirement.

Whilst the full implications of the 2012 based sub-national household projections (2012 SNHP) is still to be determined, it can be inferred that Sefton’s housing needs and requirements will be put under greater pressure and scrutiny, increasing the importance and significance of the proposed housing allocation sites, particularly those that provide clear evidence that they are suitable, immediately available, viable and can therefore be delivered within a five year period. This is consistent with the Council’s approach to promoting a wide range of sites through the plan which will assist in meeting their requirement within the earlier years, something that Bellway is supportive of given the immediate availability of land at Waddicar Lane, Melling to be brought forward for new homes.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents NLP Housing Needs Assessment
Policy MN1	Housing and employment requirement	
Respondent No 734	Response Ref 3	Representor Name Maria Bennett
Organisation Name		
Obj/Sup/Com Objection		

Summary of Main Issues

Backlog of Housing

It is difficult to accept a ‘backlog’ requirement is necessary. These are dwellings that have not been provided in Sefton, the households have simply not formed or they have migrated out of or more likely not migrated in to Sefton. The main issue is a suppressed economy during the backlog period hasn’t driven in-migration and household formation in the area as projected

As illustrated in paragraph 5.29 of NLP’s report Sefton operated a Policy of housing restraint between 2003 and 2008 however throughout this period Sefton’s population fell by nearly 6000. Supply doesn’t now need to catch-up, these circumstances have passed, these households did not form. Many other authorities in the country over-provide housing and correspondingly they do not carry over this excess provision forward from historic plan periods

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 735	Response Ref 2	Representor Name
Organisation Name Catalyst Capital		
Obj/Sup/Com Support		

Summary of Main Issues

We support Policy MN1 Housing and Employment Targets that the housing target should be a minimum of 11,070 new dwellings.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 737	Response Ref 2	Representor Name
Organisation Name		
Obj/Sup/Com	Support	

Summary of Main Issues

Our clients (the owners of site MN2.5) support the proposed level of housing to be a minimum of 11,070 new dwellings (Policy MN1).

This level of housing is justified and “based on a full objective assessment of the needs of households in the Borough” which includes the “Housing Requirements for Sefton Paper”, published in November 2014.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 738	Response Ref 4	Representor Name Charles Smith
Organisation Name	CP&S Ltd	
Obj/Sup/Com	Objection	

Summary of Main Issues

CP&S Ltd do not feel that Policy MN1 will deliver sufficient housing to meet local needs. The NLP ‘Review of Objectively Assessed Need for Housing in Sefton’ (2014) updates previous reports. This is the document which has shaped the proposed housing requirement. We believe that the proposed delivery of 615 d.p.a. is likely to have an adverse impact upon the economy. The NLP Study concludes that the full objectively assessed need for housing in Sefton ranges between 600 and 800 d.p.a. (11,070 to 14,400 dwellings over the plan period). However, the Council has chosen to pursue a delivery option at the lower end of this spectrum, which has potential to restrain growth, without adequate justification.

NLP recognise that a figure of 800 d.p.a. ‘broadly equates to job stabilisation’ (para. 1.26, pg. 14). This figure would be necessary to prevent economic decline in the borough. Therefore, selecting a housing requirement which is significantly below 800 d.p.a. is likely to result in the loss of jobs.

Chapter 4 of the Publication draft Local Plan refers to the need for an early review of the Local Plan, once adopted, in order to take account of the impacts of the expansion at the Port of Liverpool. This review is intended to reflect on sub-regional studies and the implications of the Port expansion for housing requirements. Liverpool 2, as well as other SuperPort related projects, are anticipated to have a significant impact on the sub-region in terms of direct and indirect employment creation. This has clear implications for the number of dwellings needed in the area, particularly in light of the impacts of in-migration upon population increase in Sefton. This approach contradicts the following principles of sustainable development outlined in Policy SD2.

Pursuing a housing requirement at the lower end of the NLP range also has significant implications for affordable housing delivery. The NLP report states that based on 30% of housing being affordable, a housing requirement of 600 d.p.a. would only provide half of the total affordable housing need identified in the Strategic Housing Market Assessment (SHMA). The top end of the range would deliver around two-thirds of the affordable housing target. This calculation is based on the findings of the February 2014 SHMA, which identified an annual affordable housing need of 361 dwellings. However, the most recent update to the SHMA (November 2014) identifies an increased affordable housing need of 434 d.p.a. It is evident that only achieving 42% of affordable housing provision from such a significant source will not address Sefton’s housing needs. In light of the updated SHMA evidence there is a clear need to increase the housing target to meet affordable housing needs in Sefton over the plan period. Without responding to this increased need with an increased housing target, the Local Plan will fail to meet the full, objectively assessed needs for market and affordable housing.

The NPPF is clear that a 20% buffer must be added to a housing requirement in cases where a local authority has under-delivered persistently in the past (para. 47). The Strategic Housing Land Availability Assessment (SHLAA) demonstrates a clear record of under-delivery in previous years in Sefton. Regardless of the reasons for past under-delivery, provision for an additional 20% to the five year housing requirement should be made in Sefton.

Summary of Suggested Changes

The development of approximately 350 dwellings at Oriel Drive will contribute towards meeting a higher housing requirement.

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents** NLP Housing Needs Assessment
Policy MN1 **Housing and employment requirement**
Respondent No 740 **Response Ref** 9 **Representor Name**
Organisation Name Formby Residents Action Group
Obj/Sup/Com Objection

Summary of Main Issues

A consideration and critique of the housing market signals and other housing issues that have been used to underpin the NLP study of housing requirement and the Local Plan.
This includes Migration, Land Values, House Prices, affordability, rents, overcrowding and homelessness, rate of development and housing need.

Set out in Chapter 9 [pages 29-45] of the representation.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents** Employment Land Premises Stud
Policy MN1 **Housing and employment requirement**
Respondent No 740 **Response Ref** 10 **Representor Name**
Organisation Name Formby Residents Action Group
Obj/Sup/Com Objection

Summary of Main Issues

An analysis of BE Groups methodology for calculating employment land requirements and how these findings have been reflected in the Local Plan.

Set out in Chapter 9 [pages 46-49] of the representation.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents** NLP Housing Needs Assessment
Policy MN1 **Housing and employment requirement**
Respondent No 740 **Response Ref** 4 **Representor Name**
Organisation Name Formby Residents Action Group
Obj/Sup/Com Objection

Summary of Main Issues

An evaluation of housing demand and backlog in Sefton, with a conclusion that a backlog requirement may not be necessary. Set out in Chapter 4 [page 11] of the representation.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 741	Response Ref 1	Representor Name
Organisation Name	Priory Asset Management LLP	
Obj/Sup/Com	Objection	

Summary of Main Issues

THIS IS A SUMMARY

Priory Asset Management LLP object to the Council's approach toward assessing housing need, which is significantly understated in the Plan. The Plan does not identify the full, objectively assessed housing needs of the area, as required by the National Planning Policy Framework (NPPF) but puts forward a suppressed figure which fails to take due regard of likely household growth, the need to meet jobs growth and the need for affordable homes.

One of the key pieces of evidence in relation to the spatial strategy comprises the Household Projections published by CLG. Since the Local Plan was published the latest Household Projection figures (2012-2037) have been published. In relation to Sefton these new figures show a sharp increase in the household growth rate when compared to the 2011 interim projections. The availability of these new figures alone requires a total reassessment of the Objectively Assessed Need, and spatial strategy, which in turn impacts on the allocation of sites.

The housing target put forward within the Local Plan was calculated prior to the release of the most up to date housing projections. The figure clearly needs to be adjusted to reflect the increase in household formation forecasted. The spatial strategy is also criticised for failing to include an element for jobs growth within the housing target. The housing requirement figure should fall within a broad range of between 12,500 and 15,750 depending on the level of jobs growth promoted.

Summary of Suggested Changes

Amendment to Policy MN1 to meet the objectively assessed need for housing. The housing figure should fall within a broad range of between 12,500 and 15,750 depending on the level of jobs growth promoted.

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 742	Response Ref 2	Representor Name RF Hughes
Organisation Name		
Obj/Sup/Com		

Summary of Main Issues

I strongly object to the proposed Local Plan for Sefton and would suggest the housing figures demonstrated by Sefton are not sustainable and should be revised.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 767	Response Ref 2	Representor Name J Avery
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

According to the NPPF, greenbelt boundaries should only be altered in exceptional circumstances. Sefton's local plan predicts a population increase that is overly ambitious and at odds with the statistics that show Sefton's population has actually fallen and has an ageing population. This will lead to a natural turnover of homes. Where will all the people come from to live in these new homes? It seems to be a case of build them first and "they" will come. Sefton is part of the Liverpool City Region. Liverpool has suffered from a declining population for years and has only recently reversed this decline. Sefton's plan to build over 11000 new homes can only succeed if they poach residents from Liverpool where the major employment opportunities are available.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 769	Response Ref 2	Representor Name D Avery
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

According to the NPPF, greenbelt boundaries should only be altered in exceptional circumstances. Sefton's local plan predicts a population increase that is overly ambitious and at odds with the statistics that show Sefton's population has actually fallen and has an ageing population. This will lead to a natural turnover of homes. Where will all the people come from to live in these new homes? It seems to be a case of build them first and "they" will come. Sefton is part of the Liverpool City Region. Liverpool has suffered from a declining population for years and has only recently reversed this decline. Sefton's plan to build over 11000 new homes can only succeed if they poach residents from Liverpool where the major employment opportunities are available.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 773	Response Ref 1	Representor Name Neil Roberts
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

The plan is not justified. According to the Office of National Statistics in 2012 Sefton has suffered from the third largest fall in population in the ten years to 2011. The only two places to see more people leaving an area were Knowsley and Barrow-in-Furness.

The Office of National Statistics also point out in Regional Trends 43, The region's population is projected to increase at the lowest rate of all the English regions (9 per cent between 2008 and 2033) and is one of two regions where the working-age population is projected to decrease

On the Government web site the report Sefton's Population Projections 2011 - 2021, states

- Despite a reduction in population of 3.2% between 2001 and 2011 (Census data), overall Sefton population projected to rise by 1% between 2011 and 2021 (274,000 to 276,800) By the Government and Sefton council own admission there is a possible increase of 2,800 people over 10 years, mainly as a result of over 65's. The working population is projected to fall by 4% so it is not justified to build 11,000 houses.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 789	Response Ref 1	Representor Name JD and M-A Campbell
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

The published Plan states that the current population of Sefton is 273,300, projected to rise to 280,000 by 2037. The Plan sets out to address the need for housing for these extra 6,700 people, and aims to do so by 2030.

In section 2.3 it is stated that Sefton's population in 1981 was 300,100, but makes no suggestion as to the whereabouts of the housing once occupied by these 20,100 people; this housing must have existed at least in 1981; maybe it was demolished? If this is the case, the formerly built-upon sites must still exist and be available for re-development. Section 2.15 points out that as of April 2014 there were 5,800 vacant homes in the area (2,632 of which were long-term vacant). Thus it appears there are already sufficient homes in the Borough to accommodate an expected increase of population of 6,700 by 2037. Indeed, in section 4.47 it is noted that an extra 15,680 homes were constructed between 1984 and 2014 — despite reducing population levels. These statistics are seemingly at variance with reality.

In Section 4.3, the Plan outlines 3 possibilities for development of the new housing it deems to be necessary. Option 1 (rejected) provided for 210 extra homes per year over the Plan lifetime. Option 2 (approved), provides 510/year and Option 3 (rejected), 700 dwellings/year. It is stated that in addition to 510 new dwellings per year, Option 2 will add a 5% buffer and some 'backlog needs which have not been met since 2003', i.e. 594 dwellings/year: resulting in 10,700 new dwellings by the end of the Plan period in 2030. Section 1.3 indicates a backdated Plan start date of 2012, meaning that the Plan lifetime is 18 years (2012 to 2030). Should Plan option 2 be approved, the actual build rate for 10,700 homes over the 15 remaining years will be closer to 713/year, in other words about the same as the rejected Option 3. By section 6.11, the number of homes required has been inflated further, to "a minimum of 11,070", and by section 6.17 an extra 720 homes has been required (extra 6.5%), bringing the grand total to 11,790. This represents a build rate of 786/year, assuming building starts in 2015. In other words, Option 2 provides for over three times the build rate as the more conservative Option 1.

We note from the information given in the Plan document, that it has been decided that an extra 11,790 new dwellings will be needed by 2030. This is to apparently to house 6,300 extra people, and even this population increase is not projected to have occurred until 7 years after the Plan ends. We assume these extra people will be very happy because they will have almost an extra 2 homes per person! Note, this does not even take into account the existing 5,800 vacant properties in the region.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN1	Other Documents
Policy MN1	Housing and employment requirement	
Respondent No 798	Response Ref 2	Representor Name Arthur Finch
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I can't see a need for well over 600 houses (plus extras and back log) totaling over 1100 houses per year up to 2030, all these houses that Sefton's local plan proposes we need.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents**
Policy MN1 **Housing and employment requirement**
Respondent No 802 **Response Ref** 2 **Representor Name** M O'Hanlon
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Where are these people coming from? The census shows Sefton's population going down and a forecasted population increase for Sefton up to 2031 of only 5,000, yet Sefton's Local Plan aims to build 11,070 houses for 24,500 people within the planning period.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents**
Policy MN1 **Housing and employment requirement**
Respondent No 804 **Response Ref** 2 **Representor Name** P O'Hanlon
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Number of additional houses
Our population has declined in recent years and predictions show a modest increase in the region of 276 persons per year over the next 15 years. Numbers of houses on the scale proposed are most definitely not needed - 11,070 houses for Sefton. Where are all these people coming from to fill these houses?

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents**
Policy MN1 **Housing and employment requirement**
Respondent No 853 **Response Ref** 2 **Representor Name** Robert Simon
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Latest government population projection figures for Sefton in 2012 and in 2031 show 273,697 and 278,873 respectively. This is an average increase of only about 5,200 people. The Sefton local plan envisages a need for over 11,000 new homes up to 2030! Does this imbalance indicate that Sefton is providing additional homes for adjoining boroughs, with the resulting negative impact to be felt by all local residents?

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents**
Policy MN1 **Housing and employment requirement**
Respondent No 860 **Response Ref** 3 **Representor Name** Mark Caffrey
Organisation Name
Obj/Sup/Com

Summary of Main Issues

Incorrect Population Forecasts — One area that has been glossed over in any debate is the actual need for further development within the borough of Sefton. The conclusions in the plan appear to stem from population growth figures which now seem largely discredited. Councillors and officials have been stuck with these figures and not listen to newer projections which see a reduced need for new housing. Why?

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents**
Policy MN1 **Housing and employment requirement**
Respondent No 882 **Response Ref** 1 **Representor Name** Leslie James Baxter
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

There is a falling population in Sefton and a lack of demand for housing. The backlog of houses in the previous Local Plan were not built because of the lack of demand therefore the backlog should not be taken into consideration. In spite of this the figure of 420 houses per annum has been upgraded to 620 houses per annum. Whether the extensions to the industrial estate are necessary is debatable the houses proposed for Formby will attract professional people and their employment will in general be outside of Formby.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents**
Policy MN1 **Housing and employment requirement**
Respondent No 895 **Response Ref** 2 **Representor Name** Yvonne Irving
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Sefton has not been lacking in new build over the past 25 years, there have been numerous estates gone up but under the protection of U.D.P policy on the green belt it has not been built on and therefore the building frenzy of the sixties and seventies has been contained. This was entirely right and sensible as Sefton's population has not been increasing but steadily going down. The amount of houses for sale has always been high and there isn't a homeless problem. So the amount of houses available has been more than adequate and should not carry any form of retribution against the council. Such as the six year shortfall that they are now expected to make up on top of their housing figures

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents**
Policy MN1 **Housing and employment requirement**
Respondent No 900 **Response Ref** 2 **Representor Name** David Shore
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I object to this proposal. Although it is widely reported that housing demand is going up nationally, on a local level the projections for Sefton do not justify building on the Greenbelt and losing it for ever. I suggest we are nowhere near special circumstances arising.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN1 **Other Documents**
Policy MN1 **Housing and employment requirement**
Respondent No 965 **Response Ref** 3 **Representor Name** Tracy Smith
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Housing need calculations.
Sefton Council's Local Plan provides for a minimum of 11,070 new houses over the lifetime of the plan (2010 - 2030). This equates to an average build rate of 615 houses per year. Based on the latest 2012 ONS data, Sefton's average annual projected population increase is only 276 persons per year. The indigenous population of Sefton is projected to fall by 5,650 persons during the Plan Period. This is equivalent to an annual average decrease of 314 persons per year. A figure for net migration for Sefton has been determined as 10,611 across the Plan Period (Nathaniel Lichfield & Partners report para 6.9). This is equivalent to an annual average of 590 persons per year.
Natural change (births and deaths): -314 persons per year
Net migration: +590 persons per year.
Net increase: 276 persons per year.
It is difficult to reconcile these figures with the vast number of new houses recommended. They cast serious doubt on the level of housing need assumed within Sefton Council's Local Plan. Are we not confusing "need" with "greed"? Only a small proportion of the planned housing is "affordable" (and could therefore be deemed to be fulfilling a housing "need"). Most of it consists of market-value houses (which, of course, generate greater profit for developers). This is no justification for building on Green Belt and top-quality agricultural land.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 6 **Response Ref** **Representor Name** Elizabeth Thompson
Organisation Name Petition of Green Park Estate Residents
Obj/Sup/Com Objection

Summary of Main Issues

Opposed to the Local Plan and Building on Green Belt

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 7 **Response Ref** 1 **Representor Name** Elizabeth Thompson
Organisation Name Petition of Local Sefton Residents
Obj/Sup/Com Objection

Summary of Main Issues

Opposed to the Local Plan and Building on Green Belt

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 15 **Response Ref** 1 **Representor Name** Paula Ormond
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

The same old story from this council, lets use the green belt land because you can't be bothered to find and repair all the empty houses and commercial buildings that are all over the place. Sort those out first and stop robbing green belt land because believe it or not some people actually enjoy having some open space and a bit of greenery about, that's why I moved here. Leave the green belt alone.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 25 **Response Ref** 1 **Representor Name** Gemma Watts
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

I am in support of the local plan - particularly new houses in the Crosby/Formby area for people like myself who are stuck in the cycle of private renting and never being able to save for a deposit for the purchase of my own house due to high rents.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 27 **Response Ref** 1 **Representor Name** Carol Walsh
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I can't believe you would build on farm land with all the trouble going on. There is flood risk. There is the fact that there is no transport other any car. No room in the schools. No room in our doctors. There is Brownfield land and eye sores all over Sefton that need money spent on were there is no flood risk there is no transport worries so why build on this farm land.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 29 **Response Ref** 1 **Representor Name** John Cooke
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

This country is "full". There too many people and we shall reap the consequences of this fact sooner or later. However, Sefton Council do have a problem regarding even further building. It is vital that even more open space and 'green 'land is not lost. Otherwise our once beautiful land will become a concrete jungle. One of the reasons we have so many floods today is that everyone has concreted over their previous front gardens. The drains cannot cope.

Every effort must be taken to utilize land that has already had buildings upon. There is so much of it available. With imagination and skill it can be done. Another matter that concerns me is the fact that building houses has to accompanied with extra schools/ hospitals/ doctors. Now, not later on when the powers that be realise our infrastructure cannot cope with the extra people. The best solution is to reduce the number of people. But of course this is too simplistic for those that are in power.

Summary of Suggested Changes

Evidence Submitted

Policy MN2 gen **Housing, employment and mixed use allocations**

Respondent No 38 **Response Ref** 1 **Representor Name** N Edwards

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I am against any development on any green belt land within the boundaries of Sefton. Landowners and farmers in Sefton play a huge role in managing and maintaining agricultural farm land which provides the necessary commodities to the local community and nationwide public. The green belt does not only provide the necessities for food production it also provides a safe important habitat principally for farmland birds and pink-footed geese, natter jack toads, sand lizards, Whooper swans, King fishers, herons, bats and water voles.

Some habitats such as ancient woodland and ancient trees are irreplaceable because of their age and complexity, and cannot be recreated once they are lost.

Development should not harm the significant characteristics of the particular rural landscape.

Also Water bodies and land formally designed to manage surface water and flood risk, including adopted Sustainable Drainage Systems i.e. The River Alt which runs through green belt land may result in localised flooding if removed.

Green infrastructure has many benefits and functions including economic, nature, recreation, health and well-being benefits. Green infrastructure reduces air pollution, and air temperatures locally, and helps to reduce and manage flood risk.

These landscapes have evolved to their present form over thousands of years from a combination of natural geomorphological changes and human influence. The more notable historic landscapes and settlements occur around North Meols / Churchtown, Formby Hall, Ince Blundell, Little Crosby and Thornton, Lydiate Hall, Melling Rocks and Melling House.

Not to mention the stress any development will have on the local community and the surrounding infrastructure.

It's a shame that the people who give the go ahead to develop on the green belt will not be held accountable in 10 years time when there will be local traffic congestion and flooding.

The way Sefton council is going with the Local Plan in 50 years' time green belt will be folk law.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 52	Response Ref 1	Representor Name Ian Cowell
Organisation Name Ince Blundell Parish Council		
Obj/Sup/Com Objection		

Summary of Main Issues

Under Sefton Council's current Local Plan Ince Blundell is 'washed over' agricultural Village in Sefton's Green Belt. The Parish Council which serves the community of Ince Blundell is, because of its farming connections, extremely concerned at the potential loss from Sefton Borough's Green Belt of its Best and Most Versatile Grade 1, 2 and 3(a) agricultural land for building development. Ince Blundell Parish Council accepts that under Sefton's Local Plan the Borough may have an obligation under the National Planning Policy Framework (NPPF) to build houses in parts of its Green Belt. None the less, the Council would urge the Planning Inspector that, wherever possible, any building development should avoid using Sefton's Best and Most Versatile Land for housing development. As stated under paragraph 112 of the NPPF "Local Authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local authorities should seek to use area of poorer quality land in preference to that of higher quality."

Sefton's Green Belt covers an area of 7,840 hectares, approximately 51% of the area of the Borough. Sefton's rural area is essentially the area designated as Green Belt. According to the Local Plan around 30% of Sefton's agricultural land is Grade 1, 32% is Grade 2 and 3% is Grade 3(a). The ADAS Report states "In their current condition, soils in Sefton area a valuable, local, regional and national asset, contributing to all the ecosystem services to a greater or lesser extent" The ADAS Report continues: "Survey work undertaken for this study shows that the majority of land in Sefton is still the best and most versatile land, more than 40 years after the original provisional survey was undertaken. The best and most versatile land is capable of supporting a wide range of crops which can be harvested in winter". Agricultural production is dominated by arable cropping (cereals, oilseeds and potatoes) and horticulture (fruit and vegetables) based on the availability of good quality soils. Under the Sefton Agricultural Land Study carried out by ADAS it is stated Sefton's peaty and sandy agricultural soils are very good for agriculture if they are sufficiently drained and they should be protected from development, whenever possible, as they are a limited resource nationally. The Study continues "The best agricultural land is capable of supporting a wide range of crops which can be harvested at any time of the year and is afforded some protection under the National Planning Policy Framework (NPPF).

The ADAS Report observes in paragraph 4.2. "While soils in England have been protected for many years, there has been a growing recognition by Government of the important role soils play in maintaining a healthy environment. In its strategy for soils (Safeguarding our Soils) the Government recognises that soil cannot be replaced and is an essential growing medium. Current policies focus on protecting English soils and the important ecosystems they provide. In paragraph 4.3 it continues; "the most recent guidance on soils(Natural Environment White Paper) states that 'soil is essential for achieving a range of important ecosystem services and functions, including food production, carbon storage and climate regulation, water filtration, flood management and support for biodiversity and wildlife.'

Ince Blundell Parish Council agrees with these views.

Ince Blundell Parish Council considers that Sefton Council has produced a comprehensive and well researched Local Plan which seeks to address all the issues that might arise under a Planning Inspector's scrutiny. However, Sefton maintains that, regarding housing development, it has not been possible to avoid identifying sites that are of the 'best and most versatile ' agricultural land as much of the land in Sefton is of this quality and there are other constraints elsewhere, such as nature sites. Moreover, Sefton states that since the Framework has been in place, there have been a number of public inquiries where the protection of agricultural land has been given less weight than meeting housing needs. It cites Cheshire East and East Devon as examples. (Report of Consultation Process Part Two: Sites). The problem here is that in terms of size and proportion Sefton Council area is very much smaller than the Councils cited. Cheshire East, for example, has 40,630 hectares of Green belt land alone whilst the area of East Devon totals 82,293 hectares. To reiterate, Sefton's Green Belt cover 7,840 hectares of land. Furthermore, the quality of best and most versatile land in Sefton is of a greater proportion in comparison to its overall size compared to the Councils cited.

Sefton's Green Belt Study of 2013 also attempts to play down the significance of the best and most versatile agricultural land. Using data from MAGIC (see Table 11 paragraph 5.8) it suggests that Sefton's proportion of England's total is 0.592%. However, Natural England suggests MAGIC data gives an overall grade for an area that is not sufficiently accurate to use other than as general guidance. Moreover the maps are only accurate to about 80 hectares and are likely to contain land with a different classification within the grade mapped. Of greater significance is that current estimates are that Grade 1 and Grade 2 together form about 21% of all farmland in England. In addition Subgrade 3(a) also covers about 21% agricultural land in England. So it can be argued that even the small portion of the unique Grade 1 and Grade 2 agricultural land is likewise a valuable and irreplaceable resource which makes up a considerable portion of Sefton's Green Belt land. Furthermore, the table does not deal only with Farmland Grade 1 - 5, but also includes non-agricultural and urban areas so the suggested Sefton proportion versus England average can be misleading. Furthermore, according to the Joint Defra/EA Flood and Coastal Erosion Risk Report of 2011, more than half (58%) of the total resource of Grade 1 agricultural land in England is within the floodplain. The national percentage of

best and most versatile land (ALC Grades 1,2 and 3) located in the floodplain is 13% in England. Admittedly in England 78% of Grade 1 land in the floodplain in England is at low flood risk, and 48% of the best and most versatile land in the floodplain is at low risk. None the less, the risk is present and sacrificing Sefton's scarce Grade 1,2 and 3a soils to development only enhances this risk.

In fairness to Sefton, an attempt has been made under the Green Belt Study 2013 to discard Parcels of land as not being contained by an urban area or as being in an essential gap between settlements. Moreover, under the Green Belt Study there is an attempt [see the Constraints Hierarchy (Table 5.1)] to protect some of the Best and Most Versatile Agricultural land (Grade 1, 2 and 3(a)) by categorising it as "Severely Restrictive (but would not entirely prohibit new development)". The stance of Ince Blundell Parish Council is that such land should be classed as "Prohibitive (show stopper)" and that where there is grade 1 and 2 land it should not, under any circumstance, be subject to housing development.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 58	Response Ref 2	Representor Name Andrew and Margaret McDonald
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

We would like to register our disapproval of any building on Green Belt land in the Sefton area, until it is proven fact that there are no brownfield sites available.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 64	Response Ref 5	Representor Name KJ Trainer
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Building on Green Belt land will one day stop us growing food. China and India will one day take all the world's food. We need to keep green land for future generations.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 70	Response Ref 2	Representor Name Stephen, Lisa & Alex Fry
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Oppose any building on Green Belt

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 83 **Response Ref** 1 **Representor Name** D Tierney
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Why should people who have saved to live in pleasant environment have 11,000 homes and traveller camps thrust upon them? Is concreting over green land taking the environment into consideration? More homes mean more schools, more cars, more traffic more emmissions and more litter.

The Council can't deal with the litter as it stands. The local hedgerows are full of plastic bags.

We should protect the vital role nature plays and remember land means food to both wildlife and humans. No land - no food.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 84 **Response Ref** 1 **Representor Name** James Wildman
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

There are enough brown field sites in Sefton without destroying much needed green field sites and taking the enjoyment of these sites and replacing them with noisy pollution filled industrial sites. Our children (the future residents of Sefton) deserve the chance to enjoy the beautiful sites and the wildlife therein that Sefton are planning to destroy.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 88 **Response Ref** 1 **Representor Name** Karen Atkinson
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I would like to express my concerns about further building upon green belt land within Sefton.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 94 **Response Ref** 1 **Representor Name** Alan Dobson
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

There should be no building on grade 1 agricultural land, as this is a precious resource to the country and community in terms of self provision.

We need green spaces in our community and the decline in these will affect our health.

The Local Plan is uninspirational and it is only about overloading Sefton with more houses to get more taxes and the new homes bonus. It hasn't been based logically on need and what is best for the area.

We don't need new houses. Official population figures show that Sefton's population is in decline so how can you warrant more houses?

There has not been enough consideration in the Local Plan of the affect these houses will have on infrastructure, roads, GPs, crime, living standards, wildlife, areas used for leisure, health and schools.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 95 **Response Ref** 1 **Representor Name** Anne Thornton
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

There should be no building on grade 1 agricultural land, as this is a precious resource to the country and the community in terms of self provision.

We need green and open spaces in our community, and the decline of these will affect our health and the environment
Official population figures have shown that population in Sefton is on the decline, so this many new homes are simply not needed
There has not been enough consideration in the local plan on the effect the new houses will have on infrastructure, roads, GP services, schools, crime, living standards of the area, wildlife, areas used for leisure by local residents, health, and schools.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 98 **Response Ref** 1 **Representor Name** Steve Rowe
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

There should be no building on grade 1 agricultural land, as this is a finite resource for the area and the community . Residents of Sefton need green and open spaces in our community, and any reduction will affect our health. The local plan as currently written is un-aspirational, and it appears to be about more houses to get more taxes and the new homes bonus. Residents don't need new houses, population figures have shown that population in Sefton is on the decline, so how can you warrant so many new homes. There has not been enough consideration in the local plan on the effect these new houses will have on infrastructure, road, GP services, crime, living standards of the area, wildlife, areas used for leisure by local residents, health, and schools.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 99 **Response Ref** 1 **Representor Name** Jim O'Gorman
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Why build on Green Belt when other brownfield sites are available. Apparently, Sefton demand for housing isn't what government expectations are for the rest of the country, so why build so many houses just to meet government targets, that are not realistic in the first place.

Summary of Suggested Changes

Evidence Submitted

Chapter General	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 101	Response Ref 1	Representor Name John Nelson
Organisation Name		
Obj/Sup/Com	Support	

Summary of Main Issues

My evidence will take the form of a portfolio of letters sent to the local press mostly commenting on the various objections people have to building more houses in Formby, and in particular on green belt land. Others were at my own instigation. I had thought to include the original letters, but that would be overly cumbersome and it is fairly easy to infer from my replies the points the correspondents were making. Some of these letters were published in full, some were edited, some not published at all. The letters date from late 2013 to the present.

This evidence is not technical or statistical but simply an attempt to assuage the very real but unjustified fears of local people, exacerbated by the hyperbole of nimbyists. Some of my comments relate specifically to Formby, but the concerns I have addressed can certainly be replicated across the borough and beyond.

I simply want the Inspector to be aware that the silent majority in Formby are not opposed to well planned housing development here. Many of my friends, when they read my letters or in conversation say things like "I never thought of it like that" or "we really are making things difficult for our kids" or "people can be so selfish" and so on. I want to show beyond any doubt how illogical and false most nimbyist arguments are, ranging from deliberate misrepresentation to simple ignorance. It is unusual for these arguments to be challenged consistently over time. This I have attempted to do.

I put in an application under the Right to Contest Regulations to close RAF Woodvale and release it for community use; this was last August. At the time of writing (early Feb. 2015) I have had an acknowledgement from the Cabinet Office that the matter is being pursued but no firm decision. In the highly unlikely event that this application is successful it will be a game changer.

I have been following the great FRAGOFF debate with increasing anger and frustration. It is high time someone set out the case for limited development on green belt land and in particular, challenge the quite spurious arguments put forward by FRAGOFF in support of their cause. I shall not deal with the infrastructure/ school place argument as these have been answered elsewhere.

I went to the Sefton council website where I found a map of all the green belt land in the borough. Also highlighted were the sites earmarked for development; they are tiny, at a guess less than 3% of the total. This needs to be said.

It is possible to identify five reasons advanced by FRAGOFF to deny any development on green belt land. I shall deal with each in turn.

First, that greater use of brownfield sites would obviate the need to build on green belt land. A drive down Hawthorne road in Bootle gives the lie to this. Hundred upon hundred of well built, well designed and above all affordable homes for working families on huge brownfield sites, with more to come. Lancashire Tar Distillers, Litherland Tannery, Richmond Sausages, BICC cables, many others, now all part of a new community. How much browner can it get?

Next, that knocking down houses in Bootle means more houses must be built in Formby. There is of course no correlation between the two. Some houses have been knocked down, quite rightly, many of them empty shops with sub- standard flats above. Equally, many have been preserved and modernised.

Next, that the appeal procedure is undemocratic because decisions are made by officials not by councillors. The system was put in place under the Town and Country Planning Act 1947 which no government has sought to change for over sixty years. How undemocratic is that? The reason for it is clear. Legislators at the time knew full well that a few small-minded individuals would seek to block developments that were clearly beneficial in the wider public interest. Which is exactly what we have here. No wonder FRAGOFF are against it.

Next, the loss of agricultural production, creeping urbanization argument. The truth is there is too much land under arable production in Britain to-day. There have been many schemes over the last twenty years or so (some more draconian than others google 'set aside' for details) designed to subsidize farmers for producing less.

Finally, the danger from flooding. We have just experienced one of the wettest years since records began, yet we have had no rescuers out in small boats, no houses inundated, no floating caravans. Go to the DEFRA website and search on 'Formby Sefton flood risk' for a wealth of accurate information.

Everyone agrees that the only solution to the growing housing crisis is to build thousands more houses as quickly as possible. Some will inevitably have to be built on green belt land. Make no mistake, if FRAGOFF and their like get their way it will become

increasingly difficult for young people without rich friends or relations to buy their own homes. In short we need more houses not more nimbys.

Summary of Suggested Changes

Evidence Submitted

A series of letters written to the Formby Champion,

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 115	Response Ref 1	Representor Name Pauline Hughes
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I object this plan as it will destroy Sefton, my local environment and valuable Green Belt.

Several other grounds I object to are: The loss of best agricultural land, loss of farming communities and food production and local jobs, loss of wildlife and habitats, risk of flooding, increase of pollution and traffic on local roads which can't take it, brownfield sites should be used, noise pollution.

Summary of Suggested Changes

Used brown field site

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 116	Response Ref 1	Representor Name Shirley and Peter Irving
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Object to the Local Plan on the grounds that it will cause loss of green belt/agricultural land and loss of farming communities. Also their will be added pressure on local services including gps and local schools.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 119	Response Ref 1	Representor Name James Foy
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

We object to several parts of the changes for sefton. Increase traffic on our roads. Loss of versatile agricultural land. Added pressure on services.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 124	Response Ref 1	Representor Name Ronald Caffrey
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I am writing to object to your plans for building on the Green Belt land in Maghull, Lydiate, Aintree and Formby. Being of an age where the term "Dig for Victory" was vitally important to feed ourselves I dread to think if could happen again. We must preserve our precious agricultural land.

I do not think this plan has been thought through properly. Please concentrate on brownfield sites before losing Green Belt

Summary of Suggested Changes

Remove Green Belt site from housing supply.

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 131	Response Ref 2	Representor Name William Honeyman
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

The housing figures for Sefton are now outdated and incorrect. Nowhere are exceptional circumstances warranting green belt release mentioned. The Plan will lead to urban sprawl.

Why was West Lancs not involved with the Local Plan? Flood plains are evident across Sefton and flood risk is a major issue for a number of allocated sites. Development on these will also increase flood risk for existing properties. Schools in Sefton have no extra capacity to accommodate an increased population.

Brownfield sites should be prioritised and empty properties brought back into use before green belt land is considered. Sefton's road network is already stretched and would not be able to cope with an increase in traffic. This will result in congestion, pollution and numerous safety issues. The private sector cannot be relied on to improve infrastructure where Sefton's funds may be lacking.

Healthcare services in Sefton are also at their limit, with lengthy waiting lists at present. Doctors and dentists are unlikely to accommodate an increased population.

I believe Sefton Council has ignored concerns raised by the general public, particularly in regards to funding routes. The leader of the council has misled the council as a whole and this has resulted in the preparation of a flawed Local Plan.

Summary of Suggested Changes

Remove housing allocations from the green belt.

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents** SHLAA
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 134 **Response Ref** 1 **Representor Name** Gordon Lynes
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

My objection is the building on green belt when there is lots of brown belt, that should be used

Summary of Suggested Changes

Remove housing allocations on Green Belt land from the plan. Build on brownfield.

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 146 **Response Ref** 1 **Representor Name** Paul Lange
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I wish to object to Sefton Council's Local Plan on the following grounds:

The Local Plan is a living document and will allow our council to go back and revisit the green belt boundaries in the coming years.

The loss of best and most versatile agricultural land.

Loss of wildlife and habitats.

Added pressure on services to include Doctors, Dentists, Schools and Hospitals.

I am concerned about this last point in particular because we have trouble with the services already. For example, where I live it is like an open sewer with all the dog faeces.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 154 **Response Ref** 1 **Representor Name** Liz Williams
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I would like to submit my objection to Sefton's Local Plan on the following grounds. I want brownfield sites to be developed first before greenbelt. The question of who develops infrastructure cannot be left to developers. Housing figures do not denote special circumstances for building on greenbelt land which should be protected at all costs given much of this borders on areas of SSSI.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 166	Response Ref 1	Representor Name Deborah Simmonds
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I strongly object to the Sefton Local Plan. I consider that we are temporary guardians of the land we occupy and to destroy Greenbelt land is an irreversible mistake.

I question why so many houses are proposed and how existing resources will cope with this increase. The repercussions of this plan are major and will completely destroy the unique identity of the areas designated.

My concerns include the loss of green belt land and farming/ food production, the erosion of the countryside, increased risk of flooding, loss of wildlife habitats, effects upon services such as doctors and dentists (it is already difficult to get appointments) insufficient school places, increased traffic and congestion and lack of infrastructure planning.

I do feel that there has been a lack of consultation with the public in regard to this plan and urge you to listen to the general consensus.

Summary of Suggested Changes

To reduce the number of houses planned and to include brownfield in the Local Plan. I understand that there are in the region of 6000 empty properties in Sefton and a capacity for 6000 on brownfield land. To remove Greenbelt land from the Local Plan.

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 171	Response Ref 1	Representor Name John A McLean
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I object to the plan as it fails to address a number of vital issues which I consider must be addressed. These are:

Lack of detail as regards dealing with increased traffic flows on already crowded roads.

Lack of any details as regards the necessary infrastructure to support the additional housing proposed.

A failure to recognise the impact of additional housing and occupants on the services already in place, such as Doctors, Dentists, Schools etc. with no indication on plans to deal with these issues.

A failure to clearly set out the "special circumstances" which provide for developing existing Green Belt land.

A failure to address the issue of development of "Brownfield" sites as a first step to provide additional housing.

A failure to address the possibilities of the increased risk of flooding and how it will be dealt with for both the new developments proposed and for existing properties.

A failure to address the financial impact on householders of the necessary services that the Council will be responsible for on these proposed development as at this time many of these services are being cut back.

Summary of Suggested Changes

The plan needs to be more transparent and provide additional detail to address the numerous issues raised. There are far too many "Broad Brush" statements with a failure to provide detail to support the plan.

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 175 **Response Ref** 1 **Representor Name** Anthony Horne
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I wish to object to the local plan for the following reasons.

Sefton's Local Plan is proposing to take 4.4% of green belt land which is against the law. The Local Plan does not provide any special circumstances for using green belt land for building purposes. Sefton is unique in that it has limited land to build on due to various constraints. On one side its coastline, as well as sights of scientific interest, National trust land, golf courses and large areas of flood plains. Therefore any loss of green belt will cause urban sprawl.

Sefton has some of the best and most versatile agricultural land in the country and many of the sites highlighted for building purposes are on A1 agricultural land. This would involve the loss of farming communities, food production and the openness of the countryside. The loss of green belt land would also impact on wildlife and habitat.

The local plan indicates climate change is a major issue and they will direct building away from areas at flood risk. If this local plan is approved Sefton Council will be responsible for more wetlands, swales, ditches and verges on the new sites which they will have to adopt. This will have financial implications and could cause a rise in council tax in the future at a time of financial restraint. New housing developments on a large scale on land that has a tendency to flood increases the risk of flooding to existing housing in the area.

The draft local plan shows a lack of infrastructure planning for the additional housing. There seems to be an assumption that existing amenities will cope. The scale of the future house building proposed will put pressure on services such as Doctors, Dentists, Schools and Hospitals which in many cases are already under pressure. In the areas where new housing is proposed there will not be enough school places.

The bulk of the new housing developments in Southport, Ainsdale, Formby and Maghull will require people to travel into work by car as they are dormitory towns with very little employment in the local area. This will increase congestion on the roads and add to pollution through carbon emissions.

Statistics based on the last census show that Sefton's population growth is not under same pressures as can be found in other parts of the country. The statistics quoted in the Local Plan for population growth and the number of houses needed are wildly inflated. The Local Plan should be based on a brown field site development first. The Local Plan is a living document which will allow Sefton Council to go back in future years and revisit the green belt boundaries if necessary. There is no need to approve this large scale release of green belt land so developers can make large profits with no regard for the views of local people or local environments. Affordable housing will not be a priority for the developers.

This Local Plan does not represent the majority views of local communities.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 201 **Response Ref** 1 **Representor Name** SE Templeton
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Regarding the Sefton Local Plan, I would propose a Brownfield first policy in the Local Plan. My other objections are the increased volume of traffic and the health hazzards with the increase in pollution and emssions.

Summary of Suggested Changes

Brownfield first policy.

Evidence Submitted

Policy

Respondent No 203 **Response Ref** 2 **Representor Name** Julian Austin

Organisation Name National Grid

Obj/Sup/Com Comment

Summary of Main Issues

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.

Summary of Suggested Changes**Evidence Submitted**

Policy MN2 gen **Housing, employment and mixed use allocations**

Respondent No 203 **Response Ref** 1 **Representor Name** Julian Austin

Organisation Name National Grid

Obj/Sup/Com Comment

Summary of Main Issues

National Grid Gas Distribution would like to take this opportunity to advise prospective land developers of the following:

Crossing of assets: Construction traffic should only cross the pipeline at locations agreed with National Grid. To facilitate these crossings protection or diversion may be required; depending on site condition and pipe parameters.

Cable Crossings: For all assets, the contractor / developer will need to consider the clearance and necessary protection measures. The crossing must be perpendicular to the asset. The crossing may require a deed of consent to be agreed prior to work commencing.

Piling: No piling should take place within 15m of gas distribution assets without prior agreement from a National Grid Representative.

Pipeline Safety: National Grid will need to ensure that access to the pipelines is maintained during and after construction.

Our HP/IP pipelines are normally buried to a depth cover of 1.1 metres, however; actual depth and position must be confirmed on site by trial hole investigation to be monitored by a National Grid representative. Ground cover above gas distribution mains should not be reduced or increased. Our MP/LP mains will not be as deep as the pipelines. A National Grid representative may be required to monitor any excavations or any embankment or dredging works within 3 metres of a HP/IP pipeline or within 10 metres of an Above Ground Installations (AGI).

Monitoring of works in relation to MP/LP assets may be required by a National Grid representative. National Grid steel pipelines are cathodically protected to prevent corrosion to the pipeline. For further information please refer to SSW/22 (see further advice section).

Summary of Suggested Changes**Evidence Submitted**

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 215 **Response Ref** 1 **Representor Name** John Walsh
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I object strongly object to the use of green belt land as proposed in the local plan for Sefton. Not only will these proposals affect amenities such as health services and schools, but will also bring extra traffic to already crowded roads. There are a great number of Brownfields sites throughout Sefton and use of these would not only produce space for new build properties, but would also enhance the appearance of certain areas. Most of the land to be used in the proposals is prime agricultural land, the loss of which would endanger food production and cause hardship to local farmers.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 222 **Response Ref** 1 **Representor Name** Mark Brown
Organisation Name
Obj/Sup/Com Comment

Summary of Main Issues

I would really like to know why a brownfield first policy in the local plan cannot be a priority ?
And even with such a policy in place how can infrastructure be confirmed as more than adequate and how will road upkeep be maintained, at a higher level than currently?

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 241 **Response Ref** 21 **Representor Name** Claire Jenkins
Organisation Name Formby Parish Council
Obj/Sup/Com Objection

Summary of Main Issues

The demand for schools and educational facilities is increasing as more students come to the primary and secondary schools in Formby from the villages such as Hightown and Ince Blundell. Students also travel in by train and bus from Litherland and Ainsdale.
There can be no justification in closing any more schools. Indeed those already mothballed should be seriously considered for reopening, before any further decisions regarding the disposal these properties and land are made.
The Inspector must be made aware of the lack of schools in the local surrounding villages, such as Hightown and Ince Blundell. The closure of schools in the recent past, for example the Ravenmeols and Holy Trinity schools and the re-designation of Redgate Primary to a single form intake, places great pressure on the primary facilities, the transport services and more difficulties on local parents to enrol children in schools of their choice.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 241 **Response Ref** 16 **Representor Name** Claire Jenkins
Organisation Name Formby Parish Council
Obj/Sup/Com Objection

Summary of Main Issues

We were concerned at the inclusion of employment land sites both North and South of the Formby Industrial Estate. We recognise the need to provide a balanced, growing and sustainable economy, for local businesses. It is understood that major plans are being prepared for the expansion of the Liverpool Container Port by Peel Holdings. The plans put forward by Peel Holdings for this investment are very far reaching and insufficient thought has been given to it in the Local Plan. This inevitably places additional demands for business premises, but the inclusion of both sites at Formby is excessive.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 241 **Response Ref** 10 **Representor Name** Claire Jenkins
Organisation Name Formby Parish Council
Obj/Sup/Com Objection

Summary of Main Issues

The Parish Council will continue its opposition to building on the green belt, despite the obligations that Sefton MBC may have under the National Planning Policy Framework, until there is clear and definite justification for the need.

We wish to state our continued objection to any building on the green belt around Formby. It should continue to be protected from housing development as for example, the sites selected for possible development in the document are in the flood plain and have serious problems with drainage and surface water.

Drainage water runs east away from the settlement of Formby, travelling inland and presently requires to be pumped up to the level of the brooks feeding the River Alt. The Environment Agency have advised that no extra run off from any development can be allowed as, in extreme weather, excess water could not be carried by the river system and would flood back into the settlement area.

Account must be taken of the projections made by Sefton regarding tide levels over the next 50 years and the projected Astronomical High Tides. We consider it would be foolish to ignore this data when existing properties are already threatened with flooding.

The green belt contains a significant proportion of high quality agricultural land, requiring a control over the delicate balance of the environment, a local economy important to the villages around Formby and the wildlife. It should be protected.

The requirement for 999 homes in Formby is not feasible given the huge constraints they would place on the town's resources and infrastructure.

The publication presses for the need for extra housing development despite the population in Sefton projected to be lower than it was ten years ago. We understand the changes in society but the figure of 470 dwellings per year, we repeat is more than enough to cover the needs of the whole community.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 247	Response Ref 1	Representor Name L Marten
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I object to this plan for several reasons which I have set out below:-

The overall impact of the proposed development of a minimum of 2,461 dwellings (together with a 20 ha business park) in Maghull, Lydiate, Aintree and Melling

Maghull's and Lydiate's infrastructure will be unable to support the level of expansion set out in the Local Plan. Local schools are already heavily oversubscribed and there is a distinct shortage of doctors and dentists in these areas. I understand that United Utilities have expressed their concern that they would be able to cope with a maximum of only 30 new homes per year. Roads in Maghull and Lydiate are some of the busiest in the borough given their positioning in relation to the M57 and M58 motorways and through routes to Liverpool. Further congestion will follow, inevitably.

The local plan does not provide the basis of calculation for the number of proposed dwellings for each site. It appears to be based on the requirements of developers alone, without regard for the impact on local communities and services.

Loss of greenbelt - once built on, lost forever; the expansion of the urban sprawl; the loss of some of the country's highest grade agricultural land and the knock on effect on the borough's farming and agricultural community.

Increase in the risk of flooding to existing properties.

Apparent lack of rigorous consideration of existing brownfield sites in the borough for potential development. There are several thousand empty properties in the borough at present. The leader of the Council has openly stated this fact. Why have these empty properties not been utilised ?

The Council describes the Local Plan as a " living document". In other words, the Council will be able to revisit green belt boundaries in the future without consultation with local communities.

The developments outlined for Maghull and Lydiate in particular appear to offer no benefits to existing communities; indeed all they appear to offer is several years of upheaval and disruption from ongoing construction work. In effect, the Sefton Local Plan as it stands currently is the unwitting architect of a second town in one.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 248	Response Ref 1	Representor Name Jessica Sayers
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I formally object to the Sefton Local Plan. It is not consistent with national policy; the housing figures presented do not provide special circumstances which are required for building on the greenbelt. This will also result in the loss of grade A agricultural land which is not only despicable but also in direct contravention of national policy. The further loss of greenbelt in the borough will further exasperate the urban sprawl which has already occurred Within the Sefton borough.The local plan should have a policy of brownfield first for any developments.

Summary of Suggested Changes

There are existing brownfield sites available within the Sefton borough which should be developed first before any consideration is given to developing on grade A agricultural land. The development and regeneration of brownfield sites should be exhausted before development on any greenbelt should occur.

Evidence Submitted

Organisation Name**Obj/Sup/Com** Objection**Summary of Main Issues**

I would like to object to the local plan proposed by Sefton Council for both Lydiate and Maghull on the following grounds:

The loss of greenbelt will inevitably create urban sprawl which can already been seen in other parts of Sefton where they have joined West Lancashire.

It is clear that the required infrastructure is not in place and that the local plan is relying upon the developers to ensure this is in place. There will already be an increase in traffic to switch island and the motorways from the new dock terminal. Extra housing in Lydiate and Maghull will just add to this, causing more problems for people travelling to and from work in Liverpool and Bootle.

It is already difficult to get doctor and dentist appointments now, an increase in people living in the area will exacerbate this problem. It will also add extra pressure to local hospitals at a time where resources are already stretched and being cut. There are insufficient school places and no facility to build extra ones. Local shopping facilities will have to crease causing more congestion and problems with parking.

It is clear that affordable housing will not be achieved and again we are relying upon the developers. Building in the greenbelt will put a premium on the housing which will clearly make them unaffordable especially to the young people in the area.

At a time when we are all being encouraged to be greener and consider the environment, building on prime agricultural land that supports wildlife and is aesthetically pleasing is not conducive to a greener environment. There are plenty of brownfield sites that could be developed or existing run down housing that could be improved.

In light of all the above I wish to strongly object to the plan.

Summary of Suggested Changes**Evidence Submitted**

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 272 **Response Ref** 1 **Representor Name** A Hockey
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Taking the Borough as a whole the plan is to build 7309 houses initially, rising to 11,000 by 2030 with a further 720 (6.5%) to allow for contingencies.

I note that provision has been made for 5 business parks, with a further 4 sites allocated for "employment". There is also a tourism related development and 4 Gypsy and Traveller sites. This is commendable and I am sure that on paper the Plan may appear to be sound and should meet with Government approval. However, I wonder how much non-numerical or office-based study the council has undertaken.

Another website which the council should consult is the Office for National Statistics. Their latest figures (2013) state that one family in seven has three or more dependent children, although the average family is 1.8. Taking the initial stage of the building, ie 7309 houses, with a conservative figure of two children per family, works out at 14,618 children. Nowhere on the Local Plan is provision made for any educational establishment. On the contrary the Local Plan includes the loss of 8 schools and 2 playing fields. There has been concern for some time whether local schools can cope with the present numbers so where is the planning for the education of the future influx of children?

The Plan also states that appropriate facilities such as medical services, small scale convenience shops and community facilities will be permitted but not necessarily at this time. I do not believe that the council have taken all the ramifications into account and would urge them to go back to the drawing board.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 316 **Response Ref** 1 **Representor Name** David J Parry
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

- I would like to object to the local plan proposed by Sefton Council on the following grounds;
1. Sefton is unique in that it has limited land to build on due to various constraints, on one side it's Coast Line, as well as SSSI'S, National Trust, Golf Courses and large areas which are natural flood plains.
 2. The loss of green belt to Sefton and creating urban sprawl which has already occurred in the borough.
 3. The loss of best and most versatile agricultural land.
 4. The loss of farming communities and food production for the future.
 5. The openness of the countryside will be eroded.
 6. The of control of our borders will be lost by building up to the border with our neighbouring authorities.
 7. Increased risk of flooding to existing properties.
 8. Loss of wildlife and habitats,
 9. Lack of infrastructure planning for additional housing
 10. Added pure on services.
 11. Insufficient school places,
 12. Increased traffic volume on roads which are already stretched.

Summary of Suggested Changes

Remove Green Belt housing allocations.

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 317 **Response Ref** 1 **Representor Name** Vivienne Hilset
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I would like to register my objection to the Local Plan on the following issues:

- 1) Traffic - this is an already congested area.
- 2) Drainage - the system is old and inadequate and prone to problems
- 3) Health Service - there are already long waits for a GP appointment without an increase in demand. The same problem applies to schools.

This is not a cheap area and new property is unlikely to be "affordable".

Summary of Suggested Changes

We need to retain our green belt, agricultural land and flood plains.

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 327 **Response Ref** 1 **Representor Name** Dyanna Swindlehurst
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

We are objecting Sefton Local Plan because:-

- There should be no building on grade 1 agricultural land, as this is a precious resource to the country and the community in terms of self provision. There are plenty of brownfield sites available that could be re-used.
- We need green and open spaces in our community, and the decline of these will affect our health.
- The council and councillors have been undemocratic in the whole local plan consultation, and have not represented their electorate. They have not listened to residents and have in cases been devious and conveniently poorly communicated information about the local plan to residents, especially in the early stages.
- The local plan is un-aspirational, and it is only about overloading Sefton with more houses to get more taxes and the new homes bonus, it hasn't been assessed logically on need and what is best for the area.
- We don't need new houses, official population figures have shown that population in Sefton is on the decline, so how can you warrant so many new homes.
- There has not been enough consideration in the Local Plan on the effect these new houses will have on infrastructure, road, GP services, crime, living standards of the area, wildlife, areas used for leisure by local residents, health, and schools. We already have heavily congested roads this will get a lot worse. If the communities are artificially added to with mass migration this could cause a lot of crime and deprivation issues and existing house prices will plummet
- It is doubtful they will be affordable homes to help local people to get on the housing ladder

Summary of Suggested Changes

Remove all of the housing allocations from the plan.

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 328 **Response Ref** 1 **Representor Name** Janet Carver
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I am emailing to register my objection to build 11,000+ new homes in Sefton including proposals to build on Agricultural Land. We already suffer with road congestion and it will adversely affect our infrastructure, roads, GP services, wildlife and leisure facilities and therefore health an living standards.

Summary of Suggested Changes

Reconsider how many houses are needed. None on agricultural land.

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 332 **Response Ref** 1 **Representor Name** Kate Hogan
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I strongly object to the local plan. I believe you should exhaust all brownfield sites first. I believe you should not release green belt when there are enough brownfield sites to use first.

Summary of Suggested Changes

Please review the need for housing again. Do you really need as many houses as you have stated? Please change the wording to state that you will use ALL brownfield sites before releasing any greenebelt. Look at the infrastructure currently in place to accommodate the plan effectively.

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 335 **Response Ref** 1 **Representor Name** Lynne Howard
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I feel that the plan is not justified as there are lots of brown sites in this area that could be built on before green belt land these properties will not be priced towards affordable housing in this area the infrastructure is not in place eg roads, sanitation, doctors schools. Surely others sites are more suitable for affordable housing allowing young people to get onto the property ladder. Using these green sites destroys wildlife and farming land that cannot be replaced this is a knee jerk short term answer to the problem. What ever happened to recycling and improving the local areas. For example dunnings bridge road the amount of derelict land that has been laid waste for many years what is wrong with improving the area as well as providing much needed housing stock

Summary of Suggested Changes

Evidence Submitted

Summary of Main Issues

My general concern is with regard to proposals to build on green-belt land and in particular, prime agricultural land. I believe that we should be supporting local farmers and local food production, not encouraging farmers to sell off their food-producing land to property developers. I want to secure this land for me and future generations, as I believe food production and a natural environment, where people can unwind and exercise is more important than meeting seemingly unfounded targets for new housing.

I believe that the justifications for building on green-belt land stated in the Plan are weak and do not constitute 'exceptional circumstances'. Further to this, I think that the Plan uses the National Planning Policy Framework as an excuse for building on green-belt land and should instead be prioritising building on derelict and brownfield sites, regardless of cost. I believe that developers and the Plan are preferring green-belt sites for cost purposes, which is entirely unacceptable. I simply do not believe that we should be building on high quality agricultural land to accommodate economic expansion or unfounded claims for housing needs.

I would like to draw your attention to the following clauses in particular (extract followed by my comment):- 3.1 Urban regeneration has been a priority for Sefton for the past 30 years. The Merseyside Green Belt was drawn tightly around the urban area to encourage the revitalisation of the inner areas of the conurbation. Numerous regeneration initiatives have focussed on Bootle and Southport, but the availability of external grant funding has tailed off considerably. This clause seems to suggest that the reason for the decline in urban regeneration is due to lack of funding from central government. This is no justification for building on green-belt land and is unacceptable.

3.7 The greatest need for affordable housing – in overall numbers – is in Southport. The greatest opportunity to build affordable housing is on Green Belt sites. I do not believe that affordable housing alone is justification for building on green-belt land. 3.29 Sefton has focussed on increasing the use of low-carbon, decentralised and renewable energy. I have been unable to find any evidence of this (not related to building on green-belt land).

4.25 The Green Belt has been very successful in containing the expansion of urban areas and encouraging the re-use of derelict and other urban land. However the remaining supply of brownfield land is no longer sufficient to meet Sefton's housing and employment needs over the course of the Local Plan. The only alternative is to remove land from the Green Belt to meet these needs. I do not believe that affordable housing and employment needs are justification for building on green-belt land, nor that this is the only alternative. Development of brownfield sites should be the priority

4.26 Government Planning guidance states that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of a Local Plan. I do not believe that the Plan has provided convincing exceptional circumstances (see comment on clause 4.31 below).

4.31 Without alterations to the Green Belt boundaries, the amount of new development that could be Planned for would be relatively low. This would fall well short of what the assessment of housing needs and the review of employment land concluded we would require. It is considered that such a low level of development would have severe consequences including (as set out in the Consequences Study): Failure to meet the Government's requirement of promoting sustainable economic development and boosting the housing supply. I do not believe that this is justification for building on green-belt land.

Demand for newhousing outstripping supply, further increasing house prices leading to young people being unable to stay in the area. I believe that this statement is unfounded. Sefton's very significant need for affordable housing would remain largely unmet. I'm not convinced that this is the case. The provision of specialist older person's housing would be tightly constrained. This in turn would limit the freeing up of larger family homes for local families. I believe that this statement is unfounded. An increasingly ageing population as young people are unable to stay. This would lead to a more significant reduction in the working age population than otherwise might be the case. I believe that this statement is unfounded and not adequately supported. Fewer opportunities to retain and allow local companies to grow and to attract inward investment and economic growth. I believe that this statement is unfounded and not adequately supported. More pressure on town centres and local services, due to declining demand, as catchment populations decline. I do not understand this statement. It is vague and the meaning is unclear.

4.36 Where significant development of agricultural land is demonstrated to be necessary, the Framework requires that "local Planning authorities should seek to use areas of poorer quality land in preference to land of a higher quality" (paragraph 112). In Sefton, the majority of the sites suitable for development are on high quality agricultural land. However, there is not enough land of a poorer agricultural quality to meet objectively assessed housing and employment needs. Even where such land is available,

these sites are often subject to other constraints. In Sefton's case therefore, 'best and most versatile' agricultural land will need to be allocated for development consistent with national Planning policy. It is simply not acceptable that the "best and most versatile" agricultural land will need to be allocated for development". I believe that this is fundamentally flawed and is against the democratic wishes of local people.

4.7 The National Planning Policy Framework ('the Framework') states that Planning should 'proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs' (paragraph 17). I do not believe that this should be justification for building on green-belt land. 5.2 At the heart of national Planning policy is a 'presumption in favour of sustainable development' which should be seen as a golden thread running through both Plan-making and decision-taking. The does not seem to have been applied in the Plan.

With regard to the above question about the Plan being Legally Compliant, while I do consider the Plan to be Legally Compliant, I do not agree with the law i.e. the National Planning Policy Framework.

Summary of Suggested Changes

I believe that the Plan needs to prioritise urban development and building on derelict and brownfield sites and avoid building on greenbelt land.

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 358	Response Ref 2	Representor Name John Thompson
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

- 1) Government guidelines state that only in exceptional circumstances should green belt land be destroyed. Much of the greenbelt proposed for development in Sefton's Local Plan is agricultural land used for crop growing - much of it is prime agricultural land. There are no exceptional circumstances in Sefton that justify destroying the greenbelt - see (2).
- 2) Based on the latest data from the Office for National Statistics, the projected population increase for Sefton for the period of the plan is around 5000. Planners are asking for around 11,000 new houses sufficient for 24,000 people based on an average of 2.2 per household. Thus the proposals are totally inconsistent with the latest data and are unsound. Indeed, there are sufficient brownfield sites in Sefton to accommodate housing for 5000 people so no green belt land needs to be used.
- 3) There are no plans in place for upgrading the infrastructure to accommodate the extra people. This is especially relevant in the Maghull/Lydiat areas where the plan proposes a very significant increase in the population. Already schools are oversubscribed and appointments for doctors and dentists are at a premium.

Summary of Suggested Changes

The plan needs to be revised to provide sufficient housing based on the latest data from the ONS. Detail must be provided on how the infrastructure will be improved to accommodate extra people. This would make the plan "sound".

Evidence Submitted

Policy MN2 gen **Housing, employment and mixed use allocations**

Respondent No 360 **Response Ref** 3 **Representor Name** John Hill

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

The plan envisages building on large areas of green belt, much of which is good quality agricultural land. This is not sensible when the country is importing an increasing proportion of our food. Nationally we should be working to retain as much farmland as possible if we are to maintain food security. All local plans should bear this in mind.

The plan does not require developers to prioritise brownfield sites, of which there are many in Sefton. When this is viewed alongside an overestimate of housing need there is a strong possibility that developers will build initially on green sites and leave brownfield sites until later. Additionally it is clear that changing patterns of behaviour in the retail sector may result in further brownfield sites becoming available. Developers must be required to use brownfield sites initially and only move to green belt sites when the former have been exhausted.

Summary of Suggested Changes

Evidence Submitted

Policy MN2 gen Housing, employment and mixed use allocations

Respondent No 361 Response Ref 4 Representor Name A D Fraser

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

Sefton Council argue that the Local Plan will protect the Greenbelt. In order to do so they need to build on it and so the boundaries need to change. In order to justify building on the greenbelt Sefton need to show that

1. They must demonstrate why normal planning and development management policies would not be adequate;
2. They must set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
3. They must show what the consequences of the proposal would be for sustainable development;
4. They must demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and
5. They must show how the Green Belt would meet the other objectives of the Framework.

Sefton argue that they need to build: 500 dwellings per annum between 2012-2017 and 660 dwellings per annum between 2017 and 2030. Furthermore, they argue that these houses have to be built on Greenbelt. In order to justify this they have used the Nathaniel & Lichfield Partners Headroom model and then finessed the required outputs by making certain assumptions about factors such as

- A Strategic Housing Market Assessment
- Housing Need
- A notional Requirement for Economic Growth
- A so called "shortfall" in house construction

The NLP model was chosen by Sefton largely because they consider it an effective way to get their Local Plan past the Inspector (see HEaDROOM Update Report Review of the Objectively Assessed Need for Housing in Sefton Sefton Metropolitan Borough Council.

2). Sefton argue that this approach is transparent. "The plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements" However we cannot assess the objectivity of the NLP model because Sefton won't or cannot give us the spreadsheet to analyse the model. The NLP model may generate demographic outputs which are sound but it must be borne in mind that population trends are stochastic by nature and there will always be error terms in such projections (i.e variances between trend lines and actual data. If NLP then generate trend lines based on this data they will effectively be regressing error terms on error terms (error terms should be random and normally distributed around a mean of Zero) otherwise you cannot carry out a proper statistical probability testing which is important for any assessment of a model. This is particularly salient in the case of the latest 2014 data curve where the variables in the model have been suppressed to make the data fit current (and perhaps temporary trends lasting less than time line for the long run projection (source. Testing methodological changes to the household projections model Research report CLG 2014). Changes to cohort weightings seemed to have produced significant changes to the long run trend which line has been altered to fit the data which must raise questions about using it to predict future events.

GRAPH IN TEXT

Once you drill into the methodology used by the CLG statisticians the whole process is less "cut and dried" than at first it appears. Any model is only as good as its inputs but the model must be available to be objectively tested we need NLP's spreadsheet to test it.

In terms of the national picture Sefton with Average increase 399 had the 14th lowest growth in households in the country. Liverpool was the 6th lowest at 321 whilst the Wirral was the 9th lowest with 318(Household Interim Projections, 2011 to 2021, England p.7).

TABLE INCLUDED IN THE SUBMISSION

According to these figures Average Change is 0.53 according to the 2011 - 21 projection to 0.53 still low by national standards and low by national standards an lower than for the LCG as a whole (3.06) . On this projection Sefton need to build 530 houses per annum not 660 houses as suggested by Sefton. In the case of Sefton population change has a particular relevance to the Housing market. The projected change in the population is the main driver of the increase in households, accounting for 98 per cent of the total increase in England between 2011 and 2021. The extent to which population growth translates into increases in households depends on the age structure, sex and marital status composition of the population. (Household Interim Projections, 2011 to 2021, England p.12). This is a point also made by NLP in their report. The consultants used by Sefton NPL were also working for David Wilson Homes one of the developers with an interest in building on the greenbelt. The NPPF requires evidence to be objective. This clearly brings the integrity of the plan making process into question.

GRAPH INCLUDED IN SUBMISSION

The above chart shows how projections forecast in 2010 differ from those in 2011. 2010 population projections estimated that Sefton's resident population would increase (to the nearest 1,000) from 275,000 in 2011 to 280,000 in 2021 (1.9%). While 2011 projections show a rise from 274,000 to 277,000 (1%). This is as a result of actual births, deaths and migration during the periods used as a basis for projections. (Sefton's Population — Business Intelligence and Performance Team, Sefton Council) Sefton's population has fallen by 3.2% in the last ten years, according to figures published by the Office for National Statistics. The 2011 Census results show that Sefton is one of just 17 local authorities across the country to see its population fall. Sefton's population analysis makes the following conclusions:

- Despite a reduction in population overall Sefton population projected to rise by 1% between 2011 and 2021 (274,000 to 276,800)
- Predominantly this is due to a 16% rise in residents aged 65 and over (57,400 to 66,500)
- Over the same 10 year period the working age population (18-64 year olds) is projected to fall by 4% from 162,400 to 155,700
- Projections for younger people also show increases with the number of under 18's set to increase slightly from 54,200 to 54,600
- This is largely as a result of an 8% increase (31,300 to 33,700) in residents aged 10 and under

- Increases in Sefton's population are largely as a result of internal migration from other areas of England with an estimated 77,600 people migrating in compared to 74,000 migrating out to other areas of England.

This population data taken together suggests that there is no compelling evidence to justify the scale of house building on Sefton's greenbelt proposed by the Local Plan. The population data does suggest Sefton should make sure each development includes a sufficient amount of housing to meet the needs of the elderly in Formby and elsewhere as opposed to large expensive family houses.

The Housing Market

;

The NLP model takes the current state of the housing market into consideration. I find its conclusions difficult to reconcile with experiences on the ground. The Practice Guidance defines an HMA as the geographic area at which around 70% of local moves are self-contained. I agree with the statement "Housing Market Assessment, the Borough has a self-containment rate of above 70% and can be considered a single HMA for the purposes of this study. It is, however, recognised that there remain strong linkages between Southport to the north of the Borough and West Lancashire District to the east, as well as strong commuting linkages with Liverpool City generally" (NLP Headroom update report p6.).

The Practice Guidance identifies that longer term changes in house prices may suggest an imbalance between the demand for and supply of housing. In general by looking at median prices within the HMA to assess the relative level of market shortfall NLP says that Sefton needs to add an extra 10% (52 dpa). This it argues is evidence of a major evidence of a past shortfall.

I see no real evidence of this both in terms of practical experience and in terms of hard data. Consider the table below:-

TABLE INCLUDED WITH THE SUBMISSION

Savills UK produces the most influential data on the UK property market both residential and commercial. Property values in W. Lancs appear to be stagnating. Sefton is not much out of step with the rest of the LCR. Knowsley and St. Helens have relatively smaller populations and therefore less significant in terms of housing demand. Sefton has 6000 empty properties. A new development in Formby, the Hamptons has never been finished due to lack of demand.

GRAPH INCLUDED IN SUBMISSION

Once again there is no compelling argument of a major imbalance in Supply and Demand between Sefton and its neighbouring areas.

Housing need

The main problem is affordability but this is largely a problem associated with low productivity leading to low wages. There are no sign of a major increase in wages particularly in the LCR. Interest rate and growth trends suggest relatively anaemic economic growth. This will be further exacerbated by economic policy after the general election as both major parties are wedded to a policy of austerity which will particularly affect Sefton because of the regions relatively high dependence on government expenditure. Hence NLP's assumptions about economic growth could well prove to be illusory. There might be large numbers of people on the housing waiting list or forced to rent. Indeed many houses are now rented in Formby at all levels of the price range but the only demand that counts in a market system is "effective demand" and since social housing is off the agenda building so called "affordable housing" will make very little difference here because average wages are too low.

"Affordable" houses in Formby will be double the price for the same type of property in Bootle and therefore they are not going to be affordable to people on low wages in Formby.

The problem of housing need has not been helped by Sefton's policy of demolishing houses in Bootle. Many people displaced cannot afford the new houses that have been built to replace them. The south end of Sefton has large areas of empty brown field sites but

Sefton has taken the conscious decision to build so called "affordable housing" on greenbelt land instead. This approach is completely at odds with the concept of sustainable development and will not meet the needs of those who need affordable housing.

In the south of England the housing market is characterised by a major supply side problem whereas in Sefton we have a predominantly demand side problem intensified by Sefton's reckless house demolition program. I suggest the inspector speaks to

the former secretary of state Nick Boles who witnessed this at first hand on his visit to Sefton in February 2014. I suggest like Nick Boles the inspector does a tour of the area to see for himself the sheer scale of the amount of derelict land. Sefton's strategy of building on the greenbelt is a supply side solution which will not solve the problem of housing need. Indeed the Local Plan's is extremely weak in terms of sound economic analysis.

Permanence of the Greenbelt

The NPPF says

"The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence". (Section 79)

However, it is clear that Sefton have absolutely no intention of maintaining the greenbelt boundaries as outlined by their Local Plan. Counsellor Dowd is on record of saying that he would want an early review (2016?). Peel Holdings want to take a considerable slice out of Sefton's Greenbelt in order to develop a huge complex at Switch Island4. There are Plans for a giant inshore wind farm at Ince Blundell. I was told by the planning department that they cannot include any reference to permanence in the plan. Clearly Sefton's Local Plan goes against the spirit of the NPPF. Sefton's Local Plan is a cynical attempt raise finance through developing a community asset i.e. the greenbelt. They are essentially asking the inspector to give them a blank cheque so that they can develop the greenbelt bit by bit until there is nothing left. According to Sefton Local communities affected by the plan will receive no benefit from the New Build Premium which is outrageous. Sefton should be regenerating brownfield sites not destroying the greenbelt.

According to the NPPF

80. Green Belt serves five purposes:

1. • to check the unrestricted sprawl of large built-up areas;
2. • to prevent neighbouring towns merging into one another;
3. • to assist in safeguarding the countryside from encroachment;
4. • to preserve the setting and special character of historic towns; and
5. • to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Under Sefton's plan all five of these objectives will be thwarted. Sefton is essentially a very narrow coastal strip where much the open land is coastal and protected, golf courses or else is vulnerable to flooding. This leaves very little land available for development. The result is that development sites MN2.30, MN2.33, MN2.48, MN2.49, MN2.1, MN2.2, MN2.4, MN2.5, MN2.10, MN2.9 and MN2.11 eliminate Sefton's greenbelt by taking it right up to the boundary. Meanwhile the inspector has allowed West Lanes to build on adjoining sites at Fine Jane Farm and on new cut. Effectively Sefton are eliminating the greenbelt by stealth with no control over its boundary. Plans to build a wind farm at Ince Blundell and sites MN2.23 & MN2.24 could affect the environmental of the grade 1 listed St. Helens Church and the Grade 2 Listed Ince Blundell New Hall. Old Hall, Chapel and Temple. All of this will

lead to increase urban sprawl.

Sefton's preference for Greenfield sites over brown field sites is detrimental to urban regeneration.

This Local will effectively destroy large parts of Sefton's greenbelt either now or in the future. Clearly without a guarantee of permanence it cannot possibly be sustainable in terms of planning.

The inspector needs to look into whether Sefton's policy of demolishing houses in Bootle

has been a deliberate policy of bringing about an artificial shortage in supply in order to justify its policy of building on the greenbelt. Secondly is Sefton deliberately hoarding brown field sites instead of developing them for either industrial or housing use?

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents** Flood Risk Assessment
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 366 **Response Ref** 9 **Representor Name** Margaret Anne Hill
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

There is frequent flooding on some of the named development sites In recent years there has been increased flooding in many parts of Sefton. Much of Sefton was below sea level in ancient times and the sea is coming inland again at Formby. A 1930's Formby beach café is now well under water in the Irish Sea as was shown in an episode of the 'Coast' series.

Climate change is resulting in more frequent and severe flooding nationally, including areas across Sefton. The various known methods of tackling flooding on building sites have negative repercussions on other areas and other properties. Existing brownfield sites have drainage infrastructure in place and are not so susceptible to flooding. Homes built on flood plines are more difficult to sell and to insure. It is not justified to build on land with flooding problems.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 366 **Response Ref** 8 **Representor Name** Margaret Anne Hill
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

No exceptional circumstances exist in Sefton to require building on greenbelt as there are sufficient empty homes and unused brownfield sites to accommodate a reasonable new homes target figure. Therefore there should not be any release of greenbelt land for building purposes. The purposes and benefits of greenbelt are well-known, well-established and entrenched nationally. Recent government statements in relation to Local Plans have stipulated 'brownbelt before greenbelt'. Loss of greenbelt is not justified and it is contrary to national policy.

Let's use the opportunity of the Sefton Local Plan to improve Sefton by bringing all empty properties into good use and by turning derelict and unused sites into vibrant living areas. Let's do everything we can to improve Sefton and delay all decisions which will damage our locality until it's proved without doubt that such damage is absolutely essential to our wellbeing. Official reports and government announcements in the last 12 months state:

- There is a need to protect and make maximum use of agricultural land to feed the growing population;
- Changes in shopping patterns impact on use of land; out of town shopping is less popular so may become disused sites in next few years.
- Flooding is increasing.
- Use all brownfield sites FIRST before any greenfield sites.

These reports/announcements appear to be sound and give accurate guidance. The Sefton Local Plan does not follow the government policies. I recognise the growing population of Britain and the need the make sufficient provision of homes, food and services infrastructure within Sefton. However, there are sufficient empty properties and brownfield sites in Sefton to meet a sensible estimate of the borough's housing needs.

Loss of agricultural land A report this month shows that the proportion of imported food has risen from 20% to 40% and stresses the need to preserve and use our agricultural land. With an increasing population, the preservation and use of good agricultural land to grow food is an obvious priority. Much of the land proposed to be made available for housing now in the Sefton Local Plan is good agricultural land.

The Maghull East site is stated to be best quality and most versatile agricultural land. Building on agricultural land is permanent loss of agricultural land; surely that must be a last resort, not a first available option. It is not justified to allow building on agricultural land when reasonable alternatives exists.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 369 **Response Ref** 1 **Representor Name** Thomas McCall
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

United Utilities have stated that the drain system will only cope with 30 new houses per year not hundreds that are planned. Farmland should only be built on as a last resort using up brown sites first. Just travel to Bootle and see the sites available. Also the roads, shops, schools and doctors surgeries would not be able to cope. I don't think this has been thought out it appears the Government's bonus on new houses built seems the only factor.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents** Consultation General
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 371 **Response Ref** 1 **Representor Name** Scott Owen
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

There are plenty of brownfield sites that can be utilised. Greenfield areas should not be used for a number of reasons, mainly common sense.... environmental, flood risk, nature and so on. These areas are greenbelt for a reason and there is no justifiable reason to use them. The Government should listen to public opinion - this plan is not wanted and should not be implemented.

- Housing figures do not give "special circumstances" for building on the greenbelt.
- Sefton is unique in that it has limited land to build on due to the various constraints. On one side it's Coast Line, as well as SSSIs, National Trust, Golf Courses and large areas which are natural flood plains.
- The loss of green belt to Sefton, creating urban sprawl which has already occurred in the borough.
- The loss of best and most versatile agricultural land.
- The loss of farming communities and food production for the future.
- The openness of the countryside will be eroded.
- Loss of the control of our borders by building up to the border with our neighbouring authorities.
- Increased risk of flooding to existing properties.
- Loss of wildlife and habitats.
- Lack of infrastructure planning for additional housing.
- Added pressure on services to include Doctors, Dentists, Schools and Hospitals.
- Insufficient school places in the areas where housing has been allocated.
- Increased volume of traffic on roads which are already congested.
- Increase in pollution and carbon emissions.
- We want a Brownfield first policy in the Local Plan.
- Lack of consultation and the ability to answer questions raised by the public.
- The Council will be responsible for more wetlands, swale ditches and verges on the new sites which they will have to adopt. This will have a financial implication on services that *are already being cut.
- The Local Plan is a living document and will allow our Council to go back and revisit the green belt boundaries in the coming years.

Summary of Suggested Changes

This is all about what is right for society and for the environment. Greenbelt has always been kept separate and away from permissions for building and this should remain. In addition to the previous reasons, people choose to purchase property and reside in areas surrounding or in the greenbelt areas, on the basis that building works would not be permitted - this should not be changed.

Evidence Submitted

Policy MN2 gen

Housing, employment and mixed use allocations

Respondent No 372

Response Ref 1

Representor Name Andrew Owen

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

- Housing figures do not give “special circumstances” for building on the greenbelt.
- Sefton is unique in that it has limited land to build on due to the various constraints. On one side it’s Coast Line, as well as SSSIs, National Trust, Golf Courses and large areas which are natural flood plains.
- The loss of green belt to Sefton, creating urban sprawl which has already occurred in the borough.
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- The Local Plan is a living document and will allow our Council to go back and revisit the green belt boundaries in the coming years.

Summary of Suggested Changes

- We want a Brownfield first policy in the Local Plan.

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents Consultation General
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 377	Response Ref 1	Representor Name Dale Harris
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

- Housing figures do not give “special circumstances” for building on the greenbelt.
- Sefton is unique in that it has limited land to build on due to the various constraints. On one side it’s Coast Line, as well as SSSIs, National Trust, Golf Courses and large areas which are natural flood plains.
- The loss of green belt to Sefton, creating urban sprawl which has already occurred in the borough.
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- Insufficient school places in the areas where housing has been allocated.
- Increased volume of traffic on roads which are already congested.
- Increase in pollution and carbon emissions.
- We want a Brownfield first policy in the Local Plan.
- Lack of consultation and the ability to answer questions raised by the public.
- The Council will be responsible for more wetlands, swale ditches and verges on the new sites which they will have to adopt. This will have a financial implication on services that are already being cut.
- The Local Plan is a living document and will allow our Council to go back and revisit the green belt boundaries in the coming years.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 383	Response Ref 2	Representor Name Malcolm Gore
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

2)BROWNFIELD FIRST.

According to the plan, the council have identified enough Brownfield sites to provide half the original requirement of 10,700 houses, i.e. 5,350. This is way in excess of the number needed to house the O.N.S. figure of 5,000 population increase. However the plan specifically says and I quote:

“It is not proposed to apply a restrictive phasing policy to the release of any housing site “i.e. NO BROWNFIELD FIRST. In fact the planners told the councillors at the planning committee the government did not allow “BROWNFIELD FIRST”. I was there.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 390	Response Ref 1	Representor Name Robert Jackson
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I object to a plan that intends to incorporate Greenbelt land for developments. Greenbelts were created by people of vision to achieve several objectives. They give recreational space around urban areas to maintain quality of life, prevent urban sprawl, maintain the character of the towns and villages they are attached to and also to prevent the swallowing up of agricultural land.

Summary of Suggested Changes

Sorry but objection is about how we envisage our community.

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 392	Response Ref 1	Representor Name Roger Williams
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I wish to register my objection to the local plan as follows. Living in the Formby area the proposal developments are far too overwhelming to be acceptable. Formby is a village. It has a centre of three or four main roads. How is it acceptable to flood it with an extra thousand houses and cars? Where would these cars park at peak shopping times and weekends? The local residents bemoan the disruption to its roads during hot summer weekends but that would be as nothing compared to this invasion.

The local services too would come under strain as doctors, schools, etc would struggle to cope with thousands of extra people and children. I am not qualified to comment on the consequences of the perceived drainage issues linked to the river Alt but if these developments were to go ahead any flooding would have catastrophic results for Formby and the council. However, my final point is this: the council commissioned an independent report in order to ascertain the likely future growth of population in Sefton and the required housing needs necessary to service that growth.

When the findings were reported back to the council they drew up their local plan and cited the projected growth figures contained in their commissioned report as the basis for the housing needs as detailed in their local plan. However, since then it has come to light that the report's projections were not accurate and new data shows that Sefton is actually losing population at one of the fastest rates in all of England. If the number of people living in Sefton is not a factor in the Local Plan, why was the report commissioned in the first place?

Something seems wrong. Surely the way forward is to slow down and manage a revised local plan. The building on greenbelt is very controversial and obviously unnecessary at present as the population decrease proves. It is absolute folly to spoil and ruin communities like Formby, places which demonstrate the potential of Sefton and by and large serve Sefton very well. I hope you reject or substantially reduce these massive proposed developments.

Summary of Suggested Changes

The Local Plan needs to be revised and reduced in accordance with seftons declining population. Small villages such as formby do not require large developments on their doorstep. In the light of our population decrease building on the greenbelt should be avoided at all costs. This would surely be commensurate with astound and legal plan.

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 394 **Response Ref** 1 **Representor Name** Mark Derbyshire
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Area cannot sustain the extra demands on the medical and educational facilities that currently exist and have not seen any evidence that these concerns have been addressed.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents** SHLAA
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 395 **Response Ref** 1 **Representor Name** Leslie Ferguson
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I wish to object most strongly to the local plan proposed by Sefton council for these reasons-

- 1: Greenbelt land was set aside in law as being not for development but as a way of preventing urban sprawl and as a way of protecting our valuable agricultural land for the needs of the nation by way of food production and green spaces to separate towns and cities.
- 2: Building development in these areas does not constitute a special case for waiving this important reason to maintain the greenbelt.
- 3: There are many brownfield sites in Sefton that should be developed and that would enable affordable housing to be made available which in this present economical climate is what is needed for our housing needs. Present house building on the powerhouse site in Formby shows just what houses are being built and planned by these developers(large 3 and 4 bedroom ,expensive houses with a small number of, still expensive, 2 bedroom houses.
- 4: Many of the sites marked for development are natural flood plains, the Liverpool Rd site for instance is regularly flooded and takes a long time to drain. If this was built on the water run off would certainly flood the surrounding properties.Would the council or the developers recompense the residents? This is what would happen.
- 5: Public services,doctors dentists etc are stressed as it is without the proposed influx of more residents, a doctor appointment is usually a 5 or 7 day wait at present. All in all this plan is ill thought out and will erode the residents of Sefton and, if the greenbelt land grab spreads nationally, the country.

Summary of Suggested Changes

The Sefton local plan is not legally compliant as it goes against the legal definitions of the green belt act in that no development should be allowed on green belt land.

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 398	Response Ref 1	Representor Name Joanne Allman
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Housing figures do not give “special circumstances” for building on the greenbelt.

- Sefton is unique in that it has limited land to build on due to the various constraints. On one side it’s Coast Line, as well as SSSIs, National Trust, Golf Courses and large areas which are natural flood plains.
- The loss of green belt to Sefton, creating urban sprawl which has already occurred in the borough.
- The loss of best and most versatile agricultural land.
- The loss of farming communities and food production for the future.
- The openness of the countryside will be eroded.
- Loss of the control of our borders by building up to the border with our neighbouring authorities.
- Increased risk of flooding to existing properties.
- Loss of wildlife and habitats.
- Lack of infrastructure planning for additional housing.
- Added pressure on services to include Doctors, Dentists, Schools and Hospitals.
- Insufficient school places in the areas where housing has been allocated.
- Increased volume of traffic on roads which are already congested.
- Increase in pollution and carbon emissions.
- We want a Brownfield first policy in the Local Plan.
- Lack of consultation and the ability to answer questions raised by the public.
- The Council will be responsible for more wetlands, swale ditches and verges on the new sites which they will have to adopt. This will have a financial implication on services that are already being cut.
- The Local Plan is a living document and will allow our Council to go back and revisit the green belt boundaries in the coming years.

Summary of Suggested Changes

Do not build on Green Belt. Hold a Public Consultation before introducing any changes.

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 399	Response Ref 1	Representor Name Terence Allman
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

- Housing figures do not give “special circumstances” for building on the greenbelt.
- Sefton is unique in that it has limited land to build on due to the various constraints. On one side it’s Coast Line, as well as SSSIs, National Trust, Golf Courses and large areas which are natural flood plains.
- The loss of green belt to Sefton, creating urban sprawl which has already occurred in the borough.
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- Increased volume of traffic on roads which are already congested.
- Increase in pollution and carbon emissions.
- We want a Brownfield first policy in the Local Plan.
- Lack of consultation and the ability to answer questions raised by the public.
- The Council will be responsible for more wetlands, swale ditches and verges on the new sites which they will have to adopt. This will have a financial implication on services that are already being cut.
- The Local Plan is a living document.

Summary of Suggested Changes

Reduction of scale to exclude development of green belt Consultation process should be implemented and open to all residents of Sefton

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 405	Response Ref 2	Representor Name Michael Perkins
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

We have been told from official sources that there are up to 6,000 brown belt empty properties in the Sefton area and although the cost of refurbishing these is probably quite significant, whereas construction of new properties in the green belt is likely cheaper, more attractive to developers, and results in a quicker return to Sefton MBC in council tax revenue. This is a cheaper way of spoiling our nice environment. Sefton MBC needs to consider that many local residents have chosen their houses because of the beautiful scenic outlook, would they be compensated by council tax reductions as a result of the loss of amenity?

My property has been up for sale for 1 year, and despite two price reductions buyers are put off by the proposed development on school playing fields to the rear of the property in Knowle Avenue. It is a travesty that the outlook which prompted me to purchase the property in the first place will be marred.

Why can’t more multi-occupational buildings such as flats be considered in non greenbelt areas to minimise land take and reduce the housing construction target?

The road network and associated parking elsewhere in some of these proposed new housing zones is not adequate and difficult to satisfactorily improve. The increase in road traffic and pressure on drainage etc. would worsen the environment for existing households, with presumably no reduction in council tax charges in a highly rated area.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 406	Response Ref 1	Representor Name Peter Richards
Organisation Name	West Lancashire Borough Council	
Obj/Sup/Com	Comment	

Summary of Main Issues

West Lancashire Borough Council ("WLBC") are aware that there are a number of sites proposed to be allocated for both housing and employment in the Southport and Formby areas of Sefton in the Sefton Local Plan that are adjacent, or close, to the boundary with West Lancashire. While WLBC does not wish to object to the allocation of those sites specifically, WLBC is concerned that the Sefton Local Plan should be robust enough to ensure that the development of those sites specifically (and indeed the quantum of development overall in the Southport and Formby areas of Sefton) does not create traffic issues on the rural moss roads in the Western / Northern Parishes of West Lancashire and that flood risk is not exacerbated within West Lancashire as a result of those sites being developed.

There is a recognised issue of some vehicles travelling to / from the Southport and Formby areas seeking to avoid congestion at peak times and bank holidays on the A570 between Southport and the M58 (via Ormskirk) or on the route through Thornton to Switch Island by travelling across the rural moss roads in the Western / Northern Parishes of West Lancashire. These routes are minor in nature, often so narrow that two cars cannot pass each other except at occasional passing places, and are prone to heavy wear due to the ground conditions in these areas, and so are not appropriate for a large amount of traffic.

As such, the Sefton Local Plan must ensure that appropriate mitigation measures are implemented to limit traffic from using the rural moss roads and encourage use of more strategic routes, such as the A570. The Thornton-Switch Island Link road will help this issue, particularly relating to Formby, but it is vital that measures associated with the Southport eastern approach (A570 corridor) are delivered before, or alongside, new development in the Southport area to ensure that the vast majority of vehicles travelling to/from Southport across West Lancashire are encouraged to use the A570 and not the rural moss roads. Related to this, the Southport eastern approach (A570 corridor) is a strategic, cross boundary transport issue that should be referred to in the Duty to Co-operate statement, given the liaison between WLBC, Sefton Council and Lancashire County Council on this matter in recent years.

Similarly, all developments associated with the allocations adjacent, or close, to the West Lancashire boundary in the Southport and Formby areas must be required to address flood risk issues, especially those allocations located within flood zones 2 or 3, and provide mitigation where necessary, to ensure that flood risk is not exacerbated across the border in West Lancashire.

Summary of Suggested Changes

N/A

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 416	Response Ref 1	Representor Name P Perrin
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I object to Sefton Council Local Plan. I live on a main road Eastway and do not wish for the extra traffic and pollution that will occur. It is a very worrying fear. It will also be overpowering with services unable to cope, overcrowding in shops and schools may cause resentment among existing consumers.

Summary of Suggested Changes

Evidence Submitted

Organisation Name**Obj/Sup/Com** Objection**Summary of Main Issues**

It is evident & concerning that the KM conclusion [Keppie Massie Economic Viability Assessment of Local Plan] that development on greenbelt is generally preferred and more viable than development on brownfield land, as this conclusion is at best unreliable and at worst cynical. Yet, these considerations appear to have had significant influence on Sefton MBC policies. Local Plan paragraph 6.13 states: "It is not proposed to apply a restrictive phasing policy to the release of any allocated housing site and there is therefore no planning barrier to the early delivery these [green field] sites if circumstances allow." In other words, contrary to Policy CC4 (now Policies EQ1 and EQ7), Sefton will not be enforcing a brownfield-first policy, allowing developers to 'cherry pick' what have been billed by the KM study as being the more viable (= more profitable) sites in the greenbelt.

Most significantly however, this approach is also contrary to the NPPF and to current Government policy. According to an item in "The Planner" (10 June 2014): "Communities secretary Eric Pickles and housing minister Brandon Lewis have underlined the government view that thousands of brownfield sites are available for housing and should be given development priority. Fresh guidance published on Monday, 6 October, by the Department for Communities and Local Government discusses how councils should protect green space and keep urban sprawl at bay through their local plans. Once green belt boundaries have been established, they should only be altered in exceptional circumstances, the guidance insists. Furthermore, it stresses, housing need, including for traveller sites, cannot justify harm to the green belt by inappropriate development. "This government has been very clear that when planning for new buildings, protecting our precious green belt must be paramount," said Mr. Pickles. "Local people don't want to lose their countryside to urban sprawl, or see the vital green lungs around their towns and cities to unnecessary development.

There will be grave consequences if the Sefton Local Plan is adopted. Sefton MBC argue that some ca. 5,000 properties can be built on brownfield land within the borough, which means that the balance will need to be built on green field sites, predominantly in the green belt. Many of the green belt sites that have been allocated in the Local Plan are in areas of 'best and most versatile' agricultural land. If we are to sacrifice this hugely important resource – some of the best quality agricultural land in England - we need to be sure that the future demands of the housing market have been properly and rigorously assessed in order that the sacrifice is fully justified. Neither the NLP report nor the SHMA provide the necessary justification, and should be considered unsound.

Local Plan clause 6.13 makes clear, Sefton Council do not intend to implement a 'brownfield first' policy when releasing land for housing development – commercial development companies will be free to prioritise what they regard as the 'more desirable' sites in the green belt over existing brownfield land when drawing up their development plans. This will lead to large scale destruction of valuable farmland whilst at the same time there will be little or no development of existing brownfield sites, which will continue to lie derelict. Sefton MBC should impose strict policies to develop green belt sites only after development of brownfield land has progressed and only then when it is clear that further un-met demand exists in the housing market. Given the number of empty houses in the borough and current development sites with unsold property, there is considered at present to be no demonstrable evidence for such un-met demand.

Not only do Sefton MBC appear committed to development across substantial areas of green belt and valuable agricultural land, in taking the recommendations of the NLP report and SHMA forward into the Local Plan, Sefton MBC appear to have grossly over-estimated the areas of land required to meet the projected demand. After adding an arbitrary figure of 5% to the NLP figure of 615 dpa (with little or no justification), the Local Plan identifies a range of new housing sites that Sefton MBC consider are required to meet the projected demand. When determining the number of houses that these sites can accommodate, the Local Plan discounts the total area of each site to arrive at a net developable area equal to only 75%. This is contrary to the approach set out in Sefton MBC's Strategic Housing Land Availability Assessment (SHLAA) in which only sites above 2ha are 'netted down' by 75%. After reducing the area of each site that has been earmarked for development, Sefton Council then squander further land by applying an average development density of only 35 dwellings per hectare (dph) to the net developable area to calculate a capacity for each site. Given the issue of the aging population and the need for small and/or affordable housing, a density of 35dph over the net developable area is considered to be far too low – such a figure is arguably more representative of a development consisting of larger 3 or 4 bedroom dwellings.

The NPPF talks about the need for community involvement when developing a Local Plan however, Sefton Council have given no consideration to the large scale community-based opposition to these development proposals. The attitude of Sefton MBC is well illustrated in Section 7 of the KM Report – 'stakeholder consultation' - in which none of the stakeholders consulted represent residents of the borough (see KM Appendix 5).

When questioned both councillors and planners continually maintain that there is insufficient Brownfield sites. When residents who live and work in the borough know this to be palpably untrue. This is the sort of sweeping generalisation that local people just

cannot accept, because these “eyesores” are everywhere for everyone to see. Derelict Brownfield sites are one of the few things that we do have in an abundance. However, in reality “Insufficient Brownfield Sites” translated means it’s work for the council in terms of ownership, CPO’s, etc, and it’s not as attractive, or more importantly, lucrative for developers. Therefore it’s much easier for SMBC to hand the keys of the borough over to the developers to build on not just Greenbelt, but some of the Best and Most Versatile Agricultural Farmland in the UK.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 439	Response Ref 1	Representor Name James Winstanley
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Housing figures do not give 'special circumstances' for building on the green belt. The loss of the best and most versatile agricultural land.

Summary of Suggested Changes

More consultation with, and listening to, the local population.

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 442	Response Ref 1	Representor Name Angela Winstanley
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Housing figures do not give 'special circumstances' for building on greenbelt. Increased risk of flooding to existing properties.

Summary of Suggested Changes

More consultation with, and listening to, the local population.

Evidence Submitted

Policy MN2 gen **Housing, employment and mixed use allocations**

Respondent No 446 **Response Ref** 4 **Representor Name** Hugh McAuley

Organisation Name Formby Play Sports Ltd

Obj/Sup/Com

Summary of Main Issues

The representor supports this policy, particularly paragraphs 6 and 7, which introduces 5 strategic employment sites. With regard to paragraph 7, the representor is pleased that the policy confirms that other uses might be permitted where they are compatible with adjacent uses and maintain the overall balance of B1, B2 and B8 uses and/or are small in scale and primarily intended to serve nearby businesses. However, the representor feels that this paragraph needs to be tweaked to reflect that other uses might be appropriate if provision and support for them is reflected through other policies that directly relate to the sites themselves. For example, sport and recreation uses are supported at Site MN2.49 (through Policy MN5). As such a minor tweak to the policy is proposed to deal with this and this is set out below.

In addition, it is confirmed that the form of employment development the policy is ideally seeking is high quality business parks. Whilst the representor is broadly supportive of this as a target form of development, nonetheless in its current form this target/description is relatively prescriptive, plus it could impact on the desire to maximise job outputs. As such the representor suggests a slightly different form of words to reflect this as set out below.

Summary of Suggested Changes

Proposed change to paragraph 7 of Policy MN2 (page 35) as follows:

‘Other uses will only be permitted on the strategic employment sites where they:

- are compatible with adjacent uses and maintain the overall balance of B1, B2 and B8 uses;
- are small in scale and intended primarily to serve nearby businesses; or
- are supported through site specific policies relating to Land North of Formby Industrial Estate and Land South of Formby Industrial Estate.

Proposed change to paragraph 8 of Policy MN2 (page 35) as follows:

‘Development at the strategic employment locations must be fully masterplanned and be of a high quality in terms of layout and design and be planned to maximise job outputs (including for local people).

Reflecting the above proposed change it is also proposed to tweak paragraph 6.27 (page 37) to reflect this as follows:

‘Each of these locations should be masterplanned and developed to create high quality employment developments which are provided in a quality and managed landscaped setting and have the potential to attract local and inward investment. In all cases the aim should be to maximise job outputs in relation to accepted floorspace to job outputs.’

Evidence Submitted

None

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 452 **Response Ref** 1 **Representor Name** Ben Middlehurst
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I would like to object to the proposed Sefton LocalPlan. I struggle to understand the logic behind building on green belt land which would cause more damage than good, especially when there are many other brown field sites in the Liverpool area which would benefit greatly from re-development. It appears that maximising profits is the highest priority with no regard to the environment around which people live. The roads around these areas are already very busy, particularly around Switch Island. Building and expanding on this land will only compact the issue which the infrastructure would not be able to cope with.

The plans for developing large residential areas may seem like a good idea for providing more houses for our growing population, however the facilities such as schools and doctors are already almost full to capacity. Sefton as I believe already have many hundreds of unoccupied properties, surely it would make more economic and environmental sense to renovate these properties instead.

What about the impact on the environment and extra pollution these plans would introduce, with particular note to the increase in traffic. All in all, there appears to me to be better alternatives for solving the fore mentioned issues and for better reasons than making a quick profit with no regard for the people affected by these plans.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 470 **Response Ref** 1 **Representor Name** Barbara Harvey
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I object to this plan to build more homes in view of the fact that official figures show a decline in population in Sefton. How can you justify building so many more new houses, approx. 11000 properties, when we can't afford to take care of the existing population?

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 474	Response Ref 2	Representor Name Bill Esterson
Organisation Name Member of Parliament		
Obj/Sup/Com Objection		

Summary of Main Issues

Sefton should not have to include large scale Green Belt development at Maghull, Formby, Melling or Thornton in the plan and I would call on the Inspector to remove the major sites in these areas from the plan as they do not constitute special circumstances. Developers claim that brownfield sites are not viable. But this is because developers want to make as much money as possible, naturally. The need for excessive profit does not count as special circumstances. As the CPRE and Communities and Local Government Select Committee have both shown, developers claims about viability are based on a 20% profit level, which developers say they need to achieve. This is excessive and the NPPF should ensure that local communities are protected against excessive profiteering from developers.

The Local Plan published by Sefton Council indicates significant building of housing in particular on land that is currently in the Green Belt. This is of great concern to many people living in Formby, Maghull, Lydiate, Melling, Aintree and Thornton who face the prospect of a dramatic change in the size of the town or village where they live and a consequent change in the nature of their community.

Under the National Planning Policy Framework 2012, the Green Belt is supposed to be protected except in very special circumstances, yet developers appear to be allowed to specify where they would like to build and where they would not.

According to research by the Campaign for the Protection of Rural England, the NPPF has meant that economic considerations have outweighed environmental and community concerns across the country and developers have been allowed to argue that viability prevents them from building social housing or from building at all on brownfield sites, where they already have planning consent or from applying for planning consent on brownfield sites in the first place. I would call for the Inspector to apply the letter of the NPPF and protect the Green Belt in Central Sefton and allow Sefton Council to reduce the level of housebuilding indicated in its research as being required.

The Land Use Database identifies up to 1.5 million potential housing plots on brownfield sites and I would further argue that the Inspector takes the opportunity to look at brownfield sites in boroughs across Merseyside, Lancashire and Cheshire to ensure that the Green Belt can be protected in Sefton while housing need is met.

The Sefton Local Plan should include all brownfield sites including those currently excluded for example the rest of the land around Ashworth Hospital which has previously been developed but is not in the published plan. These brownfield sites should be considered ahead of farmland adjacent to the Ashworth site (Brownfield sites which are in the Green Belt are generally considered acceptable as development has previously taken place on them).

Similarly, the Green Belt sites adjacent to Melling, Thornton, Formby and Hightown should be removed as far as possible. Efforts should be made to remediate contaminated sites as suggested by the CPRE.

Further a 5 year rolling supply of brownfield sites should be considered. Residents are concerned at the loss of high quality farmland, at the dangers of flooding at existing difficulties in accessing GP services and at the ability of the roads to cope with an increase in traffic. Added to this is a concern that any housing that developers want to build would be executive housing of a very expensive nature, which would not address the housing needs of local people.

Protection of the Green Belt is a strong theme of the NPPF, yet in practice that protection has been absent for the last three years. A proper brownfield first policy, enshrined in the Local Plan could make the phrase very special circumstances mean what most people would expect it to mean. Ie that the Green Belt is protected and that major development in the Green Belt in Sefton will be avoided, with our housing and employment needs met using brownfield first and working with neighbouring local authorities and across the region to meet current and future needs.

I would further call for the protection of the Green Belt to be assisted by the Inspector allowing Sefton Council to include existing planning numbers such as those at the proposed Maghull Prison site in the figures for the Sefton Local Plan and for the Local Plan to require developers to build on brownfield sites before starting on the Green Belt. These recommendations are all consistent with current NPPF policy whereby the Green Belt should only be considered in very special circumstances.

Similarly, the Green Belt sites adjacent to Melling, Thornton, Formby and Hightown should be removed as far as possible. Efforts should be made to remediate contaminated sites as suggested by the CPRE.

Summary of Suggested Changes

The inclusion of all brownfield sites. A plan that works closely with local authorities across the city region, and other neighbouring authorities. The creation of a remediation fund to ensure the viability of brownfield sites. Ensuring that infrastructure is built at the same time as sites are developed with housing of for employment use. Guarantees that housing developments include social and affordable housing allocated to people living nearby.

The inclusion of all brownfield sites. A plan that works closely with local authorities across the city region, and other neighbouring authorities. The creation of a remediation fund to ensure the viability of brownfield sites. Ensuring that infrastructure is built at the same time as sites are developed with housing of for employment use.

Guarantees that housing developments include social and affordable housing allocated to people living nearby.

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 488	Response Ref 37	Representor Name Ian Brodie Browne
Organisation Name Sefton Council Lib Dem Opposition Group		
Obj/Sup/Com	Objection	

Summary of Main Issues

For context and background information we attach our previous submission [dated 7 Aug 2014] because much of what we said in it still applies:

[Many of the additional sites -AS sites-have NOT been allocated in the Local Plan - see specific comments recorded elsewhere under 488]

The additional sites:

General Principles:

Unsurprisingly, we are opposed to development on the vast majority of the addition sites as indeed we remain opposed to the development of many of the sites that the Council, under its Labour leadership, has already indicated that it wishes to see developed.

Our principles and approach have not changed in that we oppose Green Belt development in all but very specific circumstances such as those mentioned in our original submission. This is what we said in September 2013 on that matter:-

The Power House in Formby, land east of Southport at Kew, the Pontins site in Ainsdale and the presently vacant Ashworth South site in Maghull are examples of sites where a reasonable compromise can be made. The Power House, Pontins and Ashworth South are clear examples of sites which have previously been built upon to some extent and therefore lend themselves to being developed.

Couple with that our overriding concern that virtually all the undeveloped land in the Borough is high grade agricultural land that should be protected from development so that it can be used to grow food for future generations.

These principles are what frame our approach to the Local Plan process as a whole and therefore the vast majority of the 'additional sites' fall foul of our environmental sustainability test.

To illustrate our concerns we have conducted a review of the proposals for the East Parishes part of the Borough because it sadly details our concerns only too well. Whilst there are of course 'additional sites' across Sefton that land owners want to concrete over this part of the Borough is clearly being targeted by developers. Should they get their way the impact on the East Parishes communities could be catastrophic.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 488	Response Ref 3	Representor Name Ian Brodie Browne
Organisation Name	Sefton Council Lib Dem Opposition Group	
Obj/Sup/Com	Objection	

Summary of Main Issues

Threat to high grade agricultural land:

Sefton is blessed with having a significant amount of some of the highest grade agricultural land in England yet this Local Plan is aiming to build on it. This is not environmentally sustainable development in our view.

For context and background information we attach our previous submission [dated 7 Aug 2014] because much of what we said in it still applies:

Labour's draft Local Plan for Sefton is inadequate, fails to protect high grade agricultural land and lacks ambition.

Loss of 'best and most versatile' agricultural land

The Green Belt surrounding Sefton's diverse communities is almost totally comprised of high grade agricultural land often referred to as 'best and most versatile'. However, Option 2 clearly indicates that a significant part of this land, which is presently used for the growing of food, will be lost to housing developments if the Council presses ahead and confirms the preferred option of the Labour administration.

Our clear view is that compromising high grade agricultural land is a hugely negative step backwards and that it is environmentally unsustainable.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 488	Response Ref 36	Representor Name Ian Brodie Browne
Organisation Name	Sefton Council Lib Dem Opposition Group	
Obj/Sup/Com	Objection	

Summary of Main Issues

For context and background information we attach our previous submission [dated 7 Aug 2014] because much of what we said in it still applies:

Conclusion:

We have not commented on every 'additional site' in the Borough but have used specific examples to illustrate our concerns and principles.

Translating the sites to a map of the East Parishes communities quickly leads you to the conclusion that semi-rural nature of these separate villages and the Town of Maghull will all but be lost by the Council's draft proposals. To add in the majority of the 'additional sites' would simply stick the final lid in the coffin of these separate, proud and semi-rural communities.

We do appreciate that some additional housing (particularly social housing and particularly so in the north of the Borough) will be required in the coming years but a more innovative approach is required than simply looking for the nearest green field and stamping it for concreting over.

We urge the Council to rethink its approach to development land and the need for housing across the Borough along the lines of our submission of September 2013

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 492	Response Ref 3	Representor Name
Organisation Name Craig Seddon SIPP		
Obj/Sup/Com Objection		

Summary of Main Issues

In line with our comments relating to policy MN1, it is suggested that sufficient land should be identified to exceed the total housing requirement by at least 20%. The Publication Draft Local Plan identifies 720 dwellings above the 11,070 requirement. It is considered that 2,214 dwellings (11,070 x 0.2) should be identified.

The Site Appraisal chapter in this representation has demonstrated that there are a number of significant and/or severe Tier 1 constraints on some of the sites identified for Housing Allocations within the Draft Local Plan Publication document, which, by the Council's own definition, have the potential to prevent the sites from being allocated for development. Without having undertaken the necessary technical assessments, it is questioned how the Council have come to some of their conclusions for allowing these sites to be brought forward. This is particularly important for sites where severe Tier 1 constraints have been identified.

This also results in inconsistencies in the methodology and the results of the assessments. Before allocating these sites for housing, the necessary technical assessments must be undertaken to demonstrate that any constraints are resolvable. Without doing so, the Council would be allocating sites for development with unresolved significant/severe constraints upon them, which have the potential to prevent development coming forward. Until these constraints are resolved, these sites should not be allocated. Without having resolved these key issues regarding the principle and capacity of these sites, there remains uncertainty over their delivery for housing.

Summary of Suggested Changes

Sites to accommodate a further 1,494 dwellings should be identified over and above the sites identified in the Publication Draft Local Plan.

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 496	Response Ref 5	Representor Name Allan Watson
Organisation Name		
Obj/Sup/Com Objection		

Summary of Main Issues

In the earlier Draft Plan (of which I do not have a copy, and can no longer access) SMBC proposed a second site for development in Churchtown (SR4.04) comprising 4.7 hectares. In the current Local Plan three additional sites are proposed nearby: AS01 (15.5 hectares), AS28 (6 hectares) and SR4.04 (22.2 hectares). The total area of all these sites taken together is 48.4 hectares, of which 43.7 hectares is newly added. The site SR4.03 is 19.7 hectares. Therefore the new sites identified, if not more constrained than SR4.03, offer over twice the area for possible housing development as SR4.03. The use of SR4.03 is therefore unnecessary, even if such a large number of new dwellings in this area were needed and could be accommodated, which has not been established and presented in SMBC's Local Plan.

Summary of Suggested Changes

It is respectfully suggested that the points raised above indicate unequivocally that the Green Belt land parcel SR4.03 should be excluded from any further consideration for development, and the Local Plan altered accordingly. There are other sites in the area. This is not to imply that this representation endorses the development any of the other named sites, nor that this exclusion alone would cause the local plan to become legally compliant or sound. No other proposed sites have been considered in this representation. Regarding SR4.03 the Local Plan has been shown above to be, it is suggested, not legally compliant. It is in addition, should such consideration be necessary, profoundly unsound, also demonstrated above. Any one of the first four main sections above could alone be considered sufficient reason for exclusion of SR4.03: Demonstrable failure in the Local Plan to follow the Duty to Co-operate, and follow legal and procedural requirements, failure to plan strategically across local boundaries (particularly regarding West Lancashire Borough Council), failure to consistently follow both national guidelines and the the Council's own guidelines with respect to respecting separate residential areas and a gross failure to adequately assess the sustainability of the proposed development. Taken together these points could be considered to indicate that this local plan is fundamentally flawed to the extent of being unfit for purpose in proposing to develop this particular area of green belt land.

Evidence Submitted

Policy MN2 gen	Housing, employment and mixed use allocations
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Respondent No 498	Response Ref 1	Representor Name David Quilliam
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Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I strongly oppose the building on any green belt areas in Sefton.

Summary of Suggested Changes

Evidence Submitted

Policy MN2 gen	Housing, employment and mixed use allocations
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Respondent No 505	Response Ref 2	Representor Name Keith Lewis
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Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

There is a need for social housing in Sefton but this does not have to be on Green Belt as there is enough space for social housing on existing brown field sites.

The agricultural land that has been pinpointed in the Sefton local plan is an important roosting area for Pink Footed Geese and Curlew, in the winter you can see up to a thousand Geese and up to fifty Curlew on the fields around this area every morning making it is a very special place and very important for our biodiversity.

Nobody i have spoken to in this area wants to see the Green Belt tarmacked and concreted over, as we are led to believe there will be a food shortage in the near future to meet the needs of this country, so why destroy good agricultural land for no good reason?

Sefton council has done a good job here in Sefton - Thornton - Maghull - Lydiate with planting trees and designating areas for wildlife, we have Hen Harrier and Short Eard Owl wintering here on these fields every winter making these fields so so important i was led to believe that planting the trees with conifers and other tree species would help our endangered RED SQUIRREL re establish using these green corridors and the pine that has been planted in all these areas, why a change in policy?

We have enough brown field sites in Sefton to meet the needs of the local plan, as in the Hawthorn Rd corridor - Vactite site - Bootle High school - St Winefreds school - Existing empty housing that needs either replacing or revamping - Bridle Rd site set aside for industrial units about ten years ago --- NOT ONE UNIT BUILT ?

Also now that we have the new relief road from switch island to Thornton Hospice [Brooms Cross] the designated land that was left for the Southport Rd from Sterricks Lane to Gorse Lane, would be perfect for housing as you will still retain the the green lung with Bootle golf course - Litherland high school - Holy Ghost primary school and Leeds to Liverpool canal, every possible brown field site should be exhausted before any Green Belt is even considered.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 508 **Response Ref** 1 **Representor Name** Gina Blackshaw
Organisation Name
Obj/Sup/Com Objection
Summary of Main Issues
I strongly oppose the building on any green belt areas in Sefton.
Summary of Suggested Changes
Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 510 **Response Ref** 1 **Representor Name** Peter Quilliam
Organisation Name
Obj/Sup/Com Objection
Summary of Main Issues
I object to the plan proposed by Sefton Council on the following grounds:

The loss of Greenbelt will inevitably create urban sprawl which can already been seen in other parts of Sefton where they have joined West Lancs. The loss of best and versatile farm land. Loss of wildlife and habitats. Added pressure on services in the area including Doctors, Dentists, Schools and hospitals. Increase in pollution and carbon emissions. There is enough brownfield sites to accommodate the housing. Lack of infrastructure planning for additional housing.
Summary of Suggested Changes
It is important to use brownsites for developing and not green belt sites because once they have gone they are gone for good. Houses they are empty across Sefton should be used first for housing. The services in this area could not cope with the new development. Eg doctors appointment , dentist appointment-school places. Parking would be more difficult across the area because of the extra amount of traffic.
Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 510 **Response Ref** 1 **Representor Name** Peter Quilliam
Organisation Name
Obj/Sup/Com Objection
Summary of Main Issues
I strongly object to any buildings on greenbelt land in Sefton.
Summary of Suggested Changes
Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 514	Response Ref 3	Representor Name D&L Larkey
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Destruction of green belt and creation of urban sprawl
Constraints on available building land available within the Sefton area due to the coastline, golf facilities, SSSIs and National Trust
Loss of agricultural land, farming communities and food production
Erosion of open countryside
Loss of distinctive borders with neighbours
Increased pressure on drainage/sewerage facilities, risk of flooding after heavy rain and risk of tidal flooding
Loss of wildlife and habitats
Lack of infrastructure planning
Additional pressure on public services — doctors, schools, dentists, hospitals
Insufficient school places
Increased volume of traffic on already congested roads
Increased pollution and carbon emissions
Lack of brownfield first development policy within Sefton Local Plan
Lack of consultation and ability to answer questions raised by the public
Financial implications for current services should the council become responsible for additional environmental issues
The Local Plan is a living document allowing the council to revisit green belt boundaries for years to come

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 521	Response Ref 1	Representor Name J & G Larkey & Copeland
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Destruction of green belt and creation of urban sprawl. Constraints on available building land available within the Sefton area due to the coastline, golf. Facilities, SSSIs and National Trust. Loss of agricultural land, farming communities and food production. Erosion of open countryside. Loss of distinctive borders with neighbours. Increased pressure on drainage/sewerage facilities, risk of flooding after heavy rain and risk of tidal. Flooding. Loss of wildlife and habitats. Lack of infrastructure planning. Additional pressure on public services. Insufficient school places. Increased volume of traffic on already congested roads. Increased pollution and carbon emissions. Lack of brownfield first development policy within Sefton Local Plan. Lack of consultation and ability to answer questions raised by the public. Financial implications for current services should the council become responsible for additional. Environmental issues. The Local Plan is a living document allowing the council to revisit green belt boundaries for years to come.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 545 **Response Ref** 1 **Representor Name** Christine Jamieson
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

There should be no building on grade 1 agricultural land, as this is a precious resource to the country and the community in terms of self provision.

- We need green and open spaces in our community, and the decline of these will affect our health.
- The council and councillors have been undemocratic in the whole local plan consultation, and have not represented their electorate. They have not listened to residents and have in cases been devious and conveniently poorly communicated information about the local plan to residents, especially in the early stages.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 550 **Response Ref** 4 **Representor Name** Peter Brown
Organisation Name Merseyside Civic Society
Obj/Sup/Com Objection

Summary of Main Issues

The Plan proposes considerable development in the Green Belt for housing and employment uses. The amount of house building proposed is based upon an extensive Strategic Housing Market Assessment which closely follows current practice. However, MCS would make a number of important comments which call into question this strategy.

The further contribution which might be made to housing land supply by the restoration of brownfield land is not fully explained. Although reference is made to the creditable amount of land already restored and used for housing in the borough, it is not clear what further gains could be made if the government, in the future, were to re-introduce a new derelict land grant arrangement. The Society considers that this contingency should be factored into the scenarios considered. Also, the Society does not accept that consideration of the viability of development should rest entirely with the developer, and would like to see a framework for assessing viability. This is especially important as much of the land proposed to be released for development is greenfield and with apparent access to services.

The numbers of dwellings which might be provided by land release do not appear to take into account the differing densities of building which might be applied according to location, and particularly, in relation to access to public transport facilities. MCS is concerned that urban design frameworks will not be developed to allow for high densities where they are appropriate, and thereby contribute significantly to the sustainability of development. The Society has strongly favoured, where appropriate, what we have termed station focused development, otherwise known as transit-orientated development in the USA and elsewhere.

MCS considers that the release of large sites for housing/employment should include proposals for effective neighbourhood planning. The Local Plan should clearly state policies and guidance to achieve development that is well integrated with existing urban and rural/ fringe fabrics. This should include provision for pedestrian and cycle links and good access to local facilities, especially open space. Such briefs are essential to the creation of acceptable development. The Plan appears to relegate this issue to future consideration, effectively as part of the development control process, or potentially as development briefs. However, the Society believes that this is a very real part of neighbourhood planning, and that the Local Plan should provide for explicit commitment to include the local community in the preparation of guidance.

The Society is aware of the government's general support for the role of neighbourhood plans, and considers that it would be difficult for local communities to understand why the same general principle should not be applied to the preparation of proposals for those very large areas identified in the Plan.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 557 **Response Ref** 3 **Representor Name** David and Bridget Jacks
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

There are sufficient brown field sites, some of them, it has been reported, landbanked by Sefton Council itself, as well as by developers to adequately accommodate these developments. There is no need to use so much greenbelt to meet Sefton's needs. Further, Sefton's Local Plan is based on erroneous figures based on national needs which are substantially greater than Sefton's

Summary of Suggested Changes

Evidence Submitted

Correspondence between SE Phillips and Sefton Council 2007
Signed Statement of Fr David Gamble March 2015

Chapter **Plan Order** Policy MN2 General **Other Documents**
Policy
Respondent No 559 **Response Ref** 3 **Representor Name** Christopher Summers
Organisation Name
Obj/Sup/Com

Summary of Main Issues

Deleted rep merged with 1

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 560 **Response Ref** 1 **Representor Name** Vincent Jamieson
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

The local plan is un-aspirational, and it is only about overloading Sefton with more houses to get more taxes and the new homes bonus, it hasn't been assessed logically on need and what is best for the area.

We don't need new houses, official population figures have shown that population in Sefton is on the decline, so how can you warrant so many new homes.

There has not been enough consideration in the local plan on the effect these new houses will have on infrastructure, road, GP services, crime, living standards of the area, wildlife, areas used for leisure by local residents, health, and schools.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

We wish to object in the strongest possible terms to the Sefton Local Plan as published in January 2015. This plan is unsound and deeply flawed and will lead to increased urban sprawl and degradation of the environment, and will impoverish the quality of life for existing residents.

The Plan makes frequent reference to the Borough's high quality agricultural land, and the presence of numerous internationally important nature reserves and Sites of Special Scientific Interest. It goes on to say that Sefton Council is concerned about the effects of global climate change and sea level rises, and 40,000 existing homes are at risk of flooding (sect 2.11). It acknowledges that there are "large tracts of derelict land" in Bootle (2.12), and voices a concern over air pollution levels, mostly nitrogen oxides and small particulates derived from traffic. Section 3.15 notes that global climate change is likely to result in hotter summers, and that this heat stress "can be adapted to by steering development away from areas at greatest risk of flooding" [and] "recognising the role of greenspace and trees in reducing temperatures locally". It then goes on to say that the extra 11,790 houses it considers necessary must be primarily built on Green Belt areas, which will as a result shrink by 4.4%. Section 4.21 states that "Landowners and developers were solicited to submit brownfield sites for consideration.". Apparently no independent study was performed. These sources, which have a vested interest in maximising their profits, would not tend to promote urban sites, which might be more expensive to develop. Sefton Council has been very remiss in not conducting an independent study of potential sites, and as a result has been advised to add to urban sprawl and further degrade the existing environment by developing Green Belt areas. It is to be pointed out that once Green Belt areas are turned over to urban or industrial use, they are gone forever. The existing plan goes a long way to ensuring a poor quality of life for future (and not so future) generations. Developing Green Belt areas also comes with an extra cost, not mentioned in the Plan. This is the cost of supporting infrastructure. Brownfield areas already have much essential infrastructure in place – drainage, utilities, and the like. Greenfield areas must have this added to them, at extra cost to the local Council, and causing disruption to and strain on neighbouring built areas.

3. Formby. The Plan makes provision for 1,100 extra houses to be constructed mostly on pristine green areas with great emphasis on the South and West of the town. In addition there is to be constructed an extra business park, located directly on a site important to local nature conservation and abutting Downholland Brook which drains into the River Alt. Apart from pollution concerns in these waterways, run-off drainage from the new site will increase the volume of water that must be handled and will increase the likelihood of downstream flooding. A large housing development is scheduled for the agricultural fields to the South of Formby, along Liverpool Road. This is highly undesirable. It will degrade existing properties by removing the perception of closeness of open areas, and will very much increase the likelihood of flooding in the vicinity (a major concern, confirmed by Sefton's own ex-senior drainage engineer). It will, in addition, cause a massive increase in traffic congestion along Liverpool Road and Formby Bypass and will result in much degradation of air quality by the excess slow moving traffic. Another large housing development is scheduled for fields West of the railway line and just North-West of the extended development now in progress on the site of the old power plant. This proposed development is much too close to the existing nature reserve area in the coastal dunes. This important natural area will be severely degraded as a result of this development, with loss of habitat, much increased pollution, and resultant loss of biodiversity. Siting any new housing developments West of the railway line at Formby is completely at variance with the Plan's stated concern for preserving natural areas (and it bears repeating here that this will compromise dune systems that are of international importance). Developing on Green Belt land to the South of Formby adds to the inexorable closure of the gap between Formby and Ince Blundell; it is to be expected that if this trend continues, these areas will in the future inevitably become one single conurbation (probably linked to Thornton, Crosby, and the rest of Liverpool). Provision of 1,100 new houses at Formby would be expected to increase the local population by between 2,000 and 3,000. This will put unacceptable strain on medical facilities, schools, and other public services. New facilities will be needed, none of which are included, or even mentioned, in the Plan document.

4. Summary. Based on the Council's own figures we dispute the necessity for such massive housing development. We particularly dispute the necessity to build on Green Belt areas, as there are, by the Council's own admission, plenty of brownfield areas in the South which could be utilised instead, but have not been considered because the Council took input from groups with a vested interest in building on green areas. It would appear that with this desire to build on green land, the Council wishes to increase the already high level of urban decay within the region, particularly in the South, which it admits is in serious need of regeneration. We would like to stress that it is imperative that brownfield land be re-developed before any encroachment is made onto green land. We urge that the Council must conduct an independent study to identify suitable areas; to date, such a study does not seem to have been performed. Largescale development at Formby is unwarranted, will lead to environmental degradation, flooding, pollution, and traffic problems, and will put undue strain on already over-subscribed existing public services. Objective #9 in Sefton's local plan states, "To protect and enhance Sefton's natural and heritage assets". The Plan as it exists at the moment will result in the opposite of this goal.

Summary of Suggested Changes

Please refer to letter of objection in previous section. The Plan contains many inconsistencies and there is no justification for building on Green Belt land. A proper *independent* study of available building land must be carried out, and the Plan must be revised to commit to developing brownfield and economically impoverished areas first, before any green land is considered.

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 583	Response Ref 1	Representor Name Gerry Doyle
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I wish to strongly object to the use of ANY Greenbelt sites for the purpose house building until brownfield sites have been totally used up.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 589	Response Ref 1	Representor Name Edward O'Connor
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

The loss of best and most versatile agricultural land. The increased risk of flooding to existing properties. The impact of sewerage or drainage which already occur could exacerbate.

How local services will cope with the influx of so many new residents. Given that parking is already problematic, local schools already oversubscribed and doctors ever increasing.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 597	Response Ref 3	Representor Name David Parmley
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

It would seem that the neighbouring West Lancs conducted a more rigorous brownfield survey and presented a plan with little effect on the green belt. But this is not all about green belt issues. It is supposed to embrace a Sefton regeneration. I have already stated that development of the Mortons Dairy site might well drive jobs out of Sefton, some of the agricultural greenbelt developments will result in a loss of agricultural jobs. Another aspect which was disclosed at the consultation (again as a result of a direct enquiry by my wife) was an apparent desire to "homogenise" the borough. Those parts currently seen as desirable or affluent such as Lydiate would be downgraded by the inclusion of more "affordable" housing and areas such as Bootle would be uplifted. This is hardly in the interests of those residents who have aspired to live in the more attractive areas. In the meantime the plan makes millionaires of the owners of low value agricultural land. This is a sort of mix of communism and capitalism and embodies the worst features of both.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

It would appear that planners have taken the easy option to allocate green belt sites for building rather than properly assess the availability of brownfield sites or more appropriate urban development. The attitude of the elected councillors belies belief. Labour councillors elected on the basis of protecting the greenbelt have meekly acquiesced to the planners' rapacity offering the pitiful excuse that if they do not go along with it then "someone" will impose something worse. Why would an alternative necessarily be worse? If it was properly researched it might be considerably better. These councillors say only 4.4percent of the green belt is affected. How is that any responsible contention? It might well be that a plan utilising 6percent of the green belt achieves a better result or conversely a better result might be achieved by affecting no green belt at all.

Councillor Dowd has clearly been irritated by the level of opposition as he has sought to discredit the objectors for "peddling myths". His defence consists of some rather unusual statements and statistics:

- a)Building on the green belt is permitted in exceptional circumstances – the building of housing is not of itself a special circumstance and the tests for these special circumstances are rigorous indeed
- b)The council has assumed that brownfield sites will provide for only 1500 houses, however the plan disregards these "windfalls" although they would provide 13.5percent of the stated requirement of 11070 new houses.
- C)Falling population does not mean that less houses are needed –the current population of 273700 occupies 123913 houses according to the plan representing an average occupancy of 2.2; the population is expected to grow to 280000 by 2037 and the plan to 2030 supports 11070 new houses which reduces occupancy to 2.1.
- d)If the local plan fails the test of independent inquiry then developers would see it as "open season" to seek to develop green belt sites – what an unusual conclusion as those green belt applications would be subject to the exceptional circumstances test.
- E)Infrastructure issues are dismissed – there are new plans in place such as a new rail station, 32.3m for new school places, the community infrastructure levy will also provide resources – indeed! What of the 40,000 homes presently at risk of flooding? The business at Mortons Dairy has been waiting several years for an upgraded mains supply and has been forced to use a diesel generator. United Utilities are apparently satisfied with the council's proposed approach in respect of drainage and flooding. United Utilities are separately quoted as only able to cope with a maximum of 30 homes per year in Maghull and Lydiate.
- F)Affordable housing remains a key goal and will be provided where needed. The plan excludes 5700 empty homes but according to Councillor Dowd even if we were allowed to include these it would not cover the 8000 people in housing need. A truly remarkable statement – even if the 8000 people required 6000 homes (5700 being inadequate) then over half of the proposed 11070 new houses are required to address the requirements of people currently in housing need.

Councillor Dowd concludes The council has a responsibility to plan for those who need houses now and our children and grandchildren in the future, who the action group do not seem to think about. It is rather concerning that the Sefton Council has allowed the housing situation to reach this stage and requiring a 15 year plan to sort it out. Would it not make more sense to make a start on the 5700 empty homes? If the council has the responsibility it must have taken them some time to come to that conclusion whist the situation reached these levels.

All of this is very disturbing and indicates that not only is the council using this plan to cover up past neglect but it is uncertain of the justification of its own plan. Before considering the building of 11070 new houses you would think it would be first addressing the needs of 40,000 homes at the risk of flooding.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 604 **Response Ref** 1 **Representor Name** Susan Mietke
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Green belt should not be built on, Lancashire Plain has the best agricultural land Important areas of special Scientific interest that are unique, Quality of life for everyone in the affected areas will be diminished, Schools have been closed and likely to be built on, so fewer school places for any increase in population!

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 611 **Response Ref** 1 **Representor Name** Robert Noonan
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Whilst I have no objections to such developments I've never known any that turn out as well as initially proposed. That isn't just the case Sefton but across the country too.

Green Belt sites are very important to the public. They walk their dogs, they may care about the wildlife, they like the view and perhaps just the sense of greenery. They don't like the idea of more housing, business parks and industrial sites etc.

I realise that it's only a minority of Green Belt land to be used, nevertheless it will change the environment significantly in the areas planned. I don't believe that any such plans should be given the go-ahead without the full consent of the majority of the local population in the areas affected.

Issues like this are always difficult for Councils but I urge you to use the last inch of brownfield sites before moving on to the green. Don't just go along with the developers who inevitably will want control of the greener land.

I don't have any expertise about these matters and I wouldn't want to deny anyone a home in the future, but do they have to be built on Green Belt land? Over the next few years I don't just want to see endless building sites ruining peaceful green areas some of which I know very well.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 625	Response Ref 4	Representor Name
Organisation Name Wainhomes Developments Ltd		
Obj/Sup/Com Objection		

Summary of Main Issues

Part 4 of policy MN2 states "Sites MN2.2 and MN2.19 are adjacent to areas of proposed open space. These areas will be developed for new open space alongside a housing allocation".

Our objection to this part of the policy is not against the principle of the proposed area of open space as it is a result the evidence that has been prepared when assessing the proposed allocation of the site, for example to maintain the setting of the wider area with particular regard to cultural heritage (in the case of MN2.2 Meols Hall). However we consider that the policy needs to provide an element of flexibility as to where the proposed residential designation ends and the proposed open space area starts. This can only be undertaken through a detailed planning application with the necessary environmental and technical reports which may demonstrate that the residential area may be extended into the proposed open space. That level of detail cannot be undertaken at the plan making stage.

Summary of Suggested Changes

Sites MN2.2 and MN2.19 are adjacent to areas of proposed open space. These areas will be developed for new open space alongside the housing allocation with the precise boundary between residential development and the open space to be determined through the planning application process. The approved area of open space will then be protected by Policy NH5.

Evidence Submitted

None

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 626	Response Ref 1	Representor Name S Wilson
Organisation Name		
Obj/Sup/Com Objection		

Summary of Main Issues

1. Firstly I object to releasing green belt for housing as I do not believe the 'special circumstances' are present to warrant it. Their purpose; to contain urban sprawl and are as necessary now as ever, if not more so. I prefer a brownfield first approach to the sites to be utilised first. The Local Plan advocates that unmet housing need should take precedence over the maintenance of green belt, however as Seftons population has been falling for the last decade I would argue this housing need is not present in Sefton and indeed, there are many existing unsold homes costing much less than the anticipated prices of homes on green belt building applications already available in Sefton, along with empty houses which should be brought back into use. The policy advanced in the Local Plan seems to be green belt/green field first, when brown field sites are what the public want developed first. Brown field sites already have infrastructure present, and to leave them as derelict eyesores is detrimental to the surrounding housing and welfare of those residents.

2. I object to building on floodplain, even if the classification has been altered. Whatever its classification land that floods should not be granted building consent. It affects the surrounding existing housing. Homes built on land that floods also effects all our insurance premiums, and the effects of flooding causes untold misery to the homeowners.

3. The infrastructure is more developed in urban areas and the access to Doctors, Dentists and schools for example more readily available. Increased levels of cars also has a significant impact on quality of life and as Formby only has 3 exits the pressure on these at rush hour is already stretched. I am concerned about the impact of adding to it by granting planning permission for vast numbers of new houses.

3. Sefton is blessed with some of the best agricultural land in the country and once it is built on cant be recovered. I wish to maintain this land for food production for future generations.

I am concerned about the Plan in general as I do not feel enough consideration has been given to the comments of the residents and how they will be directly impacted.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 629 **Response Ref** 1 **Representor Name** Richard Simmons
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

GENERALLY I consider the Sefton Local Plan to be sound BUT I am not in favour of so much planned building on Green Belt land; it really must be a Brown Field First policy with Green Belt only considered as a last resort and only after further public consultation. The proposed sites close to my home are: 1 Prime agricultural land producing good quality food crops, 2 Part of a natural flood plain, 3 A haven for wild life, 4 Part of a natural buffer to prevent us forming a ribbon development with neighbouring conurbations. My further concerns are mainly because the barely adequate neighbourhood infrastructure could be overwhelmed: 1 The road provisions are currently barely adequate at school opening and closing times, 2 Currently it is not always possible to get a Doctor's appointment within a week of an illness - A&E beckons! 3 The local schools are currently oversubscribed - Ainsdale children cannot always get places. Whilst I hear the arguments about further residences bringing in more Council Taxes I wonder about the costs which would be necessitated by the additional flood defences, dykes, swale ditches, pumps and verges and their maintenance in a time of cost cutting.

Summary of Suggested Changes

I don't contest the legal compliance of the plan, just the soundness of the Green Belt inclusions. As for the revised wording, I have set out my objections, it is the duty of your department to revise the wording of the plan to accommodate my objections.

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 657 **Response Ref** 2 **Representor Name** Robert Burns MBE
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

It is well understood by many people that the Government/Mr Pickles have stated that the Green Belt may be used for housing development but only as a last resort. During the iterations preceding production of The Plan, the site SR4.02 [Bankfield Road] had been identified to accommodate 120 dwellings. Local residents and Southport MP Mr John Pugh identified an alternative 'Brown Field' site (literally across the road) [site of former Phillips Factory] should be considered to save the Green Belt original site. Due to lobbying by Wain Homes a local firm of developers, Sefton have now increased the 120 to 220 AND have decided to use the Brown Field site for a further 158 dwellings. So, what was originally 120 dwellings is now 378!

There has been much analysis by local papers, councillors' et al that there are many other such brown belt sites scattered across the borough, albeit some the size of 4 to 6 dwellings, but have not been utilised. Is this because Sefton cannot be bothered spending the necessary time and effort or is it the major house developers, who are naturally expecting to make a pretty penny building up to 10,00 dwellings across the borough, are not interested in such small pockets of land to build upon. They obviously prefer the large green fields where they are able to substantiate their profits by building hundreds at a time!

It is Sefton Councils raisin d'être to support the residents of the borough and not the developers; I hope this has not passed them by!

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 657	Response Ref 9	Representor Name Robert Burns MBE
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I have first-hand experience of their approach in South Ribble Council, especially New Longton and the local areas. They seem to know 'the process' enabling them to build anywhere, despite local objections and council objections too, but they take these rejections to appeal and win and soon the building begins. Trees were felled prior to lodging their development intentions thereby negating future objections relating to tree preservation, bats domiciles etc. They take no notice of the fact that people's lives are blighted when their biggest investment (their home) suddenly drops in value due to previous 'open aspect views' becoming housing estates, property curtilages suddenly overshadowed by Wainhomes developments. It is this 'total disregard' that worries me with Wainhomes, albeit I would imagine other developers are of similar moral standings.

My biggest investment in life was my house, currently overlooking fields with horses in. A 2 minute walk takes me to fields of living growing things: animals, birds, grass, hay all the things which our 'Green Belt' was intended for. Wainhomes submission includes many 'professionally produced' documents relating to topics of local objections and concerns; spookily these appendices all support Wainhomes approach by telling us there are no issues surrounding this proposed development.

No problems with sewage.
No problems with flooding.
No problems with wildlife.
No problems with vibration.

Perhaps the creators of the sewage and flooding documents should have spoken with residents of Blundells Lane and Verulam Road about recent incidents – but that would not then support the development, so perhaps that's why they didn't!

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 664	Response Ref 1	Representor Name Richard Kranas
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I object to Sefton council's Local plan on these grounds: 1.Housing figures don't show 'special circumstances' to build on the greenbelt. 2.We are adding to the urban sprawl that already exists and losing local identity. 3. Loss of high grade agricultural land and farms: loss of food crops for the future 4.Increase risk of flooding to existing properties 5. Loss of valuable flood plains 6. Destruction of wild wildlife and habitats. 7. Lack of infrastructure for additional houses. 8. Increase in traffic unacceptable. One incident on or by Switch Island already gridlocks the whole of Aintree. 9.The knock on effect of additional housing on nearby communities: increases traffic using inadequate roads systems- trying to avoid the mess that is Switch Island island 10 The pollution levels will increase: air, light and noise. Causing health problems. 11. The pressure on local education and health services will be stretched to the limit: school places, patient places. 12 the local plan is a living document which can be revisited and changed in the future; not democratic. 13. Brownfield should always be used before any greenfield site

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 666	Response Ref 1	Representor Name
Organisation Name Chancerygate		
Obj/Sup/Com Objection		

Summary of Main Issues

Chancerygate are concerned that part 6 of Policy MN2 is overly restrictive and not in accordance with guidance provided by the national Planning Policy Framework, particularly paragraphs 20 and 21, which encourages authorities to plan proactively meet the needs of business and seek to address potential barriers to investment.

The criteria for allowing alternative uses at the Former Peerless Refinery Site are unnecessarily restrictive. Alternative uses have the potential to create a range of good quality employment opportunities and Policy MN2 should make greater allowance for this. The Local Plan has a time horizon of 15 years, within this timeframe it may become apparent that the Former Peerless Refinery Site cannot come forward for employment related development. Policy MN2 should make allowance for this eventuality identifying potential alternative uses that could be acceptable in the event that employment uses cannot for any reason be delivered.

Summary of Suggested Changes

Policy MN2 should make greater allowance for potential alternative uses that could be acceptable in the vent that employment uses cannot for any reason be delivered.

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 668	Response Ref 2	Representor Name Andrew Thompson
Organisation Name Morris Homes and Ballygorryveg Ltd		
Obj/Sup/Com Support		

Summary of Main Issues

Morris Homes Northern Ltd and Ballygoryveg Development Ltd support the release of Green Belt in order to accommodate the proposed level of growth, which they believe has been underestimated. This includes the two sites they are promoting (MN2.16 and MN17) in Formby. The site constraints identified in the Council's Site Assessments can largely be dealt with at the planning application stage. However the key restraints relating ot heritage assets and vehicular access are set out under the representation for each site. The site area of MN2.16 could be increased in size which would increase the indicative capacity from 319 dwellings to approximately 426 dwellings (see detailed site representation).

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 669 **Response Ref** 1 **Representor Name** John Ashburner
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I am writing to STRONGLY OBJECT to the proposals of the Sefton local plan, as follows:-

- 1.Housing figures do not give “special circumstances” for building on the greenbelt.
- 2.Sefton is unique in that it has limited land to build on due to the various constraints. On one side it is Coast Line, as well as SSSIs, National Trust, Golf Courses and large areas which are natural flood plains.
- 3.The loss of green belt to Sefton, creating urban sprawl which has already occurred in the borough. We will have no countryside left in Maghull.
- 4.The loss of best and most versatile agricultural land. We have Grade 1 agricultural land.
- 5The loss of farming communities and their production of food for the future.
- 6.The openness of the countryside will be eroded.
- 7.Helping with health. People lead busy lives. In order to help with exercise and relaxation, where will there be, LOCALLY, for them to have a walk in the countryside; to savour the tranquility and see and hear the wildlife?
- 8.Loss of the control of our borders by building up to the border with our neighbouring authorities.
- 9.Increased risk of flooding to existing properties.
- 10.Loss of wildlife and habitats.
- 11.Lack of infrastructure planning for additional housing.
- 12.Added pressure on services to include Doctors, Dentists, Schools and Hospitals.
- 13.Insufficient school places in the areas where housing has been allocated.
- 14.Increased volume of traffic on roads which are already congested.
- 15.Increase in pollution and carbon emissions.
- 16.I propose a requirement of a Brownfield First policy, in the Local Plan.
- 17.Lack of consultation and ability to answer questions raised by the public.
- 18.There will be more financial implications on services that are already being cut.
- 19.The council will be responsible for more wetlands, swale ditches and verges on the new sites which they will have to adopt.
- 20.The Local Plan is a living document and will allow our Council to go back and revisit the green belt boundaries in the coming years.

Please think of what this LOSS OF COUNTRYSIDE all means before it is too late

Summary of Suggested Changes

Evidence Submitted

Policy MN2 gen **Housing, employment and mixed use allocations**

Respondent No 670 **Response Ref** 2 **Representor Name** Karen Williamson

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I do not object to new homes being built, what I object to is the volume of homes that are being proposed, we do not need this huge development. Also, there are many empty homes that have not been taken into consideration in Sefton Planners projections. There are also many areas (all highlighted by local action groups to the planners) that need to be developed, but they have been ignored or discounted by the council, without, in my opinion, fair consideration. Put simply, I believe we need less homes than this plan proposes and there is enough Brownfield sites to accommodate all the developments that his area can sustain.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 672 **Response Ref** 1 **Representor Name** Brenda Ashburner
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I am writing to STRONGLY OBJECT to the proposals of the Sefton local plan, as follows:-

- 1.Housing figures do not give “special circumstances” for building on the greenbelt.
 - 2.Sefton is unique in that it has limited land to build on due to the various constraints. On one side it is Coast Line, as well as SSSIs, National Trust, Golf Courses and large areas which are natural flood plains.
 - 3.The loss of green belt to Sefton, creating urban sprawl which has already occurred in the borough. We will have no countryside left in Maghull.
 - 4.The loss of best and most versatile agricultural land. We have Grade 1 agricultural land.
 - 5The loss of farming communities and food production for the future.
 - 6.The openness of the countryside will be eroded.
 - 7.Helping with health. People lead busy lives. In order to help with exercise and relaxation, where will there be, LOCALLY, for them to have a walk in the countryside; to savour the tranquility and see and hear the wildlife?
 - 8.Loss of the control of our borders by building up to the border with our neighbouring authorities.
 - 9.Increased risk of flooding to existing properties.
 - 10.Loss of wildlife and habitats.
 - 11.Lack of infrastructure planning for additional housing.
 - 12.Added pressure on services to include Doctors, Dentists, Schools and Hospitals.
 - 13.Insufficient school places in the areas where housing has been allocated.
 - 14.Increased volume of traffic on roads which are already too congested.
 - 15.Increase in pollution and carbon emissions.
 - 16.In the local plan, I propose the requirement of a Brownfield FIRST policy,
 - 17.Lack of consultation and ability to answer questions raised by the public.
 - 18.There will be more financial implications on services that are already being cut.
 - 19.The council will be responsible for more wetlands, swale ditches and verges on the new sites which they will have to adopt.
 - 20.The Local Plan is a living document and will allow our Council to go back and revisit the green belt boundaries in the coming years.
- Please think of what this LOSS OF COUNTRYSIDE all means before it is too late

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I object strongly to Sefton Council's Local Plan for a number of reasons.

Firstly, I do not think it is sound in its construction.

- It does not comply with national policy as set out in the NPPF.
- It lacks justification.
- It does not meet the needs of residents.
- It shows a complete disregard of residents' feedback over the past few years.

I am totally against any building on the Greenbelt. In 2011, a Sefton consultation with the public showed that 97% did not want the Greenbelt built on.

The main purpose of the Greenbelt is to prevent urban sprawl. This protection is needed by Formby. As it is, it has already merged with Freshfield and only RAF Woodvale prevents it merging with Ainsdale, which in turn, has merged with Southport and Birkdale. Liverpool has sprawled into Sefton as far as Thornton and Aintree so far and other communities are at risk.

The NPPF states quite clearly that the Greenbelt should only be built on in very special circumstances. These do not exist in Sefton. Housing figures are not 'special circumstances'.

Formby is a lovely place to live. One of the reasons for this is that it is relatively small and has a real sense of community. The overdevelopment, in terms of both housing and expansion of the industrial/retail site, suggested in the Local Plan would completely destroy the character of Formby and have a detrimental effect on the people who live there.

The only access to Formby is via the Formby Bypass. The increase of traffic that will be generated by new houses alone will cause chaos. Plans to expand the existing small industrial/retail site seem totally illogical. If this were to become a successful retail park, the resulting traffic using the Bypass would reach ridiculous proportions and would again impact on residents.

There is no justification for the expansion of this industrial/retail site. Many of the units have been empty for years. There are already large industrial/retail parks in the borough. There are two within easy reach of Formby; one in Southport and one in Aintree. There are far more suitable sites for this sort of development instead of Greenbelt land. Dunnings Bridge Road has large vacant industrial sites. There are also many other brownfield sites in Sefton which can be used for both employment and housing. There should be a brownfield first policy in the Local Plan.

I also feel there is no justification for the proposed house building figures. For years, Sefton was one of a few boroughs with a falling population and there is little growth at the moment. The figures just don't seem to add up.

The infrastructure and services would not cope with the amount of house building that is proposed. The Local Plan is ill-conceived in that it gives no thought to infrastructure or the needs and wishes of residents. It also puts homes at risk. Formby already has a drainage problem as it is below sea level and is built on, and surrounded by, a natural floodplain. Building on this floodplain will result in flooding of existing homes. It is also one of only two places in the country where the river flows inwards from the sea.

I am not against house building but feel strongly that brownfield sites should be used first. There are nearly 6,000 empty homes in Sefton. These should also be brought back into use. The Council has depleted housing stock by compulsory purchasing Victorian terraced houses in Bootle. These houses were low cost and exactly what is needed for first time buyers and those on a lower income. Yet the council has demolished many of them and the rest lie empty despite people wanting to buy them back. I also disagree with the Council's policy of not building low cost housing which is what is most needed in the borough. Shared ownership only seems to benefit the developers. Developers want to build executive homes on the Greenbelt. This is in the developers' interest but not what the borough needs.

The Council voted for Option 2 of the Local Plan before the public consultation which seems very odd to me and not particularly democratic. Surely the three options should have been explained to the public and then been consulted on before the draft Local Plan was drawn up.

Also, I don't think it has been made clear to the public that there will be a backlog added to the housing figures quoted in Option 2 which will take the numbers up to those of Option 3.

Sefton is different from most other boroughs as it has many constraints which limit the amount of land available to be built on. It is on the coast; has a number of Sites of Special Scientific Interest; has large areas of natural floodplain; there is also National Trust land and golf courses.

Much of Sefton's land is also agricultural and is amongst the best and most versatile in the country. Building on this land would result in the loss of precious national resources. Our farms, and so food production for the future, should be protected.

I feel the level of consultation and information has been of a very low standard. There has also been a lack of ability to answer questions put forward by the public.

As things stand, I don't believe that the majority of people understand what a Local Plan, or Neighbourhood Plan, is or how it will affect their lives.

The proposed release of Greenbelt will mean the erosion of the openness of the countryside. It will cause a loss of wildlife and their habitats.

I am incredibly worried that the loss of Greenbelt in this Local Plan is only the beginning. It is a living document and so it is possible for the Council to go back and continually change the Greenbelt boundaries, hacking away at it bit by bit. I also think the expansion of the industrial/retail site is only the first stage. I was told, on making an enquiry to the planning department a couple of years ago, that there would be a 15ft buffer zone between it and the back of my house.

I honestly feel that my way of life, my home and enjoyment of it are all under threat.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 686	Response Ref 1	Representor Name June Ritson
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I would like to object to the amount of green belt land to be built on in Thornton.

I live in Holgate and you are wanting to build nearly all around us leaving are houses in the middle of housing estates.

We are already having our green belt used for the new road.

Also there is severe flooding in this area, if there are houses built there will be an increased risk of flooding to existing properties.

We wont be able to cope as you have already closed a local primary school and the other two nearest schools are full now and over subscribed.

There will be added pressure on services in this area.The loss of green belt in Sefton creating urban sprawl.The loss of farming and food production. I would like to see a brownfield first policy in the plan.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 687 **Response Ref** 3 **Representor Name** Diana Sayer
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Taking an extract from the consultation response from Redrow 'Southport and Churchtown is heavily constrained and there are limited opportunities for new development'. This recognition by the developer should highlight the importance of re-developing existing brownbelt sites across Sefton, which in many cases already have good infrastructure, a good example locally would be the former Phillips site off Bankfield Lane. There is still a plentiful supply of brownbelt across Sefton and this should be re-developed rather than being left to erode and remain an eyesore. There are also 6,000 vacant dwellings across Sefton – twice the national average, and 11,000 homes for sale for £1 in the city of Liverpool.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 692 **Response Ref** 2 **Representor Name** Peter Harper
Organisation Name UKIP Sefton Branch
Obj/Sup/Com Objection

Summary of Main Issues

Overriding anything else, if there truly is a genuine and provable requirement to build more houses in Sefton. Not one square foot of Sefton's green-belt land should be built upon until every available square foot of Sefton's brown field land has been built upon.

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

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 693 **Response Ref** 2 **Representor Name** Michael Eccles
Organisation Name Liverpool City Council
Obj/Sup/Com Support

Summary of Main Issues

Liverpool notes that consistent with the approach to the identification of OAN the Sefton Local Plan has also identified an additional employment land requirement of 35ha to supplement an existing available supply of some 70ha. It is considered that the Sefton Local Plan's approach of matching new provision to past trends is consistent with the nature of Sefton as an area of comparatively modest economic growth, given its ageing population and long standing travel-to-work patterns into the regional core of Liverpool. It is not envisaged that major sources of employment will move from neighbouring areas such as Liverpool to Sefton. Liverpool City Council supports this view. Both local planning authorities do however recognise that there will be changes in the demand for land given the expansion of facilities at the Port of Liverpool. Both Liverpool and Sefton agree that there is a need for further evidence studies including of further port land requirements. Liverpool consequently supports the Sefton Local Plan's recognition that there will be a need for an early review of the Sefton Local Plan to address this issue.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 696	Response Ref 2	Representor Name Robin Buckley
Organisation Name Redrow Homes Ltd		
Obj/Sup/Com Support		

Summary of Main Issues

There is a compelling argument to support the revision of the Green Belt boundary in order to meet housing needs. The SHLAA of 2014 shows that only around 4,000 homes can be provided within settlement limits. There is a clear need to look beyond the limit of settlements to meet the FOAN over the full Plan period. This constitutes the exceptional circumstances to underpin a revised Green Belt boundary.

The Council has approached the review of the Green Belt boundary in a rigorous and systematic way. The Green Belt Study (June 2013) is a step by step review of parcels of land at the edge of the urban area. The Green Belt Study identified a number of locations on the edge of the five main urban areas of Sefton, together with three locations at the edge of Hightown, which are suitable for development. Following the Green Belt study a methodology has been applied for selecting Green Belt sites for development.

This resulted in almost half the potential development sites identified in the Green Belt Study being excluded from further consideration.

The housing allocations identified in Policy MN2 provide the most significant opportunity to provide new affordable housing. This is especially the case on the urban extension sites to be released from the Green Belt which are generally less constrained than sites in the urban area. The urban extension sites have a particular role to play in the delivery of affordable housing, particularly as many of them are located in the areas of highest need. This, in part, provides added support to the release of land in the Green Belt in community areas such as Southport and Formby where need is the most acute.

Summary of Suggested Changes

Evidence Submitted

Chapter	Plan Order Policy MN2 General	Other Documents
Policy	Housing, employment and mixed use allocations	
Respondent No 699	Response Ref	Representor Name P O'Hanlon
Organisation Name Maghull and Lydiate Action Group		
Obj/Sup/Com		

Summary of Main Issues

merged rep DELETE

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 699	Response Ref 6	Representor Name P O'Hanlon
Organisation Name Maghull and Lydiate Action Group		
Obj/Sup/Com Objection		

Summary of Main Issues

The Maghull and Lydiate area is a haven for wildlife and its existence should be protected, e.g Bats, herons, voles, pink footed geese, rabbits, pheasants, grouse, kestrels, owls, jays, foxes.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 699	Response Ref 5	Representor Name P O'Hanlon
Organisation Name Maghull and Lydiate Action Group		
Obj/Sup/Com Objection		

Summary of Main Issues

The Maghull and Lydiate Action Group are concerned about the infrastructure which needs to be in place to support these additional houses. Infrastructure Working Party was set up by Sefton Council itself. The Infrastructure Working Party highlighted areas of concern, for example the degree and extent of the implementation of enforcement measures to ensure that new developments include the essential infrastructure, services and facilities that they require. They also pointed out that several key infrastructure providers are companies who are dependent on the uncertainties of the market place which may affect their ability to provide the funding to meet the infrastructure needed.

Maghull and Lydiate are already at maximum capacity. Many of our narrow roads and canal bridges are at gridlock during peak hours. Even an extra 5,000 new houses could mean 10,000 extra cars on our roads and 20,000 extra people. Doctor and dentist waiting lists are already full, as are our schools.

AGRICULTURE

We have the finest agricultural land in the country and, once it is built upon, it will be lost forever. As world resources become scarcer, this land will become even more valuable. We already import 60% of our food in this country and this percentage will increase still further with loss of this agricultural land. To be so dependent on other countries is foolish with political instability, unpredictable global warming, volcanic and tsunami effects, etc. Any of these factors could drastically affect our food supply with dire consequences.

History of Maghull and Lydiate:

Lydiate and Maghull both appear in the Domesday Book of 1086 and their history goes back even further. Both were settled by the Anglo-Saxons, with some evidence in Maghull of even earlier Celtic field names. Maghull has evidence of the early three-field system of farming and Lydiate of the strip system of the medieval period. The ancient roads in both Maghull and Lydiate prove that Anglo-Saxon farmers were at work here because they follow the pattern of the reversed S-bend, which typifies lanes bordering fields where the plough was the heavy mould-board type drawn by oxen. This type of plough was too heavy and unwieldy to turn corners and the roads followed the field boundaries created by its curves. Examples of such lanes include Deyes Lane and Damfield Lane in Maghull and Lamshear Lane and Moss Lane in Lydiate, as well as Liverpool Road and Southport Road. Under snow, aerial photography shows evidence of early farm buildings.

The reason that both these places have been valued as agricultural communities for over a thousand years is because of the soil type, which is the extremely fertile alluvial Shirdley Hill sand. This has been recognised as the most valuable Grade A agricultural soil in this country.

The Anglo-Saxons recognised its worth and settled on it in the inland parishes, leaving the blown sand of the coastal areas eg Ainsdale, and the boulder clay of the eastern parishes e.g. Kirkby to the later arrivals, the Norwegian Vikings.

From a historian's point of view, later history, for instance, during the Second World War, shows the folly of allowing this country to reach a situation where we cannot feed ourselves.

Modern concerns about the carbon footprint reinforce the view that as much produce should be produced at home, and even, locally, as possible. Building on traditionally recognised good farmland and disregarding centuries of wisdom and experience is not the way forward.

We wish to preserve the village character of Lydiate and the character of Maghull as a small town. Building on the scale proposed and encroachment on to the green belt would be seriously detrimental to the character of the listed buildings in Lydiate and Maghull. [List of the 9 Grad II Listed Buildings in Maghull and 12 Grade II and 2 Grade II* Listed Buildings in Lydiate is attached]

The Maghull and Lydiate area is a haven for wildlife and its existence should be protected, e.g Bats, herons, voles, pink footed geese, rabbits, pheasants, grouse, kestrels, owls, jays, foxes.

Our natural green spaces provide recreational facilities for those from miles around. Maghull Rambling Club was formed in 1976 and its numbers are ever-increasing. It is a well known fact that open spaces are necessary for our whole health and well-being, with those living in such areas potentially enjoying a longer life-span. These natural green spaces are a bonus for our Council, requiring no maintenance costs at all. There is also a section of old railway line (Cheshire Lines) running from Plex Moss through to Maghull (approximately 6 miles). This is ideal for off-the-road cycling for families with young children. School-children regularly participate in cross-country runs along this area. Groups of fishermen from far and wide are frequently seen along the banks of the canal.

Summary of Suggested Changes

Evidence Submitted

Chapter Plan Order Policy MN2 General **Other Documents**
Policy
Respondent No 699 **Response Ref** **Representor Name** P O'Hanlon
Organisation Name Maghull and Lydiate Action Group
Obj/Sup/Com
Summary of Main Issues
Merged rep DELETE
Summary of Suggested Changes
Evidence Submitted

Chapter Plan Order Policy MN2 General **Other Documents**
Policy
Respondent No 699 **Response Ref** **Representor Name** P O'Hanlon
Organisation Name Maghull and Lydiate Action Group
Obj/Sup/Com
Summary of Main Issues
merged rep DELETE
Summary of Suggested Changes
Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 701 **Response Ref** 3 **Representor Name** Brian Rostron
Organisation Name S Rostron Ltd
Obj/Sup/Com Support
Summary of Main Issues
S Rostron Ltd support parts 6 - 9 of policy MN2, the allocation of strategic site MN2.48 and policy MN4.
Summary of Suggested Changes
Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 703	Response Ref 5	Representor Name Jackie Copley
Organisation Name CPRE Lancashire		
Obj/Sup/Com Objection		

Summary of Main Issues

Of note, CPRE Lancashire held a hustings event on the 19th March 2015 with all the parliamentary candidates for the Sefton Central constituency participating.

There was unanimous support for the reuse of previously developed land (brownfield) as a priority and for land with Green Belt designation to have continued protection.

It is important that the Local Plan represents the ambitions of the local electorate when planning for Sefton's future land use.

NPPF and Brownfield Reuse

A core planning principle of the NPPF, as stated in Paragraph 17, is that Local Plans should encourage the effective use of land by reusing land that has been previously developed (brownfield), provided it is not of high environmental value.

Sefton has 184.08 hectares (latest NLUD) of brownfield land, of which 71.95 hectares is classified as A – Previously Developed Land now vacant, and 75.43 hectares has been assessed as suitable for housing.

The Government has announced Brownfield as a planning priority and has introduced new funding and measures to unlock its potential. Like Government, CPRE believes brownfield land ought to be re-used in advance of needless countryside development.

We implore Sefton Council to do everything in its gift to support much needed Brownfield regeneration and to protect valued Countryside.

Brownfield Regeneration

Elsewhere in Lancashire, planning authorities are focusing more effort on reusing Brownfield, such as in Pendle where the Council earmarked £1.5million to a brownfield regeneration fund as part of its capital programme for 2015/2016 to match funding from Government's Brownfield Package, to unlock the potential of brownfield land for future development.

CPRE believes in accordance with the NPPF it is important that the Local Plan will not undermine future regeneration efforts by releasing 'too much' Green Belt or greenfield land for development. CPRE believes Sefton Council must adopt a Local Plan that encourages brownfield land to be brought back into use with effective land use policies.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 703	Response Ref 3	Representor Name Jackie Copley
Organisation Name CPRE Lancashire		
Obj/Sup/Com Objection		

Summary of Main Issues

Green Belt land which is subject to the protections of the NPPF should not be developed where it can be demonstrated that the benefits of development would be incompatible with one or more of the five purposes of Green Belt (NPPF Paragraph 80). The importance of this principal has been acknowledged recently in revisions to online Planning Practice Guidance (PG) and announcements by Government ministers on the intent to protect Green Belt (DCLG Press Release, 6 October 2014: Councils must protect our precious Green Belt, relating to the PG update of the same date.)

Hunston Ruling

Relevant to the implementation of this principal is the Appeal Court Ruling in the case of Hunston ([2013] EWCA Civ 1610), which specified that Objectively Assessed Need (OAN) for housing was to be estimated without regard to supply considerations, but that due account had to be taken subsequently of the protections afforded to Green Belt and accordingly it would not be surprising if the five-year housing land supply could not be complied with.

Further clarification has been supplied by the High Court Ruling in the case of Gallagher Homes ([2014] EWHC 1283 (Admin), which distinguishes between OAN (policy-off) and OAN (policy-on). The Planning Advisory Service, in its Technical Advice Note 12: Objectively Assessed Needs and Housing Targets, gives detailed procedural guidance on the implementation of these recent court rulings and the PG; we shall adopt its nomenclature, viz. OAN for OAN (policy-off) and Housing Target for OAN (policy-on).

Subnational Household Projections

The Department for Communities and Local Government (DCLG) published its latest subnational household projection series on the 27th February 2015 which provides 2012-based data to replace the 2011-based interim SNHP data. Growth rates for Sefton are in the lowest category and lower than earlier projections. We have been informed by the Council that it intends to commission Nathaniel Lichfield & Partners to update the OAN, to take account of this important new information and that a revision of the PDLP will then be published and adequate time allowed for public comment before the revised PDLP is submitted for Examination in Public.

CPRE Lancashire, on behalf of CPRE Sefton, has engaged an independent demographer John Hollis to prepare a critical assessment of the NLP 16 December 2014 HEaDROOM Update Report Review of the Objectively Assessed Need for Housing in Sefton, and to revisit the NLP scenarios in the light of the new DCLG data; in addition, he has undertaken to prepare projections for alternative scenarios.

We are in possession of his initial report, but we defer further comment until the updated NLP assessments have been published and examined by Mr. Hollis; we will then comment on the revised PDLP prior to its being submitted for Examination in Public.

Downward Adjustment of Housing Target

We have reviewed all the Green Belt sites proposed for development in the PDLP and identified a number of sites, which we do not believe should be redesignated for residential development and give detailed justifications. Were the Examining Inspector to agree with our conclusions for each of these sites we have commented on, a corresponding downward adjustment to the Housing Target would be made to be legally compliant with the Hunston and Gallagher Homes rulings.

It is the Housing Target that is the metric used to test for compliance with the five-year housing land supply rule (NPPF paragraphs 47 and 49), the compliance with the rule achieved by the PDLP would not be imperilled by these downward adjustments.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 703	Response Ref 4	Representor Name Jackie Copley
Organisation Name CPRE Lancashire		
Obj/Sup/Com	Objection	

Summary of Main Issues

CPRE is concerned that Best and Most Versatile (BMV) agricultural land Grades 1, 2 and 3a should be saved for the benefit of future generations.

The best Grade 1 farmland is a rare national asset, comprising only about 3% of all farmland in England, and a high proportion of it is located in Sefton.

The NPPF Paragraph 143 states that when preparing Local Plans, local planning authorities should safeguard the potential of Best and Most Versatile agricultural land.

In refusing the recent recovered Appeal (APP/R0660/A/13/2197532), the Secretary of State emphasised the need for the Local Plan to review all BMV agricultural land and to assign for development only sites of lowest grade to minimise loss of valuable farmland.

Therefore it is important that Sefton MBC acknowledges the value of the agricultural both for its local economic value and its national significance and this acknowledgement is embodied in the PDLP.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 703	Response Ref 35	Representor Name Jackie Copley
Organisation Name CPRE Lancashire		
Obj/Sup/Com	Objection	

Summary of Main Issues

To be legally compliant, the PDLP must be consistent with the Court of Appeal ruling in the case of Hunston and the High Court ruling in the case of Gallagher Homes, in that a clear distinction is made between OAN (policy-off) (or simply OAN in the PAS nomenclature) and OAN (policy-on) (or Housing Target in the PAS nomenclature). We continue to use the PAS nomenclature. The Council has redesignated for residential development sufficient Green Belt land to satisfy the 5-year housing land supply rule (NPPF, paragraph 47) with respect to OAN (not the Housing Target). But this is only the first stage of the process. A second stage is required to understand how specific policy protections may rule out land from being included (Please refer to the appended letter from Brandon Lewis MP Minister of State for Housing and Planning, which clarifies the point well). In doing only the first stage and not the second, Sefton Borough Council has failed to take account of the protections afforded by the NPPF preventing the development of land subject to restriction in the sense of Note 9, which qualifies NPPF Paragraph 14.

CPRE has identified a significant number of Green Belt sites proposed by the Council to be redesignated for residential development despite such a redesignation being contrary to one or more of the five purposes served by the Green Belt (NPPF, paragraph 80) and would be inconsistent with its fundamental attribute of openness (NPPF, paragraph 79); most of these sites have additional factors which make them unsuitable for residential development.

We believe that Sefton Council should remove the identified sites from the housing land supply, with a compensating deduction from the housing target, so that compliance with the five-year housing supply rule is unaffected.

Adoption of these CPRE recommendations would render the PDLP not only legally compliant, but also sound.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 707	Response Ref 5	Representor Name Matthew Good
Organisation Name Home Builders Federation		
Obj/Sup/Com Objection		

Summary of Main Issues

The HBF does not consider that the amount of allocations proposed will adequately meet the housing requirement over the plan period. The policy is therefore considered unsound as it will not be effective

Whilst the HBF does not wish to comment upon the acceptability or otherwise of specific allocations we are broadly supportive of the Council seeking to meet its full housing requirement, subject to our issues raised against Policy MN1, through the allocations plus a contingency buffer (6.5%).

The HBF does, however, question whether the contingency buffer is sufficient. Whilst plan paragraph 6.17 suggests that sufficient allocations are made to meet the full requirement plus 720 dwellings (6.5%) the reality is that the actual buffer is significantly less. This is because at least 278, and possibly as much as 500, of the 720 are expected to be delivered beyond the plan period. Paragraph 6.78 identifies that 278 of the 678 dwellings identified for site MN2.5 Crowland Street, Southport will be delivered beyond the plan period reducing the buffer to 442 dwellings. In addition the HBF is unclear whether the 213 dwellings at Town Lane, Southport (permission ref S/2012/0400), again identified to be delivered beyond the plan period, are required as part of the plan requirement. The outcome is that the buffer is at best 4%. It should also be noted that the housing requirement identified within policy MN1 is a minimum requirement and as such if the plan is to achieve greater quantities of housing development additional sites are required in conformity with this policy stance.

The December 2014 Local Plan & Community Infrastructure Levy Economic Viability Study (2014 Viability study) indicates current viability issues with many parts of the district under current conditions. These viability concerns may lead to some sites either not being brought forward or progressing slower than anticipated. This combined with the fact that the Council has failed to meet its housing requirement in all but one of the last 11 years (Draft 2013-14 Annual Monitoring Report) highlights the need to provide a wide range of sites and significant buffer to ensure that the objectively assessed housing needs of the area are delivered.

The provision of a greater buffer will also provide the Council with greater opportunities to meet its five year housing land supply requirement. The 2014 SHLAA identifies that, at the time of its publication, only a 4 year supply could be identified. The HBF note that the assumptions used to calculate the five year supply were reliant upon an annual requirement of 510 units per annum and a 5% buffer. Whilst this calculation is now somewhat out of date the five year supply is likely to have worsened due to the increase in the housing requirement, the continued under-delivery and the fact that the HBF consider a 20% buffer is required in conformity with NPPF (paragraph 47) due to persistent under-delivery.

The HBF further suggest that a greater buffer would ensure that additional development needs beyond the plan period can be accommodated. This would assist with our concerns in relation to the amount of safeguarded land proposed (see comments upon policy MN8 below).

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 712	Response Ref 8	Representor Name Andrew Pepper
Organisation Name Persimmon Homes		
Obj/Sup/Com Objection		

Summary of Main Issues

Persimmon objects to this Policy and considers that the Council's housing requirement is too low. This means that there is not enough land allocated for residential development across the Borough even taking into account the Council's identified housing land

supply. Persimmon has not interrogated the identified supply in the Local Plan but considers when set against a housing requirement of 11,070, the proposed allocations of 7,309 dwellings leaves a large proportion of new dwellings to be delivered by SHLAA sites, windfall and planning permissions.

It considers that the Policy is unsound for the following reasons:

The Policy is not positively prepared because:

1. The housing requirement is under -played. The Council should revise this in accordance with the most up to date evidence base.
2. The Policy is not justified because the evidence base is not robust . The land allocated for residential development and safeguarded land is not sufficient to meet the housing requirement.
3. The Policy, as drafted, is not effective. Persimmon considers that the Policy does not have the flexibility to allow the Council to demonstrate a 5 year housing land supply. Persimmon considers that the Plan is not deliverable in its current format.
4. The Policy, as drafted, is not consistent with NPPF. The Council does not have a five year supply of housing. In order to meet its housing requirement, the Council has sought to allocate well contained Green Belt sites. Persimmon supports this approach. However, the Policy, as drafted, is unsound and in order to make the Policy sound, additional well contained Green Belt sites, free from constraints and available for development should be allocated for residential development under Policy MN2.

Summary of Suggested Changes

Persimmon considers that additional well contained Green Belt sites, free from constraints and available for development should be allocated for residential development under Policy MN2. Its site at Mill Farm, Aintree should now be allocated for residential development.

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 716	Response Ref 3	Representor Name Robert Swift
Organisation Name Robert Swift and family		
Obj/Sup/Com Objection		

Summary of Main Issues

THIS IS A SUMMARY

Our assessment of the deliverability and developability of the proposed housing allocations in the Local Plan under Policy MN2 confirms that there are concerns over the deliverability of those sites, which in some cases results in either less supply than identified in the Local Plan and in other cases NIL supply. Of the 47 sites identified under Policy MN2, six sites are discounted in their entirety resulting in a reduction in identified supply of 1,135 dwellings over the plan period. In addition, there are 2 sites which already have planning permission and, according to the Council's explanation under paragraph 6.23 these must not be included as part of the identified supply from the proposed housing allocations. As a result these must be omitted from the housing allocations and therefore a further reduction in supply of 510 dwellings.

The Report also makes an assessment of sites which it considers are deliverable but the supply from these will be at a reduced rate for a variety of reasons including applying the 35 dph figure as set out in the Local Plan. The net result of this is to further reduce supply by 997 and 160 dwellings respectively.

The overall summary is that the identified supply from the Policy MN2 Housing Allocations is reduced from 7,309 dwellings to 4,507 dwellings.

As a result, the Landowner's position is that the housing requirement is too low and the Council's housing land supply position from its housing allocations is overstated. The net result of this is that the Council's housing land supply position is not robust and that additional land should be allocated in the Green Belt in order to meet the Council's housing requirement. In this case the site at Melling Lane, Maghull should be allocated for residential development now.

Summary of Suggested Changes

In order to make the Policy sound, additional well contained Green Belt sites, free from constraints and available for development should be allocated for residential development under Policy MN2.

Evidence Submitted

The Review of Proposed Housing Allocations Report (Barton Willmore, March, 2015)

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 716	Response Ref 14	Representor Name Robert Swift
Organisation Name Robert Swift and family		
Obj/Sup/Com Objection		

Summary of Main Issues

THIS IS A SUMMARY

Our assessment of the deliverability and developability of the proposed housing allocations in the Local Plan under Policy MN2 confirms that there are concerns over the deliverability of those sites, which in some cases results in either less supply than identified in the Local Plan and in other cases NIL supply. Of the 47 sites identified under Policy MN2, six sites are discounted in their entirety resulting in a reduction in identified supply of 1,135 dwellings over the plan period. In addition, there are 2 sites which already have planning permission and, according to the Council's explanation under paragraph 6.23 these must not be included as part of the identified supply from the proposed housing allocations. As a result these must be omitted from the housing allocations and therefore a further reduction in supply of 510 dwellings.

The Report also makes an assessment of sites which it considers are deliverable but the supply from these will be at a reduced rate for a variety of reasons including applying the 35 dph figure as set out in the Local Plan. The net result of this is to further reduce supply by 997 and 160 dwellings respectively.

The overall summary is that the identified supply from the Policy MN2 Housing Allocations is reduced from 7,309 dwellings to 4,507 dwellings.

As a result, the Landowner's position is that the housing requirement is too low and the Council's housing land supply position from its housing allocations is overstated. The net result of this is that the Council's housing land supply position is not robust and that additional land should be allocated in the Green Belt in order to meet the Council's housing requirement. In this case the site at Melling Lane, Maghull should be allocated for residential development now.

THIS IS A SUMMARY

Policy MN2 sets out a number of housing sites which are proposed to be allocated for development within the main settlements of Southport, Ainsdale, Formby, Hightown, Crosby, Thornton, Maghull, Melling, Netherton and Bootle, and sets out that circa 7,309 dwellings will be delivered through these sites. These include Green Belt sites which are proposed to be released through the Local Plan.

The purpose of these proposed allocations is to identify and exceed the total housing requirement of 11,070 dwellings in Sefton by approximately 6.5% to allow for contingencies, to ensure that housing delivery is not undermined.

The supportive text for this policy (paragraph 6.23) sets out that only sites larger than 1 hectare in size have been identified as housing allocations, and sets out sites with existing planning permissions have not been allocated. It sets out that the remainder of the Local Plan housing requirement will be met from:

- ☑ Dwellings which have been completed since 1st April 2012;
- ☑ Sites with planning permission for housing;
- ☑ Small sites (less than 1 ha) identified in the most recent SHLAA; and
- ☑ Unanticipated "windfall" sites

This differs from the supportive text set out in Policy MN1, and includes completions and differentiates between sites in the SHLAA.

The supportive text of Policy MN2 sets out a number of applied assumptions which are applied if no information is available from the landowner or developer. These include:

- ☑ Density - 35 dwelling per hectare
- ☑ Net Developable Area - 75% of the site, with the assumption that the remaining 25% would be for open space and landscaping etc provision.

Based on our expertise and in line with HBF standards, we disagree with the density assumptions. In assessing the allocated sites with a capacity of 50 dwellings.

Of the proposed 7,309 dwellings and 47 sites identified within the MN2 allocations, only 41 sites are capable of delivery, many of which at a significantly reduced rate. Based on our Assessment only 4,507 dwellings are capable of delivery. In addition, two sites have been discounted on the basis that they already have planning permission.

Summary of Suggested Changes

In order to make the Policy sound, additional well contained Green Belt sites, free from constraints and available for development should be allocated for residential development under Policy MN2.

1. Remove the anomalies between Section 2 of policy MN1 and paragraph 6.23 of the explanation to policy MN2.
2. Set out the Council's assumptions made in paragraph 6.24 and explain why these are different to the assumptions in the 2014 SHLAA.

Evidence Submitted

Chapter 6		Plan Order Policy MN2 General	Other Documents
Policy MN2 gen		Housing, employment and mixed use allocations	
Respondent No 721	Response Ref 1	Representor Name Andrew Thompson	
Organisation Name Morris Homes			
Obj/Sup/Com Support			

Summary of Main Issues

THIS IS A SUMMARY

These comments should be read in conjunction with our site-specific representation below in support of MN2.22: Land at Hall Road West, Crosby.

It is important to appreciate that the Green Belt purposes on the basis of which sites were designated have, to varying degrees, a strong subjective element.

In our view, a significant proportion of the Green Belt in Sefton does not have a long-term strategic role. It includes sites which were arguably incorrectly included in the first place and make little, if any, contribution to its purposes. This is borne out by the Council's Green Belt Study which identifies brownfield land which falls within this category adjoining the urban area.

It is now imperative that such sites are released for development and, in particular, those which are capable of contributing to 5 year supply.

Summary of Suggested Changes

None suggested.

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 722	Response Ref 2	Representor Name Jenny Hope
Organisation Name United Utilities Ltd		
Obj/Sup/Com Comment		

Summary of Main Issues

The Council is required to consider the allocation of a large number of development sites as part of the emerging Local Plan. The Council is aware from past discussions with colleagues that a fuller understanding of the impact on water and wastewater infrastructure can only be achieved once more details are known, such as timescales for development, the approach to surface water management and the chosen points of connection.

On receipt of more information it may be that we can provide more detailed comments regarding the sites which are being promoted as draft allocations. The assessment of impact on our infrastructure is an ongoing process as a range of details become available.

Additional information in respect of development sites is often only available at the planning application stage. With this information we will be able to better understand the potential impacts of development on infrastructure and, as a result, it may be necessary to coordinate the delivery of new development with the timing for the delivery of future infrastructure improvements.

Strategic Sites

The emerging Local Plan includes a number of strategic site allocations. Given the very significant size of some of these sites, we would like to emphasise that it is difficult for United Utilities to fully understand the potential impact on our infrastructure until we have more details on connection points, the nature of the development, the timing for the delivery of the development and also the approach to surface water management and drainage.

Given the size of these sites, it may be necessary to coordinate infrastructure improvements with the delivery of development once more details become available. In addition, for the larger development sites it may be necessary to ensure that the delivery of development is guided by strategies for infrastructure which ensure coordination between phases of development over lengthy time periods and by numerous developers.

Proportionate Growth

We would like to emphasise that disproportionate growth in any settlement, particularly smaller settlements, has the potential to place a strain on existing water and wastewater infrastructure. On this basis we would suggest that the distribution of future growth in the Borough should be proportionate to the size of the existing settlement for which the development is intended.

We also wish to highlight the importance of infrastructure being delivered in a coordinated manner. This is often a challenge on those sites which consist of land in fragmented ownership. We encourage the council to try and ensure agreements are in place between landowners on any sites which may be in fragmented ownership to ensure coordinated delivery of the most sustainable form of development.

You will note from our comments the emphasis we place on ensuring that development is carried out in accordance with the most sustainable approach to surface water management. We have recommended a specific policy in this respect which reflects the fact that the treatment and processing of surface water is not a sustainable solution. Surface water should be managed at source and not transferred. Every option should be investigated before discharging surface water into a public sewerage network. At the larger development sites we also highlight the importance of coordination between phases of development as part of a wider and holistic strategy in the interest of securing sustainable drainage systems.

Please note United Utilities would like to meet with the Council to discuss the individual site allocations in more detail. We understand the Council has undertaken discussions with our Asset Managers in the past however we would welcome the opportunity to meet with you in relation to this current consultation to discuss the proposed allocations on a site by site basis.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 723	Response Ref 17	Representor Name Laurence Rankin
Organisation Name Sefton Green Party		
Obj/Sup/Com Objection		

Summary of Main Issues

The figures used for housing need are challengeable and Sefton recognise this. However the intention to revise figures in future will be of little value if Green Belt land has already been released for development. The NPPF states that Green Belt should only be used in "very exceptional circumstances", a definition which, according to recent statements by Eric Pickles, (Ministerial Comments are Material Planning Considerations) does not include housing need. If there is no way to avoid use of some Green Belt, a rational approach would be to release land sequentially with need recognising that this would challenge current planning law/practice, which requires full release at the beginning of the process. Regeneration More thought needs to go into regeneration options which complement needs for innovative approaches to housing and employment provision. This could include Eco village approach, shared work/living space, small scale CHP, 3rd Sector developments.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 726	Response Ref 2	Representor Name
Organisation Name Royal London Mutual Insurance Society Ltd		
Obj/Sup/Com Support		

Summary of Main Issues

The key sites that are proposed to be allocated for housing, employment and mixed-use development are identified at draft Policy MN2. They are intended to meet the housing and employment requirements set out at Policy MN1 and their delivery is "central to meeting local housing needs, supporting businesses, attracting investment and securing sustainable development" (Paragraph 6.15).

The proposed allocation of Atlantic Park, as part of the Dunnings Bridge Road Corridor as a Strategic Employment Location (MN2.47) for B1, B2 and B8 uses is fully supported. The policy reflects the strategic importance of Atlantic Park and the Dunningsbridge Corridor more widely as to achieving the employment objectives of the Local Plan, and within Bootle and Netherton in particular. Indeed, Paragraph 7.57 of the Publication Local Plan confirms that the Corridor is "the biggest opportunity to provide large-scale and high quality modern employment development in an area of high unemployment". The Dunnings Bridge Corridor area is also well placed to positively benefit from the ambitious plans at the Port of Liverpool. Royal London is eager to continue its comprehensive redevelopment of Atlantic Park and it is considered that the emerging Local Plan allocation will provide a positive planning framework to assist this.

Draft Policy MN2 goes on to confirm that non-B Class uses will only be permitted within the Strategic Employment Locations where they are:

- Necessary to cross-subsidise the provision of B1, B2 and B8 uses on the majority of the site, or
- Small scale and intended primarily to serve other businesses operating on the business park.

It is our client's view that this aspect of policy is important and should be supported. It is necessary that the policy incorporates an element of flexibility to ensure that the required development can be brought forward in a timely manner and that whilst it is acknowledged that the Strategic Employment Locations should be maintained for mainly for employment-generating uses, the policy needs to make some allowance for the development of ancillary uses (such as an hotel, pub/restaurant, crèche, etc) to support the overall functioning and operation of these areas.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 729	Response Ref 2	Representor Name Alison Jordan
Organisation Name Mersey Care NHS Trust		
Obj/Sup/Com Objection		

Summary of Main Issues

Object to policy MN2 on the grounds that the sites identified are not sufficient in order to meet the objectively assessed needs, contrary to the National Planning Policy Framework. The council has not taken the necessary steps to 'significantly boost housing supply'.

Summary of Suggested Changes

Additional deliverable housing sites should be identified to accommodate the proposed housing requirement and provide sufficient flexibility as required by the Framework. The Trust objects to land at Ashworth Hospital being identified as Safeguarded Land under policy MN8 and calls for it to be specifically allocated as a housing site under policy MN2.

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 730	Response Ref 3	Representor Name Gerry O'Brien
Organisation Name Nextdom Ltd		
Obj/Sup/Com Support		

Summary of Main Issues

The Publication draft Local Plan identifies criteria for identifying strategic employment sites. We are in agreement with the methodology used and believe that the criteria are sound.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 732	Response Ref 5	Representor Name
Organisation Name Bellway Homes Ltd		
Obj/Sup/Com Support		

Summary of Main Issues

Bellway is supportive of this Policy, particularly allocation MN2.30 'Land to the east of Wadigar Lane, Melling', a site allocated for 178 new homes.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents** Agricultural Land Study
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 734 **Response Ref** 2 **Representor Name** Maria Bennett
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

This land should be protected at all costs as it has become clear that we rely heavily on imports and if we are to build all over it we will never be able to go back and restore it for agricultural use and support ourselves in the future. We are an Island and nobody knows what will happen in the future and our future generations should not be left in a position where they cannot grow food. This is not sustainable development.

It is a fact that when ADAS was asked to prepare a further report for Sefton MBC back in August 2012, they upgraded all Sefton's farmland again, many to grade 1, yet strangely, many of the sites allocated for development in the local plan were not tested. Below is the map taken from the ADAS report clearly showing how land had been upgraded but also how sites have been excluded from the updated report.

Most of this farm land has been farmed for many years, producing a variety of crops during this time with good yields. Under [NPPF, section 11, 109] "The planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, geological conservation interests and soils.....[and] recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production);"

ADAS whose report Sefton Council relies upon, on their own website states: "one of the most significant challenges facing mankind is the provision of food from a sustainable and profitable production system"

I believe that we should clearly be building on Brownfield Sites first before any other land it touched. Sacrificing grade 1 and 2 agricultural land and indeed in Sefton where it is seen to be the best and most versatile, is not sustainable for any future generations.

Summary of Suggested Changes

Evidence Submitted

Chapter **Plan Order** Policy MN2 General **Other Documents**
Policy
Respondent No 734 **Response Ref** **Representor Name** Maria Bennett
Organisation Name
Obj/Sup/Com
Summary of Main Issues
Summary of Suggested Changes
Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents** SHLAA
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 734 **Response Ref** 5 **Representor Name** Maria Bennett
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

There are many Brownfield sites in this borough and many owned by the council. The vast majority of them are based in the south of the borough and many of them are not in the local plan. We need to ensure that all Brownfield sites are built on first, we need to let the developers know that no local plan is a developers charter, it must be for the local community.

I raise the issue that are we just going to leave these sites, many which have been in this state for many, many year, to continue to deteriorate, create an eyesore to the area and expect people to live in new houses built opposite them, without any idea of when they are going to be developed. Other sites include along the canal corridor [Bootle - photographs provided] which many people would love to live by yet again all these sites remain vacant.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 734 **Response Ref** 1 **Representor Name** Maria Bennett
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

The proposed development of many sites within this Local plan are currently within the green belt, The definition of the greenbelt is made quite clear in the NPPF and has 5 purposes [NPPF Chapter 9 Section 80]. Many, if not all of the sites described with Sefton MBC's local plan fall into at least 4 out of the 5 definitions within the NPPF and in some cases all 5 of the definitions.

Once an area of land has been defined as green belt [NPPF Chapter 9, Section 81], the stated opportunities and benefits include:
provide opportunities for outdoor sport and recreation
to retain and enhance landscapes, visual amenity and biodiversity
to improve damaged and derelict land

In addition I also believe that the greenbelt should:
Provide opportunities for access to the open countryside for the urban population
The securing of nature conservation interests
The retention of land in agricultural, forestry and related uses.

As stated in the National Planning Policy Framework "Green belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan" [NPPF Chapter 9, Section 83]. The proposed developments amount to inappropriate development within the green belt and is "by definition, harmful to the green belt and should not be approved except in very exceptional circumstances" [NPPF Chapter 9 Section 87]. A lack of a 5 year land supply does not amount to very exceptional circumstances nor does unmet need of housing.

I also have real concerns that Sefton MBC have stated that even if this proposed greenbelt in local plan is granted they then intend to review the greenbelt again in 2016/17 and on a regular basis in the future.

We have already joined up our invisible borders with neighbouring councils and this appears to be set to continue thus creating urban sprawl which is clearly not what is intended by the NPPF. The NPPF clearly states that greenbelt should be protected except in very special circumstances.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 740 **Response Ref** 17 **Representor Name**
Organisation Name Formby Residents Action Group
Obj/Sup/Com Objection

Summary of Main Issues

An overview of the historic processes that have influenced flood risk in Sefton, the limitations of using flood risk maps for planning purposes, impacts of flood risk on house insurance, the limitations, costs and problems of Sustainable Drainage Systems, flood risk and surface water issues and problems in Formby.

Set out in Chapter 13, 14 [page 77-90, 107], Chapter 19 [pages 141 - 149], Appendix B [192-212] and Appendix C [pages 213 – 217] of the representation.

The group would also like to rely on the full report of Mr John Williams [rep no. 1026] on flood risk issues

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 740 **Response Ref** 3 **Representor Name**
Organisation Name Formby Residents Action Group
Obj/Sup/Com Objection

Summary of Main Issues

An overview of agricultural land quality in Sefton, a critique of the Agricultural Land Study.
Set out in Chapter 3 [pages 9-10] of the representation.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 740 **Response Ref** 5 **Representor Name**
Organisation Name Formby Residents Action Group
Obj/Sup/Com Objection

Summary of Main Issues

An objection to the housing distribution in Sefton, and that the current approach will undermine regeneration in South Sefton.
Set out in Chapter 5 [pages 12-13] of the representation.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 740	Response Ref 2	Representor Name
Organisation Name	Formby Residents Action Group	
Obj/Sup/Com	Objection	

Summary of Main Issues

Reasons for Green Belt

A precis of current national policy on Green Belt, Green Belt land in England and overview of the impact of the Local Plan on Green Belt land in Sefton

Set out in Chapter 2 [pages 6-8] of the representation.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 740	Response Ref 15	Representor Name
Organisation Name	Formby Residents Action Group	
Obj/Sup/Com	Objection	

Summary of Main Issues

An assessment of the potential for new homes from brownfield sites, particularly in the Bootle and Netherton area.

Set out in Chapter 11 [page 69-70] of the representation.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 740	Response Ref 16	Representor Name
Organisation Name	Formby Residents Action Group	
Obj/Sup/Com	Objection	

Summary of Main Issues

An overview of the capacity of Sefton's schools and how this may be impacted by new housing development.

Set out in Chapter 11 [page 69-70] of the representation.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 741	Response Ref 3	Representor Name
Organisation Name Priory Asset Management LLP		
Obj/Sup/Com Objection		

Summary of Main Issues

THIS IS A SUMMARY

The Local Plan allocates sites for housing and employment uses, some of which are located in the green belt. Priory Asset Management LLP consider that several of the proposed allocations in the Plan will either not deliver the level of growth proposed, or they are more severely constrained than other non-allocated sites in the Borough.

The Council have published the Site Selection Methodology in January 2015 to explain how they have selected the allocated sites for development. The Green Belt sites specifically formed part of a Green Belt Study which commenced in 2011. This was updated in 2013 and led to a Red, Amber, Green Assessment which informed the 'Preferred Options' stage of the Local Plan.

The Site Selection Methodology document, published in January, identifies the constraints and opportunities for each of the proposed allocations. It is apparent that there are several allocated sites, included within Policy MN2, that have significant weaknesses and constraints as identified by Sefton. Examining the Assessment Forms, and the submitted evidence, indicates that several allocated sites are unsustainable, and that other discounted sites are better served to meet the housing requirement. There are several anomalies where sites have been selected which, according to the site selection methodology, should have been dismissed. The most significant error in the site selection process is the failure to re-assess sites once the Strategic Flood Risk Assessment (SFRA) was re-modelled. Sites which were dismissed due to failing the sequential test were not given the opportunity to be considered again despite several being reclassified as within Flood Zone 1.

The process has also allowed for sites to be selected which are wholly reliant on the development of other sites. Factors such as this should have been considered as fundamental criteria due to the question marks over deliverability. Any site which could not be brought forward independently or does not have an agreement in place should not be allocated as delivery cannot be insured. The Local plan is dependent on all allocations being developed within the plan period.

The Local Plan also includes brownfield allocations carried forward from the previous plan. We do not suggest that this incorrect, although additional sites should be included to insure against failed delivery.

Summary of Suggested Changes

Revise Policy MN2 to include the Land South of the Crescent, Maghull (LPA reference AS15) as an allocated site which is removed from the green belt.

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 742	Response Ref 1	Representor Name RF Hughes
Organisation Name		
Obj/Sup/Com Objection		

Summary of Main Issues

I wish to register my objection and concerns in relation to the Sefton Local Plan. I note that brownfield sites have not been fully explored to my knowledge. The use of brownfield sites would help to maintain the Green Belt which in an area of grade 1 agricultural land is very important for food security and maintenance of community.

Brownfield sites would also allow the local communities to maintain community links, both in terms of established community links and strengthening existing schools, GPs, shopping areas, transport etc. Further intrusion into the Green Belt within Sefton would put undue pressure on medical services, transport, schools and the present identity of the local communities, to which this Local Plan proposes. The communities would become a sprawl.

The fact valuable farmland, wildlife, habitat for bats will be lost.

In the best interests of the communities of Sefton a further and more detailed policy and indepth research in the brownfield sites should be adopted.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 744	Response Ref 1	Representor Name JP Holliday
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

The 18point of objection ['Save of Sefton' petition] should be thoroughly explored and scrutinised before any action is taken to build houses on our ever dwindling precious Green Belt.

Do we really want to leave our future generations with another Hong Kong, once a green island, now a polluted concrete jungle.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 745	Response Ref 1	Representor Name Ann-Louise Hartley
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I wish to object to the proposed development of Sefton's Green Belt land.

Sefton has some of the best agricultural land in the country and I believe that building on such good land will mean that ground valuable for food production will be lost forever. The open areas between the communities which we currently enjoy will be destroyed.

I believe that flooding and drainage problems will be increased, especially further down the water courses.

I understand that there are a considerable number of brownfield sites in Sefton. It would make sense to develop these areas first, despite them being a more expensive option.

In 20 year's time, Sefton will be one massive urban sprawl. Please do not take that route and allocate some common sense and some foresight for those living in the future.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 749 **Response Ref** 1 **Representor Name** Janet Hagar
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I am totally devastated by Sefton's Labour councillors plan to build on our precious prime agricultural green belt land. I am reliably informed that there are over 6,000 empty houses in the Sefton area and huge swathes of ugly derelict brownfield sites in Bootle, there are enough to fulfil the proposed housing needs on Hawthorne Road alone, all just waiting to be developed. The madness is that the councillors are saying that they want to hold back these brownfield sites for the future but are prepared to carve up the precious greenbelt now to greedy developers who just want to cherry pick the best sites that will produce the biggest profits. Common sense seems to be in very, very short supply to these councillors, most people can see that building on these derelict eyesore brownfield sites and refurbishing empty houses would improve the environment for all concerned, but alas no this is not the case, the said councillors are hell bent on opening up our greenbelt to the developers. Our precious green belt is there for a reason, it has fed us in the past, present and should be kept to feed future generations and should not treated as a moneypot for them to exploit.

Once the green belt is built on it is lost forever, please don't let this happen.

The green belt should never even be in the equation, when and only when every square inch of the brownfield sites have been exhausted should our precious green belt land be considered. If the councillors had chosen to use the brownfield sites option in the first place then all other objections ie flooding, overcrowded schools, lack of infrastructure, congested roads etc. etc. etc. would not be an issue.

Please allow common sense to prevail, PLEASE ENSURE THEY USE THE BROWNFIELD SITES BEFORE ANY GREEN BELT LAND

It seems to me that these labour councillors are speculating on the money they expect to receive from the government from the new home building bonus to balance their books, the bigger & the more expensive homes built using the greenbelt land will produce the most money, shame on them for using our precious greenbelt as a book balancing exercise.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 751 **Response Ref** 1 **Representor Name** A Evans
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Full use should be made of the BROWNFIELD sites that are being wasted.

There is a complete lack of INFRASTRUCTURE planning associated with the additional housing.

Building on our GREENBELT sites will create a loss of food producing land essential for our future.

Our Lane is already pounded by heavy waggons and cars .We cannot sustain any further increase in the volume of traffic that would be created by large scale greenbelt development, and the increase in pollution.

I would also bring into question the method and background in deciding the total number of extra houses that are needed for the "increase in population"

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 754 **Response Ref** 1 **Representor Name** JA Carroll
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I do not agree that prime agricultural land should be used to build thousands of houses when they could be built on brown field land and 1000s of empty homes are left unoccupied.

Sefton's local plan is a living document so how many more houses could be built when the 11,000 plus houses have been built?

I don't see in Sefton's plan how they will improve the infrastructure that would be needed to cope with the increase in population. This would include roads, doctors, dentists, and recreational facilities.

I have lived in Maghull for 39 Years. The reason we moved here was because it was a beautiful area to live in and a much sought after location. I don't see how building on the proposed scale would enhance the area and what benefits it would have for its residents.

I am not against building ouses in Sefton as I know the govt requires Councils to have aplan but why destroy natutal surroundings when there are viable alternatives.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 756 **Response Ref** 1 **Representor Name** Malcolm Calvert
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I strongly object to the Sefton Local Plan. This area is GB and should not be built on. It is one of the best agricultural soil in the UK. We need these fields. To grow crops because the population in Britain is increasing year by year, and we need to keep land like this to grow crops on.

BF should be used even if the the financial cost is greater than building on GB land.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 757 **Response Ref** 1 **Representor Name** M Cain
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I object to Sefton's Local Plan with regards to the following:

- The National Planning Policy Framework is clear on greenbelt protection. It states that greenbelt must only be released under exceptional circumstances, which are not in evidence within Sefton.
- Sefton's green belt is of the highest quality agricultural grade. This must be preserved for present and future food production, which is not important only for Sefton, but for the British Isles.
- Much of Sefton's high grade agricultural land has already been encroached upon. This must be brought into check in line with the N.P.P.F.
- A consequence of the current version of the local plan would be massive increase in carbon footprint and associated environmental pollution. This would be detrimental to the health and well being of all Sefton residents and is unacceptable.
- There is no evidence to support Sefton council's claim for the need to build 11,000 new homes.
- Public consultation was highly flawed.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 758 **Response Ref** 1 **Representor Name** LJ Burke
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I WOULD LIKE TO OBJECT TO THE LOCAL PLAN PROPOSED BY SEFTON COUNCIL ON THE FOLLOWING GROUNDS:

1. The loss of green belt land to sefton
2. Increased volume of traffic, especially regarding the proposed 40 new houses at the end of Turnbridge road. All building traffic will be routed through Green Park as the existing swing bridge has a weight limit. Obviously the planners have not done their homework as Green Park has two primary schools attached to it and excessive building traffic will create a dangerous risk to school children and residents alike. Also the recent poor L.E.D. lighting upgrade will increase the risk of accidents with increased traffic.
3. There are enough brownfield sites
4. Added pressure on Doctors ,Dentists Schools and Hospitals.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 768 **Response Ref** 1 **Representor Name** K Ainsworth
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

It is our feeling that there is insufficient infrastructure to deal with the current population. Increasing the population without a clear commitment to improved, new infrastructure could be very damaging to our borough, e.g. schools.

Summary of Suggested Changes

Evidence Submitted

Policy MN2 gen **Housing, employment and mixed use allocations**

Respondent No 774 **Response Ref** 1 **Representor Name** A Hockey

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

Sefton Borough Council have invited comments on the Local Plan and having read the document with interest I must admit I am baffled by some of the proposals which have apparently been accepted.

Taking the Borough as a whole the plan is to build 7309 houses initially, rising to 11,000 by 2030 with a further 720 (6.5%) to allow for contingencies. (Actually, 6.5% of 11,000 is 715)

I note that provision has been made for 5 business parks, with a further 4 sites allocated for "employment". There is also a Visitor & Tourism related development and 4 Gypsy and Traveller sites.

This is all very commendable and I am sure that on paper the Plan may appear to be sound and should meet with Government approval.

However, I wonder how much homework— apart from arithmetic —the council members have done.

The report also states that appropriate facilities such as medical services, small scale convenience shops and community facilities will be permitted but not necessarily at this time. But still no mention of education.

I am sure the councillors who voted in favour of the plan are convinced that they have made a wise decision. But I am also sure that they have not taken all the ramifications into account and would urge them to go back to the drawing board before it is too late.

Another website which they really should consult is the Office for National Statistics. Their latest figures (2013) state that one family in seven has three or more dependent children, although the average per family is 1.8. Taking the initial stage of building, i.e. 7309 houses, with a conservative figure of two children per family, works out at 14,618 children. Nowhere on the Local Plan is provision made for any educational establishment. On the contrary, Sefton Borough Council in their wisdom have, on their plan, lost 8 schools and 2 playing fields to sites for the building of houses!

There has been concern for some time whether local schools can cope with the present numbers so where is the planning for the education of the future influx of children?

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 781	Response Ref 1	Representor Name Colin Quarrie
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I feel bound to protest about the Sefton local plan on the basis there is no apparent desire to build houses on present brownfield sites.

There are lots of brownfield sites in Sefton. Bootle in particular, where huge swathes of old industrial land lying dormant, with weeds growing through the old concrete & tarmac, plus many smaller areas that would all add up to house building plots, they don't all have to be large housing estates, and I'm sure local residents would welcome these sites having decent houses on them rather than being left as an eyesore. There are dozens of these areas on Merseyside as a whole and could be utilised to get the required numbers of housing without using green spaces and good agricultural land.

The way local councillors behave, it is only a matter of time before Burscough, Ormskirk, Aughton, Lydiate, Maghull, Aintree, Melling, & Kirkby are not separated by green areas at all, and become just one large urban spread all the way to the City. They have no thought whatsoever for generations to come, when food is going to be scarce. Countries like China, India and the up and coming African states are demanding more sophisticated food, so all our agricultural land will be required for basic staple foods. It is an absolute must that all brownfield land is utilised first, because, once green spaces and agricultural land is concreted over and built on, there is no way back.

I can only think this reluctance to building on brownfield sites is money orientated, where developers prefer building on fields where there are no clean up costs of previous developments. Local councillors must insist that these sites must be developed first.

The generations to come must be able to spend some of their leisure time walking in the areas between the various towns & villages, experiencing the birds and various wildlife in the hedgerows, trees and fields, just like we have been able to do.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 784	Response Ref 1	Representor Name James Bennett
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

1. With the council making huge cuts, e.g. less bin collections, libraries closing these public services are continually being cut to the bone, so how do they expect to cope with the extra pressures on the services.
2. Building on greenbelt site is not acceptable in any circumstances when there are brown belt sites available and plenty of vacant housing in Sefton not being occupied.
3. We shouldn't be developing on our most versatile agricultural land, we need this for farming communities and food production. If we take away our agricultural land we will then need to look further afield for our food supplies leading to possibly becoming dependent on other countries for our goods which is not good for the economy.
4. We need homes that are affordable for first time buyers not the premium properties that the developers are planning. We already have unaffordable new homes in Formby that are sitting empty which is no good for anybody let alone the economy.
5. Sefton council should have more control over the developer's plans, not just give the land without assurance that it won't cost the council and home owners in tax to put things right in the years ahead.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 789 **Response Ref** 2 **Representor Name** JD and M-A Campbell
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

The Plan makes frequent reference to the Borough's high quality agricultural land, and the presence of numerous internationally important nature reserves and Sites of Special Scientific Interest. It goes on to say that Sefton Council is concerned about the effects of global climate change and sea level rises, and 40,000 existing homes are at risk of flooding (sect 2.11). It acknowledges that there are "large tracts of derelict land" in Bootle (2.12), and voices a concern over air pollution levels, mostly nitrogen oxides and small particulates derived from traffic. Section 3.15 notes that global climate change is likely to result in hotter summers, and that this heat stress "can be adapted to by steering development away from areas at greatest risk of flooding" and] "recognising the role of greenspace and trees in reducing temperatures locally". It then goes on to say that the extra 11,790 houses it considers necessary must be primarily built on Green Belt areas, which will as a result shrink by 4.4%.

Section 4.21 states that "Landowners and developers were solicited to submit brownfield sites for consideration.". Apparently no independent study was performed. These sources, which have a vested interest in maximising their profits, would not tend to promote urban sites, which might be more expensive to develop. Sefton Council has been very remiss in not conducting an independent study of potential sites, and as a result has been advised to add to urban sprawl and further degrade the existing environment by developing Green Belt areas. It is to be pointed out that once Green Belt areas are turned over to urban or industrial use, they are gone forever. The existing plan goes a long way to ensuring a poor quality of life for future (and not so future) generations.

Developing Green Belt areas also comes with an extra cost, not mentioned in the Plan. This is the cost of supporting infrastructure. Brownfield areas already have much essential infrastructure in place — drainage, utilities, and the like. Greenfield areas must have this added to them, at extra cost to the local Council, and causing disruption to and strain on neighbouring built areas.

Based on the Council's own figures we dispute the necessity for such massive housing development. We particularly dispute the necessity to build on Green Belt areas, as there are, by the Council's own admission, plenty of brownfield areas in the South which could be' utilised instead, but have not been considered because the Council took input from groups with a vested interest in building on green areas. It would appear that with this desire to build on green land, the Council wishes to increase the already high level of urban decay within the region, particularly in the South, which it admits is in serious need of regeneration.

We would like to stress that it is imperative that brownfield land be re-developed before any encroachment is made onto green land. We urge that the Council must conduct an independent study to identify suitable areas; to date, such a study does not seem to have been performed. Large-scale development at Formby is unwarranted, will lead to environmental degradation, flooding, pollution, and traffic problems, and will put undue strain on already over-subscribed existing public services.

Objective #9 in Sefton's local plan states, "To protect and enhance Sefton's natural and heritage assets". The Plan as it exists at the moment will result in the opposite of this goal.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 793 **Response Ref** 1 **Representor Name** Gail Pickett
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Please take this letter as a formal objection to the Sefton Local Plan and I cite the following reasons for my objection. What actual demand truly exists for the number of properties identified, are all empty properties being utilised? The plan should address these matter first before any contemplation of green belt development.

Loss of grade 1 Agricultural land when UK food production is under threat across a number of demands. Loss of wildlife habitat and the fragmentation of wildlife zones and the loss of corridors for wildlife has not been adequately considered within the plan. Lack of infrastructure planning — more houses require more roads, more schools and more utility delivery. I cannot see that these matters have been appropriately planned for

This local plan does not protect the green belt and fundamentally it needs to. Many brownfield and derelict sites exist for what local housing is required (in both Southport and the South of the borough) without any need to build on green belt areas. Greenbelt should be valued for what it is - precious breathing space between communities, just because it is more cost effective for developers should not mean that green space is lost.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 794 **Response Ref** 1 **Representor Name** Phil Pickett
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Please take this letter as a formal objection to the Sefton Local Plan and I cite the following reasons for my objection. Loss of grade 1 Agricultural land when UK food production is under threat across a number of demands. Loss of wildlife habitat

Lack of infrastructure planning — more houses require more roads, more schools and more utility delivery. I cannot see that these matters have been appropriately planned for. This local plan does not protect the green belt and fundamentally it needs to. Many brownfield and derelict sites exist for what local housing is required (in both Southport and the South of the borough) without any need to build on green belt areas. Greenbelt should be valued for what it is - precious breathing space between communities, just because it is more cost effective for developers should not mean that green space is lost.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 795 **Response Ref** 1 **Representor Name** George Parkinson
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

The ability of the UK to feed itself will be jeopardy if large areas of the Green Belt is used for housing. Lancashire has the most desirable agricultural land in the UK. The ground conditions in the Formby/Ainsdale area is not suitable for building and this area is a flood plain.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 803 **Response Ref** 2 **Representor Name** P Larsen
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

It is clear that the infrastructure is not in place and that the local plan is relying upon developers to ensure this is in place.

There are insufficient school places, doctors, densities and hospitals already in the area building more house will only add to the existing problem

It is clear that affordable housing will not be achieved and again we are relying upon developers. Building in the greenbelt will put a premium on the housing, which will clearly make them unaffordable.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 819 **Response Ref** 1 **Representor Name** Noreen McGowan
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Once the Green Belt has gone it has and there will never be a way of replacing it. Neither will there be a way of replacing the farms or the farming communities who use our high quality local land to feed us. I find it short sighted and terrifying that the more the coutry disappears under a suburban sprawl the less means we have of feeding and supporting ourselves.

I know that we are lucky that Sefton is a relatively safe and peaceful area but it has little else in the way of facilities; and unattractive and boring shopping centre, no restautants or social areas that are worth mentioning, nothing much in the way of parks....all we have is the greenery of the surrounding areas which would steadily shrink with the present plans and the constant battle with traffic to get anywhere else.

If there is a need for more accomodation in the area then surely it makes sense to use brownfield sites first and to consider the needs of the local community and not destroy the quality of life here by overwhelming the schools and the transport network.

Please fight to kep the wellbeing of the local residents who are trying to prevent the area becoming a disaster to live in.

Summary of Suggested Changes

Evidence Submitted

Policy MN2 gen **Housing, employment and mixed use allocations**

Respondent No 821 **Response Ref** 2 **Representor Name** A McCaffley

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

Brownfield sites should be considered first not shelve them and use the easy option of green belt land. The loss of prime agricultural land, farming communities and food production for our future. The urban sprawl, no borders with the neighbouring authorities.

Lack of infrastructure, the roads are heavily congested now. Switch Island would a worse nightmare than now. Small schools and insufficient places, added pressure to the dentists, doctors, hospitals etc.

Loss of our wildlife and their habitats where do they go to. Loss of our lovely countryside and no open spaces to walk to, all we would see is houses.

The exit from the M58 along Parl Lane/Kenyons Lane/Lambshaer Lane is the shortcut to the west, Southport, Ormskirk, Formby, Hightown. This route passes 3 schools and increased traffic from more houses is not acceptabe. In lydiate we have no buses after 6.30pm only a circulare bus to the station.

Flooding is another issue, so is the sewers as United Utilities don't have the capacity for thousands of new homes. The list is endless.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 825 **Response Ref** 1 **Representor Name** V Roberts
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I object to the Local Plan on the following grounds:

Development of Green Belt innappropriately falls contrary to the 5 purposes of Gren Belt and should only be considered in 'exceptional' circumstances. I believe that these 'exceptional' circumstances have yet to be proved.

Sefton is unique in that it has limited land to build on due to the various constraints. It is a long thin strip of land bordered by the coastline on one side and eroded in the middle by West Lancashire. The loss of any Green Belt will create urban sprawl contrary to the purpose of Green Belt.

Some of the land is not only designated Green Belt but prime agricultural land. We should be encouraging local produce to be grown here on our doorstep instead of importing it, causing transportation pollution. Once its gone, its gone.

The loss of wildlife could prove catastrophic to the local environment and any removal of trees will increase the flood risk. Much of this land is on flood plains. We are told that developers will ensure that any new housing will be protected from flooding but the water has to go somewhere so excess water will find its way to older, existing properties.

There will be a loss of control of borders with other authorities if development takes place near to our neighbouring authorities.

The schools and doctots are already at saturation point and there is no mention in the plan to provid any additional services or infrastructure.

There will be an increased volume of traffic on our already congested, narrow roads causing additional pollution.

Basically the quality of life for Sefton's residents will greatly deteriorate if this plan goes through in its current form please. Please consider brownfield sites.

I am pleased common sense prevailed and some of the sites have been removed from the plan but surely there must be a mre flexible option is chosen, bearing in mind the figures eem to show that dmand is not so great as was originally calculated.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 831 **Response Ref** 1 **Representor Name** Kay Thompson
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Why should Green Belt be used when the Bootle area has masses of brownfield space, e.g. the old Johnsons site? We need greenbelt preserving.

The developers will build, and walk away from any future problems with flooding. The rate payers will be left to pay the cost through our rates.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 832	Response Ref 1	Representor Name Joyce Swift
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

The loss of greenbelt in Sefton will inevitably create urban sprawl, if allowed we could become one with many other nearby towns. Greenbelt should only be released for building under exceptional circumstances. There are plenty of brownfield sites in Sefton to cater for our housing needs; we also have hundreds of empty one and two bedroomed old properties that could be brought back into service. Building on our greenbelt before even considering using brownfield sites and empty properties first violates the NPPF. Infrastructure for our existing empty houses and Brownfield sites already exists, these sites are ideally located for employment; bus routes; train stations; doctors; dentists; hospitals; gas supply; electricity; water and drainage systems.

Whereas Sefton's greenbelt sites have many infrastructure problems including: access roads, services, employment, and flooding. If allowed could cause existing nearby homes to become overwhelmed putting extra pressure on all services.

To enable the builders to build on proposed low line sites they must first raise the land buy as much as 2 metres to prevent their new houses becoming flooded, this will only pass on their problems to neighboring houses.

Sefton needs cheap, affordable homes for first time buyers, not very expensive executive homes within the greenbelt.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 833	Response Ref 1	Representor Name A E Clotworthy
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I object to the Local Plan on the grounds in the 'Save Our Sefton' petition.

I feel it is paramount that all plans for my are conceived for the 'common good' of all those whom the local council claims to represent. There is distinct absence of this concepit here and this plan best suits the 'money men' developers who stand to gain more by houses built ion any green belt land, as opposed to brownfield land.

Surely building on brown field land, as well as the renovation of older properties, and would in fact aesthetically enhance our area, whilst at the same time allowing Green Belt land to remain untouched for the benefit of all.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 834 **Response Ref** 1 **Representor Name** Raymond Wix
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I have lived in Formby all of my adult life, over the years I have seen many changes, during this time Formby has evolved from a village into a small town. Existing roads and infrastructure are struggling to keep up; I do not wish Formby to become any larger than it is now. We have pushed the boundaries of our small town right up to the edge of the greenbelt; any further expansion into the green belt I fear will overwhelm services and infrastructure.

Greenbelt was put in place to prevent urban sprawl. Sefton Council have already breached the greenbelt by building 74 new houses on the powerhouse site.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 836 **Response Ref** 1 **Representor Name** Gwyneth O'Hara
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I would like to object to the local plan proposed by Sefton Council on the following grounds:
I would like to see a Brownfield policy adopted first rather than building on greenbelt, but nobody at Sefton answers your questions. Why?

There is a clear lack of infrastructure considerations. With the need for more Doctors, Schools etc will this mean an extra cost on Council Tax being borne by Formby for the Sefton district.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 838 **Response Ref** 1 **Representor Name** L Smith
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I am writing to object to the local plan proposed by Sefton council on the following grounds:
The increase in traffic and pollution would be disastrous for Sefton.
Sefton's best and most versatile agricultural land must be retained for present and future food production.
Area boundaries would become less distinct.
Sefton simply does not have sufficient school places.
The National Planning Policy Framework states clearly that greenbelt land must only be released under 'exceptional circumstances', which these are not.
The majority of Sefton is already at risk of flooding. This would increase hugely with the amount of houses proposed.
Sefton's population is declining. This brings into question the need for such a volume of housing.
Sefton council will not adopt a 'Brownfield first' policy, despite having many sites available.
Dentist and doctor facilities are inadequate
Over 6,000 properties currently lie empty in Sefton.
The current infrastructure is insufficient to accommodate the proposed amount of houses.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 839 **Response Ref** 1 **Representor Name** Denise Forrest
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I object to the Local Plan. This plan is being imposed upon the people of Sefton. Many residents of Sefton have not even heard of the Local Plan. It is a plan that is putting profits, big business and politics before people. The plan is not focused on sustainable development and the needs of the local communities.

In my opinion the Council have taken the destruction of prime agricultural green belt land very lightly. They have not adequately adopted a brown field site first policy [possibly due to grants for such innovation having been cut by Central Government].

More and better mixing, managing and innovation of housing provision needs to be developed with areas of social deprivation coming under the spotlight. With approximately 5,800 empty homes in Sefton currently standing empty there is clearly a need for a more efficient management of our housing stock.

The plan proposes to build large amounts of homes on areas of critical drainage - increasing flooding problems already evident in Formby households. Council taxpayers picking up the larger bill with this plan.

The plan has shown little community engagement and is ignoring such principles as 'sustainability'. Equality, quality of life, community engagement, better environments and above all the wishes of residents.

The plan does not address in any way the areas of social and housing deprivation to the south of the borough i.e. Bootle. Many industrial brownfield sites could be developed for recreational and housing provision.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 840	Response Ref 1	Representor Name JF Smith
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

The loss of best and most versatile agricultural land would be disastrous for the farming industry and would significantly reduce our ability to produce our own food. The openness of the countryside would be lost, or greatly reduced. Town boundaries would become less distinct and urban sprawl would result. Sefton, and particularly Maghull and Lydiate, cannot cope with the resulting increase of traffic which would be generated by the proposed amount of new houses.

The infrastructure required to support the number of houses proposed is not in place and cannot be put in place by Sefton council, who will be relying on developers to undertake any necessary work and associated financial burden. There are insufficient school places and doctor and dentist surgeries to accommodate such a population increase. There would be an unacceptable increase in carbon emissions and pollution resulting from such a volume of new builds. Most of Sefton is low lying and is at serious flood risk. This would severely increase under the amount of proposed new houses. Sefton council based their projection figures on inaccuracy and there is no grounding for their projected population increase. The population of Sefton is declining, not increasing.

Sefton Council has admitted that there are sufficient Brownfield sites available to accommodate any building that is actually necessary. They are, however, refusing to adopt a 'Brownfield first' policy. There are currently over 6,000 empty properties in Sefton. This coupled with available Brownfield sites would provide enough space to satisfy even the figures proposed by Sefton Council, which are hugely excessive.

Sefton council are not adhering to the guidelines set out in the N.P.P.F, which clearly states that greenbelt should only be released under exceptional circumstances. These are not exceptional circumstances.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 842	Response Ref 1	Representor Name FE Smith
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I object to the Local Plan proposed by Sefton council on the following grounds:
Necessary crop production would suffer due to loss of agricultural land.
Communities in Sefton are already at gridlock at peak hours. They could not cope with additional traffic. Sefton does not have adequate drainage systems to cope with a huge increase in dwellings. The resulting rise in pollution would be unacceptable. Sefton is already at risk of flooding. This would increase in the face of the scale of building proposed under the local plan. Sefton's population is in decline. There can be no justification for predicting such a huge rise in population. Existing Brownfield sites and empty properties should be utilised before releasing greenbelt.
The public were not adequately consulted and have not been accurately represented by Sefton council.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 844 **Response Ref** 1 **Representor Name** Robert Wooder
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I wish to make the following objections to Sefton's proposed local plan
There seems to be a lack of thought being given to the required infrastructure that would be required to support such housing expansion. By building in the suggested areas it seems a greater strain would be placed on already over subscribed medical and hospital services. There would be an increase in the volume of traffic on already congested roads, which would also increase air pollution and carbon emissions.
It would seem as though there is adequate brownfield sites that could be used before building on the greenbelt is considered. The loss of greenbelt would effect future generations enjoyment of the countryside. By using the greenbelt we would lose valuable and versatile agricultural land which will inevitably be required to help feed future expanding generations

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 850 **Response Ref** 1 **Representor Name** W Boardman
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I would like to make the following objections to Sefton's local plan proposals
Building on the greenbelt should not be allowed especially in Sefton where there are sufficient brownfield sites which can be developed instead. The loss of our greenbelt will create urban sprawl. The greenbelt is important for wildlife and habitats. It should be preserved for future generations to enjoy. Parts of Sefton are low lying. As you drive from Crosby to Southport you can plainly see that the greenfield sites are a lot lower than the road. I feel building there will undoubtedly lead to flooding on the already established homes. Building on the greenbelt will put a premium on the housing and therefore affordable housing will not be achieved. The cost of these homes will be beyond the range of the average family.

Summary of Suggested Changes

Evidence Submitted

Summary of Main Issues

The Maghull and Lydiate Action group have outlined several reasons why the Sefton Local Plan in its present form is undesirable for the area. One of the most important, in my opinion, is the very real risk of flooding to existing properties. Another is the loss of grade one agricultural land, sacrificed for building when it is a fact that brownfield sites are available. This strikes me as highly irresponsible and an example of passing the buck on to the next generation.

Building companies aim to make profits which is understandable, however, they should not be allowed to take the path of least resistance by ruining good agricultural land which may be essential in the future. In a sane and civilised society, structures have traditionally been in place to ensure that private companies play by established rules. Now it seems that these structures and laws are no longer respected. The actual purpose of the greenbelt (to ensure that urban expansion is limited to certain areas) is itself being undermined.

Sadly it appears that we are being let down by the very people who were elected to positions of responsibility in order to represent our interests. Some of the councillors who previously posed as environmentalists have now abandoned that stance in order to side with developers whose only interest is profit. Whatever long-term damage they create will not be the developer's responsibility.

The Local Plan has not been properly thought through and shows every sign of being a monumental disaster. The effects of a 30% population increase on an area already suffering from traffic congestion hardly bears considering. It makes me angry to think that concepts such as Greenbelt which were once considered sensible and valid are now being shoved under the carpet and local residents are forced to form action groups to defend themselves because their elected representatives have chosen not to represent them.

Summary of Suggested Changes**Evidence Submitted**

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 854	Response Ref 1	Representor Name Hayley Sargeant
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I am writing as a local resident to object to Sefton Council's local plan. I currently live in a greenbelt area of Sefton. There has already been a loss of greenbelt land in Sefton, any further loss will mean the loss of the best and most fertile agricultural land, including the loss of farming communities. The land my house is surrounded by, provides local food production as well as picturesque countryside. Further building in this area will mean that there is further urban sprawl meaning that the openness of the countryside will be eroded.

I already have great difficulty in getting a GP appointment, increasing the population in this area will add pressure to an already over-subscribed service.

Like most working families in the area, both my husband and I commute to work, the roads are already extremely busy at peak times, creating bottlenecks on certain roads and obviously increased pollution. Any new housing will doubtless be purchased by working people who will also want to commute adding to a problem that already requires resolution.

I would like a 'Brownfield first' policy in Sefton's local plan, so that the beautiful green belt areas can be saved. There are numerous Brownfield sites in Sefton, I can see no reason not to adopt this policy.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 865	Response Ref 1	Representor Name Patricia Roberts
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

All the bullet points as stated on our save our sefton petition rre still as relevant as they were a few years ago and here we are again hoping that someone in sefton council is listening to the people who have to live in these areas.

As stated in the petition we want a brownfield first policy in the local plan.

The whole infrastructure will not take any more houses, pollution, congestion, noise levels which are bad enough now for people like myself who live in Sedbergh Avenue and Oriel Drive. I hope that someone in the planning department is going to listen to the residents of the area!

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 868	Response Ref 1	Representor Name Malcolm Wooder
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I would like to object to the local plan proposed by Sefton Council on the following grounds
Building on the green belt would lead to urban sprawl which has already occurred in the borough. Once this land has been built on it is gone forever. Using this land would mean the loss of best and most versatile agricultural land. Surely it would be preferable to utilise existing brownfield sites before embarking on an irreversible course of depleting the greenbelt. Sefton currently suffers from traffic congestion and by building where as been suggested it must surely add to this congestion.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 871	Response Ref 1	Representor Name Earl O'Keefe
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I am writing to log my objection to the Local Plan proposed by Sefton Council regarding the building of houses and other developments on Green Belt land.

The Green Belt is intended to preserve what remains of our countryside and to ensure that there are areas where our indigenous wildlife can exist and which can be used for transit from countryside area to countryside area. I object most strongly to this special resource being sold off for development.

Most, if not all, needed housing could be supplied by building on brown field sites. Developers, of course prefer prime agricultural land like that in Formby, as it is much less costly to build on. I ask that you do not sacrifice our countryside for the benefit of the developers and their shareholders.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 872 **Response Ref** 1 **Representor Name** Pauline O'Keefe
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I am objecting to the Local Plan proposed by Sefton Council regarding the building of houses and other developments on Green Belt land.

I grew up on the outskirts of London and was taught both by my parents and at school that Green Belt was an all-important means of protecting our limited countryside and preserving the character of our towns and villages. Without it we will have straggling development linking one town with another, losing agricultural land and open space, which provides shelter for wildlife and is a precious resource for future generations. Once the land is gone it is gone.

Most, if not all, needed housing could be supplied by building on brown field sites. Developers, of course prefer prime agricultural land like that in Formby, as it is much less costly to build on. I ask that you do not sacrifice our countryside for the benefit of the developers and their shareholders.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 874 **Response Ref** 1 **Representor Name** Norman Brown
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I would like to object to the local plan proposed by Sefton Council on the following grounds:

The plan has failed to take into account the increase in the dangers of flooding because of already existing problems which we have experience of. At times of heavy rain we are unable to use our downstairs toilet as it backs up due to the inability of drains to cope with the rainwater. Also water can be seen coming out of the manholes in the centre of the road.

The determination of Sefton Council in pursuing the loss of Green Belt to development even though there are sufficient Brownfield sites available.

The lack of any forward plans to deal with the pressures which will be put on roads, schools, doctors and dentists.

The irreversible loss of agricultural land at a time when both the UK population and the worldwide demand for food is increasing.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 876	Response Ref 1	Representor Name Enid Brown
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I would like to object to the local plan proposed by Sefton Council on the following grounds:
The plan has failed to take into account the increase in the dangers of flooding because of already existing problems which we have experience of. At times of heavy rain we are unable to use our downstairs toilet as it backs up due to the inability of drains to cope with the rainwater. Also water can be seen coming out of the manholes in the centre of the road.
The determination of Sefton Council in pursuing the loss of Green Belt to development even though there are sufficient Brownfield sites available . The lack of any forward plans to deal with the pressures which will be put on roads, schools, doctors and dentists. The irreversible loss of agricultural land at a time when both the UK population and the worldwide demand for food is increasing.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 893	Response Ref 1	Representor Name Elaine Roberts
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I wish to object to Sefton Councils' Local Plan on the following grounds -
The loss of green belt land in Sefton, resulting in the erosion of the openness of the countryside, creating urban sprawl. Increased risk of flooding to existing properties. The loss of agricultural land and the impact that would have on future food production, as well as the local farming communities. The impact on local roads, leading to an increase in the volume of traffic on roads that are already congested. An increase in traffic will also raise pollution and carbon emission levels.

Summary of Suggested Changes

Evidence Submitted

Policy MN2 gen	Housing, employment and mixed use allocations
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Respondent No 895	Response Ref 3	Representor Name Yvonne Irving
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Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

Thanks to the phasing out of the UDP we are under threat of encroachment into the green belt by new planning laws and a council who is not fighting to represent the people or honour its commitment to the very special environment that is in its hands. It is certain that the green belt is even more important now than it was 32 years ago when it was under less pressure, and instead of dismantling it there should be stronger policies to keep it in place. The NPPF states clearly that no building will be allowed on the green belt "except in very special circumstances" Sefton Council have concluded that they meet this criteria and have a housing need sufficiently compelling to warrant building on the green belt because the land supply is not available. They have explained this in the Local Plan Section A Chapter 4 para 4.13. by saying that Sefton Council can build on the green belt because it has "special circumstances" due to the lack of viable land. Surely if the green belt is such a necessary protection for the countryside then it makes more sense to conserve what's left, especially as the government keep reaffirming their commitment to its survival. The NPPF para 83 and 84 says the green belt is still regarded as being of paramount importance, this was echoed in Feb this year when the DCLG issued a number of statements that promised to honour their commitment to the green belt and that 'unmet housing need is unlikely to outweigh harm to the green belt and other harm to constitute very special circumstances justifying inappropriate development The harm to Sefton's green belt is not addressed in the Local Plan it just assumes that the loss of a third of its unprotected green belt which will affect wild life habitats, the openness of the land, valuable farmland and benefits to the communities will have to be accepted by the people of Sefton because this is the only course of action open to the council. At no point has the council ever said they would challenge the government on the position they are in or even try to put forward option 1 as a fair compromise given Sefton's special circumstances. Building 11.500 houses and huge new industrial estates on the green belt much of which are also in flood plains and cover irreplaceable farmland adds to the council's attitude. Creating new built in areas inappropriately will only increase pollution, traffic, harm to the environment and loss of land that future generations may be in desperate need of. Also, building on Sefton' green belt is not compatible with Para 80 of the NPPF which says the green belt is of great importance if it stops the unrestricted sprawl of large built up areas and it prevents neighbouring towns from merging into one another. Also, If it safeguards the countryside from encroachment and preserves the setting of historic towns. Lastly if it encourages urban regeneration by recycling derelict land. Well Sefton's green belt meets all of this criteria which is why the council has no right to meddle with it. To do so will take away all of the protection that it has provided since its inception. Large scale developments like the ones proposed will not help to tackle climate change or preserve farmland plus it will put hundreds of existing homes at risk of flooding. Sefton's neighbouring authorities are in the main unable to offer much help towards the housing needs of Sefton that is all except West Lancashire which is four times the size of Sefton and is 80% rural. They are building far less homes than Sefton and what building they are prepared to do is planned right up to Sefton's boarder. They are in a very good position to offer a duty to co-operate but according to the Local Plan they have refused to do so.

Summary of Suggested Changes

Evidence Submitted

Policy MN2 gen

Housing, employment and mixed use allocations

Respondent No 895

Response Ref 1

Representor Name Yvonne Irving

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

Look at the map [attached] and ask yourself "how much open space does Sefton have" For three quarters of its length Sefton is a narrow stretch of land that consists of densely developed built up areas. Some stretch from the natural boundary with the sea to the boundary with neighbouring authorities separated only by isolated areas of green belt. It also has a coastal strip of dunes that have nature conservation status which cannot be built on. Southport for example at the far North of the borough has now reached the boundary with West Lancs and can no longer expand in that direction. Many of the settlements from over fifty years ago have spread outwards and at present are being kept from merging by the green belt. The South of the borough contains the densely populated areas of Crosby, Bootle, Litherland, and Maghull. The green belt that separates these settlements are in flood plains or valuable farmland and an area between Litherland and Maghull is under threat of a very large development from Peel Holdings that need access and storage for their Superport that is presently being built at Seaforth docks. So this sums up what a real problem that this very small borough has in finding enough land for all the new developments that the governments NPPF is expecting it to provide. Sefton Council began by drawing up three options. A consultation was held over many weeks to discover which option the people would choose, Sefton residents voted for option 1 which meant fewer houses and no building on the green belt, the vote was over whelming but the council ignored the result and voted for option 2. This option favoured more houses and employment land and because of the lack of viable land it advocated the release of 4.4% of the green belt. The council have insisted that there was no choice because the government would turn down option 1 as it did not have a "sound "basis and everyone wondered why they bothered with a consultation in the first place.

Sefton's land is 50% developed, of the 50% left, 38% consist of areas of highly protected green belt made up of Nature Reserves, SSSI's, Ramsar sites and golf courses,(please see map) This only leaves 12% of land left to possibly build on. However this is nearly all green belt but also valuable farmland and much of it is in flood plains and should not be built on. Despite this the proposals in the Local Plan want to develop 4.4% which amounts to a third and is therefore a significant loss to this borough given its modest land capacity and its numerous restraints. This is why I believe that Sefton is a 'special case'. It is unique in that it is probably the most important nature area both in this country and internationally. This was officially recognised in 1983 when a firm line was drawn around the rapidly expanding urban sprawl. The protected land outside of this line was known as the Merseyside Green Belt. The Local Plan does recognise Sefton's sensitive and special environment but says it is not special enough. So even though confronted with extensive documentation on Sefton's internationally important areas for nature conservation which are protected by law, the council still insist that they must meet their development needs first because they have no choice. So once more the environment is compromised to make way for developments that this borough cannot truthfully accommodate. The glaring truth is that if option 1 had been accepted houses would still be built but the lower numbers suggested could have been accommodated on the available brown field sites and not on the precious green belt. If the council had insisted in their Local Plan that they are a very special, very small borough that has only very limited amount of viable land available, and therefore it cannot possibly satisfy the government's legislation. Then I do believe they could have had a very strong case. The facts are indisputable and this is why I object to the published Local Plan because it is the wrong plan for Sefton. It does not reflect the wishes of the residents and it does not adequately protect the environment for the future. It proposes to build on approx. 260 hectares and does not take into account the fact that Peel Holdings are after another 400 to 500 hectares over the next fifteen years for their huge container base. It will be very shocking to many residents if the Local Plan is accepted as this will be the start of the infilling of those areas that have survived in order to keep some of the sprawl at bay. Without a doubt there will be a race by the numerous developers who at present are all lined up to grab as much of the green belt as they can. I have no doubt that they are going to demand that Sefton needs even more houses and will not go away until there is no land left.

Summary of Suggested Changes

Evidence Submitted

Map of 'protected' and 'private' Green Belt in Sefton

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 901 **Response Ref** 1 **Representor Name** Linda Shore
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I would wish to raise the following, different objections:-

Building which results in loss of wildlife and habitats I object to the proposal to build-on the Greenbelt and any countryside. Formby is famous for it wildlife, in particular the red squirrels and natterjack toads. It is also one of the reasons why my family and many others choose to live here. All building work and additional houses will always result in the wildlife being worse off.

I object to this proposal, on the grounds that no allowance is made for the increased pressure on our local doctors, schools, chemists and other local services.

I object to this proposal on the grounds that there are no plans for additional schools to cope with the increase in the number of children the additional houses will bring. The two High Schools in Formby are already over-subscribed with 3 children applying for every 1 place. This will mean that some children in Formby will have to travel elsewhere in the borough to attend school. This has a number of negative impacts. If they are taken via car this results in increased traffic and pollution. In addition, children who are friends can end up going to different schools which affects there social development and is detrimental to the community as a whole.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 902 **Response Ref** 1 **Representor Name** J Houghton
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Sefton's Local Plan will build on large quantities of our best quality arable farmland, before brownfield sites. We should build on the brownfields first; this will regenerate Inner Cities and Towns, bringing employment, prosperity, and support our local supply and building companies. Sefton also has hundreds of empty 2 bed houses that lay empty; these could be refurbished and would be ideal as affordable homes We must protect the greenbelt at all cost; these high-grade fields are amongst the very best in England. We can't afford to loose such good, productive, arable land, we have an alternative: Build and refurbish first time buyer's homes on brownfield sites and in inner towns.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 904 **Response Ref** 1 **Representor Name** P Cullen
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I strongly object to Sefton's ill-conceived Local Plan:

Building on our greenbelt This is not special circumstance, I therefore object very strongly to Sefton Council building on our greenbelt, which would only bring us closer to Formby and Hightown causing unnecessary urban sprawl.

There is no demand for Sefton Councils large quantity of new houses, I feel we have enough existing houses for our future needs, if things alter them we can build on our many brownfield sites.

Best quality agricultural land I strongly object to building on high quality arable farmland, we need these fields for food. I believe we should be less dependant on imported food, we should be thinking of our Children.

We should build on the many brownfield sites in Sefton for any future housing and retail needs, there are vast quantities of old boarded up, vandal buildings, and lots of cleared untidy land that could be developed, if only to improve the areas for local people who live in our inner towns

Summary of Suggested Changes

Evidence Submitted

Photograph

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 908 **Response Ref** 1 **Representor Name** Michael Cullen
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I strongly object to Sefton's ill-conceived Local Plan:

Housing figures Although it is widely reported that demand for housing is going up, locally this is not the case, I feel we have enough existing houses for our future needs. We are nowhere near Sefton Councils projections for future housing requirements.

Building on our greenbelt We are nowhere near special circumstances, I therefore object very strongly to any building on our greenbelt, which would only bring Ainsdale closer to Formby and Hightown causing urban sprawl. Best quality agricultural land I strongly object to building on high quality arable farmland, we need these fields (Within the greenbelt) for our food. I believe we should be less dependant on import food, we should be thinking of our future generations.

I believe we should build on the many brownfield sites in Sefton for any future housing and retail needs, I regularly drive through these areas as part of my business, there are vast quantities of old boarded up, vandalized unoccupied buildings, and lots of cleared scruffy land that needs to be developed if only to improve the areas for local people who live in our inner towns. Please see photo.

Summary of Suggested Changes

Evidence Submitted

Photograph

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 910 **Response Ref** 1 **Representor Name** FM Humphreys
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

To add to the congestion of traffic don't forget the parking. The parking spaces in the village and at the railway stations are not sufficient now. If more houses are built, the next residents will probably visit the NT in Victoria Road and the beach. Parking there is not enough and properties in the area already have double yellow lines outside their homes.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 912 **Response Ref** 1 **Representor Name** L&A Curlett and Lander
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

We feel very strongly about the Sefton Local Plan. We object to your plans. As you are spoiling and risking so many important things. The pressure you intend to put on the people/ the communities- will be way too much. The future of Formby or indeed the surrounding areas will suffer terribly, with what you are proposing/intending. Building on brownfield first-would be much more sensible it seems so the brownfield policy would be a good start. Flooding problems will increase and you budgets would never be able to repair the damage caused there.

Please listen to the people/ the communities- and truly hear their wishes. Representing the public is about the long game, not short sighted financial boost/ a quick fix. We understand that affordable housing is a reality, but why aren't you sourcing empty housing in Sefton/areas of Merseyside which can be restored/ rebuilt? Please represent the public not the interests of investors. To serve the people is hopefully in the councils job description.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 919 **Response Ref** 1 **Representor Name** P Parker
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I object to the Sefton Local Plan because it recommends building on green belt land. In addition to this I strongly object on the grounds that there is an increased risk of flooding to the existing properties in the area. I am also very concerned about the increase in traffic congestion, and the added pressure on local services such as schools, Doctors, Dentists.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 921 **Response Ref** 1 **Representor Name** Linda Smith
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I object to the Sefton Local Plan because it recommends building on green belt sites, severely increases flooding to my home if this happens who is liable to cover remedial costs?
Also how are our roads going to cope with the increased traffic? Which also of course increases pollution.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 922 **Response Ref** 1 **Representor Name** AN Pawson
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Objection to Sefton Local Plan
I am writing my personal objection to the current Sefton Local Plan. Although I accept the need for additional housing stock and do not wish to be considered a "NIMBY" my objections to the current plan are mainly based on
The lack of infrastructure and additional amenities for the proposed increase in housing/population.
The proposed site for new housing- I am not convinced that the areas/site are suitable with respect to minimal risk of flooding.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 924 **Response Ref** 1 **Representor Name** MA Iliff
Organisation Name
Obj/Sup/Com Comment

Summary of Main Issues

I am particularly concerned about the added pressure on doctors, dentists schools and hospitals.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 925 **Response Ref** 1 **Representor Name** William Valentine
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I am writing to express my strong objection to the recently published Sefton Local Plan. In particular I would like to register my deep concern about the proposal to allow building upon designated Green Belt.

I have a number of reasons for my disagreement with this decision. For example urban sprawl, loss of agricultural land, wildlife habitats and complete lack of recognition of local views etc. However overarching all of these objections, I would like to add that as a geography graduate in the early 1980's my studies gave the strong message that Greenbelt was designated as such to provide a "lung" to urban areas and provide open spaces and drainage as a contrast to the built up parts of our environment. They were not designated greenbelt in order to allow the value of land to increase to a point where it became convenient for owners or authorities to then sell it off for short term financial or political gain.

I am expressing my views not as a NIMBY, they were feelings I held equally as strongly when I was still a resident in Bootle. Once this land is gone it will be lost to future generations forever- that must not be allowed to happen. Thank you for allowing me to register my views as a Sefton ratepayer.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 928 **Response Ref** 1 **Representor Name** R Anderson
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Why do we need to build houses on the best land when there are so many Brown Field sites in areas around the city. All over the city there are still old built sites that have never been developed.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 930 **Response Ref** 1 **Representor Name** Janice Court
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I reiterate my objection to Sefton Councils Local Plan on the grounds stated on the enclosed petition. Also on the grounds that the remaining Green Belt cannot be despoiled, future generations need the pastoral spaces which we are lucky to be able to enjoy today. Once this land is built on- its gone for ever! What a diabolical legacy to leave for future generations!

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 933 **Response Ref** 1 **Representor Name** D Barker
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

We object to Sefton Council Local Plan on the following grounds.
Added pressure on services to include Doctors, Dentists, Schools and Hospitals. Increased volume of traffic on roads which are already congested. We want a Brownfield first policy in the Local Plan.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 936 **Response Ref** 1 **Representor Name** John Mullen
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I object to the Local Plan because:
The huge increase in Road traffic, the schools are full, the doctors surgeries are full, the ruination of the countryside.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 938 **Response Ref** 1 **Representor Name** JR Young
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I am writing to object to the local plan proposed by Sefton Council on the following grounds:
The plan would see the loss of swathes of some of the Best and Most Versatile Land in Britain, which the NPPF states can only be released under exceptional circumstances. The plan would change the character of local towns and vilages, with boundaries becoming eroded. Sefton would be subject to an unnacceptable increase in pollution levels. Sefton does not have the means to alter the existng infrastructure. Schools and medical surgeries are already at capacity. The existing flood risk in Sefton would increase hugely.

The population of Sefton is in decline and does not requires such a high volume building programme. It is not necessary to encroach on our agricultural land when there are empty properties and several Brownfield sites within Sefton.

A minimal survey produced figures to the effect that Sefton's residents were not happy with the contents local plan, despite being very deftly worded to produce a biased result towards favour. This was admittedly destroyed by Sefton Council.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 939 **Response Ref** 1 **Representor Name** C Young
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I am writing to object to the Local Plan proposed by Sefton Council as per the following: In the current climate of worldly unrest. It is imperative that we retain the means to produce our own food. Release of any of our greenbelt would prevent this.

The resultant significant rise in pollution (carbon footprint, light, noise) would be highly detrimental to the health and well being of Sefton's residents. Sefton lies in a flood plain. Significant building as proposed by the local plan would dramatically increase flood risk.

The figures produced by Sefton are innaccurate. Sefton's population has declined, Sefton's population has declined steadily for years, belying their claims for significant housing need. A brownfield first policy should be adopted to avoid unnecessary use of agricultural land. There are over 6000 empty properties in Sefton.

This indicates a lack of housing need. Sefton Council's consultation process was a farce. The public were not adequately consulted, nor were any opinions gained heeded. The Local Plan has not been produced in line with the guidelines set out in the National Planning Policy Framework.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 941 **Response Ref** 1 **Representor Name** Nikolai Smith
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I object to Sefton's Local Plan on the following grounds:
Sefton's residents were not properly consulted about the local plan, despite clarity that they objected to release of greenbelt land. This land is necessary for present and future food production for both Sefton and the rest of Britain. Sefton Council should be doing their utmost to protect it.

The local plan is a living document. This means that greenbelt boundaries could be altered in the near future.

The National Planning Policy document states that greenbelt land must only be built upon under special circumstances. The true population trend of Sefton shows that its council's projections are highly inaccurate and can not justify any greenbelt release.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 943 **Response Ref** 1 **Representor Name** Linda Poole
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I would like to object to the Local Plan proposed by Sefton Council on the following grounds.
The loss of green belt will devalue properties and surrounding areas; Properties will be subject to lack of drainage; Will create urban sprawl which is already present in the borough; Loss of agricultural land and good food production; Schools will be overcrowded; Doctors, Dentists, hospitals and schools will be stretched to danger point. As our police and fire and ambulance services are; Increased volume of traffic which are already congested; Increase in pollution and carbon emmisions.

On a personal point, how will it affect me? It will affect me seriously. The traffic is already heavy. It will be greatly increased if this plan goes ahead. The heavy goods that travel passed my home are horrendous, In the night and day, you cant pull out of our you drive because they go so fast once they pass the cameras. I consider this plan a sersious health hazard to me, because of the carbon emmisions, the traffic noisem and the unsettled state I feel now. I know a lot of people in this area, in fact in the borough and all I speak to are opposed to the plan.

If birds were in a nest would it build and disturb it, that is a known fact. Our services have lready been drastically cut, if this goes ahead it will be very dangerous for the future.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 946 **Response Ref** 1 **Representor Name** P Thompson
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Who can we hold responsible for flooding which will occur if the proposed building takes place?
Who will insure our properties? Wil I be able to sell ? No have we not learnt the devastation that can happen if you build on flood plains/zones. The council already make lots of money from Aintree ie the Race Course + Business estate. Brown site are available use them before destroying our countryside.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 947 **Response Ref** 1 **Representor Name** JG Blair
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I object to Sefton Council's Local Plan-The loss of grade one and two agricultural land, Increased risk of flooding, added on Doctors, Dentists, Schools, hospitals, Traffic is already bad now, lack of the ability to answer questions raised by the public.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 949 **Response Ref** 1 **Representor Name** Maureen Brady
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I would like to object to the Local Plan proposed by Sefton Council on the following grounds- Increased volume of traffic on roads already congested; Added pressure on services, ie Doctors, Dentists, Schools etc; Loss of Green belt and agricultural land; Builders are interested in profit, not affordable housing; Brownfield sites should be used.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 956 **Response Ref** 1 **Representor Name** N and J West
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

We would like to object to the local plan proposed by Sefton Council on the following grounds.

There is not a need for this plan, there are sufficient brown field sites and empty properties to meet any demand here. A considered plan for the above should come first, before one that destroys beautiful open countryside in this little island.

The country can not afford the loss of such high grade agricultural land. Have we forgotten World War 2, a land army will not produce food from built over land. The plan will create an urban sprawl for no good reason. Roads are heavily congested at present. This plan will make the roads a total nightmare.

The infrastructure is inadequate and drains, water sewers, gas and electricity. They are not up to taking the greater load proposed by the plan. The utilities do not have the money or the plan that will resolve these problems. The pollution of the air and increased carbon emissions that will come from this plan will create problems. The plan will increase the risk of flooding to existing properties. Underground water course have not been considered.

This plan will ruin the community we have voted and paid for over the past forty years.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 957 **Response Ref** 1 **Representor Name** Irene Webster
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I would like to object to the local plan proposed by Sefton Council on the following grounds: The loss of green belt land to sefton. There are enough brownfield sites. Added pressure on Doctors, Dentists, Schools and Hospitals.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 960	Response Ref 1	Representor Name I R Vaudrey
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I am writing to you to submit my objection to Sefton Council's proposed Local Plan.

The population in Sefton is not increasing therefore we do not need extra houses. There are over 6000 unoccupied properties in Sefton. There should be no building on AI agricultural land which is a precious resource to the country and the community - all brownfield sites should be used first. The loss of greenbelt will inevitably create urban sprawl which can already be seen in other parts of Sefton where they have joined West Lancs - plus the openness of the countryside will be eroded.

The proposed developments would have a damaging long term effect on the health and well being of the existing community, the local environment, and the natural habitat - and lead to an increase in pollution. It will add pressure on services to include doctors, dentists, schools and hospitals. It is clear that the infrastructure is not in place and that the local plan is relying upon the developers to ensure this is in place. This would lead to increased volume of traffic on roads which are already congested.

As stated in your own summaries areas suggested are Green Belt Land; are subject to flooding; have problems with drainage; have insufficient infrastructure for additional transport; have Grade 1 Agricultural Land Classification; have significant historical classification; have a reducing population.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 961	Response Ref 1	Representor Name M Vaudrey
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I am writing to you to submit my objection to Sefton Council's proposed Local Plan.

The population in Sefton is not increasing therefore we do not need extra houses. There are over 6000 unoccupied properties in Sefton. There should be no building on AI agricultural land which is a precious resource to the country and the community - all brownfield sites should be used first. The loss of greenbelt will inevitably create urban sprawl which can already be seen in other parts of Sefton where they have joined West Lancs - plus the openness of the countryside will be eroded.

The proposed developments would have a damaging long term effect on the health and well being of the existing community, the local environment, and the natural habitat - and lead to an increase in pollution. It will add pressure on services to include doctors, dentists, schools and hospitals. It is clear that the infrastructure is not in place and that the local plan is relying upon the developers to ensure this is in place. This would lead to increased volume of traffic on roads which are already congested.

As stated in your own summaries areas suggested are Green Belt Land; are subject to flooding; have problems with drainage; have insufficient infrastructure for additional transport; have Grade 1 Agricultural Land Classification; have significant historical classification; have a reducing population.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I am submitting this letter as my personal objection to Sefton's Local Plan. My reasons are:

People of this country were so proud to see the establishment of Green Belt legislation which aided 'breathing spaces' around built-up areas thus preventing urban sprawl and opening access to the countryside from those same built-up areas; these 'breathing

spaces are still vital around our great conurbations and nothing has changed.

We hear so much (probably every day) via the media about protection of wildlife, habitats, species and ecosystems. Bio Diversity Action Plans aim to protect them and it is not for any Council or Developer to interfere and thus destroy beautiful areas of open countryside and its intrinsic wildlife.

The UK has very limited areas which are classed as Grade 1 or Grade 2 agricultural land. Sefton has such land, prime quality, fertile and productive. The UK is losing self-sufficiency in food production and as a country we should be maximising our productive farmland, not disposing of it; importing food leads to extra 'food miles' and consequent pollution/higher Co2 levels and as a worst case scenario, the UK could be vulnerable as a result of over-reliance on imported food.

Sefton Borough is mostly flat and low-lying with large areas of natural flood plains. Building developments mean more non-permeable surfaces, less natural drainage and increased artificial run-off, a consequence of which could be flooding.

In particular areas for proposed development S128 and S129, the bordering roads are minor roads. School Lane, Park Lane and Poverty Lane unsuitable for industrial plant and lorries.

More effort should have been made by Sefton Council to identify Brownfield sites within the Borough as potential for development rather than the 'thin end of the wedge' seen by what could be the first attack on precious Green Belt land.

Summary of Suggested Changes**Evidence Submitted**

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

Whilst fully appreciating the importance of having a sound Local Plan in place, I wish to object to Sefton Council's Local Plan in its current form for the reasons given below. Basically, I believe that too many new houses are being planned, and that they are being planned in the wrong places.

Green belt protection

Notwithstanding the questionable level of "housing need" implied by Sefton's Local Plan, there are very real reasons (enshrined in Government policy) for not building on some of the proposed sites, as many of these sites are within the Green Belt. The National Planning Policy Framework reiterates and emphasises Government policy on the protection of the Green Belt (paras 87 - 89).

This was re-emphasised in October 2014 by Eric Pickles, Secretary of State for Communities and Local Government, and is confirmed by the National Planning Practice Guidance, which states: "The Government has re-affirmed the importance of Green Belt protection and ensuring its robust safeguards are not undermined when assessing unmet housing need", and is made even more explicit in paragraph 034, which states: "Unmet housing need is unlikely to outweigh the harm to the Green Belt and other harm to constitute the 'very special circumstances' justifying inappropriate development on a site within the Green Belt."

To build on these site's would go against four of the five main purposes of Green Belt land, as stated in the National Planning Policy Framework:

- To check the unrestricted sprawl of large built-up areas In Maghull and Lydiate alone, over 2,000 houses and a business park are planned on Green Belt land. This represents an increase of such proportions as effectively to create a "new town", with all the infrastructure issues that implies, changing the character and appearance of the area forever.
- To prevent neighbouring towns merging into one another Development of the proposed sites would encroach significantly on the boundaries between Lydiate/Maghull and Melling, Aintree and Aughton, especially when viewed in conjunction with planned development in neighbouring West Lancashire, which shares a large boundary with this part of Sefton. For instance, Sefton Council's Local Plan Site Assessment warns that development of the Kenyons Lane site (MN2.28) site would have "significant impact", as "the site would narrow the gap between this part of Lydiate and Aughton Village by around 40% at its narrowest point."
- To assist in safeguarding the countryside from encroachment Much, if not all the Green Belt sites proposed for development are designated highgrade (grades 1 and 2) "best and most versatile" arable land. The NPPF says that "International and national bodies have set out broad principles of sustainable development. Resolution 42/187 of the United Nations General Assembly defined sustainable development as meeting the needs of the present without compromising the ability of future generations to meet their own needs".

Recent research indicates an impending crisis for food production in the UK, with the proportion of our food needs met by produce from farms in the UK falling at an alarming rate. In such a climate, to concrete over significant areas of such highgrade agricultural land would seem both short-sighted and foolhardy.

- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Sefton Council's own figures show that there are enough available brownfield sites within the urban area to accommodate 6,300 houses. This is more than enough to satisfy the demand for a five-year housing supply. The NPPG reminds us that "Local Plans can pass the test of soundness where local planning authorities have not been able to identify sites for growth in years 11-15" (paragraph 027). The NPPF sets out a core planning principle that planning policies should encourage the effective use of land by re-using land that has been previously developed (brownfield land).

The NPPG (para 025) states: "Local Plan policies should reflect the desirability of reusing brownfield land... Particular consideration should also be given to Local Plan policies on planning obligations, design, density and infrastructure investment, as well as in setting the Community Infrastructure Levy, to promote the viability of brownfield sites across the local area.. .Authorities do not have to allocate only those sites that provide the maximum return for landowners and developers."

I would urge Sefton Council to adopt and enforce a "brownfield first" policy, ensuring that all brownfiled sites are exhausted before releasing Green Belt land for development.

Empty properties

There are currently more than 6,000 empty properties in Sefton. This figure, when added to the number of brownfield sites available in Sefton, is more than adequate for our housing needs for the next 15 years. Furthermore, this quantity of serviceable

but empty homes could be taken as casting further doubt on Sefton Council's alleged "need" for so many new houses. Surely, if there was a significant demand for housing, these properties would not be standing empty? NPPF para 5.1 says: "Local planning authorities should identify and bring back into residential use empty housing and buildings in line with local housing and empty homes strategies' .

Proposed type of development inappropriate to local demand.

The NPPF (paragraph 50) recommends that local authorities should "plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community", and should "identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand,"

As mentioned above, census figures show that the population of Sefton is declining, yet it is claimed that we need more houses because the number of individual households is increasing (due to an increase in numbers of people living on their own, e.g. elderly or divorced people). If that is the case, surely we need to re think our basic housing model. Three-, four and five-bedroomed houses (which constitute the majority of planned developments) are inappropriate, and it stands to reason that we cannot continue to cover the earth with vast estates of individually occupied houses. Such a model is greedy and wasteful of land, and unsustainable in the long run. Instead, if new building is genuinely needed, a more sustainable alternative (and one more appropriate to the demographic needs of the borough) might be to create small developments of low-rise apartments, with tree-planting and plenty of green space around, forming small communities in pleasant surroundings with shared gardens.

In Sefton Council's Overview and Scrutiny Committee (Regeneration and Environmental Services) Infrastructure Working Group Final Report (December 2014), the Council's Working Group raises the following concern:

"The 2013 Strategic Housing Market Assessment was referred to that indicated the need for smaller, 1 bedroomed accommodation in Bootle. However, it was suggested that developers wanted higher profits from 3 or 4 bedroomed properties even though with average ages increasing there was a need for smaller units of accommodation."

Response - Developers were reluctant to build apartments and smaller units of accommodation due to recent poor market experience in areas such as Liverpool City Centre. This is just one of several clear indications that pressure from developers is being allowed to dictate planning policy and to override the genuine needs of the community.

Wider issues/ sustainability

In its publicity material for this plan, Sefton council claims a number of alleged benefits arising from the plan's adoption. However, there is a certain circularity to their claims, and they all seem to come back to building houses! For instance, the "health and wellbeing" section is based mainly on provision of "suitable homes" (apparently we'll all be well and healthy once we've got new housing estates to live in), while the "employment" section places a lot of its hopes on construction. In other words, house-building is being held up as a panacea for all the borough's problems, without a genuine vision of the impact such a massive building program would have on the borough, how it would be implemented, and whether it is truly realistic and sustainable.

For example, with regard to concerns about drainage/sewer systems: United Utilities has already indicated that it can cope with only a further 30 houses per year in Maghull. Sefton Council's Local Plan site assessments acknowledge that "Waste water network upgrade might be required." When viewed in the context of all the proposed developments in Maghull/Lydiat (total 2005 houses over 18 years, i.e. an average of 111 houses per year assuming a constant build rate), it becomes clear that development on the scale planned would throw further strain on a system which is already stretched to capacity, and poses serious questions about the ability of that system to cope with the increased demand.

The following is drawn from Sefton Council's Overview and Scrutiny Committee (Regeneration and Environmental Services) Infrastructure Working Group Final Report (December 2014):

Following a presentation from United Utilities, the question was raised as to whether the local drainage system can cope with the erection of so many new houses, United Utilities advised that the key issue was that surface water run-off should not go into the sewerage system, as this could cause very high flows linked to rainfall. There was "an acknowledgement of some existing problems and the need to ensure that new developments do not make the situation worse."

The use of Community Infrastructure Levy to reduce flood risk was mooted.

Elsewhere in the report, however, it is acknowledged that the CIL could put some developments at risk due to viability issues, and that "the Council could be flexible with regard to CIL/Section 106 requirements". If it is considered necessary to raise funds to pay for infrastructure improvements through measures such as CIL and yet doing so may render proposed developments un-viable, this would seem to cast doubt on any realistic prospect of the necessary improvements being delivered.

It seems that individual members of Sefton Council are aware of residents' concerns, yet these concerns are not being acted upon or reflected in the content of the Plan. The following is drawn from Sefton Council's Overview and Scrutiny Committee (Regeneration and Environmental Services) Infrastructure Working Group Final Report (December 2014):

The Working Group received a presentation from Keppie Massie Consultants on infrastructure issues arising from the emerging Local Plan. Members' comments included:

- the methodology was very much focused on the needs of land owners and developers but not on the needs of local communities - the focus was on financial rather than social value
- "The presentation by Keppie Massie was helpful in terms of understanding 'viability', however, it did appear to be focused on developer and landowner issues, less attention seemed to be focused on sustainable development from a community perspective including an objective assessment of social value/ impact as part of the analysis."

Further comments from the same Infrastructure Working Group Report:

- "We need a balance, there should be two sides of the equation. At the moment we have plenty of information from developers re viability issues but we are short on information regarding community impacts."

Other points noted by the Working Group included:

- The need for development was recognised but residents felt that developments were being forced upon them
- Concern at the lack of work done by local authorities regarding social impact
- Some communities consider that they have not been consulted adequately regarding development proposals - this has even led to the formation of a new political party in Formby (the "party" referred to is Community Action not Party Politics).

Conclusion.

Sefton Council's Infrastructure Working Group made the following recommendation:

"A robust policy approach should be developed to ensure that an equitable balance is achieved between viability from a developers and landowners perspective and the social costs and benefits for the local community," It is my view (and also the view of thousands of other Sefton residents, who have signed a petition to that effect) that such a balance has not yet been achieved, and

that the future of this borough is in danger of being determined by developers at the expense of the people of Sefton.

This plan is being imposed upon the people of Sefton and is a far cry from the "collective vision" recommended by the NPPF.

Sefton Council maintains that these decisions (the building of so many houses, and the release of Green Belt land) are being forced upon it by the Government. The planning announcement made by Secretary of State Eric Pickles in October 2014, and recent decisions by planning inspectors in Leeds and Durham (see appendix), do not, however, seem to bear this out.

The Ministerial Foreword of the NPPF says: "Sustainable means ensuring that better lives for ourselves don't mean worse lives for future generations." The Local Plan will affect the whole of Sefton for the coming generations. For the reasons outlined above, I consider the Plan in its current form to be fundamentally flawed.

Appendix

Eric Pickles announcement (extract from The Daily Telegraph 4th October 2014)

England's most valuable countryside will be shielded from development under new protections being unveiled by Eric Pickles today.

The Local Government secretary is issuing new guidance after becoming concerned that councils are sacrificing green belt to meet new housing targets. The news comes after increasing concern that councils are allowing building on protected Green Belt land to meet new five-year housing targets. Mr Pickles told The Daily Telegraph: "Protecting our Green Belt must be paramount. Local people don't want to lose their countryside to urban sprawl, or see the vital green lungs around their towns and cities to unnecessary development. "The guidance will ensure councils at the heart of the reformed planning system, so councils and local people can now decide where development should - and shouldn't - go. Specifically the new guidance makes clear that councils do not have to build on the Green Belt just to meet the locally set five-year housing targets. Councils will have to "take account of any constraints such as Green Belt which indicate that development should be restricted and which may restrain the ability of an authority to meet its need", it says.

A Government source said: "Many council planning officers are telling their councillors that they have to remove Green Belt protection when drawing up their Local Plans, in order to meet [housing] demand.

"We are making clear that this isn't the case, and they can take into account development restrictions - such ongoing Green Belt protection - when drawing up their Local Plans and determining how many houses they want to plan for."

Recent Local Plan planning decision (Durham)

A planning inspector has identified 'fundamental issues' with the emerging local plan for County Durham in north-east England, which would make the plan unsound. The inspector who has been examining the strategy said the council's assessment that 1,651 new homes were required in the area in each year of the plan period was not justified and was based on unrealistic assumptions of employment growth and inward migration.

The inspector said the proposed amendments to the green belt boundary around the city of Durham were flawed "particularly in relation to the release of sites to accommodate some 4,000 unnecessary dwellings in Durham's green belt".

Recent Local Plan planning decision: Leeds

Communities Secretary Eric Pickles has dismissed an appeal over developer Thornhill Estates' 400-home development proposed for Farsley in west Yorkshire which Leeds City Council had failed to determine in the prescribed period. The planning inspector who held the initial appeal inquiry recommended the outline scheme should be allowed. However, the Secretary of State intervened and requested the inquiry should be reopened to consider housing issues. By the time this was held the council's Core Strategy had been found to be sound. The inspector subsequently recommended the appeal should be refused, a stance agreed by

the Secretary of State.

Pickles agreed with the inspector that the scheme would result in an adverse impact on the character and identity of the local areas as well as involving the loss of a key site for the local bat population. Pickles' decision letter concluded he was "satisfied that the council [has] now identified a five year supply of housing land in an up-to-date core strategy without the appeal site, so the presumption in the [National Planning Policy] Framework in favour of sustainable development does not apply".

"Furthermore the adverse impacts on local character and identity count against the proposed scheme and the Secretary of State considers it appropriate for the council to proceed to identify the most sustainable sites through the preparation and adoption of its site allocations plan."

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 966	Response Ref 1	Representor Name A O'Brien
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I wish to object to building on the greenbelt.

Lack of infrastructure, we cant cross the roads safely now, more traffic will cause increase in volume of traffic on our roads, increase in pollution and carbon emmisions. I want to have a brownfield policy in any plans (lots in Bootle eg Hawthorne Road etc.)

The loss of the best and most versatile agricultural land. We already import 60 per cent of our food, if all this land is built on, there will be no turning back. Also, the loss of wildlife and habitats.

Lastly the housing figures show we do not need all these extra houses, so why build them. I hope you consider the majority of the wishes of the people of Sefton.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 967	Response Ref 1	Representor Name Peter Matthews
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I enclose a list of my personal main objectives to Sefton Council's Local Plan. We want a Brownfield first policy in the Local Plan. The loss of green belt to Sefton, creating urban sprawl which has already occurred in the borough. The loss of best and most versatile agricultural land. Insufficient school places in the areas where housing has been allocated. Added pressure on services including Doctors, Dentists, schools and Hospitals.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 968 **Response Ref** 1 **Representor Name** N Matthews
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Objection to Sefton Local Plan
We wish to express our objection to the proposed Local Plan throughout Sefton. We object to the loss of green belt always believing this land to be sacrosanct, the loss of best and most versatile land which is needed for food production in the future. These proposals will mean the loss of wildlife and their habitats and the openness of the countryside in this area. We want a Brownfield first policy in the Local Plan.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 969 **Response Ref** 1 **Representor Name** R&G Lowe
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

We understand wish to object to Sefton Council's Local Plan on the following grounds:
1. The loss of best and most versatile agricultural land
2. Added pressure on services to include Doctors, Dentists, schools and hospitals.
3. Increased volume of traffic on roads which are already congested. We want a brownfield first policy in the Local Plan.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 972 **Response Ref** 1 **Representor Name** ME Jones
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

To whom it may concern. I agree with all the objections points on the "save our Sefton" petition, especially a Brownfield first policy in the Local Plan and the importance and loss of prime farming land for the future! Added pressure also on services, Doctors especially an insufficient school places in the areas where housing has been allocated. I can only write mainly for the area around my home. I have lived here for 47 years + seen many changes. As a nan I walk around to St Gregory's school in Sandy Lane with my grandson in the pram on certain days of the week to collect my granddaughter and the traffic that comes up Kenyons Lane which I cross and then Liverpool Road onto Lamshear Lane is very busy.

Further along Lamshear Lane at school times parked because parents are picking children up which with the traffic make it dangerous to cross the road to Sandy Lane. Imagine having more traffic from a housing estate on Kenyons Lane and maybe in the future one on Liverpool Road/Lamshear Lane/Sandy Lane, it would be horrendous, with three schools on that route St Thomas's, St Gregory's + Lydiate Primary.

That route also earlier and later in the day is a route that a lot of motorists use going to and from work in the morning and evening crossing over northway into Kenyons Lane/ Lamshear Lane to south port Road from the M58. Hopefully my objections will be given due consideration.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 973 **Response Ref** 1 **Representor Name** GM H
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I wish to register my objection to Sefton Local Plan and agree with all the reasons stated on the petition. In particular I am unhappy for the following reasons: I think many more brownfield sites should be used before greenbelt is taken. Local infrastructure and services (Doctors,dentists, schools etc) already overloaded. Roads already congested. Loss of prime and very precious agricultural land for farming and food production in the future.

The fact that the council could take more green belt land in the future. Sefton Council will be responsible for more wetlands/swale ditches+verges etc, therefore more expense and more cuts to local services. I totally support all the reasons stated in the local petition and believe that the wishes of people actually living in this area are being overlooked.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 974 **Response Ref** 1 **Representor Name** Paul Lavin
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I object to Sefton's Local Building Plan. I have lived in Lydiate for over 20 years and I am totally devastated by Sefton's Labour councillors plan to build on our precious prime agricultural green belt land. I am reliably informed that there are over 6,000 empty houses in the Sefton area and huge swathes of ugly derelict brownfield sites in Bootle, there are enough to fulfil the proposed housing needs on Hawthorne Road alone, all just waiting to be developed. The madness is that the councillors are saying that they want to hold back these brownfield sites for the future but are prepared to carve up the precious greenbelt now to greedy developers who just want to cherry pick the best sites that will produce the biggest profits. Common sense seems to be in very, very short supply to these councillors, most people can see that building on these derelict eyesore brownfield sites and refurbishing empty houses would improve the environment for all concerned, but alas no this is not the case, the said councillors are hell bent on opening up our greenbelt to the developers. Our precious green belt is there for a reason, it has fed us in the past, present and should be kept to feed future generations and should not treated as a moneypot for them to exploit.

Once the green belt is built on it is lost forever, please don't let this happen.

The green belt should never even be in the equation, when and only when every square inch of the brownfield sites have been exhausted should our precious green belt land be considered. If the councillors had chosen to use the brownfield sites option in the first place then all other objections ie flooding, overcrowded schools, lack of infrastructure, congested roads etc. etc. etc. would not be an issue!!

Please allow common sense to prevail, please use brownfield sites first.

It seems to me that these labour councillors are speculating on the money they expect to receive from the government from the new home building bonus to balance their books, the bigger & the more expensive homes built using the greenbelt land will produce the most money, shame on them for using our precious greenbelt as a book balancing exercise.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 975 **Response Ref** 1 **Representor Name** K Frey
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Objection to local plan
Why would you want to build on our fields, when there are areas of Liverpool derelict and in need of pulling down and houses rebuild there, please leave our lovely fields and wildlife alone.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 978 **Response Ref** 1 **Representor Name** A Glover
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I want to take this opportunity to raise my concerns about the planned extra housing in my local area. I feel that local people should have a say and be consulted about these plans, which will have such a big effect on our day-to-day life.
My main concerns are the increased traffic in and out of Maghull/Lydiate, at least now on a busy day, you can expect to wait at least half an hour to get from Maghull to Switch Island, and with extra housing planned, it is going to have a detrimental effect on work life balance.

I also feel strongly about the fact that we are losing our greenbelt, which offers our children lovely walks and "Fresh Air" increased housing will result in a "Concrete Jungle". Its not often that I feel strongly enough to take time and sit down and write my concerns, but on this occasion it is of the upmost importance. Other concerns are lack of facilities for doctors, dentists and A+E. The people have spoken, please take time to listen to their genuine concerns.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 985	Response Ref 1	Representor Name Valerie Jukes
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I am writing to you to submit my objection to Sefton Council's proposed Local Plan. The population in Sefton is not increasing therefore we do not need extra houses. There are over 4000 unoccupied properties in Sefton. There should be no building on A1 agricultural land which is a precious resource to the country and the community - all brownfield sites should be used first.

The loss of greenbelt will inevitably create urban sprawl which can already be seen in other parts of Sefton where they have joined West Lancs - plus the openness of the countryside will be eroded.

The proposed developments would have a damaging long term effect on the health and well being of the existing community, the local environment, and the natural habitat - and lead to an increase in pollution. It will add pressure on services to include doctors, dentists, schools and hospitals. It is clear that the infrastructure is not in place and that the local plan is relying upon the developers to ensure this is in place. This would lead to increased volume of traffic on roads which are already congested.

The council and councillors have been undemocratic in the whole local plan consultation and are not representing the electorate - most of whom are against it.

As stated in your own summaries areas suggested:-

are Green Belt Land; are subject to flooding and have problems with drainage; have insufficient infrastructure; for additional transport; have Grade 1 Agricultural Land Classification; have significant historical classification; have a reducing population.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 987	Response Ref 1	Representor Name Terri Young
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I wish it to be noted that I object to the local plan proposed by Sefton Council on the following grounds:

The necessity of the scale of new builds proposed by Sefton council is not justified by the six thousand properties lying empty in Sefton.

Much of sefton is already at gridlock during peak traffic hours and could not possibly accommodate the enormous. Increase in volume that would result from implementation of the local plan. Sefton's greenbelt is protected under guidelines set out in the NPPF.

Any available brownfield should be utilised before any consideration is given to release of greenbelt. The current infrastructure could not support additional building as outlined in the local plan. Existing flood risk would increase. Sefton has a declining population and therefore cannot possibly be in need of such a volume of new housing.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 988 **Response Ref** 1 **Representor Name** P Jones
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I would like to object to the local plan proposed by Sefton Council for the following reasons.

2. Loss of green belt will create urban encroachment which can be seen in other parts of Sefton where they have joined West Lancs.
3. There is no infrastructure in place and the local plan is relying on developers to make this happen.
4. Affordable housing will not be achieved and again reliance will be placed on developers to build on green belt will put a premium on the houses that will make them unaffordable.
5. Sefton can not afford to lose agricultural land which is some of the best in the land.
6. Added pressure on services ie Hospitals, Doctors, Dentists and Schools.
7. Increased volume of traffic on roads that are already congested.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 990 **Response Ref** 1 **Representor Name** JD Jones
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

OBJECTION TO SEFTON'S LOCAL PLAN

Please note my objection to Sefton's Local Plan due to the following:

1) Section 9 of the National Planning Policy Framework outlines the importance of Green Belt protection. It states that the fundamental aim of Green Belt policy is to:

- prevent urban sprawl by keeping land permanently open
- to preserve the existing special character of historic towns
- Serve to assist in urban regeneration by encouraging the recycling of derelict land.

True housing requirements within Sefton do not constitute the exceptional circumstances necessary to justify altering Green Belt boundaries.

2) The public have not been fully and properly consulted with regard to the Local Plan.

3) Sefton's infrastructure would have to be dramatically altered to serve an increase of 11,000 new houses. As Sefton Council does not have the funding in place for this, the generosity of developers would be relied upon.

4) Sefton is low lying and already at serious flood risk. Such an increase in housing would exacerbate the existing risk.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 991 **Response Ref** 1 **Representor Name** M Jones
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

OBJECTION TO SEFTON'S LOCAL PLAN

Please lodge my objection to Sefton's current version of the local plan as per the following:

1. The local plan flies in the face of the National Planning Policy Framework, ignoring guidelines put in place to protect the greenbelt. The Framework states that:

- The fundamental aim of the policy is to prevent urban sprawl by keeping land permanently open (para.79)
- New greenbelt boundaries should only be established in exceptional circumstances(para.82)
- Greenbelt exists to check the unrestricted sprawl of large built up areas (para. 80) and also to:
- prevent neighbouring towns merging (para. 80) and
- assist in urban regeneration by encouraging the recycling of derelict and other urban land (para.80)

There are no such exceptional circumstances to justify building on Sefton's greenbelt.

2. There are many derelict brownfield sites in Sefton. There must be a 'brownfield first' policy put in place to agree with paragraph 80 of the N.P.P.F.

3. Sefton's schools are already struggling to accommodate its education needs.

4. Medical facilities (doctor surgeries, dentist surgeries, hospitals) are at capacity.

5. Contrary to Sefton council's claims of a need for 11,000 new houses to be built, there is evidence to suggest a non-existent to minimal need. Sefton's population is in steady decline and over six thousand homes are currently vacant.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 995 **Response Ref** 1 **Representor Name** HH Jones
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

OBJECTION TO SEFTON'S LOCAL PLAN

Please acknowledge my objection to Sefton's local plan due to the following:

- Sefton's local plan is failing to acknowledge the strict guidelines of the National Planning Policy Framework. It clearly outlines the necessity of greenbelt protection, stating that it must only be released under very special circumstances, which are not evident.
- There are sufficient brownfield sites available to accommodate any true housing need in Sefton for many years to come. The N.P.P.F. insists that greenbelt boundaries must be adhered to in order to encourage urban regeneration. If a brownfield first policy is not adopted, urban regeneration is unlikely to occur, leaving large sites derelict throughout the borough.
- Flooding has already been a significant problem within Sefton. It would be foolhardy to deliberately increase the existing risk by building on greenbelt.
- The character of Sefton would be changed to its detriment as urban sprawl took hold, wiping out the boundaries between towns, villages, and even encroaching on the West Lancs border.
- It is known that a survey produced a negative response to the local plan in its current form, and that this survey was subsequently destroyed by Sefton Council. The entire consultation process was unequivocally flawed.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 996	Response Ref 1	Representor Name E Jones
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

OBJECTION TO SEFTON'S LOCAL PLAN

Please note my objection to Sefton's Local Plan based on the following criteria:

Sefton needs to retain its high grade agricultural land, which will be required for future crop production. Greenbelt land is protected under the terms laid out in the National Planning Policy Framework, which permits redefinition of greenbelt boundaries only

under exceptional circumstances. The local plan does not demonstrate such exceptional circumstances.

li) The N.P.P.F. also states that the openness and permanence of Greenbelt is to be adhered to.

lii) Urban sprawl would be a consequence of the current version of the local plan.

lv) Sefton cannot cope with a large scale increase in pollution.

V) Sefton does not have the means to cope with increased demand on its drainage system. Sefton lies in a flood plain and is already susceptible to flooding.

Vi) The population of Sefton has been steadily declining for several years. The projection figures put forward by Sefton Council are inaccurate and there cannot be the need for 11,000 new homes in Sefton.

Vii) It has come to light that there are several thousand empty properties across Sefton. If these lie empty, how can a demand for 11,000 homes exist?

Viii) The residents of Sefton are not being accurately represented by Sefton Council. No adequate consultation took place.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 997	Response Ref 1	Representor Name Mervyn Jones
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I object to the local plan proposed by Sefton council on the following grounds:

I was not adequately consulted about housing requirements and the local plan for Sefton.

I have deep concerns regarding flooding issues. Properties in Sefton have a history of flooding. Some residents in streets in Maghull were unable to return to their homes for one and a half years following floods of 2012. We simply do not have a drainage system to adequately cope with an additional 11,000 homes.

Actual housing requirements are, at most, a fraction of that proposed by Sefton council.

It is understood that there are over 6,000 empty properties in Sefton. Why have the council not factored these properties into their calculations?

Green Belt is only to be released under exceptional circumstances (NPPF), which are not evident.

The increase in traffic volume and associated pollution would be hugely damaging to health and would therefore be unacceptable.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 998 **Response Ref** 1 **Representor Name** Brenda Jones
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

OBJECTION - SEFTON'S LOCAL PLAN

I object to the local plan proposed by Sefton council on the following grounds:

- We, the public, have not been consulted fully regarding the local plan. The democratic process has been compromised and therefore has failed to arrive at a fair and majority decision.
- The National Planning Policy Framework document allows building on the greenbelt only under 'exceptional circumstances'. Housing need figures do not constitute exceptional circumstances.
- I wish the council to adopt a 'brownfield first' policy.
- Building cannot be justified while there are over six thousand empty properties in Sefton.
- The N.P.P.F. states that one of the functions of greenbelt is to encourage urban regeneration. All derelict and brownfield sites in Sefton should therefore be regenerated before any greenbelt release is given consideration.
- There have been previous issues with flooding in Sefton due to its low lying situation. It would be absolutely ludicrous to consider exacerbating the situation by building on greenbelt.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 1002 **Response Ref** 1 **Representor Name** Jan and Ted Murray
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

We agree with everything mentioned in the objection letter to the Local Plan (Save our Sefton) Our main objection is volume of traffic on the existing infrastructure. We cannot begin to imagine what Paradise Lane will be like considering what it's like now.

Summary of Suggested Changes

Evidence Submitted

Policy MN2 gen Housing, employment and mixed use allocations

Respondent No 1006 Response Ref 1 Representor Name John Colson

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

Objection to Sefton Local Plan

In presenting their local plan Sefton seem to have ignored many of the fundamentals of the National Planning Policy Framework. In his introduction to the policy the Rt hon Greg Clark MP states that it should be a "collective enterprise" residents of Sefton do not consider this to be the case.

I have concerns over the loss of green belt, valuable agricultural land and a very real risk of flooding. In the National Policy "Protecting the Green Belt" it is stated that a fundamental aim of the Green Belt policy is to prevent urban sprawl "To assist urban regeneration by recycling derelict and other urban land" and "innappropriate development is by definition harmful to the Green Belt and should not be approved except in very special circumstances" I do not believe the plan fulfills these criteria. Indeed in view of the government policy to discount new houses built on Brownfield sites by 20% to first time buyers one can only envisage,if the proposals go ahead, many unsold, unaffordbale new build to add to these already in the borough.

Developments proposed will only increase traffic, congestion and pollution. There will be increased pressure on already inadequate doctor, dentist, school and Hospital services. These proposals can only have a negative impact on Sefton residents and I object strongly to them.

Summary of Suggested Changes

Evidence Submitted

Policy MN2 gen **Housing, employment and mixed use allocations**

Respondent No 1016 **Response Ref** 1 **Representor Name** Robert Ketchell

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I am writing to you to submit my objection to Sefton Council's proposed Local Plan.

The population in Sefton is not increasing therefore we do not need extra houses. There are over 3000 unoccupied properties in Sefton.

There should be no building on A1 agricultural land which is a precious resource to the country and the community - all brownfield sites should be used first.

The loss of greenbelt will inevitably create urban sprawl which can already be seen in other parts of Sefton where they have joined West Lancs - plus the openness of the countryside will be eroded.

The proposed developments would have a damaging long term effect on the health and well being of the existing community, the local environment, and the natural habitat - and lead to an increase in pollution. It will add pressure on services to include doctors, dentists, schools and hospitals

It is clear that the infrastructure is not in place and that the local plan is relying upon the developers to ensure this is in place. This would lead to increased volume of traffic on roads which are already congested.

The council and councillors have been undemocratic in the whole local plan consultation and are not representing the electorate - most of whom are against it.

As stated in your own summaries areas suggested:- are Green Belt ,and are subject to flooding and have problems with drainage have insufficient infrastructure for additional transport have Grade 1 Agricultural Land Classification have significant historical classification have a reducing population.

Summary of Suggested Changes

Evidence Submitted

Policy MN2 gen **Housing, employment and mixed use allocations**

Respondent No 1017 **Response Ref** 1 **Representor Name** Norma Ketchell

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I am writing to you to submit my objection to Sefton Council's proposed Local Plan.

The population in Sefton is not increasing therefore we do not need extra houses. There are over 3000 unoccupied properties in Sefton.

There should be no building on AI agricultural land which is a precious resource to the country and the community - all brownfield sites should be used first.

The loss of greenbelt will inevitably create urban sprawl which can already be seen in other parts of Sefton where they have joined West Lancs - plus the openness of the countryside will be eroded.

The proposed developments would have a damaging long term effect on the health and well being of the existing community, the local environment, and the natural habitat - and lead to an increase in pollution.

It will add pressure on services to include doctors, dentists, schools and hospitals. It is clear that the infrastructure is not in place and that the local plan is relying upon the developers to ensure this is in place. This would lead to increased volume of traffic on roads which are already congested.

The council and councillors have been undemocratic in the whole local plan consultation and are not representing the electorate - most of whom are against it.

And as stated in your own summaries areas suggested:- are Green Belt Land are subject to flooding and have problems with drainage have insufficient infrastructure for additional transport have Grade 1 Agricultural Land Classification have significant historical classification have a reducing population

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

Objection to Sefton Local Plan

I wish to formally object to the local plan in its current form, and offer these comments for consideration by the inspector. I am aware that there are many documents being produced providing technical reasons for the rejection of this plan, and it is for this reason that I am adopting a more personal approach. These are my perceptions, and I hope they have the necessary impact.

(i) My primary objection is to the proposal to build on green belt land. There are many areas proposed for release for development, some of these do not pass the sequential test whilst other brownfield sites do pass the test. This makes no sense except that the profits, for the developer, on brownfield are not as high as new greenbelt sites.

(ii) The greenbelt land in question is some of the best, most versatile land in England. This fact cuts little ice with Sefton Borough Council (SBC), in fact they try to offer every possible excuse to describe sites as poor or low grade land that is difficult to farm. It beggars belief that they are prepared to allow this land to be lost forever in preference to utilising brownfield sites that stand derelict, one of which, to my knowledge, for 25 years.

(iii) Some brownfield sites are rejected or constricted because they are classed as 'contaminated land'. Yet there is one site in Formby that is extremely contaminated with white asbestos and PCB's, and that is currently being developed. This proves that, when necessary, any site can be utilised and it is only, once again, a profit driven argument.

(iv) Regarding the contaminated site in Formby, SBC have acknowledged in public that they do not have the resources to ensure any restrictions on the planning process get adhered to. It is public knowledge that the white asbestos was not removed, but was buried on site. It is also public knowledge that the behaviour and conduct of the developer used is deplorable, with representations having been made by local residents at all levels with little or no remedial action taken.

(v) SBC chose to use the services of Nathaniel Lichfield and Partners (NLP) for their preparation of the Local Plan. NLP are renowned for being used by major developers in their proposals to fight the arguments placed against them by local authorities. I question whether this company can be truly independent in their opinions and calculations and whether information acquired cannot be used in subsequent planning applications in Sefton. In other words the situation is not unlike playing chess against yourself, you know what is happening on both sides.

(vi) SBC have made it public that they have no way of dictating the quantity of affordable homes built on any development. So whilst headline grabbing announcements are made of 30% affordable homes, in reality the number can be as low as 10% or less.

(vii) There are figures quoted for a population increase, or head of household increase that are in conflict with Government figures. Whilst most agree that there is a housing problem with figures taken nationally, this is not always the case with regional growth. Sefton has numbers of immigrant workers that come and go, and an ageing population. Population figures in Sefton appear to buck the trend, and therefore negate the requirement for intense house building.

(viii) For all the sites sought, SBC propose only to utilise 75%. This skews figures and capacity capability. In Bootle, there is an area where over 400 small houses are being demolished to make way for 130 executive homes. This development has received significant and sustained opposition on the basis of small affordable homes that could be renovated are being lost to build more expensive properties that local people cannot afford in that area.

(ix) SBC appear to be lining up other agencies for failure and blame when planning the new developments. United Utilities (UU) have stated they can only accommodate 30 new build houses on any site per year. In most of the sites the sewers and drains are inadequate and would require significant investment. SBC state they have consulted with UU, but they fail to state the outcome of those consultations. The Environment Agency (EA) show generalised flooding as a problem in Sefton, the line of the river Alt has already been straightened over the years, resulting in faster flow and subsequently more demands on pumping. Funding is tight in the EA, and their stance is to reduce reliance on pumped drainage, not to increase it.

(x) Sefton mostly lies below mean sea level (in fact some areas are so low farmers allow for a 2 degree temperature differential compared to surrounding areas) For this reason water has to be drained inland before it is collected and pumped into the river Alt and out to sea. The geology of the area is such that groundwater is very high, and, because of the clay basin in which some of Sefton sits, surface water does not soak away effectively. Subsequently there is always a great deal of water lying on the top of the ground following relatively low rainfall.

(xi) To combat flood risk, developers propose to raise land levels, sometimes by up to 2 meters, in order to try and store water and provide a sufficient level to utilise gravitational drainage. This method is used at the contaminated site in Formby. At the very least, this method is visually very poor, but significantly, this also displaces water that would otherwise be held by the land.

(xii) SBC land drainage engineers have already stated that SuDS are not an effective solution in this area. But SBC continue to ignore all warnings, even by their own officers.

(xiii) The displacement of water, the reduction of holding capacity, the constriction of water flow across and through land, and the high groundwater levels are all reasons not to build on these green belt sites. In some areas in Formby previous developers had to stop building further onto land (that is now included in the plan) because it was saturated. SBC ignore these facts.

(xiv) Traffic flow in many areas of Sefton, at peak times, is gridlocked. In Formby, there are significant traffic flow issues, and parking and facility provision is already critical. To increase properties in the area by hundreds or thousands of houses will result in thousands more vehicles and ever more increasing traffic flow problems. SBC have conducted traffic surveys, some are more realistic than others, for example one traffic survey lasted for 30minutes during off peak hours and was conducted by a developer. SBC are well aware of traffic 'pinch points', however they do not offer any solutions to accommodate ever increasing traffic flow.

(xv) There are nearly 6000 empty dwellings registered in Sefton. I understand this to be a minimum figure as it is difficult to quantify. In Formby, there are 5 estate agents, lots of property for sale, and even more to let because they cannot sell. There are brand new properties that will not sell, and stand empty or await letting.

(xvi) A newly developed 3-bedroom house in Formby (on the contaminated development site) costs nearly £100,000 more than the same house (design and developer) in Bootle. Where is the affordability in that? SBC will not address this.

(xvii) In the preparation of this plan SBC say they have 'consulted'. They have not. They put forward a presentation of what they intended to do. They failed to consult with 9 of the 10 parish councils. They prevented community groups from attending stakeholder meetings (actually stating that should they try to attend then they would be asked to leave). They have refused to enter into any discussion about the local plan with local residents groups.

I deplore the attitude of this council toward the communities and residents that it is supposed to represent and support. It maintains total intransigence, always looks on the negative and has never once tried to explain how it has looked at alternatives to the question of planning. It is no secret that the head of planning resigned, without a new position to go to, because her personal professional opinions varied with that of the council.

I am aware of several residents that have reported SBC to the DCLG and that have asked the council is placed into special measures, as they have no confidence in the motives, ideals or integrity of several of the council hierarchy. These are my personal views and opinions.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I wish to formally object to the local plan in its current form, and offer these comments for consideration by the inspector. I have been flooded twice in 12 years during my 25 years in this house. Sefton Council do not even have a record of the flood in 2000, although there were pictures of this road and my house, being pumped out by the fire brigade, in the local papers. The local plan that Sefton Council is proposing ignores advice from its own officers, plans to build on greenbelt land before brownfield, and suggests building industrial sites where there is flooding and which will cause water to be displaced and back up into residential areas. Sefton Council have not even noted all the water courses on its plans which, as water movement is so vital in this area, is shoddy to say the least.

In my opinion Sefton Council have not consulted, and refuse to listen to the residents and communities of this borough. The majority party of the council are of a single mind-set, pompous, patronising, and are unvarying in their views and opinions on planning issues. There is no imagination, no vision, and no impetus to try and do the right thing by the residents of the borough they supposedly represent. Their decisions and motives are income and profit driven, self-promoting, and leave a very sour taste. I am personally afraid that this borough council is vindictive and parochial in its decision-making, and that flooding will become more frequent. I have no confidence in any planning decisions this council proposes, and I condemn the attitude of it towards both community and residents organisations and representatives.

As described by The Rt. Hon. Eric Pickles, this is a 'toxic borough'.
These are my personal views and opinions.

Summary of Suggested Changes**Evidence Submitted**

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

It is clear that many individual development sites will have a serious detrimental effect on flooding to existing nearby properties, but to develop all of these sites could have very worrying cumulative effects on the ability of many areas to drain correctly. This is particularly true in relation to removing the "buffer zone" of land at the edges of places like Formby, Southport, Maghull, Lydiate and Melling – there will be a severe loss of land that can absorb the natural flow of water towards the rivers and watercourses, without this, existing properties will flood on a more regular basis, even without taking climate change into account.

It may have come to your attention that many of these sites have very similar flooding problems – could it be that landowners are only coming forward to suggest their land be developed because they know only too well that the solutions to the problems that exist are not solvable within the sites themselves? Therefore, landowners who know only too well that there are problems see it as easier to sell the land and give the problem to someone else rather than try and solve a problem that is caused by river levels or land drains that they are not responsible for themselves and therefore have difficulty in solving.

This Local Plan appears to believe that if a site floods, it can be cured by developing the site. Apart from this being an entirely wrong approach, nowhere in the entire Local Plan does it show that the actual cause of flooding on a significant proportion of these sites is obviously external to the sites themselves. No amount of "tinkering" with the sites will actually cure the problems experienced by existing residents or the flooding on the proposed sites, Sefton Council need to re-assess the situation and admit that the cause of the problems is EXTERNAL to the proposed sites and until those issues are resolved, at best, all that developing sites will do is push the water and flooding into other areas. By pushing developments up to the immovable object of the River Alt (for example) there is nowhere else for the water to go but towards the existing housing near these development sites.

After the floods of 2007, The Pitt Review strongly recommended that Local Authorities, the Environment Agency, Water Companies and Riparian owners needed to work more closely together – yet it can be seen that despite the best efforts of experienced drainage officers within the Council, the Planning Department appear to be going ahead with a Local Plan that clearly fails to realise that developments that rely on the River Alt to drain them must also appreciate how the River Alt works and how the levels of the water in River Alt actually prevent certain sites from drainage properly. It is no use simply going ahead with developments whilst ignoring the fact that The River Alt and Downholland Brook (amongst many other watercourses) are not actually under the Council's control.

It is also apparent that Sefton's Planning Department perhaps does not understand the level of pressure they place on other departments to accept their ideas, even when other departments may say that developing a particular site is "not a good idea". Planners need to accept that advice given to them about development from other departments is given in good faith and is given by experienced people who have the best interests of the Council, the Council Taxpayer and the practicalities of real life at heart.

It is clear for many of these sites that significant works will have to be implemented to protect the new properties from flooding, unfortunately, in doing so, the only likely outcome is that these works will put existing properties at increased likelihood of flooding.

It is obvious that many of these sites have such serious flooding problems, caused by factors external to the sites, that they should have been discounted as possible development sites long before publication of this Local Plan. It appears that rather than viewing the sites on their genuine merits and suitability for development, a paper only plan has been produced that has more to do with theory than the real world. This has also affected the way Councillors have either supported or rejected the plan, it is clear that this plan may be more politically motivated rather than being designed provide the needs of existing and future residents, why else would developments be proposed for sites that so obviously flood.

It would be suggested therefore that Sefton must look at their Local Plan again, moving proposed developments away from locations that already flood and away from possible sources of flooding.

As it stands, the Local Plan cannot possibly abide by NPPF Ch 10 paragraph 100 "Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at high risk, but where development is necessary making it safe without increasing flood risk elsewhere."

If this means it is difficult for Sefton to meet the so called obligations for numbers of new properties, Sefton must accept this outcome, as must anyone who has developed this policy. It is not possible to continue developing land until it is all concreted over – that will undoubtedly cause more flooding.

Summary of Suggested Changes**Evidence Submitted**

Policy MN2 gen

Housing, employment and mixed use allocations

Respondent No 1036

Response Ref 1

Representor Name Brian and Christine McDonald

Organisation Name**Obj/Sup/Com** Objection**Summary of Main Issues**

I would like to submit our OBJECTION to Sefton's local plan on the following grounds.

The unforgivable destruction of Grade 1 agricultural land/ farm land when there is an absolute abundance of BROWN field sites with in the Borough of Sefton that are not being considered. We personally feel that it should be a policy of BROWN field first and then if needed other land. We would also like to object to the destruction of GREEN belt land as we feel in this part of the country we need as much GREEN belt as possible in order to maintain a level of clean air as possible.

We feel that as residents of this borough the elected councillors have shown a total indifference to the wishes of the residents who have continuously objected to the contents of this local plan and have literally bulldozed it through by the sheer fact of being a one party council."

Where we live is already prone to flooding, which has happened with in the last two (2) years, and we feel that if this plan in it's present form is passed it will/may increase the likely-hood of more flooding through the removal flood plains. And all this for the sake of houses which the future owners will have difficulty in getting home insurance for. May we remind you of the consequences of what happened to homes built on flood plains in Somerset not so long ago.

At moment my wife and I (being pensioners) have great difficulty in using local services i.e. Doctors, Hospitals, Dentists due to an already overloaded and densely populated area. Therefore by adding many thousands of new properties in to this equation we feel that these situations can only get worse. As for other services such as drainage and sewerage, the road that we live in has in the past been flooded by raw sewage escaping from the sewers due to them being very old and inadequate for the existing population.

Traffic in our area is to say the least is gridlocked quite often, owing to Switch Island. We know an awful lot of money is being spent to try and alleviate this but why spend all this money to get the traffic moving again and then increase the traffic by adding many thousands more cars to our roads. Traffic from Switch island quite regularly backlogs along Northway (A59) through Maghull making it extremely dangerous for our children going to and coming home from school.

When the local plan was first devised the developers where required to allot a certain percentage of properties built as affordable housing, this was subsequently printed in the published plan. But once their proposals had been accepted into the local plan a least one developer of a large site has declared that they would not be able to deliver the declared amount of affordable housing as there was no profit in these affordable homes. Thus leaving at least one of the main benefactors (our younger generations of first time buyers) still out in the cold. All for the sake of profit.

We trust that you will take into account our comments when reviewing the local plan

Summary of Suggested Changes**Evidence Submitted**

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 1038 **Response Ref** 1 **Representor Name** Anthony Griffiths
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I wish to object to Sefton Council's Local Plan to allow building on Green belt land. The national planning policy as set out in paragraph 89-90 of the National Policy. Chapter 6 page 47 para 6.69 of the Local Plan state that green belt boundaries should be altered only in exceptional circumstances. The Local Plan gives no details of the exceptional circumstances under which they have designated the Green belt areas surrounding Formby as suitable for development.

The projected population growth for the area in the period 215-2030 (Headroom update report page 27 3.33 Population change) is minimal and cannot be used as justification for encroaching on the Green Belt. Furthermore part of the Green Belt surrounding Formby which the local plan has designated as suitable for development is Grade 1 agricultural land, this fact has not been mentioned in the plan. Once prime agricultural land is built on it is lost forever as is the potential for food production in future in an uncertain world of climate change.

The country needs to produce more food at home to reduce its dependence on imported food and to reduce its carbon footprint to combat detrimental climate change. Allowing development on the Green Belt would set a precedent for the future to allow further loss of good agricultural land and erosion of the green space, the loss of wildlife and recreational spaces resulting in continuous urban sprawl.

Summary of Suggested Changes

The Local Plan should be changed so that all future developments are on brownfield sites.

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 1066 **Response Ref** 1 **Representor Name** Chris Jones
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I emailed the council planning department recently to enquire what provision the council had made for self builders in its local plan.

I was surprised to be informed that no such provision has yet been made. May I submit a formal request that the council fulfills its legal requirements to make building plots available to local residents who wish to embark on a self build project?
I am also informed that pending legislation will empower local residents to force local councils to meet these obligations, should they fail to do so.

In the light of this, could you please advise me on how the council intends to meet its legal obligations within the local plan for providing suitable plots for self builders?

Summary of Suggested Changes

Evidence Submitted

Policy MN2 gen **Housing, employment and mixed use allocations**

Respondent No 1283 **Response Ref** 1 **Representor Name** Louis Barnett

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

Whilst the plan may be legally compliant I do not consider it to be sound or to constitute sustainable development. It is a box-ticking exercise to meet unsustainable targets which bear no relation to real needs, based on the false premise that building on green belt land is an inevitable necessity to maintain roofs over people's heads. This is disingenuous, and probably represents an agenda driven by interests which stand to gain from manifestly unsustainable development. The question - where will it then end? - has no answer, which is essential for anything purporting to be considered sustainable.

However lengthy, expensive and scientific the draft reports and eventual plan, they are based on what is essentially guesswork about household numbers and population trends. There are however some inescapable facts.

Sefton and every area has its Plimsoll line, and the clogging-up of infrastructure, access to essential facilities and general environmental degradation are real and unavoidable if there is increased house-building, which benefits only developers and politicians desperate for a snake-oil solution to problems they can't cope with. Our infrastructure and local services are already failing, and with future cuts from central government support inevitable how can things be improved or the gap bridged for an increased population?

However, where people live is largely driven by choice - if you build it, they will come, as the film says. More housing in an attractive area will of course fill itself, and generate profits for developers who don't have to live here; this is not a question of local housing need but choice to live in certain areas, and by catering for this choice the area is ruined for all. Net in-migration is a matter of choice. People who can afford to want to live in the suburbs near to or on green belt areas, and the areas they leave will become more run-down. This mobility is fuelled by low interest rates when buying has become cheaper than renting.

This isn't about providing housing for Sefton people, but potentially importing people from outside to make money for developers. Sefton isn't a closed system; an increased supply will generate increased demand. The plan needs to represent the population who already live here, and defend a sustainable capacity level for Sefton that doesn't degrade the local environment against those who would profit from doing so.

Development can easily become a downward spiral, as each subsequent degradation is easier to justify as the character of an area changes for the worse - why bother to save the green residue, it's not worth the effort, just fill in the gaps with more housing. And there appears no coherent idea of where the tide will be stopped, or how housing will be balanced with other industrialization of the green belt via wind and solar farm applications: each case taken on its merits, with no coordination or defined idea of where it will all stop before all is lost, environment, agricultural land and wildlife habitat all buried under profitable concrete and industrial activity.

Which was the purpose of the green belt, to draw a line in the earth and define incursions as by definition unsustainable development. Now torn up for profit, as will any new, temporary line be in a few years' time.

It is easy to disparage local people as NIMBYs, but they are often the only ones who care about the local environment; the people drafting masterplans have other agendas and represent powerful interests to which a bit of green space is barely worth the lip-service when profit's to be made pursuing an unsustainable approach. It is disingenuous not to address the logic of this, and frankly admit there is no reason to stop and no definition of an ultimate limit to the process. Selling the pass is unsustainable.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 1284 **Response Ref** 1 **Representor Name** V White
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SOS Petition+
I agree with all the above grounds, it is unnecessary to build on green belt.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 1285 **Response Ref** 1 **Representor Name** Deirdre and Brian J Chessar
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SOS Petition+
The openness of the countryside will be eroded "and erased"
Loss of control of our border by building up to the border with our neighbouring authorities "Causing urban sprawl"
Increase in "air and noise" pollution and carbon emissions.
Ack of consultation and the "in"ability to answer questions raised by the public. "by Sefton Council"
The Council will be responsible for more wetlands, swale ditches and verges on the new sites which they will have to adopt. This will have a financial implication on services that are already being cut. "drastically"
The Local Plan "should be" is a living document and "should and must" will allow our Council to go back and "revert" revisit the green belt boundaries in the coming years.
A 20 year plan, prevent this from ever happening as development will quickly follow on foot thereof.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 1286 **Response Ref** 1 **Representor Name** AW and MW Bullock
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SOS Petition+
My wife and I totally support the above objections to Sefton Councils local plan, as residents of maghull for 60 years we have seen many changes, not all for the better, but this latest is a step too far, any encroachment onto the Green Belt is a backward step.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 1287 **Response Ref** 1 **Representor Name** I Roby
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SOS Petition+
All of these

We do not need any more building. We have not got police, fire, ambulance services. We have a town hall that is almost useless. We pay more community charge for this facility. We have lived here for 48 years. Have seen a real decline in the area.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 1289 **Response Ref** 1 **Representor Name**
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SOS Petition+
Don't forget safe sewage disposal, clean drinking water supply.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 1293 **Response Ref** 1 **Representor Name** B Spencer
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SOS Petition+
I definitely agree with the above listed objections.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 1294 **Response Ref** 1 **Representor Name**
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SOS Petition+
We have been told by united utilities that it is category class 1 flood area and I have the area maps to prove it!
Sefton Council know how we feel about this

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 1295 **Response Ref** 1 **Representor Name** R and BC Buckton
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SOS Petition+
Outlined points are particularly important ! + The whole planet breathes through the green areas, not through concrete and tarmac.

The loss of best and most versatile agricultural land.
Loss of wildlife and habitats.
Lack of infrastructure planning for additional housing.
Increased volume of traffic on roads which are already congested.
We want a Brownfield first policy in the Local Plan.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 1296 **Response Ref** 1 **Representor Name** J Moulton
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SOS Petition+
Building at back would devalue our homes as well.

Summary of Suggested Changes

Evidence Submitted

Policy MN2 gen **Housing, employment and mixed use allocations**

Respondent No 1298 **Response Ref** 1 **Representor Name**

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SOS Petition+
Periodic overloading of sewers.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN2 General	Other Documents
Policy MN2 gen	Housing, employment and mixed use allocations	
Respondent No 1301	Response Ref 1	Representor Name
Organisation Name Save Our Sefton Petition		
Obj/Sup/Com Objection		

Summary of Main Issues

We the undersigned wish to object to Sefton Council's Local Plan on the following grounds:

- Housing figures do not give "special circumstances" for building on the greenbelt.
- Sefton is unique in that it has limited land to build on due to the various constraints. On one side it's Coast Line, as well as SSSIs, National Trust, Golf Courses and large areas which are natural flood plains.
- The loss of green belt to Sefton, creating urban sprawl which has already occurred in the borough.
- The loss of best and most versatile agricultural land.
- The loss of farming communities and food production for the future.
- The openness of the countryside will be eroded.
- Loss of the control of our borders by building up to the border with our neighbouring authorities.
- Increased risk of flooding to existing properties.
- Loss of wildlife and habitats.
- Lack of infrastructure planning for additional housing.
- Added pressure on services to include Doctors, Dentists, Schools and Hospitals.
- Insufficient school places in the areas where housing has been allocated.
- Increased volume of traffic on roads which are already congested.
- Increase in pollution and carbon emissions.
- We want a Brownfield first policy in the Local Plan.
- Lack of consultation and the ability to answer questions raised by the public.
- The Council will be responsible for more wetlands, swale ditches and verges on the new sites which they will have to adopt. This will have a financial implication on services that are already being cut.
- The Local Plan is a living document and will allow our Council to go back and revisit the green belt boundaries in the coming years.

Anumber of people indicated specific points on the petition. These were numbered as totalled:

- Housing figures do not give "special circumstances" for building on the greenbelt. 6
- Sefton is unique in that it has limited land to build on due to the various constraints. On one side it's Coast Line, as well as SSSIs, National Trust, Golf Courses and large areas which are natural flood plains. 10
- The loss of green belt to Sefton, creating urban sprawl which has already occurred in the borough. 9
- The loss of best and most versatile agricultural land. 8
- The loss of farming communities and food production for the future. 8
- The openness of the countryside will be eroded. 6
- Loss of the control of our borders by building up to the border with our neighbouring authorities. 10
- Increased risk of flooding to existing properties. 14
- Loss of wildlife and habitats. 8
- Lack of infrastructure planning for additional housing. 12
- Added pressure on services to include Doctors, Dentists, Schools and Hospitals. 23
- Insufficient school places in the areas where housing has been allocated. 17
- Increased volume of traffic on roads which are already congested. 16
- Increase in pollution and carbon emissions. 11
- We want a Brownfield first policy in the Local Plan. 13
- Lack of consultation and the ability to answer questions raised by the public. 10
- The Council will be responsible for more wetlands, swale ditches and verges on the new sites which they will have to adopt. This will have a financial implication on services that are already being cut. 10
- The Local Plan is a living document and will allow our Council to go back and revisit the green belt boundaries in the coming years. 6

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 1303 **Response Ref** 1 **Representor Name** Mr, Mrs and Miss Cahill
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SOS Petition+

We have been in our house over 30 years and bought because of its natural location. We have already had factory units built right next to our houses. We once had sheep in fields next to us, this has long gone, we don't want more houses etc built next or near to our home.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN2 General **Other Documents**
Policy MN2 gen **Housing, employment and mixed use allocations**
Respondent No 1305 **Response Ref** 1 **Representor Name** Marie & Tom McVeigh
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SOS Petition+

In Maghull more than 10 farms have disappeared over time and the farmers have been evicted losing their income and work

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Southport Sites **Other Documents**
Policy MN2 Southpor **MN2 Southport sites**
Respondent No 5 **Response Ref** 2 **Representor Name** Elizabeth Thompson
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Sefton are proposing to build on parks in Southport and Wildlife areas in Ainsdale, this is madness, we need space for leisure activities.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Southport Sites **Other Documents**
Policy MN2 Southpor **MN2 Southport sites**
Respondent No 153 **Response Ref** 1 **Representor Name** Richard Hendry
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

We do not need further housing in Ainsdale. There is no secondary school in Ainsdale. I do not expect the prices to be charged will be affordable to most people. I do not think the villages infracture could cope with that many houses. The Nature Reserve proposed by Ainsdale Wildlife Trust would be available for use by not only Ainsdale people but the wider community of Merseyside as it is not to far from the Railway Station. The Reserve would protect the wildlife & fauna of the area.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Southport Sites **Other Documents**
Policy MN2 Southpor **MN2 Southport sites**
Respondent No 231 **Response Ref** 1 **Representor Name** Phyllis & Arthur Broughton
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Two schools in Ainsdale have closed, therefore there would be no places of learning for hundreds of new children that hundreds of new houses would produce.

There is a severe dearth of parking space in Ainsdale village now - imagine if there were any more cars to fight for spaces. If houses were built near the railway at Pinfold Lane, there would have to be a roundabout created just over the bridge, which would become an accident blackspot, judging by the speed that vehicles come over the bridge. There is only one Post Office in the area, and even now folk often have to queue outside (often in the rain) to collect pensions etc. The queue would be round the block if we were invaded by new people.

Can I suggest that Planners come to visit Ainsdale, preferably about 11.00 am or 3.30 pm to see how busy it can be.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Southport Sites **Other Documents**
Policy MN2 Southpor **MN2 Southport sites**
Respondent No 268 **Response Ref** 2 **Representor Name** Fred Weavers
Organisation Name Sefton MBC
Obj/Sup/Com Objection

Summary of Main Issues

The Kew roundabout in Southport causes traffic problems. Approximately 1000 houses have been given planning permission and Sainsbury's have been given planning permission for a superstore in the immediate area. There is Land identified for another 800 houses in the area add in land identified for employment a primary school a high school a sixth form college Meols Park playing fields then ask what are the plans for controlling traffic at Kew Roundabout?

Summary of Suggested Changes

Evidence Submitted

Policy MN2 Southpor **MN2 Southport sites**

Respondent No 304 **Response Ref** 1 **Representor Name** Nicholas Fellows

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I am writing in dismay regarding Sefton Council's Revised Local Plan regarding the plans for new housing in the Churchtown and the Crossens area. The main objection I have is that the area simply does not have the infrastructure to support the development of over 800 houses.

Location. These developments are at the most northern point of Sefton. Why is there such a high concentration of new housing to be built solely around the Churchtown/Crossens area? There are no dual carriageways, motorways and infrastructure to support these developments with an already struggling road network. The Meols Cop area which is an arterial route out of Southport is already at capacity for congestion and as a result car commuters use the farm roads to get in and out of Southport that are not designed for that purpose or amount of traffic. There is already 20 mph traffic calming in the Churchtown area and Bankfield Lane has speed bumps and a weight restricted bridge. In addition, Churchtown Village is a one way system with no room to develop the roads as it has listed buildings. How is the area going to support another 1000 plus cars? The local roads will simply not support such an increase in traffic. I drove home yesterday and Churchtown was at a standstill in the evening rush hour and the school traffic in the morning and afternoon bring the area to a halt.

Schools. All the local schools St Patricks, Churchtown Primary, St Johns and Larkfield are all at capacity and have no further land to develop to increase classrooms for the extra children that would move into the area. Within Sefton there are school places available but the majority of these are in South Sefton so why develop the majority of houses in an area with no availability.

Health. The local GP surgeries could not cope with the large influx in population as most practices are either running at or near capacity. The local hospital services are already stretched and having already lost or are losing additional services that are being transferred to Liverpool hospitals. This is against national policy that is encouraging services to be available for local people. Where you propose to build the new houses is the furthest point away from these Liverpool Hospitals. Also the new houses will be developed for numerous families with the nearest Childrens A&E now being in Ormskirk. We know how difficult it can be to get to Ormskirk in the summer and Bank Holidays with the traffic but these houses will be at the furthest point away from the services with no direct transportation link and access for families without cars. The new houses will significantly increase CO2 emissions and create noise pollution to the area and existing residents as this is development on a massive scale.

Employment. Where are the jobs to support this new population? Southport has no industry to speak of and we are already reliant on service industries in the town many of which are closing. Potential new residents will have to commute to other areas for work putting further strain on the already struggling road network.

Green Belt. Why is Southport and particularly the Churchtown/Crossens area losing double the amount of green belt as a percentage than the rest of Sefton? This is productive land and amongst the most fertile in the UK. Nationally carbon emissions for the UK need to be reduced so we will need to be more self-sufficient so why are we developing prime green belt land that is used for agriculture and also for local shooting parties that bring extra income and jobs to the area. Once this land is developed it can never be returned for farming. Farming does provide work for the local population and this land will potentially reduce the need for these workers.

Flood Plain. Why are you building houses on a flood plain? This is against government and national policy. The owners of the new proposed housing will have to foot the bill for additional insurance premiums.

Phillips Factory. The land at the previous site of the Phillips factory has recently been made available for housing development. This is good news as the site has been derelict for years and got vandalised frequently. It has now been cleared ready development. Why therefore, have you kept the proposed site on green belt land off Bankfield Lane when you have now got this site? This is increasing development even further in an area that simply does not have the infrastructure to support it. The inconvenience to residents like myself that will be surrounded by developments will be massive. My daughter has asthma and I am massively concerned about her health with both the Phillips factory and the site off Bankfield Lane being developed.

Churchtown Village. The character of this small village will be destroyed by the development of so many new houses which won't be in keeping with the local area.

Population Studies. Where is the evidence that we require all these new houses in Southport and Sefton? The studies Sefton quote are already outdated. National studies demonstrate that housing is needed mostly in the SE of England not in Sefton and Merseyside.

I live at The Mallards in-between the Phillips site and back onto the proposed green belt development site. We will be affected

more than anyone else in Sefton and we will potentially be surrounded by new developments. We already have new structural cracks since the Phillips demolition began. We worked hard to afford our house and its value will plummet as a result of these developments.

I am flabbergasted that Sefton Council have proposed such large scale developments concentrated in one area of Sefton that simply does not have the infrastructure to cope. In addition, it is a scandal that we are developing on green belt land and I really do question why Southport is losing a much higher percentage of green belt land than the rest of Sefton. To me these developments already seem a done deal between Sefton Council, the developers and the landowner. Of course the developers would rather develop in Southport as potentially they can increase their profits in comparison to other areas in Sefton.

Summary of Suggested Changes

The Sefton Local Plan should significantly reduce the number of houses being proposed to be developed in Southport and specifically the Churchtown and Crossens area for all the reasons listed above.

Evidence Submitted

Chapter 6		Plan Order MN2 Southport Sites		Other Documents
Policy MN2 Southpor		MN2 Southport sites		
Respondent No 350		Response Ref 2	Representor Name Carol and Stephen Hosker	
Organisation Name				
Obj/Sup/Com	Objection			

Summary of Main Issues

The proposed building on these sites [in Southport] is not justified because it is driven by Central Government edict to build a certain quota of new dwellings, regardless of demand for housing in these areas. This is building for building's sake. These proposed development sites are far too extensive and deleterious to wildlife habitats. We also consider that the current Plan is unjustified because there are still many properties still lying empty and unused. In a similar vein, we think that the under-utilisation of brownfield sites (e.g. in Crowland St, Southport) undermines any justification of the scale of the proposed development.

The actual demand for new housing is not known; such extensive building should not be countenanced until this demand has been properly quantified. To go ahead and build would be to destroy arable and other greenfield, previously undeveloped land with the very real possibility that supply will outstrip demand - the green space therefore having been degraded and lost for no good reason.

Summary of Suggested Changes

A revision of the Plan should:

1. Significantly reduce the area of Green Belt to be built upon.
2. Fully utilise all brownfield options (e.g. Crowland St, Southport, please see specific emailed objection from us regarding this.)
3. More actively explore and implement effective measures and incentives to bring empty properties back into use.
4. Should include research to ascertain the actual extent of housing shortage/need before proceeding with any building.

Evidence Submitted

Chapter 6		Plan Order MN2 Southport Sites		Other Documents
Policy MN2 Southpor		MN2 Southport sites		
Respondent No 405		Response Ref 4	Representor Name Michael Perkins	
Organisation Name				
Obj/Sup/Com	Objection			

Summary of Main Issues

There are quite a few land space areas outside the greenbelt not being used effectively that could accommodate some housing requirements. (eg Fairway and Kew Park & Ride sites).

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Southport Sites **Other Documents**
Policy MN2 Southpor **MN2 Southport sites**
Respondent No 481 **Response Ref** 1 **Representor Name** Barrie Partington
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

In Southport alone we have 6000 properties vacant and nationally the figure is 1 million. Occupy these proprties first and foremost. The Southport population is static and has even fallen over the last 15 years, therefore demand for even more houses is not justified.

Ainsdale had a massive house building programme in the late 1960s and early 1970's resulting in its infrastructure being stretched to the limit, e.g. roads are always busy; schools classrooms full to capacity with two schools closing recently; the hospital at Kew cannot cope with the present ageing population; ambulances re-routed to other hospitals as well as outside Southport.

Local Government and Planners should put pressure on the Government to stabilise the UK population, e.g. by implementing a two child policy. Only skilled immigrants should be allowed entry in the UK. Repatriate the 580,000 eastern europeans and leave the EU. The North West is just about the most urbanised area in the UK and fast apporach a tipping point. Overdevelopment of this island will ruin the landscape for future generations and have a catastrophic effect on wildlife.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Southport Sites **Other Documents**
Policy MN2 Southpor **MN2 Southport sites**
Respondent No 482 **Response Ref** 1 **Representor Name** Sharon Partington
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I am opposed to the proposal of building properties on the Green belt in the Ainsdale area. This will effect the wildlife and the environment. There is no infrastructure to support the increase in population: closure of police station, closure of schools, closure of library, additional pressure on limited on limited social services, additional pressure on health services which are pressured, e.g. GPs and hospitals, especially A&E, public transport cuts, no rest or nursing homes.

I do not agree that Sefton should fill our open Green belt spaces with affordable houses. The residents of Ainsdale are concerned that this could lead to social disorder, crime in an area that has not experienced such a growth in population.

I want our nature reserve protected and all the wildlife. E.g. Natterjack Toads, Sad Lizards, Red Squirrels. More houses means more pollution and more traffic on te roads which will effect the health of all the residents.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Southport Sites **Other Documents**
Policy MN2 Southpor **MN2 Southport sites**
Respondent No 609 **Response Ref** 2 **Representor Name** M E Baylis
Organisation Name
Obj/Sup/Com Comment

Summary of Main Issues

There are many brown field sites around Southport which have good vehicle access and will not disrupt existing communities. For example the land around Southport and Formby Hospital, much of which appears to be scheduled for commercial development which is never likely to happen.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Southport Sites **Other Documents**
Policy MN2 Southpor **MN2 Southport sites**
Respondent No 657 **Response Ref** 4 **Representor Name** Robert Burns MBE
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

One of the 'drivers' of The Plan, is to help with the regeneration of The Port of Liverpool. I appreciate that Sefton is part of the conurbation of Merseyside, being one of it's 5 boroughs, but the Port itself is not in Sefton - it is in Liverpool City Council. There is a small percentage of the Docks which falls in the Sefton area in Bootle. My observation to the Independent Inspector is: how can the building of approximately 850 dwellings on the northerly border of Sefton, which is approximately 25 miles away from The Port, assist in any way? There is no direct rail line, so either a combination of buses and trains or cars will be required to reach The Port, not an environmentally 'green' solution - assuming that there will be employees or users of The Port living on this northerly border.

It is contained in The Plan that there is little employment in the Southport area, apart from low-pay 'care-home' type employment, most other employment for north-Sefton residents is in Preston, Liverpool or Manchester and, as already stated, all over 20 miles away, again resulting in further congestion and pollution.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Southport Sites **Other Documents**
Policy MN2 Southpor **MN2 Southport sites**
Respondent No 657 **Response Ref** 8 **Representor Name** Robert Burns MBE
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

It is well documented that services are under great pressure these days, local authorities struggling to provide sufficient care and assistance to the community, and Churchtown is no different. The local health centre is over-subscribed and under resourced, both local junior schools in a similar situation. As previously mentioned there are little opportunities for employment in and around Southport, the last 'employer' of any note was in fact the council, but most of those jobs have migrated southwards to Bootle, adjacent to Liverpool. I speak with personal experience that many of the services previously provided at Southport District Hospital have likewise moved to Liverpool and are being delivered by Aintree and Broadgreen Hospitals.

All of this paints a rather depressing picture of Southport, yet we are considering building many hundreds of dwellings in an area already struggling to cope, with very little opportunity of local employment. If the borough is in need of thousands of new homes, would they not be better placed nearer the areas where employment is more likely?

Southport Courts recently closed down, and there are currently negotiations taking place regarding the number of police stations which will remain in Southport, if any. The developments along Bankfield Lane are literally on Merseyside Police's northern most edge; 999 'code 1' deployments take ages to arrive and due to the shape of Sefton, Lancashire Constabulary vehicles are more visible on Bankfield Lane whilst policing their Southern Division, than Merseyside units. How is Merseyside Police supposed to manage the increased demand, generated by these rural developments?

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Southport Sites **Other Documents**
Policy MN2 Southpor **MN2 Southport sites**
Respondent No 657 **Response Ref** 7 **Representor Name** Robert Burns MBE
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Unsuitable Bedrock for Development – Specifically North Sefton

On 13th March 2015 a sinkhole appeared in Churchtown, ½ mile from the proposed development on Bankfield Lane’s Green Belt, a similar hole appeared in Ainsdale during the 1990’s. I intended citing these occurrences in my objections, specifically mentioning how fortunate we had been that neither of these sinkhole incidents caused an explosion. I expected that such an observation would have been dismissed by Sefton staff by means of a meaningless statistic whereby an explosion occurs every 1:1000 years of other suitable method of being fobbed-off.

Imagine my delight when another sinkhole appeared 8 days later on 21st March 2015, in Crossens 250 yards from the development, on this occasion causing an explosion; however, I was very pleased that nobody was injured.

Most of the land in North Sefton, as categorised by the Environment Agency, is Designated Bedrock – Secondary B Aquifer i.e. predominantly lower permeability layers which may store and yield limited amounts of groundwater due to localised features such as fissures, thin permeable horizons and weathering. As a consequence it is prone to this type of subsidence and the likelihood of a gas pipe being ruptured is obviously increased in the more developed areas. We are all very grateful that nobody yet has been injured (or worse) by these incidents but, should Sefton be increasing our risk of further explosions by proposing developments in these vulnerable areas?

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Southport Sites **Other Documents**
Policy MN2 Southpor **MN2 Southport sites**
Respondent No 658 **Response Ref** 1 **Representor Name** Stewart Porter
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I am writing to place on record my concerns at the proposals for new housing.

The plan seeks to place many of the houses in Southport and particularly in North Southport which is out of balance to the rest of the Borough and an area with the poorest transport links.

Some of the evidence presented by developers and land agents is wrong and I would suggest has been written by consultants who have no local knowledge and never visited the proposed sites.

The plan does not properly the address the issue of “Living above the shop”. There are hundreds of potential housing units above shops in Southport and no attempt has been made to bring this Brown Land into use.

Likewise the council continues to grant planning consent for large houses to become offices whilst many existing office in the town centre remain vacant.

The plan fails to look at this issue.

It is my contention that bringing these types of accommodation into the housing stock could produce many hundreds of units.

This would be sustainable development with little impact on transport infrastructure bring back life and vitality to the Southport town centre. It could reduce the amount of green belt required for development.

Summary of Suggested Changes

I request the number of planned houses in North Southport is significantly reduced

The units of accommodation can be achieve by use of brown sites above shops in the town centre

Evidence Submitted

Policy MN2 Southpor MN2 Southport sites

Respondent No 658 Response Ref 2 Representor Name Stewart Porter

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

The proposed local plan suggests that 1542 houses should be planned for North Sefton. Coupled with proposals in the West Lancashire Local Plan where they intend to permit a large number of houses adjacent to the Sefton Boundary.

North Sefton has the poorest transport links being reliant on an outdated village style road system on which car and buses are the only viable transport links.

Traffic surveys presented to you as evidence were taken at times of the day when traffic flows are lower. Around commuting and school run times many roads suffer gridlock and no amount traffic management will alleviate the situation. Cars already queue the full length of Mill Lane and Botanic Road at peak times. The main A565 is queued regularly both in and out of town and this is much worse in the summer holiday season.

New housing developments will make traffic much worse. Particulate matter air pollution contributes to lung cancer incidence in Europe; the inevitable queuing traffic will pollute the air and cause ill health to Sefton residents

One developer/land agent suggests there is a road link across the moss from Moss Lane, Southport to Rufford; this is in fact an unmade farm track and the cost of purchasing the land and upgrading it to adopted road standards would be prohibitive. The same applies to the numerous other farm tracks in the North Southport hinterland.

The plan suggests that section 106 agreements will pay for much of the required infrastructure improvements, however this area has such poor infrastructure demanding Section 106 agreements will threaten the viability of some developments. Reducing the number of proposed houses is an essential to maintain the viability of development

Schools

The number of additional pupils generated from new housing developments may be estimated as follows:

- An additional 3 children per 100 family houses per year group will be generated for primary and pre-school numbers, (7 year groups);
 - An additional 2 children per 100 family houses per year group will be generated for secondary (5 year groups).
- For North Southport this will mean 47 new junior school pupils for each of the seven year groups and for 30 new secondary school pupils for each of the 5 year group. Yet the plan glosses over where, when and how these places will be created. Existing schools are already over developed or on restricted sites which are not suitable for further expansion. The plan fails to address these issues.

Emergency Services

Restricted access particularly to the Moss Lane site will limit or even prevent access by emergency services. The traffic gridlock mentioned previously will impact on response times.

Essential shops

Essential local shops exist but access to them is restricted by the poor transport infrastructure and extremely limited on street parking. Many of the proposed houses are not within walking distance of essential shops.

Community facilities

Save for a couple of local pubs and churches there are no community facilities. The council recently closed a local museum and a library.

Leisure Services

There are very limited facilities for sports and no provision for organised sports coaching. There are a number of children’s play areas but these are run down and under resourced. There is nothing to occupy older/teenage children. One local park Botanic Gardens has been run down in a concerted effort by Sefton Council. The Council plan to dispose of playing field on Preston New Road the A565

Summary of Suggested Changes

I request the number of planned houses in North Southport is significantly reduced

Evidence Submitted

Chapter 6 **Plan Order** MN2 Southport Sites **Other Documents**
Policy MN2 Southpor **MN2 Southport sites**
Respondent No 665 **Response Ref** 7 **Representor Name** Tony Dawson
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

My main concern is that the plan appears to be entirely driven by estimates of needed private housing numbers. Others have commented in detail about the possibly incorrect assumptions behind the numbers 'required' in the plan so I shall comment more on the lack of clear vision for how the real housing needs of the Borough, and Southport in particular, will be met.

In a plan which claims to meet government strategic objectives in respect of energy conservation, one might expect the Local Plan to attempt to meet the clear need of the population which is overwhelmingly for small units located centrally in places where there is a facility to walk or cycle to many services or to easily access regular and frequent public transport. Instead, we have a plan which appears to facilitate the building of three and four bedroom houses (a market which is not short of properties) on green fields, some of it high grade agricultural land, in places where there is little infrastructure and people will have to travel many extra miles each week, mostly by car.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Southport Sites **Other Documents**
Policy MN2 Southpor **MN2 Southport sites**
Respondent No 687 **Response Ref** 4 **Representor Name** Diana Sayer
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Woodvale Airfield

The proposed development site for Ainsdale by Woodvale airfield at Woodvale has been withdrawn following consultation feedback in 2013. This airfield has minimal flying activities, and may be subject to military cut backs. It has immediate access onto the A565 dual carriage way all the way to Liverpool and the new £19.5 million link road that connects cars to Switch Island and 3 Motorways. This does seem to be an ideal site for development and the council needs to more closely scrutinise the suitability of this site.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Southport Sites **Other Documents**
Policy MN2 Southpor **MN2 Southport sites**
Respondent No 688 **Response Ref** 1 **Representor Name** Ann Rimmer
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Settlement Area Southport, Site Address Land south of the Coastal Road Ainsdale, Site Area 20.9. The community would request that an alternative be looked into with one possible option being the above site. This site has many more positives as opposed to Moss Lane which the community would consider to be the following:

Similar size if possibly larger than Moss Lane so would accommodate the same number of affordable houses if not more. Infrastructure of the Roads and other public services are already in place and would require less cost to be spent on improvement for the developer. Impact of increase in traffic and population would be less of an issue in this area as opposed to Moss Lane as this area has a wide range of facilities and services that is suitable of supporting large scale development in an area that will be deliverable and attractive to the market.

Speedier travelling time to Preston, Liverpool and other surrounding areas see below: Access to Preston via Coastal Road - Mersey Path - onto A565 - Southport New Rd - Preston. Access to Liverpool via Coastal Road - A565 all the way to Liverpool. Access to M57 via new Thornton Bypass link to Switch Island. No identified impacts on designated heritage assets. Lesser impact on the Landscape at this site as opposed to Moss lane.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Southport Sites **Other Documents**
Policy MN2 Southpor **MN2 Southport sites**
Respondent No 728 **Response Ref** 4 **Representor Name** Martyn Sayer
Organisation Name Churchtown Green Belt Action Group
Obj/Sup/Com Objection

Summary of Main Issues

Sefton Council's Green Belt Study considered site S011, Land at Birkdale Hills, south of Eco-Centre. This site was dismissed at stage 2 of the assessment on the basis that it is not contained by the urban area. However, it is not clear how site S011 can be considered to be not contained by the urban area and dismissed but preferred site SR4.03 is clearly, on this basis considered to be contained by the urban area. As identified earlier in these representations the Site SR4.03 is surrounded by Green Belt and is separated from the urban area of Churchtown and Southport by Green Belt. The sites should have been assessed on the same basis.

Site S011 is located on the southern edge of Southport town centre and is in a significantly more sustainable location than preferred Site SR4.03. It does not have a wildlife designation according to the assessment and despite the Council's assessment is well contained by Esplanade to the east, Costal Road to the west and the Coach Park to the north. It has existing quality roads which would not require any potential improvement. It does not serve any of the five purposes of Green Belt identified by NPPF. On a basis of 30 dwellings per hectare this site could potentially accommodate 300 houses but given its location in close proximity to Southport town centre a higher density would be justifiable and the site maybe suitable for 400 houses or more.

Summary of Suggested Changes

Evidence Submitted

Local Plan Representations, Matthews and Goodman September 2013
Transport & Highways Review September 2013

Chapter 6	Plan Order MN2 Southport Sites	Other Documents
Policy MN2 Southpor	MN2 Southport sites	
Respondent No 728	Response Ref 6	Representor Name Martyn Sayer
Organisation Name Churchtown Green Belt Action Group		
Obj/Sup/Com Objection		

Summary of Main Issues

South of Coastal Road, Ainsdale

This site should be reconsidered for development [Sefton have not allocated it in the Publication draft]. It is more suitable and sustainable, and not affected by our environmental or infrastructure issues. Sefton should review this option and its risks carefully in view of government cost cutting/culling of military resources. This station may be at risk of closure, or no longer fulfil a viable economic role for the RAF in the next few years. If closed it would provide an excellent opportunity to introduce and provide new leisure facilities, or centre for sports excellence - to be enjoyed by Formby and Southport residents.

The site is in a prime commuter belt with excellent access to transport and network links, e.g., adjacent to rail and bus routes, and A565 Formby bypass - which is about to be connected to a new £19.5M link to Switch Island motorway connections (M57/58.....and M6/62 etc.), due to be opened in May 2015. Development on this site would add to the long term business benefits of this link.

The airfield carries out very limited flight training and there appears to be no use for private aircraft. Have Sefton obtained and assessed data on how many flights are logged per week/month/annum? There may be some specific risks from aircraft, but it should be recognised that this is a very small military airfield that only occasionally accommodates operational military aircraft. The flight risks should be carefully assessed for this low risk airfield, e.g., landing/take-off, and noise, as modern prop-driven aircraft engines are very quiet and efficient.

Summary of Suggested Changes

Evidence Submitted

Local Plan Representations, Matthews and Goodman September 2013
Transport & Highways Review September 2013

Chapter 6	Plan Order MN2 Southport Sites	Other Documents
Policy MN2 Southpor	MN2 Southport sites	
Respondent No 737	Response Ref 3	Representor Name
Organisation Name		
Obj/Sup/Com Support		

Summary of Main Issues

Our clients (the owners of site MN2.5) agree with the Authority's approach towards housing distribution and logically a number of proposed housing allocations are located within and adjacent to the Authority's main settlements.

The proposed allocation sites at Southport will deliver circa 1,757 new dwellings which is justified as it is one of the "North West's main coastal resorts", the population of Southport is expected to "increase significantly" and Southport has the "greatest need for affordable housing due in part to the high house prices and a restricted supply of affordable housing" (Local Plan Publication Version).

"Southport's ability to grow is constrained by the coast to the west, the boundary with West Lancashire in the North and East and RAF Woodvale to the South" (Local Plan Publication Version).

Although our clients site was (at earlier stages of the Local Plan preparation) was identified as a mixed housing and employment site, this is not viable. Sefton's employment requirements can be met elsewhere within the Authority such as land at Southport Business Park and land to the south of Formby Industrial Estate which we understand is now proposed for employment development (7 hectares) (site reference MN2.49).

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Southport Sites **Other Documents**
Policy MN2 Southpor **MN2 Southport sites**
Respondent No 1034 **Response Ref** 1 **Representor Name** Stephen Giles
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

Site to the south of the Coatsal Road, Ainsdale

I understand a site at Woodvale has been proposed but rejected by the MOD. This should be looked at again.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Southport Sites **Other Documents**
Policy MN2 Southpor **MN2 Southport sites**
Respondent No 1035 **Response Ref** 1 **Representor Name** Diane Culverhouse
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I object to the Sefton Local Plan. It is not legally compliant because developing greenbelt land is only justified as a last resort.

I object that the sites of the Sefton Local Plan, for building a total of 1506 houses, are ALL within North Southport, on the top boundary and a long way from the centre of the borough, and principally around the historic village of Churchtown. Why is the Local Plan for Sefton borough limited to housing development in this small area? Is there a political motivation in this - Churchtown being geographically about as far away from the Bootle-based council as you can get?

I object to the four developments being in such close proximity to each other – and together causing too much pressure on the infrastructure. This will impact on the road traffic, already too overloaded, and resulting in heavy congestion on : Mill Lane, Roe Lane, and the route through Churchtown and through to Crossens, where the traffic will then be joined by the vehicles from the two development sites at Bankfield Lane and Balmoral Drive, no doubt causing considerable queuing on the Phillips Factory Bridge – on one of but two roads out of Southport to Preston ; The Moss Lane and Crowland Road sites are very near to each other – will they be linked by road? Building a total of 1506 houses in such a small area (at an average of 2 cars per house as well as works vehicles), will cause further danger to local residents and pedestrians, especially the elderly and children, attempting to cross roads and cycle, and damage to property (much built on sand), including Grade I and II listed in much of the area. The transport link from the Moss Lane site out to Ormskirk, Wyke Lane, will also be heavily congested. Wyke Lane, frequently used by cyclists, already has a considerable history of road accidents; Roe Lane roundabout, already very dangerous, spills traffic out onto Mill Lane (through Churchtown), and onto Roe Lane and High Park, where at Meols Cop that traffic will meet the extra traffic coming out of the Crowland Street development site around the corner. The increased housing will place too much pressure on Southport hospital, (there already has to be an overspill to Ormskirk), local schools, surgeries, homes for the elderly and emergency services.

Building housing, drainage etc will result in a threat of flooding to the whole adjacent area, and Meols Hall is already affected by flooding. The dyke drainage system so characteristic of the agricultural land in this area is visual evidence that the Moss Lane, Bankfield Lane and Crowland Road land is prone to such problems.

The proposed widening Moss Lane could not be completed without destroying the historic bridge, a feature which not only enhances the area but can only take single lane traffic. The creation of new roads will impact on Wyke Lane. I object to the fact that the Local Plan will decrease and spoil the current quality of “openness” and increase the sense of suburbanisation of the area around Wyke Lane and Churchtown, the North Meols conservation area, Churchtown’s green-belt and heritage sites, its Grade I and II Listed buildings; the Moss Lane planned site will impact negatively on this current area of natural beauty and the public’s access to its extensive views of the scenic Lancashire, Ormskirk, Parbold, Winter Hill of Bolton, Trough of Bowland and Pendle Hill. Damaging this environment by building housing estates will also drive away local wildlife including protected species eg the water voles, larks and oyster catchers that habitually nest around that land, herons, swans, ducks, hawks and other treasured wildlife.

Summary of Suggested Changes

Evidence Submitted

Policy MN2 Southpor	MN2 Southport sites
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Respondent No 1075	Response Ref 1	Representor Name P Abbott
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Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

We Object to Sefton's Local Plan proceeding for the following reasons-

Proposed 11,070 homes, 50% on greenbelt land.
2,183 for Southport + 700 just starting at Kew.
1,542 of these along a narrow <3 mile stretch at the N.E of Southport
1,348 on greenbelt land, bordering with W.Lancs.
An unfair distribution + unsustainable within such a small area.

At last census- S/P population falling- many schools were closed throughout Sefton. S/P- large elderly population- well catered for with many 1-2 bedroom appartments with similar, affordable accomodation in abundance for younger people. House prices, contrary to the S of Eng have been falling over the last few years: plenty of available, affordable homes for families. So no need for this high no of new homes especially in such a small concentrated are of the borough. " Development on green belt land only justifiable in exceptional circumstances" (National Planning Policy Framework)

Southport- a coastal tourist town - only 2 arterial road at least 20 mins from motorway network. Commuters to Liverpool, Preston and Manchester cause grid-locked roads- even worse during holiday season. Roads cannot take any more traffic, especially the narrow winding A570 Ormskirk road- already hazardous as the only route for emergency ambulances between 2 separate A+E department at SP and Ormskirk hospitals.

S/P infrastructure- totally inadequate to support a development of this size. Our victorian sewers are bursting causing carriageways to collapse- twice in Chruchtown in last few weeks, causing hazardous diversions for sometimes many weeks. A+E dept at breaking point, GP surgeries, dentists + schools all over subscribed. Our courts, Local police stations, sme day centres+ all local libraries have been closed. Our 2 renowned parts in Churchtwon are being run down as all maintenance staff have lost their jobs + equipment in children's play areas will not be replaced . A potential danger no room to expand Churchtown schools or the local health centre. Many town centre shops closed as rates too expensive + only limited light industry . Insufficient work to sustain proposed vastly, increased population. No of crowland st (High Park) proposed houses has more than doubled to 678 without the original planned industry - another loss.

Summary of Suggested Changes

Evidence Submitted

Policy MN2.1	Bartons Close, Southport
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Respondent No 1	Response Ref 1	Representor Name David Walshe
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Organisation Name

Obj/Sup/Com Comment

Summary of Main Issues

There are currently only two main roads connecting Crossens with Churchtown, Preston New Rd and Rufford Rd/Bankfield Lane. Balmoral Drive also acts to many locals as a connecting road between the two districts with drivers attempting to beat the congestion on Preston New Rd or avoid the car damaging speed bumps on Bankfield Lane. The average speed on Balmoral Drive I estimate to be at least 40mph, however some drivers drive much faster. Have concerns over the safety of children on these roads. What measures will be put in place to cope with the additional traffic? May I suggest speed bumps are removed from Bankfield Lane.

Summary of Suggested Changes

None

Evidence Submitted

Organisation Name**Obj/Sup/Com** Objection**Summary of Main Issues**

This land was set aside some years ago for a future Water Lane bypass, there having been a number of accidents over the years on the stretch of road this was to bypass, some fatal.

Whilst I appreciate the proposed bypass has been shelved indefinitely, I understand on financial grounds, the construction of housing or other buildings on this site would prevent the bypass and leave Water Lane as the only road available to Preston for the future to come.

Traffic on Water Lane has increased steadily over the last few years. This increase is likely to continue despite government efforts to reduce traffic generally. Water Lane is not particularly wide and it does not take much of an incident to cause huge traffic problems. Even a legally parked vehicle can create considerable hold ups.

In view of the above I would strongly urge you to reconsider the inclusion of this plot of land in your Local Plan.

Summary of Suggested Changes**Evidence Submitted**

Policy MN2.1 Bartons Close, Southport

Respondent No 290 Response Ref 1 Representor Name Clair Fellows

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

The main objection I have is that the area simply does not have the infrastructure to support the development of over 800 houses.

Location. These developments are at the most northern point of Sefton. Why is there such a high concentration of new housing to be built solely around the Churchtown/Crossens area? There are no dual carriageways, motorways and infrastructure to support these developments with an already struggling road network. The Meols Cop area which is an arterial route out of Southport is already at capacity for congestion and as a result car commuters use the farm roads to get in and out of Southport that are not designed for that purpose or amount of traffic. There is already 20 mph traffic calming in the Churchtown area and Bankfield Lane has speed bumps and a weight restricted bridge.

In addition, Churchtown Village is a one way system with no room to develop the roads as it has listed buildings. How is the area going to support another 1000 plus cars! The local roads will simply not support such an increase in traffic. I drove home yesterday and Churchtown was at a standstill in the evening rush hour and the school traffic in the morning and afternoon bring the area to a halt.

Schools. All the local schools St Patricks, Churchtown Primary, St Johns and Larkfield are all at capacity and have no further land to develop to increase classrooms for the extra children that would move into the area. Within Sefton there are school places available but the majority of these are in South Sefton so why develop the majority of houses in an area with no availability.

Health. The local GP surgeries could not cope with the large influx in population as most practices are running at or near capacity. The local hospital services are already stretched and having already lost or are losing additional services that are being transferred to Liverpool hospitals. This is against national policy that is encouraging services to be available for local people. Where you propose to build the new houses is the furthest point away from these Liverpool Hospitals. Also the new houses will be developed for numerous families with the nearest Children's A&E now being in Ormskirk. We know how difficult it can be to get to Ormskirk in the summer and Bank Holidays with the traffic but these houses will be at the furthest point away from the services with no direct transportation link and access for families without cars. The new houses will significantly increase CO2 emissions and create noise pollution to the area and existing residents as this is development on a massive scale.

Employment. Where are the jobs to support this new population? Southport has no industry to speak of and we are already reliant on service industries in the town many of which are closing. Potential new residents will have to commute to other areas for work putting further strain on the already struggling road network.

Green Belt. Why should Southport and particularly the Churchtown/Crossens area losing double the amount of green belt as a percentage than the rest of Sefton? This is productive land and amongst the most fertile in the UK. Nationally carbon emissions for the UK need to be reduced so we will need to be more self-sufficient so why are we developing prime green belt land that is used for agriculture and also for local shooting parties that bring extra income and jobs to the area. Once this land is developed it can never be returned for farming. Farming does provide work for the local population and this land will potentially reduce the need for these workers.

Flood Plain. Why are you building houses on a flood plain? This is against government and national policy. The owners of the new proposed housing will have to foot the bill for additional insurance premiums.

Phillips Factory. The land at the previous site of the Phillips factory has recently been made available for housing development. This is good news as the site has been derelict for years and got vandalised frequently. It has now been cleared ready development. Why therefore, have you kept the proposed site on green belt land off Bankfield Lane when you have now got this site? This is increasing development even further in an area that simply does not have the infrastructure to support it. The inconvenience to residents like me that will be surrounded by developments will be massive. My daughter has asthma and I am massively concerned about her health with both the Phillips factory and the site off Bankfield Lane being developed.

Churchtown Village. The character of this small village will be destroyed by the development of so many new houses which won't be in keeping with the local area.

Population Studies. Where is the evidence that we require all these new houses in Southport and Sefton? The studies Sefton quote are already outdated. National studies demonstrate that housing is needed mostly in the SE of England not in Sefton and Merseyside.

My Situation. I live at The Mallards in-between the Phillips site and back onto the proposed green belt development site. We will be affected more than anyone else in Sefton and we will potentially be surrounded by new developments. We already have new structural cracks since the Phillips factory demolition began and my 7 year daughter has asthma and we are concerned by impact of all of the dust created by the proposed new developments. Furthermore, me and my husband both work full time and have worked hard to afford our house and its value has already plummeted as a result of these potential developments.

Putting our position to one side I am flabbergasted that Sefton Council have proposed such large scale developments concentrated in one area of Sefton that simply does not have the infrastructure to cope. In addition, it is a scandal that we are developing on green belt land and I really do question why Southport is losing a much higher percentage of green belt land than the rest of Sefton.

To me these developments already seem a done deal between Sefton Council, the developers and the landowner. Of course the developers would rather develop in Southport as potentially they can increase their profits in comparison to other areas in Sefton.

Wildlife – There appears to have been no consideration for the wildlife that live on the greenbelt land. This has been minimalized and the potential impact has not been investigated fully.

Summary of Suggested Changes

Remove MN2.1 as an allocation.

Evidence Submitted

Chapter 6	Plan Order Site MN2.1	Other Documents
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Policy MN2.1	Bartons Close, Southport
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Respondent No 632	Response Ref 1	Representor Name Sylvia Phillips
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Organisation Name

Obj/Sup/Com	Objection
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Summary of Main Issues

Bartons close presently comprises of 10 privately owned houses. 10 more similar homes would complete the close. BUT 36 properties will adversely change the environment & certainly have an effect on resale value surely 36 houses on this strip of land is too many, the density of these houses would block out the natural light especially to existing properties in meadow brow. An immediate problem for residents of bartons close will be if this narrow close is expected to carry all the new estate traffic ? As entry/exit on to water lane is already difficult. Where will the digging vehicles, concrete mixers, sewage pipes, builders waggons, utilities etc be stored will bartons close be a builders yard & car park for estate workers. Any temporary or permanent road into new estate would have to avoid an existing deep storm water tank behind no.1 bartons close. The change to drainage when the field is concreted over (houses, pavements, garages, sheds, paths,) could mean bartons close will have considerably more rain water to run off & flood garages as the field drains will no longer work under concrete.

Summary of Suggested Changes

Fewer New Houses on SR4.01 Bartons close.

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.1 **Other Documents**
Policy MN2.1 **Bartons Close, Southport**
Respondent No 1048 **Response Ref** 1 **Representor Name** Jackie McGovern
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

The reasons for objection bare mainly down to safety and access issues as confirmed in the site assessment report. I have previously been told by the planning department there was a restriction on the number of houses that could be built in Bartons Close. Further homes being built would have to use Fell View as an access route onto Banks Rd which as stated in the site assessment would prove unsafe and unsuitable. It mentions in the report that there would be a possibility of blocking off Bartons Close access at Water Lane and existing properties would therefore also have to use Fell View as an access route. This would further escalate the problem particularly in the summer when there is increased traffic due to the regular car boot sales on Banks Rd. There are already problems at the Plough roundabout particularly at peak times. I understand green belt land will have to be released but brownfield sites and the conditions they carry should be a priority in solving the problem. Southport town centre is a disgrace and there are many issues in the town that should be addressed before we consider increasing the number of homes being built.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.1 **Other Documents**
Policy MN2.1 **Bartons Close, Southport**
Respondent No 1062 **Response Ref** 1 **Representor Name** Therese Forfar
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Flood concerns as we are in a Flood Zone 1 and the ground proposed is on a hill.
Too much traffic as it is, making cracks appear in our houses. Enough problems with speeding drivers, which the council does not do anything about, from the roundabout from our side of the road, even though there have been fatalities on Water Lane. Already a problem turning onto the main road due to the amount and speed of traffic, and the development of even more houses. If houses are subsidised housing, it will affect our house prices and the crime levels will go up, and the general area will deteriorate. Compensation is required for us if that occurs.
Too near the roundabout!
Fell view which will have the access point is already a bad crime hotspot, we do not wish to bring that to our road.
No wildlife assessment has been done, which is illegal. There are several species of wildlife within the field, which should be assessed as to endangered species. All wildlife need to properly re accommodated if this goes ahead. These animals should not have to suffer because of greed!!

Risk of subsidence due to unsettling of ground that is already delicate.

Summary of Suggested Changes

A full wildlife assessment by professional bodies of the area.
A full flood assessment by independent assessors.
A full traffic flow analysis of both Water lane and Banks road.
Local plans be shown locally, not in Bootle!!
Compensation for lower house prices for Bartons Close if subsidised housing goes ahead.
Ensuring Sefton Council are not absolved from legal action against them should our houses flood, due to building on a hill in a Flood Path 1, so therefore an unsuitable place for new buildings. Especially due to the unsettling of the ground which will occur with pile driving. This will also cause a risk of subsidence as happened with KGV School.

Evidence Submitted

Policy MN2.2**Land at Bankfield Lane, Southport****Respondent No** 1**Response Ref** 2**Representor Name** David Walshe**Organisation Name****Obj/Sup/Com** Comment**Summary of Main Issues**

There are currently only two main roads connecting Crossens with Churchtown, Preston New Rd and Rufford Rd/Bankfield Lane. Balmoral Drive also acts to many locals as a connecting road between the two districts with drivers attempting to beat the congestion on Preston New Rd or avoid the car damaging speed bumps on Bankfield Lane. The average speed on Balmoral Drive I estimate to be at least 40mph, however some drivers drive much faster. Have concerns over the safety of children on these roads. What measures will be put in place to cope with the additional traffic? May I suggest speed bumps are removed from Bankfield Lane.

Summary of Suggested Changes

None

Evidence Submitted

None

Policy MN2.2 **Land at Bankfield Lane, Southport**

Respondent No 54 **Response Ref** 1 **Representor Name** Philip Kitchen

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

We completely disagree with the proposed building plans at Blundells Lane, Churchtown. Please take into consideration that the schools are full and the extra traffic on already very busy roads. Please reconsider.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

There are a number of factors that I feel have not been address in the documents that have been produced by the local council and their external (contracted) consultants.

POINT 1

Firstly within the document it states that following a recent traffic survey there were no 'noise, vibration, or traffic issues highlighted that would cause problems with the proposed new housing development. I feel this must be addressed as it is incorrect. Bankfield Lane is currently used as the main cut through route for traffic wishing to avoid the main town. So often the road becomes congested and in the summer months when people visit the Botanic the road is almost impassible due to cars parked on one side of the road. There have been a number of collisions on this road over the years, which actually lead to Sefton installing speed humps in aim to slow and calm the traffic. Also to add to this the local Churchtown Primary School which is a 3 or 4 form entry school is at capacity. Bankfield Lane is used during the morning and afternoon school run as a place to park to allow parents to collect their children for the school entrance at the rear of the school in Botanic Gardens. The again causes the traffic to become unsafe with cars rushing for parking spaces and often pulling out into the oncoming traffic. Sefton Council just this month have made the road into a 20mph zone for this same reason. Traffic is dangerous on this road and will continue being so as the road is simply too narrow for the sheer weight of traffic. On this point adding an additional 200 + homes onto this already hindered infrastructure will have dire consequences.

With regards to vibration and the statement that limited vibration was noted it's clear that the consultants have not spoken to or may have possibly carried out the survey during none peak times. I would personally like to invite Sefton Council, their consultants and the planning bodies to sit in any room at my property, or any other property on Bankfield Lane and see that vibrations are clearly felt. No expensive test equipment would be necessary. With the introduction of the speed bumps this has exaggerated this problem, on passing over the speed bumps it sends a wave of vibrations through our house. This is mainly caused by buses and lorries not slowing for the speed bumps. But to levitate this problem it would require these types of vehicle's to be banned from Bankfield Lane. But with the proposal of 200+ houses they would surely need this infrastructure. So again the plan is hindered and perusing would only cause the issue to become worse and overtime structural damage will become detrimental. Additionally, for the houses to be built there will be an increased number of transport trucks and heavy use vehicle present which will again highlight the issues raised above and in point one.

Noise, though not mentioned in the survey noise levels will be increased both through the increased levels of traffic but also from the homes. Bankfield Lane is already a congested road with high traffic noise levels this partnered with the noise from 200+ properties will have a significant effect on the existing residents.

Point 2

One of the most casing points that doesn't seem to have been fully addressed is the impact that the houses will have on our local wildlife. There is no mention in the survey about the Bats that we have in abundance in the Spring and Summer months, I understood these to be a protected species. At present the green belt fields and pastures provide a key sanctuary for Rabbits, Hares, Pheasants, Swallows, Wild Fowl, Frogs and Toads. Removing this vital part of their environmental habitat. During summer the area is a spectacle in natural beauty and this is to be replaced with houses? The areas provides local children and adults a safe natural environment to plan and get close to nature. A lot of the schools use the area for lessons and to teach the understanding of wildlife and how key it is to protect.

Point 3

The area which is being proposed is prone to flooding, it was identified by the environmental agency that it was at risk. This is evident in the winter months when our garden speeds a number of weeks submerged. Building houses on this area will minimise the drainage options and I feel will increase the risk of flooding from the water table which is so prevalent.

Point 4

The local services within Churchtown are already at maximum capacity, our local schools (speaking from experience with two parents as head teachers) are already over subscribe and class numbers are already at 30+. Adding to this may have an effect on education and parents will have to look further afield to ensure school places. Past KS1 education there is only on High School within a 3 mile radius that servers Churchtown, Crossens and the local area. This is also effected by the high numbers and pupils

have had to attend schools not local to them.

Our local health services, mainly Churchtown GP surgery also struggle with the sheer volume of patients wishing to gain appointments. At present you have to phone between the hours of 8.00am and 8.30am and it is a lottery if you get an appointment.

Point 5

Business in Southport is bad, with many high street shops and business closing down because of slowing trade and low numbers of visitors. Within Southport town centre there are business shutting their doors on a daily basis, which in turn means there are an ever decreasing numbers of job opportunities. People are now having to travel to Liverpool and Preston, and in cases Manchester to find work. Southport which many years ago had a thriving economy is becoming vastly limited in opportunities.

Working as part of the 'Building Schools for the future Programme' the comments recently posed that the proposed houses would create new job opportunities is unjust as the large building firms such as the one that will be employed to construct the houses use their chosen approved contractors. All of which I can personally guarantee will be subcontracted in from 'non local firms'.

Point 6

One of the most pressing and personal concerns that I have is the direct impact that the new build will have on our house. At present we have unrestricted view across the field as far as Parbold Hill and Rivington Pike. This was the reason that we purchased the property in 2011. Building houses behind our house will have a certain impact on this and for planning to be granted it goes against everything that I believe planning and consultation stood for. Surely you cannot build a structure that has a direct hindrance on the views of the surrounding houses. The field directly behind our house contains horses that we have as a family become fond of and my children have grown with these animals, feeding them from our garden. This has brought our children closer to Nature and given them a respect of Nature. Instead we will now be faced with a view of the back of someone's house.

Summary

I feel that the report has been constructed in a manner that supports the build of new houses but has not listened to the feelings and key points raised by the local community. Now advice or concerns of the local residents if felt has been noted.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.2	Other Documents
Policy MN2.2	Land at Bankfield Lane, Southport	
Respondent No 92	Response Ref 2	Representor Name Richard Stuttard
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

The proposal to build over four hundred properties on each site is quite frankly ludicrous. Bankfield Lane has already been ruined by excessive speed bumps, thereby sending most of the traffic down Preston New Road. Churchtown is an area designated as a conservation area, cottages here being hundreds of years old, if the intention is to squeeze it from both sides forming traffic chaos, this plan will almost certainly achieve its objective. I understand that housing needs to be built but to ruin the town's most attractive village would be a folly.

Summary of Suggested Changes

Evidence Submitted

Policy MN2.2

Land at Bankfield Lane, Southport

Respondent No 150

Response Ref 1

Representor Name Michael Andrew

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

Regarding Site References SR4.02 and AS.01. Item 13 for both sites states "Utility Infrastructure - minor constraint. Waste water upgrade might be required". Our property has been affected by flooding on several occasions during the sixteen years we have lived in Verulam Road. The flooding tends to occur when there is heavy rainfall which causes the road to flood full width from garden

wall to garden wall to a depth in places in excess of 30 cms at the junction of Verulam Road and Merlewood Avenue. The water will typically wash up our driveway 1m or so and after the flooding subsides there will be toilet tissue particles and waste left behind. This is intimidating, unpleasant and stressful when it occurs.

On 22 August 2011 a flood occurred and was reported to United Utilities. We were told by e-mail that the District Engineer, Dave Griffiths, considered 'The flooding at Verulam Road was a hydraulic problem, linked to flooding on Bankfield Lane, which occurs when the network is overwhelmed by heavy rainfall.' United Utilities further stated that 'due to budget constraints' they were not in a position to fix the problem, but recommended that we continue to report such events. On 31 July 2012 a flood occurred and we were told by United Utilities that 'the flooding is not tidal related' and were offered a home visit by the District Engineer, Dave Griffiths. During this visit we were told that the problem occurs when heavy rainfall occurs and water surges from the Bankfield Road area towards the junction of Verulam Road and Balmoral Drive the waste water system can't cope and water backs up through the drains, flooding the road.

The solution to this problem, we were told, was to position a surge tank in the field on this side of the bridge near the * former Phillips factory. This surge tank would take the excess waste water which would then be released back into the system when

levels had dropped to a point where the system could cope. Mr Griffiths was completely open with us and told us that this was too expensive to be practical unless lots of houses were affected and in simple terms there just weren't enough people complaining for it

ever to make it onto their budget. Short of starting a local campaign to promote reporting of this flooding there was nothing we could do about it. I have since been told, by a local surveyor, that there is a known 'pinch point' at the Balmoral Drive end of Verulam Road which is subject to blockage by debris exiting the Botanic Gardens water system. Whether this is true or not I do not know, but it would make sense. My concern is that if the waste water system is obliged to cope with a considerable expansion in the number of houses connected to it on the Bankfield Road side that there will be more problems with this type of flooding. If, as Mr

Griffiths stated, the problem will only be solved by the addition of a surge tank positioned on the site of the proposed development I

can only imagine that unless it is addressed at this point it will NEVER be addressed. If the solution to the problem is too expensive to make it onto the United Utilities annual budget plan I would consider that it is unrealistic to describe it a 'minor' and that if our properties are not to be affected by the proposed development a waste water upgrade WILL be required, not 'might'. On this point I find the Sefton Local Plan UNSOUND and NOT EFFECTIVE.

Summary of Suggested Changes

In my opinion for the Sefton Local Plan to be 'sound' I would like to see SR 4.02 and AS.01 Item 13 amended to 'Utility Infrastructure -

waste water network upgrade will be required to lessen the impact of additional waste water volume on historic flooding issues on Bankfield Lane, Verulam Road and Merlewood Avenue' or similar.

Evidence Submitted

Policy MN2.2

Land at Bankfield Lane, Southport

Respondent No 161

Response Ref 1

Representor Name Karen Burns

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I strongly object to the inclusion of the proposed housing development site at Bankfield Lane Churchtown within Sefton's Local Plan on the following grounds:

[Note - this is a summary of the key issues - more detail provided in the response]

I strongly object to the proposed Bankfield housing development based on the detrimental impact and loss of Green Belt land. I also strongly object to any further development of Blundells Lane to the detriment of Green Belt.

I strongly object to the proposed Bankfield housing development based on the detrimental impact on a conservation village "Churchtown" and local area.

I strongly object to the proposed "Bankfield" housing development based on the detrimental impact of increased traffic, vehicle and road congestion on the local infrastructure.

I strongly object to the proposed Churchtown Bankfield Lane "Green Belt" housing development based on an unacceptable increased local vehicle usage.

I strongly object to the proposed Bankfield housing development based on the potential detrimental impact of flooding and local drainage structure.

I strongly object to the proposed Bankfield housing development based on the lack of sustainable local employment which is a planning criteria for proposing a housing development.

I strongly object to the proposed Bankfield housing development based on the potential damage excessive road usage and heavy loaded traffic will have on the local area and property. I also highlight that the vibration test report is inconsistent and of little significance.

I strongly object to the proposed Bankfield housing development and detrimental impact on local residents.

I strongly object to the proposed housing development Bankfield Lane/Blundells Lane Green Belt and non-protection of the 'Countryside' Human Rights Act Article 8.

Summary

"At Risk" loss of Green Belt; "At Risk" the Historic Conservation Village of Churchtown; New intrusive road structures; Congestion of road infrastructure with routes being restricted as part of traffic management protocols (2 access/exit routes have a maximum 7.5T limit); Risk of flooding due to incapacity of drainage system on Blundells Lane/ Bankfield Lane; Protection of the Countryside Human Rights Act, in particular Protocol 1, Article 1 and Article 8; Vehicle noise and increased vehicle emissions; Vehicle vibrations/damage to property; Lack of local sustainable employment; Over-subscription of the 2 local Primary Schools of Churchtown and Crossens; Local GP surgeries are full to capacity

Summary of Suggested Changes**Evidence Submitted**

Policy MN2.2 Land at Bankfield Lane, Southport

Respondent No 290 Response Ref 2 Representor Name Clair Fellows

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

The main objection I have is that the area simply does not have the infrastructure to support the development of over 800 houses.

Location. These developments are at the most northern point of Sefton. Why is there such a high concentration of new housing to be built solely around the Churchtown/Crossens area? There are no dual carriageways, motorways and infrastructure to support these developments with an already struggling road network. The Meols Cop area which is an arterial route out of Southport is already at capacity for congestion and as a result car commuters use the farm roads to get in and out of Southport that are not designed for that purpose or amount of traffic. There is already 20 mph traffic calming in the Churchtown area and Bankfield Lane has speed bumps and a weight restricted bridge.

In addition, Churchtown Village is a one way system with no room to develop the roads as it has listed buildings. How is the area going to support another 1000 plus cars! The local roads will simply not support such an increase in traffic. I drove home yesterday and Churchtown was at a standstill in the evening rush hour and the school traffic in the morning and afternoon bring the area to a halt.

Schools. All the local schools St Patricks, Churchtown Primary, St Johns and Larkfield are all at capacity and have no further land to develop to increase classrooms for the extra children that would move into the area. Within Sefton there are school places available but the majority of these are in South Sefton so why develop the majority of houses in an area with no availability.

Health. The local GP surgeries could not cope with the large influx in population as most practices are running at or near capacity. The local hospital services are already stretched and having already lost or are losing additional services that are being transferred to Liverpool hospitals. This is against national policy that is encouraging services to be available for local people. Where you propose to build the new houses is the furthest point away from these Liverpool Hospitals. Also the new houses will be developed for numerous families with the nearest Children’s A&E now being in Ormskirk. We know how difficult it can be to get to Ormskirk in the summer and Bank Holidays with the traffic but these houses will be at the furthest point away from the services with no direct transportation link and access for families without cars. The new houses will significantly increase CO2 emissions and create noise pollution to the area and existing residents as this is development on a massive scale.

Employment. Where are the jobs to support this new population? Southport has no industry to speak of and we are already reliant on service industries in the town many of which are closing. Potential new residents will have to commute to other areas for work putting further strain on the already struggling road network.

Green Belt. Why should Southport and particularly the Churchtown/Crossens area losing double the amount of green belt as a percentage than the rest of Sefton? This is productive land and amongst the most fertile in the UK. Nationally carbon emissions for the UK need to be reduced so we will need to be more self-sufficient so why are we developing prime green belt land that is used for agriculture and also for local shooting parties that bring extra income and jobs to the area. Once this land is developed it can never be returned for farming. Farming does provide work for the local population and this land will potentially reduce the need for these workers.

Flood Plain. Why are you building houses on a flood plain? This is against government and national policy. The owners of the new proposed housing will have to foot the bill for additional insurance premiums.

Phillips Factory. The land at the previous site of the Phillips factory has recently been made available for housing development. This is good news as the site has been derelict for years and got vandalised frequently. It has now been cleared ready development. Why therefore, have you kept the proposed site on green belt land off Bankfield Lane when you have now got this site? This is increasing development even further in an area that simply does not have the infrastructure to support it. The inconvenience to residents like me that will be surrounded by developments will be massive. My daughter has asthma and I am massively concerned about her health with both the Phillips factory and the site off Bankfield Lane being developed.

Churchtown Village. The character of this small village will be destroyed by the development of so many new houses which won’t be in keeping with the local area.

Population Studies. Where is the evidence that we require all these new houses in Southport and Sefton? The studies Sefton quote are already outdated. National studies demonstrate that housing is needed mostly in the SE of England not in Sefton and Merseyside.

My Situation. I live at The Mallards in-between the Phillips site and back onto the proposed green belt development site. We will be affected more than anyone else in Sefton and we will potentially be surrounded by new developments. We already have new structural cracks since the Phillips factory demolition began and my 7 year daughter has asthma and we are concerned by impact of all of the dust created by the proposed new developments. Furthermore, me and my husband both work full time and have worked hard to afford our house and its value has already plummeted as a result of these potential developments.

Putting our position to one side I am flabbergasted that Sefton Council have proposed such large scale developments concentrated in one area of Sefton that simply does not have the infrastructure to cope. In addition, it is a scandal that we are developing on green belt land and I really do question why Southport is losing a much higher percentage of green belt land than the rest of Sefton.

To me these developments already seem a done deal between Sefton Council, the developers and the landowner. Of course the developers would rather develop in Southport as potentially they can increase their profits in comparison to other areas in Sefton.

Wildlife – There appears to have been no consideration for the wildlife that live on the greenbelt land. This has been minimalized and the potential impact has not been investigated fully.

Summary of Suggested Changes

Remove MN2.2 from the plan as a housing allocation.

Evidence Submitted

Chapter 6	Plan Order Site MN2.2	Other Documents
Policy MN2.2	Land at Bankfield Lane, Southport	
Respondent No 334	Response Ref 1	Representor Name Carl & Marjorie Kirk
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

1. The original proposed Development Plan (SR4.02) (120 homes) for Blundell Lane, Churchtown, now amended to MN22 (220 homes,) is on prime agricultural land which should not be sacrificed to housing development.
2. The public sewer in Bankfield Lane is already overloaded. It regularly floods in stormy conditions resulting in standing flood water in Bankfield Lane/Verulam Road/Merlewood Avenue. The private sewer currently serving Blundell Lane had to be fitted with a non-return valve to prevent raw sewage from flooding residents' garden areas. In periods of just moderate rainfall the valve shuts down thus leaving the residents unable to use their facilities.
3. If this development is to offer affordable housing, then the outcome will include reasonable numbers of young children. The local schools are at capacity so how could further educational needs be met? It will be well nigh impossible.
4. Traffic Management resulting from a development of this magnitude would, I submit, be an issue which could not be satisfactorily resolved. Currently, Churchtown village and its feeder routes are congested with school traffic. To introduce more traffic would grid-lock the system. Bankfield Lane/Verulam Road/Balmoral Drive already suffer from an overflow of vehicles from the car park adjacent to the Botanic Gardens, which provides access to the Pre-School Nursery and Churchtown Primary School. This development will produce an unmanageable additional volume of traffic.
5. In the sustainability appraisal of Sefton Local Plan it says at 5.3.10 re flooding, (quote) "sewer flooding is also considered to be a significant issue across the Borough which is closely linked with surface water flooding. It is generally caused by sewer systems that have insufficient capacity to cope with severe rainfall events" (unquote). I contend that this supports my argument in Paragraph 2.
6. It would appear, on the face of it, that the current Plan does not include the Additional Sites Plan (AS01) submitted by developers and landowners with an eye to making a substantial profit from changing the use of good agricultural land into more valuable land for building. It is worrying therefore, that within the mass of information on the Sefton website this Additional Sites Plan is to be found with detailed plans for road access down Blundell Lane with traffic management at its junction with Bankfield Lane. Is this the thin end of the wedge only to be revealed if and when Plan S0402 (MN22) is approved, the development completed, and Plan AS01 'nodded through' subsequently on the application of developers and land agents?
7. If MN22 does get approval then road access should be re-appraised and use made of the already existing access points to this land from The Crescent in Crossens.
8. The Government Minister, Mr Eric Pickles, has been quoted as saying that local councils, when drawing up their plans, should not be using greenbelt/agricultural land whilst there are alternatives available. Churchtown, particularly Blundell Lane, does not need a housing development of this magnitude. The infrastructure cannot support it. Furthermore, there are no employment opportunities available in this area. It would appear from the proposals put forward by the Council that the Churchtown area is being singled out for major development for the whole of Southport.
9. Finally, I submit that there is no justification to consider the additional site AS01 at Bankfield Lane for inclusion in the Local Plan. The housing needs of the Churchtown area are more than adequately met currently and especially if Plan SR4.02 (as amended to include MN22) is to be included in the Local Plan.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.2	Other Documents
Policy MN2.2	Land at Bankfield Lane, Southport	
Respondent No 350	Response Ref 4	Representor Name Carol and Stephen Hosker
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

The proposed developments at Bankfield Lane would destroy designated local wildlife sites and have a negative impact on water voles/water vole habitats.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.2	Other Documents
Policy MN2.2	Land at Bankfield Lane, Southport	
Respondent No 357	Response Ref 1	Representor Name Edward Bird
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I am a resident of Bankfield Lane, Southport and oppose the local plan for sites off Bankfield Lane. A major concern is the increased traffic on the road, which is already dangerous at rush hour – more so since the hole in Churchtown Village led to diversions along the road. The traffic calming measures in place – speed bumps – are only partially successful and there is still regular speeding by vehicles –sadly many of them buses. There is a danger to local wildlife, as well as using agricultural land. I would be surprised that buildings were put up off Bankfield Lane, as the fields behind are flooded almost each winter. The nearest school is Churchtown Primary which is heavily over-subscribed and is overcrowded. As a parent I can testify to such. To add another 300 or so houses to the area would place a strain upon the local schools that would be hard to bear, resulting in a poorer education for those children. That is if they manage to negotiate the increasingly dangerous traffic.

These points have been made in the past to you and I am sure you are familiar with them. However, there is another point. It is that there have been added some additional sites. In one - AS01 - the plan is to have all housing on both sides of Blundell lane. However, on your Local Plan, housing will only be on one side of Blundell Lane and half of that will be open space. There is a clear lack of transparency here in that one plan says one thing and another says a different thing. I would venture to suggest that this is not a democratic way to do things. In an age when it is becoming increasingly difficult to have people engage positively with politics and the political system, such obfuscation leads to scepticism if not cynicism about politics.

Whilst I realise that there is a need for housing in the country, it seems to me that it is destructive to all our welfare to encroach upon green belt land, particularly when there are so many other sites available.

Summary of Suggested Changes

Remove MN2.2 as an allocation.

Evidence Submitted

Chapter 6	Plan Order Site MN2.2	Other Documents
Policy MN2.2	Land at Bankfield Lane, Southport	
Respondent No 373	Response Ref 1	Representor Name Joan Kendrew
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Re Bankfield Lane, you are proposing to build on a flood plain.

There is a national insurer who will not insure the Mallards as it claims we live on a flood plain, so how can you justify building on this site, what's wrong with the Balmoral Road site, I presume it has all major utilities laid on already and is easier to access.

Summary of Suggested Changes

Remove MN2.2 as an allocation. Build on MN2.3

Evidence Submitted

Policy MN2.2 Land at Bankfield Lane, Southport

Respondent No 391 Response Ref 1 Representor Name William Roberts

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

These new submissions are clearly made by developers and land owners with an eye to making a substantial profit from changing the use of good agricultural land into more valuable land for building. No case can be made for doing this for the needs of the requirements of the town or the neighborhood in particular.

The land behind Bankfield lane in Churchtown is prime growing land. The fields proposed have been cultivated at least since medieval times. The baronial strips can be clearly seen when rain water stands on it in the more inclement months. It is part of our heritage and was farmed by the monks of Sawley Abby in the twelfth century. The topography of the land in question falls sharply the whole way to the Three Pools waterway. This is fine for draining excess storm water. However, disposing of waste and foul water is another matter. The public sewer in Bankfield Lane is already heavily overloaded.

Verulam Road floods at times of storm water and the private sewer serving the houses in Blundell's lane had to be fitted with a non-return valve to prevent raw sewage from flooding their gardens. This means that in periods of even moderate rainfall the non return valves are shutleading to long periods when they are unable to use their facilities. This means that if the foul water from property is to be drained to the West a vastly larger sewer must be built to replace the inadequate existing one and the falls are almost impossible. The alternative is to drain the sewage to the North which will require very large drains, overload the existing sewer in Crossens and require an expensive pumping station to serve the South end of the site where this unacceptable plan is situated.

On the original proposed Development Plan for this area of the town a larger area of land was proposed behind The Grange and East of Bankfield Bridge. This plan was subsequently modified and reduced substantially in size So the question that should be asked is. Why are you even considering any proposal to develop an even larger site which will go a long way to destroying our lovely precious ancient village of Churchtown?

A final point. If this property is to accommodate low income buyers the outcome will be reasonable numbers of young children. The local schools are bursting at the seams and there is no proposal to build more. Are we responding to a real need for housing or blindly following the governments politically biased housing party line? The need for more low cost housing is patchy and does not apply everywhere. There are plenty of lower cost housing on the market in the Southport area, We should not be responding to the selfish greed of agricultural land owners and property developers. The existing local Development Plan as in place at the moment is more than sufficient and should be stuck to in it's current form.

During what has been a relatively dry winter in Southport the pressure on the sewerage system in Bankfield lane has been under extreme pressure due to the extra loads already imposed by additional building developments. This as lead to the properties of numbers 1,3, and 5 Blundell's lane which are served by a private sewer suffering blockage to the sewerage system as back pressure from the main sewer in Bankfield Lane closes the non return valve fitted to the system.

The main sewer has been overloaded for years and can cope with no more pressure being added to the system. It's easy to imagine what would happen in the event of another wet winter with the system staying as it is. It can clearly not cope with any more additions.

Churchtown is the historical heart of what now is Southport. It is a unique, quaint and beautiful old village and any new housing developments in the area is certain to destroy it. There is surely enough more suitable sites in the Sefton district to more than cope with the development plans required by the Central Government.

Many of us in the Southport area feel passionate about save guarding our heritage and urge the Council to preserve the quality of the areas of the town which are so precious.

Summary of Suggested Changes

Evidence Submitted

Policy MN2.2

Land at Bankfield Lane, Southport

Respondent No 400

Response Ref 1

Representor Name Robert Berry

Organisation Name**Obj/Sup/Com** Objection**Summary of Main Issues**

I agree in principle that more houses are needed in Sefton.

I am concerned that if permission is given for 3 – 400 houses on green belt the current derelict former Phillips works could potentially be left for another 50 years as a blot on the landscape.

Because the supply of land is increased due to green belt being made available there will be no incentive to develop this large area as land values will inevitably drop.

I realise that Wainhomes (and the soon to be rich land owner) have spent a fortune on surveys saying the area can cope with extra people/traffic. Has it taken into account there is a 20 mile per hour speed limit on Bankfield Lane and surrounding areas (enforced March 2015)?

The land in question will increase in value 20 fold if you give permission – what do we as ratepayers get back?

There are no quality open spaces on the plan – when the cold wind blows across Meols Hall the allotments won't be very inviting

“The Green” is a tiny plot on a huge area – you can imagine how this will end up..

I live in the vicinity and the water pressure is hopeless in summer – is there a proposal for a new main?

Surveys say Bankfield Lane can cope with more traffic. – we will need the road widening to cope or ban parking on both sides to make safe.

I don't think the surveys were taken on a busy summer afternoon.

My main concern is the fact that the area will be a building site for 10 years (or longer depending on the state of the housing market)

The plots will need to be piled – I don't like the idea of 10 years listening to a piling rig.

Will there be restrictions on hours worked?

Wainhomes will make the right noises about using local labour and materials but this just does not happen “for operational reasons”.

I urge the planning committee to vote against this green belt proposal – when its gone its gone – but more importantly the blot on the landscape left behind will never be addressed.

What a sad legacy this will leave behind if approved.

Summary of Suggested Changes**Evidence Submitted**

Chapter 6	Plan Order Site MN2.2	Other Documents
Policy MN2.2	Land at Bankfield Lane, Southport	
Respondent No 488	Response Ref 17	Representor Name Ian Brodie Browne
Organisation Name	Sefton Council Lib Dem Opposition Group	
Obj/Sup/Com	Objection	

Summary of Main Issues

For context and background information we attach our previous submission [dated 7 Aug 2014] because much of what we said in it still applies:

Flooding - the two large greenbelt sites proposed for building in the north of Southport [including MN2.2] and one of the 'reserved' sites in Lydiate are prone to flooding and they add to concerns that the draft plan does not give enough emphasis to flood prevention.

Turning to Southport, it has just a couple 'additional sites' put forward by developers and land owners for inclusion as development land in the Local Plan, but both sites illustrate and reinforce our environment first approach to the Local Plan process:-

[Sites AS01 and SR4.02 referred to below have been allocated as MN2.2]

This Meols site is an extension of site SR4.02. We objected to the development of SR4.02 in the last round of consultation. AS01 will simply develop a much larger area which is presently Green Belt land. Our clear view is that neither of these adjacent sites should be developed for the total of around 420 houses that are proposed because there is an obvious and altogether acceptable alternative. That alternative site is the old Philips factory site (Local Plan ref MN2.3).

Summary of Suggested Changes

Evidence Submitted

Policy MN2.2

Land at Bankfield Lane, Southport

Respondent No 492

Response Ref 5

Representor Name

Organisation Name Craig Seddon SIPP

Obj/Sup/Com Objection

Summary of Main Issues

Land at Bankfield Lane (Site MN2.2) is a 9 hectare (ha) site identified for the delivery of 220 dwellings (24 dwellings per ha). The site is allocated in the Unitary Development Plan (UDP) as being within the Green Belt. The site is also identified as a designated Local Wildlife Site. The Site Assessment Forms (references SR4.02 and AS01) consider that the existing Green Belt boundary is weak because it comprises largely of the back of the gardens of existing properties. Whilst a strong physical boundary would be created along the north-western, north-eastern and south-western boundaries of the site, being contained by residential development and the Three Pools Waterway, a Housing allocation in this location will maintain a weak southern-eastern boundary. The boundary which the Council have identified as being weak will simply be extended further south-east. This point has not been addressed within the Site Assessment Form.

Furthermore the site is allocated as a Local Wildlife Site, with the potential for Water Voles along the water course to the north-east. No ecological assessment has been undertaken to identify what mitigation and/or compensatory measures will be necessary in order for residential development to come forward on the site. The Selection Methodology sets out that where there is a potential for a site to impact upon protected habitats, species and trees, this is a Tier 1 constraint. The Site Assessment Form therefore incorrectly assesses the impact on ecology as a moderate constraint. This should be upgraded to at least a significant constraint, unless there is evidence to support the downgrading of this constraint.

The Site Assessment Form states that there will be a single point of vehicular access into the site from Blundell Lane. Given the site is identified for 220 dwellings it is questioned whether one access point is sufficient to accommodate the site. Given there would appear to be more suitable access points along the B5244 and perhaps even on The Crescent, along the site's north-western boundary, it is questionable why access is proposed from Blundell Lane.

The Site Assessment Form identifies that Blundell Lane will require an upgrade and there may also be the necessity for upgrades to the junction at Marshside Road and Cambridge Road. Given the site is identified to deliver 220 dwellings off one access, and that road and junction upgrades will likely be required, it is considered that before this site is progressed any further a more detailed highways assessment should be undertaken to demonstrate that it is achievable. Without this, it has not been demonstrated that whether safe and suitable access can be achieved or what the impact of the development will be on the wider highway network. Both of these have the potential to be Tier 1 constraints, which would rule the site out.

Whilst it is acknowledged that the Selection Methodology that best and most versatile agricultural land is a Tier 2 constraint given there is insufficient non-best and most versatile agricultural land, the fact that the entire site falls within grade 3a must be taken into consideration. Were the site to be allocated, 9 ha of best and most versatile agricultural land would be lost.

Given there are significant ecological and access constraints, which have the potential to be Tier 1 constraints without further assessment, the deliverability of Land at Bankfield Lane is questionable.

Summary of Suggested Changes**Evidence Submitted**

Policy MN2.2 Land at Bankfield Lane, Southport

Respondent No 497 Response Ref 1 Representor Name David Newall

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

With most of the development earmarked under the Local Plan, on what equates to around 3% of Sefton's Green Belt, Cllr Dowd Leader of Sefton Council said there are not enough brownfield sites to cover all the development needed. He said: "One of the myths is that we have more brownfield sites available. I keep on saying to people 'you tell me where they are,' as these sites seem to be hidden under the ground somewhere that no-one knows about." Interview January 2015 with the Visitor newspaper.

In 2013 as part of the local plan consultation process I wrote sighting the former Phillips site as an alternative brownfield site to the greenbelt proposal opposite (Bankfield Lane) put forward by the planners. Cynically as I see it this alternative to save greenbelt land has now been incorporated in the latest local plan document as another site to flood the Churchtown area with housing. So much for Cllr Dowd's comment. (I didn't realise I had to inform him as well)

See below, excerpt from Cllr Dowd's Interview in January 2015 with the Visitor newspaper. "And if you get to the stage where you try and restrict the development on the Green Belt, which we are, because we don't have the availability in the urban areas – you will be stuck between the devil and the deep blue sea. "So I reject the idea that we are just willy nilly trying to build on the Green Belt or in any specific area just because we want to – we are doing it as part of a whole balanced process. "We are not saying we have got that balance absolutely right, but what we have done is tried as best as we can – once it goes to the independent public inquiry the council will stand up and be counted on how it has made its decisions."

With regard to building on greenbelt land at Bankfield Lane Churchtown Cllr Dowd's statement doesn't ring true. This land was stated as a proposed site from the very beginning of the process ignoring the brownfield site which is literally over the road. As this brownfield site has now been incorporated into the local plan I would argue that it would now be inappropriate to build on the greenbelt land opposite as well. One of the five purposes of greenbelt land is 'To assist in urban regeneration, by encouraging the recycling of derelict and other urban land' Not to use such land as an after thought and in addition to building on the greenbelt.

In the past 20 years, the amount of arable land in the United Kingdom has decreased by 30% and food imports have increased by 47%. There is now general agreement that national food production has to increase and in particular there has to be more local food production. Sefton's high-grade farmland should be valued as an irreplaceable and valuable asset. It should be built on only as a last resort, because once developed in this way it is irretrievably lost. In support of this view, the NPPF (par. 112) advises local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality. Therefore building should be on the brownfield site over the road from the Bankfield Lane site. The 'best and most versatile' agricultural land at Bankfield Lane should not be used. There is no evidence that any effort has been made to follow this advice.

It is important that decision-makers now take account of the Written Ministerial Statement published on 2 July 2013 by Brandon Lewis, Parliamentary Under Secretary of State at the DCLG: "As set out in [our policy] document [Planning policy for traveller sites] and in March 2012's National Planning Policy Framework, inappropriate development in the Green Belt should not be approved except in very special circumstances. Having considered recent planning decisions by councils and the Planning Inspectorate, it has become apparent that, in some cases, the Green Belt is not always being given the sufficient protection that was the explicit policy intent of ministers. The Secretary of State wishes to make clear that, in considering planning applications, although each case will depend on its facts, he considers that the single issue of unmet demand, whether for traveller sites or for conventional housing, is unlikely to outweigh harm to the green belt and other harm to constitute the 'very special circumstances' justifying inappropriate development in the green belt."

In 2012 the following question was asked in the document 'Objections to Green Belt Sites. Southport generally and Churchtown Area' Consultation Report 2012 Q. Object to the disproportionate level of housing proposed to be built on greenbelt land in Churchtown. The size and density of the proposed housing scheme is totally out of scale and character to the settlement of Churchtown. A. The Green Belt Study has identified all land in Sefton that we believe has some potential for development. Regardless of which option is chosen there is an opportunity to discount some sites and to distribute housing land more evenly. Nevertheless, as Southport is fairly constrained by the sea, nature designations, flood risk areas and a tight boundary with West Lancashire, the number of options in this area is limited. However, no decision has been made on whether any sites in the Green Belt should be developed and no Green Belt Land for release may be the preferred option.

At this time 711 houses were proposed over 2 sites but now you've included the former Phillips Factory Site as well this has risen to 828 houses over 3 sites. What happened to 'Regardless of which option is chosen there is an opportunity to discount some sites and to distribute housing land more evenly'?

There is no evidence that any effort has been made to distribute housing land more evenly across Southport in this instance. In fact it looks like the Churchtown area is merely being proposed as a dumping ground for more & more housing. Even the land once occupied by the local library is advertised as building land for housing. The Local Plan proposes to build just short of 40% of all housing for the Southport area in and around Churchtown while at the same time Botanic Gardens a major local facility is being run down. Churchtown library was closed & then demolished only recently. Yet it would appear to be a great place to build houses. Why?

The only reasons I can see is that the landowner is willing to sell and the developer is willing to buy. That's it! Not really a great planning strategy is it. I note that Sefton Council is now advertising for even more land to build houses on but with the stipulation that it has to be outside the greenbelt. How ironic! In Churchtown I would advise you to look around for land to build additional facilities such as a new school, youth club & doctors surgery. 'Planning for Sefton's Future - A Core Strategy for Sefton' highlights issues of concern such as difficulty in getting to some key services, such as health services, the poor quality of many parks in Sefton, the need for more facilities for younger people & pollution caused by traffic.

This local plan doesn't address any of these concerns in fact in its present form it will exacerbate these problems in and around Churchtown. If these proposals go ahead the Churchtown area will see around 3,000 new residents give or take a few hundred. Where are the required facilities for these additional residents going to be built? We have no land! Even if there was more land you'd probably propose to build houses on it. This local plan merely reaffirms local peoples view of the local council being out of touch & anything but local.

Summary of Suggested Changes

The NPPF (par. 112) advises local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality. Therefore building should be on the brownfield site over the road from the Bankfield Lane site. The 'best and most versatile' agricultural land at Bankfield Lane should not be used. There is no evidence that any effort has been made to follow this advice. Bankfield Lane greenbelt site has always been shown in the local plan consultation documents as a development site and the brownfield site opposite ignored until recently, when it was suddenly incorporated. One of the five purposes of greenbelt land is 'To assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. Not to use such land as an after thought and in addition to building on the greenbelt. This purpose has been ignored along with one of the objectives of greenbelt land which is 'To retain land in agricultural, forestry and related uses' Document-Core Strategy FAQs 2011 Q. Do we need to protect all our farming land to secure food production? A. We will try to use as little as possible of the 'best and most versatile' agricultural land (grades 1 – 3a of DEFRA's agricultural land classification system), particularly if there is alternative land available in the vicinity, which is of a lower grade. Please note the word 'particularly' According to the 'A Local Plan for Sefton' document you are looking for 'best environmental outcome'. Flooding opposite sides of Bankfield Lane with housing isn't my idea of it. I'm sure you would have tried your very best to kept to the letter of the law preparing the local plan for Sefton but you've failed miserably to keep to the spirit of it.

Evidence Submitted

Chapter 6	Plan Order Site MN2.2	Other Documents
Policy MN2.2	Land at Bankfield Lane, Southport	
Respondent No 541	Response Ref 4	Representor Name Nigel Ashton
Organisation Name Meols ward councillors		
Obj/Sup/Com	Objection	

Summary of Main Issues

We have particular objections to the inclusion of two Green Belt sites in the north of Southport as housing allocation – site MN2.2 land off Bankfield Lane / Three Pools and site MN2.4 land off Moss Lane.

7. Our objections to both these sites (MN2.2 and MN2.4) are on three grounds:

- Flood risk – the area is in a flood zone. Sefton's own flood risk prevention strategy warns against inappropriate development. Climate change will make things worse.
- Agriculture – the land is prime farming land. We need to grow more of our own food. There is a strategic national interest in preserving good farming land.
- Wildlife – the area is a recognised Local Wildlife Site.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.2	Other Documents
Policy MN2.2	Land at Bankfield Lane, Southport	
Respondent No 551	Response Ref	Representor Name Stephen Sayce
Organisation Name Environment Agency		
Obj/Sup/Com Objection		

Summary of Main Issues

We have received site specific Flood Risk Assessments for land at Bankfield Lane , however, we have advised Sefton Council that additional information including modelling is required to demonstrate that this site is acceptable in flood risk terms In light of the above we consider that the Council have not been able to satisfactorily apply the exception test as required by the NPPF. Sefton Council are aware of our requirements on the above points and we are working very closely with them to ensure the correct information is submitted.

Summary of Suggested Changes

Evidence Submitted

Policy MN2.2	Land at Bankfield Lane, Southport
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Respondent No 625	Response Ref 1	Representor Name
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Organisation Name Wainhomes Developments Ltd

Obj/Sup/Com Support

Summary of Main Issues

Wainhomes support the designation of our client's site. However we consider that the site capacity should be increased to 310 dwellings. The site has an area of 9 has and could achieve an average density of around 35 dph.

The TA (Appendix 2) has been updated taking account of a development of more than 300 dwellings on this site and the cumulative impact of site MN2.4, and has also modelled the impact on the wider highways network. There are no transport or highway reasons that would prevent the site from being taken forward.

Three ecological reports have been submitted (Appendix 3). The ecological appraisal has demonstrated that, in principle, residential development at the site is feasible and acceptable. Development will provide an opportunity to secure ecological enhancement for fauna typically associated with residential areas. The Water Vole Assessment concluded that pre-construction surveys will be required if features such as a surface water outflow is required into Ditch 2 or the Three Pools Waterway. The Wintering Bird Survey did not detect any Whooper Swans and concluded that the development will not affect this species. As the habitat is widely available over the local area, it will not significantly reduce the habitat for foraging and hunting birds such as Northern Lapwing, Curlew and Barn Owl. Retention of features such as hedgerows and ditches will maintain habitats suitable for breeding birds and hunting Barn Owls. Provided all recommended mitigation and enhancement is undertaken, the development will not have a significant effect on biodiversity.

The Flood Risk Statement (Appendix 4) indicates that when ignoring the presence of existing flood defences the Site is located predominately within Flood Zone 1 and Flood Zone 2, with a small section along the eastern boundary of the Site in Flood Zone 3. This is attributable to the fluvial flood risk from Three Pools Waterway and Captains Waterway, whilst the Flood Zone 2 outline is as a result of the risk of tidal flooding from the Irish Sea. When taking into account the existing coastal defences no overtopping would be expected in up to a 1 in 1000 year tidal event. As such no flood risk mitigation measures are considered necessary. From a flood risk perspective, the majority of the land under the control of Wainhomes Developments Ltd is developable, the only exclusion being the land shown to be within Flood Zone 3 on the EA's Flood Map along the eastern boundary.

The Utilities Statement (Appendix 5) confirms that all necessary services are available and there is capacity to deliver the proposed 310 dwellings. As a result of ground vibration from construction vehicles on existing dwellings and the listed buildings in Churchtown being raised by local residents during previous consultations, a Ground Vibration assessment has been carried out (Appendix 6). This concluded that there will be no damage to existing buildings from construction vehicle movements associated with the development site. Nor do they expect there to be any impact from piled foundations during construction. This was the case when Wainhomes built The Grange development.

The Heritage Assessment (Appendix 7) concluded that development of the site would not impact on any designated assets. Development would give rise to some, but less than substantial harm to the character and significance of the Conservation Area by reason of limited change to the setting. The assessment concluded that the setting, and in particular site MN2.2, makes a neutral contribution to the overall character and significance of the Conservation Area. In order to ensure any perceived harm is sufficiently mitigated, the proposals include establishing a landscaped buffer to the wouthwest of the site that would limit any views of the proposed development.

The Council's Agricultural Land Study concluded that the site contains mostly Grade 3a agricultural land, the lowest category of best and most versatile agricultural land. The site meets the test set out in footnote 11 of the National Planning Policy Framework. Assuming the Local Plan is adopted on 1st April 2016, a planning application would be submitted in May. The first houses would be completed in January 2017, and the site would deliver some 30 - 35 completions a year.

Summary of Suggested Changes

The indicative density of site MN2.2 should be increased to 310 dwellings.

Evidence Submitted

Layout - Appendix 1; Transport Assessment - Appendix 2; Ecological reports - Appendix 3; Flood risk and drainage - Appendix 4; Utilities assessment - Appendix 5; Ground vibration heritage assessment - Appendix 6; Heritage Statement - Appendix 7.

Chapter 6	Plan Order Site MN2.2	Other Documents
Policy MN2.2	Land at Bankfield Lane, Southport	
Respondent No 657	Response Ref 5	Representor Name Robert Burns MBE
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

There are a number of supporting documents included in The Plan which appear to have been included without any scrutiny by Sefton Council. As mentioned earlier, the original site adjacent to Bankfield Lane bridge (MN2.2) was intended for 220 dwellings within its 4.7 Ha. Its access points originally were via 2 roads: Three Pools and The Crescent, both adjacent to the development plot, which made complete sense.

In the amended plan access is via 'an enhanced Blundells Lane'. It wasn't via Blundells Lane originally, simply because it couldn't be used, it didn't reach Blundells Lane! Sefton have had to amend the Plan to cover their embarrassment as they hadn't realised the new access, which they had included, was away from the plot so they had to change the outline to incorporate Blundells Lane. If this wasn't so deceitful and embarrassingly incompetent, it would be funny.

The recommendation to use Blundells Lane came out of the document http://www.sefton.gov.uk/media/493020/PO_482n-TA.pdf written by Mr Alan Davies of DTTC who understandably suggested Blundells Lane, as his 'terms of reference' for the document were based on the extended sites of Bankfield Lane i.e. MN2.2 (SR4.02) and MN2.02 (AS01) covering 14.2 Ha. (three times larger than the original site and encompassing Blundells Lane) equating to approx. 5/600 dwellings. For a site this size then access via Three Pools and The Crescent would be unacceptable.

Sefton's Published Plan however, does not include the larger 14.2 Ha site but the original 4.7 Ha. I have spoken with Mr Davis regarding this access road and we agreed that, had his terms of reference been specifically the 4.7 Ha site then his findings may well have been different. I hope you can see where my disappointment lies.

It appears that Sefton are supporting the 'developers' (who understandably are in it for the profit) rather than supporting/representing the residents of the Borough as is their *raison d'être*, this accusation is based on the fact that DTTC were appointed not by Sefton but by Wainhomes.

As the original site (4.7Ha) has now been extended, perhaps doubled in order to reach Blundells Lane, the 'due diligence' originally performed on its original specification, is now pointless/irrelevant due to this change.

Mr Davis, in his summary section, states 'there are no local highway capacity or safety issues along the road frontage and the route operates at the posted speed limit'. He also states in his 'Assessment Summary', that the network can 'accommodate the development (again relating to the 14.2 Ha site!) with little or no increase in queues or delay....', and in his 'Impact During Construction', states there will be 'an unavoidable use of HGV traffic, movements will be adjusted to times with minimal impact'. He fails to mention that at either end of Bankfield Lane, which is both left and right from his proposed entrance via Blundells Lane, there are weight restrictions of 7.5Tons. He has even included a photograph of 1 sign in his document. I find it quite remarkable that nobody at Sefton thought there may be an issue that there is no legal access for the required delivery and supportive HGV vehicles which would be required to build over 200 dwellings! Also, since Mr Davis' report Sefton has found it necessary to introduce a 20 mph limit throughout the proposed area due to the number of accidents, the volume of traffic and the 2 junior schools (approximately 1200 children) on Bankfield Lane/Rufford Road. And we are now considering a further 850 dwellings! I have spoken with Sefton Planning about these weight restrictions and they have agreed the weight limits will be an issue but will be picked up when a planning application is submitted. Doesn't this seem a complete waste of time and effort which could have been avoided had somebody read, understood then challenged Mr Davis' recommendations, rather than accepting them and publishing them!

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.2	Other Documents
Policy MN2.2	Land at Bankfield Lane, Southport	
Respondent No 703	Response Ref 6	Representor Name Jackie Copley
Organisation Name CPRE Lancashire		
Obj/Sup/Com	Objection	

Summary of Main Issues

CPRE is opposed to the redesignation of this Green Belt site for housing. In our view the existing boundary of the Green Belt is well defined by rear gardens, not weak as referred to in the officer assessment. Redesignation would constitute a serious encroachment into the countryside. Residential development would have adverse impact to the ecological significance, notwithstanding any mitigation measures which might be enforced due to the area being designated as a Local Wildlife Site. An ecological assessment would be required as a condition of any redesignation of this site. CPRE attributes significant weight to the fact that the entire site is best and most versatile agricultural land. Sefton District Group is aware of flood risk in this area, due to the adjacent Three Pools Waterway and is reliant on the use of a major pumping station to keep the area free from tidal flooding. The development of housing here would have an adverse impact to the setting of heritage assets (grade II* listed Meols Hall and the North Meols Conservation Area.)

MN2.2, Land at Bankfield Lane, Southport Site Ref Site ref. AS01:

CPRE is opposed to the redesignation of this site for residential development.

The site is adjacent Site Ref. SR4.02. It is linked to the redesignation of SR4.02. Redesignation would constitute a serious encroachment into the countryside.

Residential development would have adverse impact to the ecological significance, notwithstanding any mitigation measures which might be enforced due to the area being designated as a Local Wildlife Site. An ecological assessment would be required as a condition of any redesignation of this site.

CPRE attributes significant weight to the fact that the entire site is best and most versatile agricultural land.

Sefton District Group is aware of flood risk in this area, due to the adjacent Three Pools Waterway and is reliant on the use of a major pumping station to keep the area free from tidal flooding.

The development of housing here would have an adverse impact to the setting of heritage assets (grade II* listed Meols Hall and the North Meols Conservation Area.)

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.2	Other Documents
Policy MN2.2	Land at Bankfield Lane, Southport	
Respondent No 716	Response Ref 23	Representor Name Robert Swift
Organisation Name Robert Swift and family		
Obj/Sup/Com	Objection	

Summary of Main Issues

Land at Bankfield Lane, Southport (Site MN2.2) is a designated local wildlife site with water voles present and identified as an area of local biological interest within the Sustainability Appraisal . However, this does not appear too been included as such within the Proforma Assessment of the site. It is also located within flood zone 2; however it is considered by the Council that with flood defences it is flood zone 1. Only part of the site has been included within the proposed allocations, on the basis that the larger site is not considered to be well contained and would have a negative impact on landscape and ecology.

These considerations will apply to the smaller site as it remains relatively open. A density of 30 dph has been applied.

Summary of Suggested Changes

The indicative site capacity of site MN2.2 should be reduced from 220 dwellings to 200 dwellings.

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.3 **Other Documents**
Policy MN2.3 **Former Phillips Factory, Balmoral Drive, Southport**
Respondent No 1 **Response Ref** 3 **Representor Name** David Walshe
Organisation Name
Obj/Sup/Com Comment

Summary of Main Issues

There are currently only two main roads connecting Crossens with Churchtown, Preston New Rd and Rufford Rd/Bankfield Lane. Balmoral Drive also acts to many locals as a connecting road between the two districts with drivers attempting to beat the congestion on Preston New Rd or avoid the car damaging speed bumps on Bankfield Lane. The average speed on Balmoral Drive I estimate to be at least 40mph, however some drivers drive much faster. Have concerns over the safety of children on these roads. What measures will be put in place to cope with the additional traffic? May I suggest speed bumps are removed from Bankfield Lane.

Summary of Suggested Changes

None

Evidence Submitted

None

Chapter 6 **Plan Order** Site MN2.3 **Other Documents**
Policy MN2.3 **Former Phillips Factory, Balmoral Drive, Southport**
Respondent No 161 **Response Ref** 2 **Representor Name** Karen Burns
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

The Sefton Local Plan proposals redevelopment of the Phillip's Site, Balmoral Drive, Churchtown, to build 158 residential properties. This site is adjacent to Bankfield Lane, Churchtown/Rufford Lane, Crossens; if the Phillip's housing re-development site is approved in conjunction with the Bankfield Lane Green Belt site, this could potentially contribute to a massive unacceptable overall increase in local road vehicle usage.

It is acknowledged that the Phillip's site is an in-fill redevelopment area, not Green Belt, and offers an opportunity to facilitate affordable housing. However if the Phillips site is developed then this must compromise any further housing development in the Churchtown area as the adverse effect on the local infrastructure cannot be justified as "safe" for road users and pedestrians.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.3 **Other Documents**
Policy MN2.3 **Former Phillips Factory, Balmoral Drive, Southport**
Respondent No 290 **Response Ref** 4 **Representor Name** Clair Fellows
Organisation Name
Obj/Sup/Com Comment

Summary of Main Issues

Phillips Factory. The land at the previous site of the Phillips factory has recently been made available for housing development. This is good news as the site has been derelict for years and got vandalised frequently. It has now been cleared ready development. Why therefore, have you kept the proposed site on green belt land off Bankfield Lane when you have now got this site? This is increasing development even further in an area that simply does not have the infrastructure to support it. The inconvenience to residents like me that will be surrounded by developments will be massive. My daughter has asthma and I am massively concerned about her health with both the Phillips factory and the site off Bankfield Lane being developed.

Summary of Suggested Changes

Remove MN2.2 as an allocation from the plan.

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.3 **Other Documents**
Policy MN2.3 **Former Phillips Factory, Balmoral Drive, Southport**
Respondent No 488 **Response Ref** 34 **Representor Name** Ian Brodie Browne
Organisation Name Sefton Council Lib Dem Opposition Group
Obj/Sup/Com Support

Summary of Main Issues

For context and background information we attach our previous submission [dated 7 Aug 2014] because much of what we said in it still applies:

Turning to Southport, it has just a couple 'additional sites' put forward by developers and land owners for inclusion as development land in the Local Plan, but both sites illustrate and reinforce our environment first approach to the Local Plan process:-

Our clear view is that the extended Local Plan site MN02 should not be developed for the total of around 420 houses that are proposed because there is an obvious and altogether acceptable alternative. That alternative site is the old Philips factory site.(Local Plan ref MN2.3).

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.3 **Other Documents**
Policy MN2.3 **Former Phillips Factory, Balmoral Drive, Southport**
Respondent No 541 **Response Ref** 3 **Representor Name** Nigel Ashton
Organisation Name Meols ward councillors
Obj/Sup/Com Comment

Summary of Main Issues

It is vital that development at MN2.3 includes ancillary developments such as a school, GP surgery, and shops. This development should also recognise, and be sympathetic to, the heritage of the site of the old Vulcan Motor works.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.3 **Other Documents**
Policy MN2.3 **Former Phillips Factory, Balmoral Drive, Southport**
Respondent No 541 **Response Ref** 2 **Representor Name** Nigel Ashton
Organisation Name Meols ward councillors
Obj/Sup/Com Support

Summary of Main Issues

4. We believe that there are existing brownfield sites that can be used for housing without impacting on the prospect for jobs in the future and we welcome the inclusion of the old Phillips site off Rufford Road, Southport for housing development (MN 2.3).

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.3	Other Documents
Policy MN2.3	Former Phillips Factory, Balmoral Drive, Southport	
Respondent No 716	Response Ref 24	Representor Name Robert Swift
Organisation Name	Robert Swift and family	
Obj/Sup/Com	Objection	

Summary of Main Issues

Former Phillips Factory, Balmoral Drive, Southport (Site MN2.3) is brownfield, and in part currently occupied and subject to existing by existing lease agreements, which could potentially impact on viability. There are contamination and remediation issues on site, which need to be investigated and addressed, alongside heritage considerations on the Clifford Road side as it is locally listed. A density of 30 dph has been applied.

Summary of Suggested Changes

The indicative capacity of site MN2.3 should be reduced from 158 to 135 dwellings.

Evidence Submitted

Chapter 6	Plan Order Site MN2.3	Other Documents
Policy MN2.3	Former Phillips Factory, Balmoral Drive, Southport	
Respondent No 728	Response Ref 3	Representor Name Martyn Sayer
Organisation Name	Churchtown Green Belt Action Group	
Obj/Sup/Com	Support	

Summary of Main Issues

LG Philips announced plans to close its manufacturing plant at Balmoral Drive later this year, leaving a significant Brownfield site available for redevelopment in Crossens. It is understood the site is approximately six hectares and is surrounded by residential properties. Making it ideal for residential development.

The site is very unlikely to be attractive to a potential commercial occupier given its location, access and surrounding uses. NPPF is clear in paragraph 22 that local authorities should not seek to protect allocated employment sites where there is no reasonable prospect of it being used as such having regard to market signals and local need. It is understood that the site was dismissed as part of the SHLAA due to flood risk. However, given the lack of sites in the Borough and it's previously developed state its allocation could be justified through the sequential and exceptions tests as outlined in NPPF.

The site at Balmoral Drive has the potential to provide over 500 houses on a Brownfield site negating the need for the release of Site SR4.03. The former LG Philips site is in a more sustainable location, closer to services and public transport options. This site should be considered a suitable alternative to Site SR4.03.

Summary of Suggested Changes

Evidence Submitted

Local Plan Representations, Matthews and Goodman September 2013
Transport & Highways Review September 2013

Chapter 6	Plan Order Site MN2.3	Other Documents
Policy MN2.3	Former Phillips Factory, Balmoral Drive, Southport	
Respondent No 735	Response Ref 1	Representor Name
Organisation Name Catalyst Capital		
Obj/Sup/Com Support		

Summary of Main Issues

Catalyst Capital is the freehold landowner of the former Phillips factory and associated units on Balmoral Drive in Southport. The site provides an assortment of low grade industrial, warehouse and office space, which is largely vacant. This representation supports the policy allocation and demonstrates that the site are deliverable and developable.

The site provides a total of 360,000 sq. ft of low grade/derelict accommodation comprising a mixture of predominantly industrial units. The long term leaseholder, Phillips, vacated the site in 1996. Since then parts of the site have been sub-let on a variety of short term leases. Phillips' lease is due to expire in 2019, upon which the site will become vacant. Catalyst Capital has recently purchased the site with the intention of redeveloping the site for residential land uses.

A Due Diligence Flood Risk Assessment has been prepared. The Environment Agency classifies the flood risk as low. Hydraulic breach modelling has been undertaken by our client and a strategy for residential development on the site would need the levels to be raised in more vulnerable areas to a minimum of 300mm above the flood level. Viability assessments have been undertaken based upon the raised levels and a future residential development can accommodate this additional cost.

A geo-environmental assessment was undertaken in February 2015. The assessment states that the site is contaminated, with concentrations of heavy metals, polyaromatic hydrocarbons and total petroleum hydrocarbons. The reports states that it is considered unlikely that works to remediate the land will incur significant costs and the overall risk rating of the site is assessed as low. The site also has levels of peat, as a result of which the assessment recommends piled foundations. Viability testing has been undertaken accounting for the piled foundations demonstrating that residential development is viable, with realistic S106 and affordable housing to offset against the significant remediation and foundation costs. Our client will submit an outline planning application in order to secure a developer with an aim of delivering the site within the next five years. There are no insurmountable constraints that would delay the deliverability of the site for residential development.

Summary of Suggested Changes

Based upon the existing density of the surrounding residential area, we suggest a density of 35 units per hectare, equating to an indicative capacity of 173 units on the site. We therefore recommend that the capacity for the site is increased to 173 units.

Evidence Submitted

Chapter 6	Plan Order Site MN2.3	Other Documents
Policy MN2.3	Former Phillips Factory, Balmoral Drive, Southport	
Respondent No 741	Response Ref 5	Representor Name
Organisation Name	Priory Asset Management LLP	
Obj/Sup/Com	Objection	

Summary of Main Issues

The Philip's Site (MN2.3) comprises a brownfield industrial site currently used for commercial purposes within a predominantly residential area in Southport. It is a 6ha in size and is expected to accommodate approximately 158 units equating to a density of 26.3 dwellings per hectare.

The site is considered to be 'moderately' constrained by flood risk as 20% of the site is in Flood Zone 3, and 70% is in Flood Zone 2. It is expected that this will be downgraded once existing flood defences are included within the calculation. However, due to the risk of flooding, the development would have to incorporate development strategies to protect the proposed development from flooding. These costs would be additional abnormal costs and could impact on the development's ability to deliver housing. The fact that the changes in the Strategic Flood Risk Assessment have allowed this site to be carried forward and others not to be reassessed, raises questions about the site selection process undertaken by Sefton.

The site may need to deliver improvements to the junction at Marshside Road and Cambridge Road. This could either result in a significant abnormal cost or limit the level of development in order not to trigger the improvements to the junction. The development is modest in size with known contamination and flood risk constraints.

The historic use of the site has been primarily industrial which leads there to be a very high risk of contamination. Though this in itself is not a 'showstopper' it is costly to remediate and may prohibit the sites ability to deliver affordable housing. Due to the need for affordable housing within Southport, and the north of the Borough generally, this would negate one of the principal positives of the site.

The issue of deliverability is further complicated by the existing tenancy and lease issues on site. This could restrict the sites ability to be delivered early within the plan period, if at all. The fact that the site is currently in commercial use indicates a need for employment land in this location. Further information should be provided to prove that marketing has been undertaken to evidence that there is no demand for the existing use.

Maintaining an employment use within this location would adhere to policy 37 of the National Planning Policy Framework which states: 'Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.' The retention of existing sites for employment uses would reduce the pressure on other green belt sites to be developed for employment uses, therefore assisting in reducing the pressure to develop on green belt land.

It is recommended that further work be undertaken to ascertain whether this site could viably be maintained as an employment site thus providing a more sustainable form of development and reduce the pressure on the Green Belt to deliver employment developments.

Summary of Suggested Changes

Delete Site Ref MN2.3

Evidence Submitted

Chapter 6	Plan Order Site MN2.3	Other Documents
Policy MN2.3	Former Phillips Factory, Balmoral Drive, Southport	
Respondent No 1034	Response Ref 4	Representor Name Stephen Giles
Organisation Name		
Obj/Sup/Com	Support	

Summary of Main Issues

The development of the old Phillips factory site in Southport is accepted as it is relatively small and makes good use of a brownfield site. However the rest of the required development should be distributed more evenly throughout Sefton.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.4 **Other Documents**
Policy MN2.4 **Land at Moss Lane, Churchtown**
Respondent No 32 **Response Ref** 1 **Representor Name** N Walmsley
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I strongly oppose the development of 450 houses on Moss Lane Southport. I do not think you are being reasonable in building so many properties. 2 cars to every household would result in 900 cars going down Moss Lane which is only fit for and meant for a tractor. The land on which you propose to build this development is always waterlogged and the drainage is impossible. Where are all the children going to school and where are the doctors? They would not be able to cope with influx of so many people. Also down the lane only part of it has a pavement.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.4 **Other Documents**
Policy MN2.4 **Land at Moss Lane, Churchtown**
Respondent No 73 **Response Ref** 1 **Representor Name** John Duffy
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Excess of traffic both during and after development. Possible damage to structural stability of property which is over 200 years old. The proposed development will damage wildlife. Lack of provision for education, physical and medical care. Land is Green belt with high water table. The development will require pile driving with the possibility of damage to existing properties. Property is within a conservation area which will suffer adverse effects in breach.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.4 **Other Documents**
Policy MN2.4 **Land at Moss Lane, Churchtown**
Respondent No 92 **Response Ref** 1 **Representor Name** Richard Stuttard
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

My main concern is the proposed planning for the Churchtown Area of Southport. The proposal to build over four hundred properties on each site is too many. On the Moss Lane site the only road available to carry the traffic is Moss Lane itself which already at the junction with Mill Lane causes traffic congestion, particularly during School times. We did see a traffic survey being undertaken but it was conducted during school holidays. Churchtown is an area designated as a conservation area, cottages here being hundreds of years old, if the intention is to squeeze it from both sides forming traffic chaos, this plan will almost certainly achieve it's objective. I understand that housing needs to be built but to ruin the towns most attractive village would be a folly.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.4	Other Documents
Policy MN2.4	Land at Moss Lane, Churchtown	
Respondent No 174	Response Ref 1	Representor Name Deborah Hancox
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Objections are as follows:

1. If the proposed housing development is built, this would add massive traffic congestion in the locality of Churchtown. The roundabout at the top of Moss Lane currently gets heavily congested at peak times of a morning and afternoon. It will not be able to accommodate the doubling/trebling of traffic that would be generated from the additional 450 proposed households. To the East of Moss Lane it narrows into a single track road, heavily subsided surface, with ninety degree bends out towards West Lancs. At the intersection of Fosters Close there is a blind bend where Moss Lane narrows and on one side the pavement is replaced by a ditch forcing pedestrians to cross on this bend.
2. The current use of this greenbelt for the production of crops and as grazing land should be kept, as once built on, the farmland is not recoverable. We should be looking to recycle and redevelop the existing built on areas, derelict industrial land units, poor housing stock that could be redeveloped to produce more and improved homes.
3. The site in question is prone to regular flooding in winter, specifically the field visible from the back of our house, between Pitts House Lane and Moss Lane. This is not just standing water in the field after heavy rain, in winter it stays "lake-like" for weeks. 4. Will the Sewage and Drainage system be able to cope with any increase housing in this area? At the bottom of our road, Fosters Close where it adjoins to Moss Lane, there is a sewage holding tank and pumping system, that has had numerous problems over the years, requiring frequent visits by the Water Utilities company. My concern is that if it is operating at "full" capacity now, it wont be able to accommodate the extra housing development unless it is massively upgraded.
5. Due to the nature of the land, in Fosters Close (and I'm sure in the other neighbouring streets) there are numerous examples of land movement and subsidence (the most obvious being shifting of conservatories, pavings, drains sinking/collapsing, etc). This predominantly peat based area is not good land to build on. Please reconsider this proposal to destroy this beautiful area of Greenbelt.

Summary of Suggested Changes

Remove the proposal altogether. Keep SR4.03 an area of greenbelt.

Evidence Submitted

Chapter 6	Plan Order Site MN2.4	Other Documents
Policy MN2.4	Land at Moss Lane, Churchtown	
Respondent No 176	Response Ref 1	Representor Name Derek Hancox
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Objections are:

1. The inevitable increase in traffic from so many new households, in an area that already suffers congestion at peak times, makes it unsuitable for such a development to proceed in Churchtown. The intersection of Moss Lane, Mill Lane and Roe Lane is a narrow roundabout that is a bottleneck of a morning. At the junction of Pitts House Lane and Moss Lane there is a sharp bend where Moss Lane narrows and on one side the pavement is replaced by a ditch. It is this junction that the development will have at least one of its access to Moss Lane.
2. The current use of this greenbelt for the production of crops, grazing and recreational purposes should be kept, as once built on, this land is not recoverable. The fields and paths in this area of Green Belt offer a safe and pleasant environment for our young children to walk, cycle and generally explore. Lots of people walk here, ramblers, bird spotters, fishermen and dog walkers.
3. The site in question is prone to regular flooding in winter.
4. The Sewage and Drainage system with the pumping and holding tank at the junction of Pitts House and Moss Lane struggles to cope with present demand levels.
5. This area is abundant in wildlife. Animals I personally have spotted here are Red Squirrels, Rabbits, Hares, Voles, Shrews, Stoats, Weasels and Bats. Numerous birds, including Woodpeckers, a variety of Geese, Tits, Finches, and also Barn Owls, Buzzards, and Herons. It would be a tragedy if this area with so much diversity of wildlife is lost.
6. Due to the nature of the land, there are numerous examples of land movement and subsidence. This predominantly peat based area is not good land to build on.

Summary of Suggested Changes

Evidence Submitted

Organisation Name**Obj/Sup/Com** Objection**Summary of Main Issues**

I am most concerned about the proposal for development of houses concerning Moss Lane. The area is Green Belt which I consider should be kept as such. The area is agricultural as well as full of wildlife, with many variety of birds . The farm stables which have many horses (good grazing land) is a very succesful venture and should remain.

The number of houses mentioned seems excessive and I cannot see how the churchtown area could possibly cope with such a huge addition.

I am also very concerned that if the development went ahead the traffic problem would be enormous and also a serious health risk. Physically and mentally . Churchtown is clogged with traffic now and further expansion in housing would multiply this hugely. A further thought about the land, it is very fast draining so would really need further drainage and the buildings to be piled or floated on beds. The drainage ditches are already very deep. A very expensive way to build so many properties.

Hospitals and schools are already full to capacity in this area. I don't see how the NHS would cope. I am most definitely against the proposed development.

Summary of Suggested Changes**Evidence Submitted**

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

We feel the proposed residential development on greenbelt land in the above area would create more problems than it would solve.

These reasons are listed below.

1. Increase in Traffic. The extra volume of traffic entering and exiting Moss Lane from Lane Ends junction at Roe Lane would be unacceptable. The narrow and bendy Moss Lane would not be able to stand the extra traffic which could amount to another thousand vehicles. The majority of which would be commuting to Manchester, Preston Liverpool etc as there is not a lot of local employment available, adding to already busy exit roads in the Southport area. (Preston New Road and Scarisbrick New Road). I thought we were nationally encouraging a greener environment. Public transport would also need increasing. The building phase would be terrible with all the extra construction traffic.
2. Effects on the existing local community services. The extra capacity on local schools, doctors dentists etc. How would you deal with this?
3. Drainage. An enormous upgrade of the sewage system would be required, as at the moment Moss Lane's drains are worked on a tank holding system which is pumped up at intervals, and during the winter months needs regular work carried out by engineers at a considerable cost to the council. The drains also become blocked with leaves in the autumn and winter times.
4. Potential damage to existing dwellings. The land in question would be a very difficult building project because all the properties in this area have had to be piled to an approximate depth of 80 feet, and the land lies in water for eight months of the year. There would be the problem of structural damage to all the surrounded buildings due to the piling and heavy plant and machinery coming up and down Moss Lane. We would intend to have our property pre-surveyed before the work commenced and after to see if any structural damage had occurred during the building work, and if so we would be putting a claim into the builders/council for the work to be put right. We would also be getting legal advice for devaluation of our property.
5. Loss of Agricultural Land. We feel that the loss of Grade 1 agricultural land which is always fully planted throughout the seasons by local produce growers would be very detrimental to the food chain in years ahead. Has there been an official study giving an accurate assessment of the quality of agricultural land i.e. soil analysis etc?
6. Leisure. Leisure pursuits would be severely affected e.g. walkers, cyclists, horse riding and anglers.

Summary of Suggested Changes**Evidence Submitted**

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

Whilst we appreciate that there are difficulties in allocating sufficient land for the governments housing requirements we object very strongly to the proposals we have seen both in general and specifically for the above land allocation.

To be told that matters will be addressed is insufficient to give us confidence in the proposals especially when the whole concept is flawed. While the government is insisting on the allocation of land it has also set out a procedure which is legally binding on the council. To say that there is insufficient funding is not permissible. We feel that short cuts are being taken with the procedure and we are therefore being disadvantaged compared with other council areas who are following the correct procedure more thoroughly. Consequently, it seems likely that we will end up with the wrong solution for Churchtown.

Our biggest concern is that the fine mosaic of Churchtown will be finally destroyed by such a large development which is more appropriate to a much larger town like Southport itself or even Liverpool would be a much better place to take such a large development. To say that there is no where in Southport is not a reason to destroy what is left of the identity of Churchtown as a small separate settlement to Southport. It is already significantly swallowed up by Southport. It is not just the development of housing itself, it is all the ancillary services, increase in population and traffic which will further eat away at the valuable and rich heritage of Churchtown.

We do not wish to seem completely against new housing and we propose something more suitable for the scale and size of Churchtown. Instead of large scale developers being used, a scheme could be put together using small local builders, thus helping the local Churchtown economy and employment. Small groups of houses designed specifically to the needs of people in Churchtown. Each group of a different design and character suitable for Churchtown. Designed and planned so that it will continue the existing settlement pattern and enhance and even restore the character of Churchtown. This is not a proposal for another Poundbury or for twee cottages, we are asking the council to make a bold move to show how villages can be extended with houses of today without damaging the character of the village and the valuable assets to the local community who live here.

Our proposal will require more funding and resources and the use of expertise to draw up a suitable plan. Perhaps, if the council could offer their support to such a scheme the funding could be found rather than see our beautiful and historic heritage finally destroyed together with a place to live in which is supportive to a good way of life which we have enjoyed for many years. We would like to see Churchtown continue to enhance the lives of everyone who lives here. We highlight the following specific points in our objection:

1. As there is little extra employment in Churchtown it is more likely to attract commuters from Liverpool and Manchester thus increasing the traffic problems and adding little to the vibrancy of the local community.
2. The size and density of the proposed housing scheme is totally out of scale and character to the settlement of Churchtown.
3. No details as to how the character of the built environment of Churchtown will be protected and the new development will become part of that valuable mosaic.
4. No details as to how the social and community aspects of Churchtown will be looked after.
5. No detail as to how the local services and infrastructure will cope with such a concentrated development.
6. Insufficient employment opportunities in Churchtown for such an increase in population.
7. Local schools are already full. No details as to how schools will be provided for this increased population.
8. Local medical services are full. No details as to how new services will be provided to the additional population.
9. No details as to how this development will benefit Churchtown and the local community. No. Insufficient details as to how the valuable wildlife and natural environment will be protected.
11. No detailed reports about the wildlife and natural environment.
12. No details about the local agricultural and semi-rural nature of Churchtown and how it will be protected from further erosion and assimilation into suburban Southport.
13. No details as to how the character and separate identity of Churchtown will be looked after whilst such a large and unsuitable development takes place.
14. No details as to how the lives of people will be protected during the long construction phase of the proposed development.
15. The proper procedure for the Core Strategy and then the Land Allocation seems to have been side stepped.
16. The 'tick box' stages are highly unsatisfactory and some of the conclusions do not appear to fit the facts.

To say that any of the above "will be addressed" is insufficient reassurance that this development will not be highly detrimental not only to the fabric of Churchtown but more importantly to the way of life of the community. We would like to know how you are planning to address the traffic around Churchtown School during pick up times. The roads are grid locked now. I object to the whole basis of the proposal and strongly object to the proposal in its present form. If the council is short of money this would be a complete waste of resources to take it any further. A much better starting proposal needs to be found.

Summary of Suggested Changes

Evidence Submitted

Summary of Main Issues

1.1 Paragraph 82 of the National Planning Policy Framework (NPPF) says that "New Green Belts should only be established in exceptional circumstances". It refers to major urban extensions as a possible example of an exceptional circumstance. However, it sets out a range of criteria which Local Planning Authorities (LPAs) must comply with when proposing new Green Belts. One criterion being that it must show what the consequences would be for sustainable development.

1.2 Paragraph 84 of the NPPF says that LPAs should take account of the need to promote "sustainable patterns of development".

1.3 The NPPF is an important material consideration that LPAs must have regard to when preparing local plans. If a local plan is not consistent with the NPPF it is unlikely to be adopted, unless it can clearly be demonstrated that there are cast-iron reasons for the inconsistency.

1.4 My objection to the draft Sefton Local Plan is that it is not consistent with the NPPF for the reasons I have set out below — in particular, that the allocation of the Moss Lane site is not consistent with the principle of sustainable development clearly stated in the NPPF. Furthermore, nothing I have read within the Draft Local Plan convinces me that there is a justification for establishing a new Green Belt boundary in this part of Southport. As such, I consider the Draft Local Plan is unsound.

2.1 The northern part of the administrative area of Sefton Metropolitan District occupies a very narrow coastal strip and the Green Belt is very tightly drawn around the urban area. In addition, the adopted Sefton Unitary Development Plan (UDP) does not show in this part of Sefton, any "safeguarded land" between the urban area and the Green Belt that could accommodate long term housing growth. Thus, there is little scope for expanding the urban area without eroding the Green Belt.

2.2 I recognize the fact that the LPA is seeking to accommodate a modest amount of new housing development. I also accept that if the preferred option for the future of Sefton is accepted, then some development of greenfield sites may be necessary.

2.3 Given the above factors it seems obvious that the LPA should look beyond its administrative boundary in order to accommodate new urban development. I note that there has been some consultation with adjacent LPAs. In the case of Southport it is West Lancashire District which lies to the east and where the natural area of search for new development should take place.

2.4 However, the consultation with West Lancashire clearly shows that Sefton desires to expand its urban area within its own administrative area. In my view this shows that Sefton is merely paying lip-service to the consultation process.

2.5 If it is unavoidable that greenfield land has to be developed adjacent to the Southport area it seems to me that this should only happen on land that meets all the tests of sustainability e.g. accessible to shops, services and other public infrastructure.

2.6 There is land that does this but it lies within West Lancashire District, which is identified in its emerging Local Plan as "safeguarded land". It is located at Bentham's Way, Birkdale and is defined in Policies GN2(a) and GN2(b).

2.7 I consider the Bentham's Way site is far more suitable as a major expansion of the Southport urban area than Moss Lane for a number of reasons:-

- it is in a more sustainable location, being much closer to schools, shops and other public infrastructure
- the local highway network has the capacity and geometry to accommodate it
- it is less conspicuous and less of a threat to the openness of the Green Belt as it is largely screened by the frontage ribbon development along Moss Road

2.8 Section 110 of the Localism Act imposes on Councils a "duty to cooperate". There is nothing that I have read in the Draft Local Plan which clearly demonstrates that the Council has fully discharged this duty. Cooperation is more onerous than consultation, as it imposes additional responsibilities such as the need for joint planning towards meeting future development needs. There have been discussions with adjacent LPAs but the minutes of those meetings (see the 2013 "Consequences Study, Appendix 2 — "Notes of Meetings with Neighbouring Local Authorities"). These indicate that Sefton has chosen to meet its future housing need within its own administrative area regardless of the sustainability objectives of the NPPF.

2.9 The Planning Inspectorate have recently warned a number of Councils about failing their duty to cooperate as set out in the Localism Act. The NPPF requires Councils to meet the housing needs of the whole Housing Market Area. As far as I can see there is no evidence that the Council has engaged constructively with its neighbours. Instead it has adopted a piecemeal approach, whereas what is required is a more strategic and coordinated approach. Otherwise, why has part of Southport's housing need not been met at Bentham's Way rather than Moss Lane? As such the Draft Local Plan fails to achieve sustainable development and fails the test of cooperation. It is therefore unsound.

2.10 The Sefton Green Belt Study (June 2013) adopted a "traffic light" methodology for analyzing potential housing sites. The "Red, Amber, Green Assessment" in the Study shows the performance of each identified site against a range of criteria.

2.11 The conclusion of the Assessment in relation to Moss Lane (referred to as Parcel S004 South) clearly states:-

"The site is suitable for housing. Although poorly related to the urban area as it separated from it by the Southport Old Course, etc"

2.12 The Assessment also says that the site:-

"...is not within easy walking distance of the nearest centre. In addition, the site has "poor access for pedestrians...."

In fact the nearest shops are almost a kilometre from the site. The nearest schools are over 2 km away. There is also no public bus route nearby and it is questionable whether the bus operator would provide a bus service to a site effectively at the end of

a very long cut de sac. In addition, the Assessment identifies numerous capacity constraints at local schools and GP surgeries. All of these constraints show the site's poor performance against a range of sustainability criteria.

- The proposal is not consistent with the NPPF as it is not a sustainable location for housing being "poorly related to the urban area"
- The LPA has not satisfactorily discharged its duty to cooperate as required by the Localism Act
- The LPA has not adopted a strategic approach to meeting its future housing need, as it has confined its area of search to its own administrative area
- There is other land adjacent to the Southport urban area within West Lancashire District that is far more sustainably located than Moss Lane. Given the above factors, the Council is unable to demonstrate "exceptional circumstances" for altering the Green Belt boundary at Moss Lane. As such, the Draft Local Plan is "unsound".

Summary of Suggested Changes

Evidence Submitted

Organisation Name**Obj/Sup/Com****Summary of Main Issues**

1. In 2009, I received letters from Sefton Council Conservation Officer telling me that my property was now to be included within the boundaries of Churchtown Conservation Area. I was delighted to be included in this change of status, as according to the council, who stated in the Churchtown Conservation Document dated 7th May 2009, (quote) "common to all [buildings in the conservation area] will be an identifiable environmental quality which should be protected from unsympathetic redevelopment or alteration".

The council also stated that we were privileged that we were to be part of Churchtown Conservation Area, as the council acknowledged that we were now to be part of "areas of special architectural interest, the character or appearance of which it is desirable to preserve or enhance".

2. We, all of us within the Churchtown Conservation Area, but particularly those properties on Moss Lane and Mill Lane which were included in 2009, now find ourselves under threat from the proposed building on greenbelt land of 538 houses.

3. The process of construction of such a vast amount of properties would be catastrophic for some of the buildings within the conservation area. These buildings are not built on conventional or modern foundations, some of the buildings dating back 150 years or more. I have been reliably informed by a building surveyor that the huge increase in traffic necessary for the construction of such a development, and also the subsequent huge increase in use of Moss Lane for daily car journeys would be detrimental to the structure and stability of not only my own property, but of all those which border both Moss Lane and Mill Lane. The very properties which are supposed to be protected under the terms of the Conservation Area Document issued by the council in 2009.

4. It was also reported in the 2009 document that (quote) "detrimental factors to the visual and environmental character are related to the areas of traffic signage, street furniture and traffic". The amount of traffic was also identified as a "negative factor" having an "impact on the life of the community generally". This was in 2009

5. I would suggest that the volume of traffic on both Moss Lane and Mill Lane and, in particular, the junction known as Lane Ends has increased dramatically since 2009, already causing cracks and structural damage to appear in some of the older properties within the Conservation Area. Surely then, the huge volume of traffic which would be inevitable with the building of 538 properties, and with the only access being Moss Lane, will only cause more structural problems for these beautiful old buildings (many of which are listed) which should be preserved for future generations. Indeed, the council have already acknowledged that they should be protected so why would the council now be placing the area under threat by agreeing to such a development.

6. I am a bee-keeper and a member of the British Bee-keeping Association. We are told daily, by newsletter and email that the plight of the bee population in this country is becoming catastrophic. Recent statistics have headlined that 3/5ths of our native populations of insect and wildlife have been lost over the past few years due to loss of natural habitats. Farmers, gardeners and agriculturalists across the country are being encouraged to protect the environment, and are being urged to grow bee friendly plants in order to attempt to avert the disaster which will occur to our food production if the bee population declines further.

7. The area of land which is designated greenbelt at the end of Moss Lane, is a haven for bees, butterflies, red squirrels and other wildlife. I therefore ask the question why then are the council determined to tarmac over such an area? Why are the council undermining and contradicting everything we as a country are being urged to do which is to protect and conserve such areas for the benefit of the future?

8. I fully object to the plans to build 538 houses on greenbelt land at the end of Moss Lane in Churchtown. Surely there are other sites which are more suitable. There must be sites scattered across Sefton which are brownfield sites and therefore much more suitable to development. There must be sites such as the now abandoned /Ninsdale High SellocII which has infrastructure already in place or the derelict Philips factory in Crossens which would provide room for the building of a number of homes.

9. Furthermore, I do understand the need for affordable housing. However, has any thought been given to the bringing back into use empty properties through renovation and rejuvenation. I have lived in Southport for many years and have seen the exceptional number of larger houses being demolished to make way for apartments in particular along Cambridge Road in Churchtown. Therefore, instead of one large development, could not more be made of existing properties which now stand empty and decaying. To build over wildlife habitats with concrete and tarmac, to destroy such a haven for bees, butterflies and other native species is a travesty. To jeopardise the future of Churchtown Conservation Area, when the council promised to protect it for future generations is both hypocritical and holds cheap all that "conservation" represents.

Summary of Suggested Changes**Evidence Submitted**

Chapter 6	Plan Order Site MN2.4	Other Documents
Policy MN2.4	Land at Moss Lane, Churchtown	
Respondent No 227	Response Ref 2	Representor Name Marianne Welsh
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I am objecting to the proposals to build approximately 670 houses in Crowland Street Southport Site Ref: SR4.04 (MN2.5), and also 450 houses off of Moss Lane Southport, Ref: SR4.03 (MN2.4), plus the potential housing allocation at the Kew Park & Ride Site (Green Belt Study Ref: S008).. I do not think the Local Plan is sound because I believe it is not positively prepared in that the infrastructure requirements would not be able to cope with these massive developments.

Secondly regarding the proposals for housing on land at Moss Lane, a third of the site has been identified as having a susceptibility to ground water flooding. It is only a country lane and has a poor level of accessibility for pedestrians. There is also limited opportunities for cyclists along this lane. With 450 houses proposed there would inevitably be a large increase in vehicles from residents living on the development and this would mean an enormous increase in local traffic and commuter traffic using this lane. This area is also not near a train station, nor are there frequent bus stops, plus there are no GPs/Health Centres in the immediate area. There is the potential for a strain on Health Centres and local Primary Schools in the area of Churchtown itself which are already believed to be full to capacity. Thirdly regarding the proposals for potential housing at the Kew Park&Ride in a recent report by Sefton Council there are potential gas and contamination issues as the site is within 250 m of a known land fill site.

Summary of Suggested Changes

I would suggest that other areas of Sefton are looked at in depth to identify more suitable areas for potential housing developments, in areas that are not already heavily congested with traffic and have the infrastructure needed for such large housing developments. Also areas that have Primary Schools available to take more children plus GPs/Health Centres that can also take more new patients. I believe that to make the Local Plan legally sound the above criteria needs to be met.

Evidence Submitted

Chapter 6	Plan Order Site MN2.4	Other Documents
Policy MN2.4	Land at Moss Lane, Churchtown	
Respondent No 237	Response Ref 1	Representor Name Christopher Wood
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Moss Lane is a virtual cul de sac, as the only way out at the far end is across a single track road, that continually settles into the deep ditches on either side, even when only carrying occasional light traffic. The land is totally unsuitable for extensive development as it floods in heavy rain, and due to the peat content I had to pile down 15 metres with 7 piles to rebuild my conservatory as it had settled. The whole land quivers when a heavy farm vehicle passes. The garden paths have to be relaid every few years, as they move continually.

Moss Lane is very narrow, with a deep ditch on one side and a narrow footpath on the other side. 450 dwellings suggest 900 extra cars, with 1800 extra car journeys each day, trying to exit onto Roe Lane. Mill Lane is already backed up to the Roe Lane roundabout from Churchtown Preston New Road traffic lights at peak times. Churchtown village will simply seize up with extra vehicles, and the extra vibration will severely damage the ancient valuable thatched cottages lining the narrow roads, which have recently been restricted to 20 mph for safety.

The Old Links Golf Course is a very valuable, much used 9 hole course, which would be absolutely ruined by shortening 2 of the holes.

The foul water drainage system in Moss Lane is already struggling to cope, with constant attention required at the pumping station opposite my bungalow. As I live in a small development of 20 houses at the corner of Pitts House Lane and Moss Lane, I cannot object to a similar small development, but 450 new homes is far too many.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.4	Other Documents
Policy MN2.4	Land at Moss Lane, Churchtown	
Respondent No 239	Response Ref 1	Representor Name JA&M Grierson
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Our objections:

1. One way in and out of Moss Lane which is narrow and cannot be widened. The traffic chaos, noise, pollution, and damage to existing houses would be significant.
 2. This is quality agricultural land in regular use, providing jobs and a living for people.
 3. There is already a surface water and sewage problem, due to the new water table.
 4. The area is rich in wildlife and provides leisure activities for walking, leise mooring, cycling and fishing
 5. Not one Southport councillor voted for this proposal, it was passed by a labour dominated south Sefton-based Council and Planning department.
 6. This is Green Belt land and as such should be there to provide and bring pleasure to all.
 - 7 The land is unstable as it is peat based completely unsustainable for an estate of so many houses. So much for protecting our interests this is complete political bias.
- Once the Green Belt is lost, it is lost forever, what a legacy for our future generation? Build on brownfield sites and then see if there is a need to use our precious Green Belt. We think not.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.4	Other Documents
Policy MN2.4	Land at Moss Lane, Churchtown	
Respondent No 242	Response Ref 1	Representor Name Lindsay Hansford
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I object to the proposed development of 450 houses on Moss Lane Greenbelt site for several reasons - 1) Traffic access - this development could add another 1,200-1,500 daily vehicle movements along Moss Lane which is a narrow road, already overcrowded at times with cars speeding along to avoid the traffic congestion on Meols Cop Road. 2) Health issues - even low levels of exposure to traffic fumes can raise the risk of lung cancer. Traffic already build up during peak times. this will be compounded by these additional houses 3) Community facilities - local schools are already at capacity. Where would families send their children? What about those who are not car drivers? Some would have a lengthy walk to the nearest bus stops on Roe Lane or are there plans to bring buses down Moss Lane (see point 1)?

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.4	Other Documents
Policy MN2.4	Land at Moss Lane, Churchtown	
Respondent No 243	Response Ref 1	Representor Name Andrew Standeven
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I object to the inclusion of site reference SR04.03 and would take issue with the following statements made in the Site Assessment Form. The high accessibility score to a school is correct in terms of distance, however, there is no mention of the suitability of that school for any families in the new housing. The most recent Ofsted report (2012) for Bishop David Sheppard notes that the school is 'below the average size' for a school of it's nature.

Expansion of the school is not possible as it is bordered on the western side by Old Links Golf Club (a constraint already noted in the Site Assessment); housing to the east and an average size playing field to the north and south. Both of these would be required as recreation were the school to be able to be expanded. Furthermore, the northern playing field is not under the control of the school. I would take issue with the constraint severity of 'minor' under section 5 Heritage. At present there is an unfettered view of the conservation area from the western side of the site which would be obscured completely.

It would the increase to suburbanisation is not therefore 'limited' as the assessment suggests but instead, is extensive. Section 7 Site Access assesses the constraint as 'Moderate'. Moss Lane is not able to be widened within the existing highway boundary as there is a large drainage ditch to the north of the lane as it leaves the remaining houses. Further down Moss Lane, there are houses on both sides of the road and the pedestrian footpath is of average width only. As the houses on the northern side end, Moss Lane narrows and the pedestrian footpath ends as there is insufficient room to accomodate this and the road.

To the west, the road is under the care of West Lancashire DC and is single track; as noted in section 12 Ground Conditions are fragile which means that any excessive traffic on this section of the road would severely weaken it. Section 9 Accessibility Requirements are not 'likely' to be required as noted in the assessment but, instead, are 'definitely required as the site is currently inaccessible. Section 13 Utility Infrastructure would require upgrade.

This week, the sewer in Moss Lane collapsed and it was closed for a week for United Utilities to repair it. This demonstrates the infrastructure is already under pressure and cannot cope with the housing that is there presently.

Summary of Suggested Changes

Remove site SR4.03 from the list of sites within the Local Plan

Evidence Submitted

Chapter 6	Plan Order Site MN2.4	Other Documents
Policy MN2.4	Land at Moss Lane, Churchtown	
Respondent No 256	Response Ref 1	Representor Name Christine Whincup
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I object to the proposed building of 450 houses off Moss Lane, Churchtown for the following reasons.

1. The infrastructure of Churchtown is barely adequate for the existng population now, the building of 450 houses more means a greater number of residents needing the facilities of schools, doctors, dentists and roads.
 2. Moss Lane can only just cope with the present volume of traffic, which at times is quite chaotic and the 4 lanes end roundabout. It is only a fairly narrow road which narrows even more at its northern end.
 3. The proposed site is mostly agricultural and home to various species of wildlife.
 4. The land has been and still is prone to flooding which doesn't bode well for householders.
- The area is used by many people for leisure activities, such as riding horses from the local stables, hikers and dog walkers.

Summary of Suggested Changes

Evidence Submitted

Policy MN2.4	Land at Moss Lane, Churchtown
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Respondent No 258	Response Ref 1	Representor Name John Milnes
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Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I object to the proposed housing development in the Moss Lane area of Churchtown Southport. The amount of houses to be built means an enormous amount of extra traffic will travel along Moss Lane to Lane Ends roundabout. Moss Lane was never constructed to carry this expected increase in traffic nor the weight of heavy construction vehicles on an unstable surface. Moss Lane needs resurfacing after work done a few years ago.

The alternative way out from this development is through farm land along a very narrow road with passing places. This road is unstable, continually sinking and has deep ditches on either side. There is no way this road could cope with extra traffic without creating safety issues. The areas designated for building has an abundance of wildlife which will be severely affected by this development.

You are proposing to build on good arable land which will disappear forever. We are importing food from all over the world and yet you are intent on destroying the means to produce home grown produce. There is a phrase called Urban Sprawl and this is a classic example.

Churchtown village is subject to a preservation order and the increase in the volume of traffic will transform a quiet scenic environment into a noisy, congested one. Please consider my objections to this plan and I implore you not to proceed before it is too late.

Summary of Suggested Changes

Evidence Submitted

Policy MN2.4	Land at Moss Lane, Churchtown
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Respondent No 260	Response Ref 1	Representor Name R A Lewis
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Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I object to the allocation of this site on the following grounds.

The only road exit from this site for residents of the proposed 450 houses is via Moss Lane. This lane is virtually a cul-de sac as its northern end goes out of in the direction of Ormskirk via a tarmacked track with restricted single lane passing places. The only exit to Southport from the proposed site is along the length of rural Moss Lane, this exits on to a small roundabout where four roads converge. Moss Lane is a narrow roadway with domestic properties on both sides. At present, this exit is barely adequate for existing residents and with an increase in vehicles from the extra 450 households, overcrowding will make access to the properties problematical and at peak times impossible. Emergency vehicles will have difficulty accessing this area.

The infrastructure of Churchtown is at present barely adequate for the existing population and an influx of the more residents from properties on the suggested site will overload schools, doctors, dentists and shops. This will cause chaotic overcrowding of this very old village of Churchtown.

The Green Belt land being considered for these houses is at present productive agricultural land with part of the area used for recreational purposes by a very active stables and Riding School. The Wildlife in this area is also of considerable significance to the very many walkers who frequently visit this rural edge of Southport.

The land and roadway of Moss Lane adjacent to this site is on an old "Mere", the ground is peat and clay which is continually shrinking. The site is very low lying with large areas of it flooding after heavy rain. This is confirmed by the Environment Agency database rights 2011 map which shows that part of the area at "Risk of Flooding from Rivers and Sea.

Summary of Suggested Changes

Evidence Submitted

Organisation Name**Obj/Sup/Com** Objection**Summary of Main Issues**

I object again for the following reasons: This is designated green belt land which has legal protection from being developed. Previous planning permission has been refused due to the unique nature of this land. This is recognized as a Flood Risk area with detrimental affects to the locality if built on. The negative influence on the local wildlife and ecology including threats to fish and birdlife in the area. The primary access to this site will be via Moss Lane which is totally unsuitable to take an additional 2000 car journeys per day on a Lane without a pavement on both sides in places.

Large influx of new residents causing excessive burden on the following local service Health Service, schools, utilities, general infrastructure, leisure services and lack of employment opportunities.

Summary of Suggested Changes**Evidence Submitted**

Policy MN2.4

Land at Moss Lane, Churchtown

Respondent No 273

Response Ref 1

Representor Name Paul and Katy Spencer

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

We object to Sefton MC'S proposal that the above named area of land be reclassified from Green Belt to land suitable for future housing development are as follows. As the majority of access traffic will use Moss Lane, this will inevitably cause difficulties at the roundabout of Roe Lane/Moss Lane.

Any major development proposals in this area will inevitably increase traffic at Kew roundabout, Scarisbrick New Road A570; Meols Cop Road B5276; Kew and Asda 24 hour retail outlet. This roundabout is already at maximum capacity, and I would therefore demand that before any development is approved a full traffic impact study is carried out.

The stretch of Moss Lane between Fosters Close and unnamed track to the west of Wykes Lane would need to be substantially upgraded, causing major disruption to local residents and damage to local wildlife. The drainage along this stretch of road would also require substantial upgrading, causing major disruption and damage to local wildlife. This land is essentially peat bog; I understand it lies on a bed of wet clay. This will require specialist construction techniques; such as Piling etc. This will cause major disruption and damage to the wildlife.

We would like to know if a Wildlife Assessment has been carried out to ascertain whether any endangered species might be encroached upon or threatened. This is a rural community and a way of life has been established here, you are eroding the area of Green Belt between Lancashire and Sefton. We believe any potential development would place a strain on local schools, Local Council services, Police, NHS, Primary Care Trusts and Local GP'S.

The development is land locked other than from Moss Lane, access from the west is not possible due to the proximity of Southport Old Links golf course, and therefore there will be no relief from traffic congestion. If the development was to be approved, only the south side of Moss Lane could be improved as it is within the site boundary. All other adjacent land and properties are privately owned. I am concerned about drainage, sewerage, gas maintenance and damage to the wildlife on both sides of the boundary.

We also would like to raise the issue of personal safety as the Moss Lane historically has only endured very light traffic and the sharp increase in heavy haulage could place the elderly, the young/children and parents at risk. Traffic would be horrendous, it would cause environmental issues of air pollution in an area of natural beauty, damage to the quality of life for the residents in the surrounding area, potential and long lasting damage to the eco chain in and around the build zone. Has a Transport Assessment been commissioned for Moss Lane and what impact a development of 400 plus houses would have on the only access road?

The reclassification of Greenbelt land adjacent to Moss Lane/ Pitts House Lane/ Three Pools waterway, Churchtown. But at what cost will this be to the Green Belt, this erosion will be permanent and irreversible.

We also believe any potential development on this land would bring horrendous traffic problems to those wishing to drop their children off at local schools; I am aware that Churchtown Primary School is at maximum capacity and the congestion in the local village of Churchtown is also at peak saturation during the school terms, meaning that other nearby schools would be used, thus driving would be more hazardous along Moss Lane as there is not other routes of access for the proposed development site.

Summary of Suggested Changes**Evidence Submitted**

Policy MN2.4 Land at Moss Lane, Churchtown

Respondent No 290 Response Ref 3 Representor Name Clair Fellows

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

The main objection I have is that the area simply does not have the infrastructure to support the development of over 800 houses.

Location. These developments are at the most northern point of Sefton. Why is there such a high concentration of new housing to be built solely around the Churchtown/Crossens area? There are no dual carriageways, motorways and infrastructure to support these developments with an already struggling road network. The Meols Cop area which is an arterial route out of Southport is already at capacity for congestion and as a result car commuters use the farm roads to get in and out of Southport that are not designed for that purpose or amount of traffic. There is already 20 mph traffic calming in the Churchtown area and Bankfield Lane has speed bumps and a weight restricted bridge.

In addition, Churchtown Village is a one way system with no room to develop the roads as it has listed buildings. How is the area going to support another 1000 plus cars! The local roads will simply not support such an increase in traffic. I drove home yesterday and Churchtown was at a standstill in the evening rush hour and the school traffic in the morning and afternoon bring the area to a halt.

Schools. All the local schools St Patricks, Churchtown Primary, St Johns and Larkfield are all at capacity and have no further land to develop to increase classrooms for the extra children that would move into the area. Within Sefton there are school places available but the majority of these are in South Sefton so why develop the majority of houses in an area with no availability.

Health. The local GP surgeries could not cope with the large influx in population as most practices are running at or near capacity. The local hospital services are already stretched and having already lost or are losing additional services that are being transferred to Liverpool hospitals. This is against national policy that is encouraging services to be available for local people. Where you propose to build the new houses is the furthest point away from these Liverpool Hospitals. Also the new houses will be developed for numerous families with the nearest Children's A&E now being in Ormskirk. We know how difficult it can be to get to Ormskirk in the summer and Bank Holidays with the traffic but these houses will be at the furthest point away from the services with no direct transportation link and access for families without cars. The new houses will significantly increase CO2 emissions and create noise pollution to the area and existing residents as this is development on a massive scale.

Employment. Where are the jobs to support this new population? Southport has no industry to speak of and we are already reliant on service industries in the town many of which are closing. Potential new residents will have to commute to other areas for work putting further strain on the already struggling road network.

Green Belt. Why should Southport and particularly the Churchtown/Crossens area losing double the amount of green belt as a percentage than the rest of Sefton? This is productive land and amongst the most fertile in the UK. Nationally carbon emissions for the UK need to be reduced so we will need to be more self-sufficient so why are we developing prime green belt land that is used for agriculture and also for local shooting parties that bring extra income and jobs to the area. Once this land is developed it can never be returned for farming. Farming does provide work for the local population and this land will potentially reduce the need for these workers.

Flood Plain. Why are you building houses on a flood plain? This is against government and national policy. The owners of the new proposed housing will have to foot the bill for additional insurance premiums.

Phillips Factory. The land at the previous site of the Phillips factory has recently been made available for housing development. This is good news as the site has been derelict for years and got vandalised frequently. It has now been cleared ready development. Why therefore, have you kept the proposed site on green belt land off Bankfield Lane when you have now got this site? This is increasing development even further in an area that simply does not have the infrastructure to support it. The inconvenience to residents like me that will be surrounded by developments will be massive. My daughter has asthma and I am massively concerned about her health with both the Phillips factory and the site off Bankfield Lane being developed.

Churchtown Village. The character of this small village will be destroyed by the development of so many new houses which won't be in keeping with the local area.

Population Studies. Where is the evidence that we require all these new houses in Southport and Sefton? The studies Sefton quote are already outdated. National studies demonstrate that housing is needed mostly in the SE of England not in Sefton and Merseyside.

My Situation. I live at The Mallards in-between the Phillips site and back onto the proposed green belt development site. We will be affected more than anyone else in Sefton and we will potentially be surrounded by new developments. We already have new structural cracks since the Phillips factory demolition began and my 7 year daughter has asthma and we are concerned by impact of all of the dust created by the proposed new developments. Furthermore, me and my husband both work full time and have worked hard to afford our house and its value has already plummeted as a result of these potential developments.

Putting our position to one side I am flabbergasted that Sefton Council have proposed such large scale developments concentrated in one area of Sefton that simply does not have the infrastructure to cope. In addition, it is a scandal that we are developing on green belt land and I really do question why Southport is losing a much higher percentage of green belt land than the rest of Sefton.

To me these developments already seem a done deal between Sefton Council, the developers and the landowner. Of course the developers would rather develop in Southport as potentially they can increase their profits in comparison to other areas in Sefton.

Wildlife – There appears to have been no consideration for the wildlife that live on the greenbelt land. This has been minimalized and the potential impact has not been investigated fully.

Summary of Suggested Changes

remove MN2.4 as an allocation from the plan

Evidence Submitted

Chapter	6	Plan Order Site	MN2.4	Other Documents
Policy	MN2.4	Land at Moss Lane, Churchtown		
Respondent No	292	Response Ref	1	Representor Name Hilda Smith
Organisation Name				
Obj/Sup/Com	Objection			

Summary of Main Issues

My objections to this proposal are as follows :-

1. The main problem which will happen if the development of 450 houses goes ahead, will be a complete breakdown in ,movement of traffic as it reaches the Lane Ends roundabout. This is a very busy junction during the whole of the day.
2. The only alternavie exit from Moss Lane, other than the roundabout is a side road, Warren Road, with a 20mph speed limit. This road has cars parked on both sides and makes a convoluted journey for motorists through another side road. Where these two roads meet, there is an entrance to a primary school and any additional traffic in this area will be a potential danger for the children.
These two side roads eventually lead to a main road, which is some distance from the Lane Ends roundabout. Recently, due to ground works, the part of Moss Lane immediatly before the roundabout was closed for 9 days, making the only exit for motorists being as described above. With additional vehicles from the proposed new houses trying to exit Moss Lane via the roundabout, it would seem inevitable that the only alternative route will be along Warren Road. It is easy to see what a huge problem this would be for all concerned.
3. It would appear that the decision to build 450 dwellings on green belt land off Moss Lane has not been given sufficient thought. This will cause great difficulties to everyone in this area, particularly pedestrians who will be at risk of being involved in accidents.
4. I would hope that those concerned in this proposed development who may not at this time have local knowledge, would actually visit the road at busy times of the day and realise what chaos there will be with another 450 houses, all needing to drive along the same narrow road.

Summary of Suggested Changes

Remove MN2.4 from the plan as an allocation.

Evidence Submitted

Policy MN2.4

Land at Moss Lane, Churchtown

Respondent No 296

Response Ref 1

Representor Name C Speakman

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

My objections are as follows:

1) 450 houses will mean approx 900 adults and "x" amount of children, can the local doctors / dentists cope with the increased workload.

2) The nearest schools are "Churchtown Primary" and "Bishop David Sheppard" schools. Will these schools absorb the extra children? If not where do they go?

3) There is an obvious danger for the children living close to the Three Pools Waterway. I only hope my concerns are wrong and no children are injured/drowned (water attracts children).

4) There is no accident and emergency for children in Southport, they need to go to Ormskirk hospital. The quickest route is down the Wyre Lane (next to the Three Pools) and join the Southport / Ormskirk Road at Carr Cross.

This road is narrow and has passing places to allow on coming traffic through. There are no lights and in most places there are 12 to 14 feet drops either side of the road. It is not recommended to use at night.

5) Will the island at the top of Moss Lane take extra traffic, in the rush hours traffic already queues in Moss Lane.

I have attached a map to highlight items 4 & 5.

Summary of Suggested Changes

Remove site MN2.4 as an allocation.

Evidence Submitted

Policy MN2.4

Land at Moss Lane, Churchtown

Respondent No 302

Response Ref 1

Representor Name Scott Owen

Organisation Name**Obj/Sup/Com** Objection**Summary of Main Issues**

Moss Lane is definitely not suited to having an influx of houses built for many reasons. I have listed them as follows:

1. I don't feel that this many houses are required in Southport by 2028. Population is diminishing and there are plenty of properties uninhabited which would benefit.
2. 4.3 states less pollution and carbon footprint. Building on Green Belt not only increases pollution and the carbon footprint but will dramatically affect nature and surrounding wildlife.
3. All new builds will contain "affordable housing" which is inappropriate for Churchtown.
4. Moss Lane has a major sewage problem and has for many years. New builds in this area would result in a massive undertaking, to contend with the extra sewage from these properties.
5. The land around this area is extremely unsuitable for buildings - ground conditions are mainly clay and new builds would require major piling resulting in a massive cost. This would not be cost effective to a developer, or this extortionate cost would be passed to the tax payer.
6. The infrastructure in this area is not suited for a development. Moss Lane is already too busy with traffic from across the Moss using it as a cut through. Once again the environment would be affected. Most family homes have two cars, this would result in a possible addition of in excess of 400-600 vehicles.

Further to my email dated 19th July 2011, please find a copy of numerous emails to the Highways and Planning Departments in relation to the extreme flooding we experience at the bottom of our driveway and Moss Lane, during heavy rainfall. As you can see from the picture, the sewers / drains do not cope in any way, highlighting one of the main issues as to why this core strategy should not incorporate Moss Lane as a potential development site.

In addition to this I would like to bring another important issue to your attention. You may not be aware but in this "potential development area" are a perigrine falcons which are a protected species as clearly stated on the RSPB Website.

Please take stock of the response you are receiving against the allocation of this site. It is clearly not wanted in this area and will had devastating effects on many aspects.

Summary of Suggested Changes

I feel that there are better suited existing areas around Sefton which could be utilised. I do not agree with the statistics in the study and feel we should be doing more in relation to other factors having a bearing on this issue. I believe immigration into Southport has not been considered.

Evidence Submitted

Chapter 6	Plan Order Site MN2.4	Other Documents
Policy MN2.4	Land at Moss Lane, Churchtown	
Respondent No 303	Response Ref 1	Representor Name Dorothy Vickers
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I object to the allocation of this site for housing. I appreciate the need for more houses, but feel that there are many alternatives to using part of our rural areas. Using existing derelict sites, identifying appropriate areas where it would not impinge on the countryside around us. The site earmarked near Moss Lane, Churchtown, has one access road Moss Lane itself. This road is totally ill equipped to deal with the extra traffic such a plan would bring. At one end is a small roundabout, which has 5 roads leading to/from it. This is already busy especially at peak times such as school hours. Traffic use this road as access to and from Churchtown from a back road to Scarisbrick. Also narrow, very twisty with passing places. As a local resident I worry that this will increase the "rat run" traffic which is already a problem here.

The facilities in this area include a small corner supermarket, cake shop, chemist, a other small shops. Parking to visit these shops is difficult even now, let alone when there are 450 extra houses using this area. The nearest Primary school is about 2 miles away, not, as earlier plans stated, 400 yards(this was as the crow flies, across a local golf course!) Amenities in and around the area are nil. The local library was recently closed by Sefton. The local park, Botanic Gardens, allowed to sadly deteriorate. I have looked at plans and ideas for this area, but questions about " how" (safe and adequate access) " when" (is this already decided?) "why" (when there must be many areas of available plots around Sefton that could be used) still seem unanswered. I feel that Sefton Council are not always transparent with their plans for the future of our town. Churchtown was the beginning of Southport and it seems sad that it is not always recognized as such. Will Sefton plough the money from this building land back into this area? I have my doubts.

Summary of Suggested Changes

Remove site MN2.4 as an allocation.

Evidence Submitted

Chapter 6	Plan Order Site MN2.4	Other Documents
Policy MN2.4	Land at Moss Lane, Churchtown	
Respondent No 323	Response Ref 1	Representor Name Audie Barnes
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I object to the allocation of 400 houses at Moss Lane. There was recently sewer damage on here that took United Utilities over a week to repair and the road was closed as a result. This caused numerous issues along for the houses on Moss Lane. If 400 more houses were built it could not stand up to the extra use. This applies to not only to the road itself, but also the sewerage, mains water and other utilities in the area.

The safety aspect for the road is the main concern. There would only be one way in and one way out. For this to even be considered a bypass needs building from Banks to Kew roundabout around the outside of Southport to support extra access and relief for the roads. Until such time no further homes should be built in Moss Lane area. There are nowhere near enough facilities in the Churchtown and Southport area for all these extra homes (e.g. GPs and schools). The Infrastructure Delivery Plan has insufficient detail for north Sefton. I feel these homes would bring nothing but issues to the area.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.4	Other Documents
Policy MN2.4	Land at Moss Lane, Churchtown	
Respondent No 330	Response Ref 1	Representor Name Derek & Yvonne Roberts
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

We object to the proposal to build 450 houses at Moss Lane Southport on the following grounds:-

- (1) Moss Lane is a narrow semi rural road which is inadequate to provide safe access to a development of that size.
- (2) There are already traffic problems at the junction between Moss Lane, Mill Lane, Roe Lane and High Park Place/Old Park Lane. At busy times this leads to drivers using roads such as Bibby Road as rat runs to avoid the congestion on the main route through High Park and Churchtown. The building of 450 houses on Moss Lane will significantly worsen this problem as the mini roundabout at the junction will not cope with the extra traffic generated.
- (3) As the houses will presumably be occupied mainly by young families the local school provision will not be adequate as Churchtown Primary is already oversubscribed. Bishop David Shepherd School would not be able to absorb the additional inflow of pupils expected.
- (4) There is only one GP practice reasonably close to the proposed development which is only a small practice on Roe Lane.

Summary of Suggested Changes

Remove site MN2.4 as a proposed allocation.

Evidence Submitted

Chapter 6	Plan Order Site MN2.4	Other Documents
Policy MN2.4	Land at Moss Lane, Churchtown	
Respondent No 344	Response Ref 1	Representor Name
Organisation Name Hesketh Estate		
Obj/Sup/Com	Comment	

Summary of Main Issues

I act on behalf of the Hesketh Estate in connection with their land ownership at the above address. In this context, I enclose a plan illustrating the extent of my client's ownership, which forms part of Housing Allocation MN2.4. Upon close scrutiny and comparison with your Local Plan Policy Map (copy also enclosed) it would appear that the area shaded pink has, erroneously, been shown as forming part of the adjacent Golf Course - which is not the case.

Accordingly, on behalf of my clients, I would propose that this anomaly be addressed by a minor extension to the Housing Allocation area, so as to accord with the ownership boundary and current land use. I trust that you are both able and willing to deal with this as a minor modification to the Local Plan at the time of formal submission to the Planning Inspectorate.

Summary of Suggested Changes

Amend site area for MN2.4 as shown on submitted plan.

Evidence Submitted

Plan showing the clients ownership.

Policy MN2.4	Land at Moss Lane, Churchtown
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Respondent No 348	Response Ref 1	Representor Name CE Johnson
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Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I Object on the following grounds;

1. The proposal would mean increased traffic both during development and after the proposed houses have been established. Moss Lane and the Lane Ends Roundabout already has severe congestion problems at peak traffic hours. Due to existing housing in the area the road cannot be made any wider or the area at Lane Ends any larger to accommodate an increase in traffic. Some of the "Roads" mentioned in the proposal are actually dirt tracks with little or no foundation or suitable surfacing.

2. Existing properties in the area would find that their foundations would be damaged by an increase in traffic. Some of these properties are very old cottages in a Conservation Area.

3. The Sewage system in the area already has a history of problems and has at times difficulty in coping with the quantity of sewage flowing with the present number of houses in the area. Work on the sewage system has only recently been completed, 11. 03. 15, which caused Moss Lane to be closed for 10 days. On the 13. 03. 15 the road in Churchtown by the traffic lights collapsed.

4. Although for some reason we have recently had the designation of a flood plain area downgraded only last winter part of the area under discussion flooded.

5. The area under debate is agricultural land of a high quality, this can be seen from the variety of crops grown.

6. The area is also home to a wide variety of flora and fauna, which many walkers take a huge amount of enjoyment from.

7. Recreational pursuits in and adjacent to the area will be negatively impacted upon. These pursuits include; fishing, horse riding, walking, cycling, golf, bird watching, care of allotments etc.

Summary of Suggested Changes

Remove MN2.4 as an allocation.

Evidence Submitted

Policy MN2.4	Land at Moss Lane, Churchtown
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Respondent No 350	Response Ref 6	Representor Name Carol and Stephen Hosker
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Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

There is a threat to water voles from development in Moss Lane. The water vole and its habitats, as the Council is aware, is a species which is fully protected under the Wildlife & Countryside Act 1981).

The development adjacent to Moss Lane has been recognised as being highly likely to lead to further development and therefore to urban sprawl. The widening of Moss Lane, necessitated by development of this type would further adversely impact the integrity of the Green Belt.

Summary of Suggested Changes

Evidence Submitted

Policy MN2.4	Land at Moss Lane, Churchtown
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Respondent No 411	Response Ref 1	Representor Name M Anderson
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Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I object for the following reasons:

Road safety - This road is already very dangerous for both pedestrians and road traffic. It is extremely narrow and on a bend by the Old Links Gold Club. Further along, by the entrance to Pitts House Lane, there are deep ditches and one very narrow pavement - no pavement in certain areas. Traffic has been damaging homes for years due to the nature of the ground. Many houses, including mine, have been damaged causes thousands of pounds, either by traffic or new homes being built.

Will houses in the area be protected from structural damage by the builder?

The land would be difficult to build on as peat can be shrinkable. Its volume decreases with moisture content.

Moss Lane is a wonderful area for walking and bike rides. Fishermen use the Three Pools and there is a feeling of peacefulness and tranquility. It is used by dog walkers and horses. Swans breed in Three Pools and there are water voles, which are a protected species.

Sewrage arrangements in the area are unusual and rely on pump and holding tanks. Gas, electric and water would need updating.

You will be turning the countryside into urban sprawl due to the Old Links Golf Club ending up in the middle of housing developments. The Golf Club will be set right next to the development causing considerable difficulty with the layout of the fairways which will most likely need considerable compensation to them. Residents may need protection from golf balls.

There are many more suitable developments near to bus stops and shops.

Summary of Suggested Changes

Evidence Submitted

Policy MN2.4	Land at Moss Lane, Churchtown
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Respondent No 488	Response Ref 18	Representor Name Ian Brodie Browne
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Organisation Name Sefton Council Lib Dem Opposition Group

Obj/Sup/Com Objection

Summary of Main Issues

For context and background information we attach our previous submission [dated 7 Aug 2014] because much of what we said in it still applies:

Flooding - the two large greenbelt sites proposed for building in the north of Southport [including MN2.4] and one of the 'reserved' sites in Lydiate are prone to flooding and they add to concerns that the draft plan does not give enough emphasis to flood prevention.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

My objections to the Local plan are as follows.

1. Traffic. The road will be unable to sustain the amount of extra vehicles without huge back ups at the 4 lanes roundabout. At present one can have considerable delay at this junction , particularly at commuter and school run times. Pressure to the area as a whole due to increased population with Moss Lane, Balmoral drive and Bankfield lane building plan.

Moss Lane is narrow in parts and can be dangerous particularly on the bend. (History of accidents, one that was serious) Farm traffic is frequent, Combined harvesters, tractors, trailers every day. Delays cost money, frustration and inconvenience. More drivers are likely to use the road across the moss (East) both sides there are drainage ditches, numerous accidents, particularly in the winter. Moss Lane will be the only access for all building supplies to site which will cause further disruption , noise and pollution.

2. Education. The schools are full, would require more than an extension to present schools.

3. Health. Would require increase in medical services.

4. Sewage system already under pressure in this road. As quoted by United Utilities.

5. I strongly object to green belt being used for this plan. I have always been given to understand that green belt could never be built on. (Obviously not the case if it suits the politicians). There is the fact that hundreds take advantage of the nearest open space by walking, horse riding, fishing, bird watching. There is wildlife to consider, birds, red squirrels, leisure activity, horse riding.

6. Contaminated land , fibre glass, old production site.

7. This plan will change the feel of the area as a whole. It will be a very sad day, I have no faith in our voices being heard, but to ever who reads this I beg you to vote against this plan.

Summary of Suggested Changes**Evidence Submitted**

Chapter 6	Plan Order Site MN2.4	Other Documents
Policy MN2.4	Land at Moss Lane, Churchtown	
Respondent No 492	Response Ref 6	Representor Name
Organisation Name Craig Seddon SIPP		
Obj/Sup/Com Objection		

Summary of Main Issues

Land at Moss Lane (Site MN2.5) is a 19.1 ha site identified for the delivery of 450 dwellings. The site is allocated in the UDP as falling within the Green Belt. The Site Assessment Form (reference SR4.03) identifies that only 10% of the site, in the north west corner, adjoins the existing built up area.

The Assessment Form identifies that there are highways and accessibility constraints to this site which would require substantial mitigation. It is therefore questionable whether the delivery of the site is viable. The Craig Seddon SIPP does not agree with the assessment that the release of this site would not significantly impact on the Green Belt setting. Given the Green Belt allocation to the west and south, and the fact that only a very small proportion of the site adjoins the existing settlement boundary, the site is poorly contained and is segregated from existing development.

90% of the site (approximately 17.2ha) comprises grade 3a 'best and most versatile agricultural land'. Were the site allocated, 15.5ha of agricultural land would be lost.

Summary of Suggested Changes

Given the site's highways and access constraints, together with its segregation and its potential impact upon the Green Belt setting of the surrounding area, it is considered this site should not be released from the Green Belt.

Evidence Submitted

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

Evidence of the council's failure to protect land which maintains the separation of individual residential areas:

(i) There is a specific issue where it would appear that the proposal to urbanise this parcel of green belt land may be illegal. Under Town and Country Planning (Local Planning) (England) Regulations 2012, Local plans and supplementary planning documents: additional matters to which regard is to be had:

"10.-- (1) © the need-- (i) in the long term, to maintain appropriate distances between establishments and residential areas, buildings and areas of public use, major transport routes as far as possible, recreational areas and areas of particular natural sensitivity or interest."

The proposed development would link a hamlet of 10 houses and bungalows, just east of Three Pools Waterway, with Southport. The hamlet is know locally as the Old Hospital hamlet, being built on the site of a previous TB hospital. The hamlet is currently surrounded by woodland and fields and is adjacent to the Three Pools Waterway. It is effectively a rural settlement. The proposed establishment of a housing estate, although itself projecting out from Southport, would be the epitome of urban sprawl and would join the hamlet with Southport. The dwelling in the hamlet nearest to the proposed development is just 16 m (app) from the Three Pools Waterway proposed boundary.

(ii) In addition to the issue of legality the need to maintain an appropriate distance between existing residential areas is also acknowledged and defined by SMBC itself in its own Planning Policy Guidance 2 Criteria (PPG2): Para 1.4 "the fundamental aim of Green Belt Policy is to prevent urban sprawl by keeping land permanently open, and that the key attribute of including land in the Green Belt is its openness."

The maintenance of an appropriate distance between residential areas is addressed more specifically still in paragraph 4.26: "The draft Methodology indicated in Purpose 2 would be assessed using distances between settlements. People attending the first Stakeholder workshop held in April 2010 agreed with the principle that the smaller the gap, the more likely it was essential that it should be kept open."

The council goes even further in acknowledging the importance of gaps between residential areas in paragraph 4.27: "The workshop concluded that while it was essential to keep open a small gap, such as a single field between small villages and hamlets (e.g. between Lunt and Sefton village) to stop them coalescing.....Any gaps that had to be kept open in order to ensure that adjacent settlements did not merge were identified as 'Essential Gaps' (EG)."

The land parcel SR4.03 is by the council's own definition an essential gap. The council has mis-directed itself by including it as a possible site for a housing estate, this is without even considering the fact that it is Green Belt land and therefore should be protected if at all possible.

(iii) At a national level the issue of the importance of green belt land not being used for housing and the avoidance of merging residential areas is unequivocally stated in the National Planning Policy Framework (NPPF), section 80:

"Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land."

Thus SMBC is disregarding government policy as well as failing to follow its own clearly stated guidelines. Far from following an appropriate, legal and consistent approach to the treatment of the parcel of green belt land in question the council's Local Plan is unsound, misguided and inconsistent.

(iv) The inconsistency arises where the council has decided to respect the land between a village (Sefton) and a hamlet (Lunt) citing the need to preserve an essential gap to avoid effectively joining these two residential areas. The same principal should be applied to the Old Hospital hamlet and Churchtown, Southport.

I have raised this issue directly with the Planning department of Sefton and been astonished at the attitude taken of blank denial of the misjudgement, failure to follow guidelines (local and national) and the relevance and very existence of the hamlet. It has

even been suggested that the hamlet is not a hamlet, or settlement (both of which have the dictionary definition of "a small village or group of houses" or "dwellings") but the equivalent of a collection of farm buildings(!), a ribbon development (it is not connected to any other residential area) or a sporadic development- whatever that may mean.

This denial appears in writing in the council's Site Assessment Form for SR4.03: "There would no impact on an existing narrow gap between settlements." This statement is incorrect.

Summary of Suggested Changes

It is respectfully suggested that the points raised above indicate unequivocally that the Green Belt land parcel SR4.03 should be excluded from any further consideration for development, and the Local Plan altered accordingly. There are other sites in the area. This is not to imply that this representation endorses the development any of the other named sites, nor that this exclusion alone would cause the local plan to become legally compliant or sound. No other proposed sites have been considered in this representation. Regarding SR4.03 the Local Plan has been shown above to be, it is suggested, not legally compliant. It is in addition, should such consideration be necessary, profoundly unsound, also demonstrated above. Any one of the first four main sections above could alone be considered sufficient reason for exclusion of SR4.03: Demonstrable failure in the Local Plan to follow the Duty to Co-operate, and follow legal and procedural requirements, failure to plan strategically across local boundaries (particularly regarding West Lancashire Borough Council), failure to consistently follow both national guidelines and the the Council's own guidelines with respect to respecting separate residential areas and a gross failure to adequately assess the sustainability of the proposed development. Taken together these points could be considered to indicate that this local plan is fundamentally flawed to the extent of being unfit for purpose in proposing to develop this particular area of green belt land.

Evidence Submitted

fundamentally flawed to the extent of being unfit for purpose in proposing to develop this particular area of green belt land.

Evidence Submitted

Local Plan [Preferred Options] Representations, Matthew & Goodman, September 2013
Transport & Highways Review, Hydrock, September 2013

Chapter 6	Plan Order Site MN2.4	Other Documents
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Policy MN2.4	Land at Moss Lane, Churchtown
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Respondent No 496	Response Ref 4	Representor Name Allan Watson
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Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

Risk of flooding: The 2013 Sefton Strategic Flood Risk Assessment is based on information from the Environment Agency. Working at length on behalf of the Churchtown Green Belt Action Group in 2011 I wrote as part of my report: "After looking into the subject of flood risk modelling as a layman I have gained the impression that although it has the appearance of being a science, with scientific data and mathematical models used to produce risk predictions, that it may not be that scientific at all. In this respect it might be compared with weather forecasting and economics. Both subjects are replete with mathematics, formulae and computer modelling. Both reliably fail to predict events accurately, and in the case of economics attempts to manage them." That remains my view and I feel that flood risk assessment should not be treated as completely reliable. Any algorithm used can only be trusted until it is proved to be invalid. This is not intended to criticise any of those working in the Environment Agency who do adhere to a scientific approach and were extremely helpful in providing me with answers to numerous questions regarding measurements, calculations and classifications.

Broadly speaking it is a good idea to build developments of any kind where the risk of flooding is lowest. Regrettably SR4.03 is at some risk of flooding, and it is questionable whether that is truly 1:1000, 1:100 or some other figure. It is low lying land protected in part by man-made defences both active and passive. Climate change will make flooding progressively more rather than less likely in the future. There is risk of flooding for the area of proposed housing development SR4.03.

Summary of Suggested Changes

It is respectfully suggested that the points raised above indicate unequivocally that the Green Belt land parcel SR4.03 should be excluded from any further consideration for development, and the Local Plan altered accordingly. There are other sites in the area. This is not to imply that this representation endorses the development any of the other named sites, nor that this exclusion alone would cause the local plan to become legally compliant or sound. No other proposed sites have been considered in this representation. Regarding SR4.03 the Local Plan has been shown above to be, it is suggested, not legally compliant. It is in addition, should such consideration be necessary, profoundly unsound, also demonstrated above. Any one of the first four main sections above could alone be considered sufficient reason for exclusion of SR4.03: Demonstrable failure in the Local Plan to follow the Duty to Co-operate, and follow legal and procedural requirements, failure to plan strategically across local boundaries (particularly regarding West Lancashire Borough Council), failure to consistently follow both national guidelines and the the Council's own guidelines with respect to respecting separate residential areas and a gross failure to adequately assess the sustainability of the proposed development. Taken together these points could be considered to indicate that this local plan is fundamentally flawed to the extent of being unfit for purpose in proposing to develop this particular area of green belt land.

Evidence Submitted

Chapter 6	Plan Order Site MN2.4	Other Documents
Policy MN2.4	Land at Moss Lane, Churchtown	
Respondent No 541	Response Ref 5	Representor Name Nigel Ashton
Organisation Name	Meols ward councillors	
Obj/Sup/Com	Objection	

Summary of Main Issues

Our objections to sites MN2.2 and MN2.4 are on three grounds:

- Flood risk – the area is in a flood zone. Sefton's own flood risk prevention strategy warns against inappropriate development. Climate change will make things worse.
- Agriculture – the land is prime farming land. We need to grow more of our own food. There is a strategic national interest in preserving good farming land.
- Wildlife – the area is a recognised Local Wildlife Site.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

We object to the draft Local Plan, and contend that it is unsound due to deficiencies in both drafting and in the interpretation of Government policy.

The Authority's own assessment of the site does not justify its inclusion as a site for future housing development.

The allocation of this site for housing not merely representing the irreversible loss of the "best and most versatile agricultural land", it would constitute a major intervention into long established green belt; diminish the status of adjoining green belt land, adversely affect a conservation area and threaten to curtail long standing public access by undermining the viability of a Golf Course established in 1892.

The Proposed Development of Green Belt Land and Damage to a Conservation Area.

Government Planning Practice Guidance¹ 6, "Delivering a wide choice of high quality homes", does not take precedence over other Guidance, including 9, "Protecting Green Belt Land".

As well as the irrevocable loss of "the best and most versatile agricultural land²" of which 90% of this site is constituted, far from being "relatively contained" the development of the site would represent a major intervention into long established green belt land as illustrated in figure one below. Even when viewed on the Sefton Local Plan Policy Map – Southport, the development site resembles development up to the Boundary of the Borough.

The Site Assessment prepared by Sefton itself concedes that the allocation of this site for housing would undermine the adjoining golf course by necessitating the removal the green belt protection which is currently afforded to it – thereby potentially extinguishing long standing public access to green belt land encouraged by Government Policy. The Southport Old Links Golf Course having existed on land adjoining this site since 1892.

No more than 10% of the boundary of the proposed site has been developed – at one end of the Moss Lane site boundary – in the form of very limited ribbon development of a character which is considered to be typical of green belt perimeter. This development replacing a range of derelict agricultural buildings many years ago.

It is disputed that, as Sefton assert, the boundary of the green belt is "weak" (largely defined by the rear of existing houses and open space). This seems to us to represent the character of typical green belt.

The site also adjoins the North Meols Conservation Area; which was itself created in part to protect the historical context and setting of the Grade II* listed Meols Hall. Meols Hall is one of only 3 listed buildings in Southport with that status⁴ ("particularly important buildings of more than special interest"), out of a total of 173 in the area which are listed. Development of the scale described would lead to the loss of the historical landscape context of the conservation area itself, and radically affect perception of the area by presenting a townscape landscape which would be dominant at the boundary of the remaining Green Belt and the Conservation Area.

Located on the Borough boundary, the development site would be remote from the housing needs which are said to be centred on the wider Borough.

The Draft Infrastructure Delivery Plan prepared by Sefton to support their Local Plan is based on the assertion that whilst brown field re-development is dis-incentivised by the absence of Central Government grant funding for decontamination or land remediation work, other forms of development may be facilitated by section 106 funding which will be forthcoming from private developers to finance the infrastructure costs which may be associated with their projects.

The site is some 800 metres from the nearest primary road – the junction known as "Lane Ends" at the end of Moss Lane, on the A5267.

The nearest bus stop to the site is also located at this junction. A good ten minutes walk from the Moss Lane boundary of the proposed site.

The Draft Infrastructure Delivery Plan assumes that an allocation of £500,000 could be procured by means of a section 106 agreement with a developer in order to enable the widening of Moss Lane as far as Lane Ends. Work to widen the road in the way

provided for would itself radically diminish the existing delightfully semi rural character of Moss Lane.

Traffic levels at Lane Ends at peak times indicate that a traffic survey must be undertaken to establish whether, even given the availability of the assumed level of financial contribution towards the capital cost of widening Moss Lane, the existing A5267 would itself be capable of supporting the additional traffic which would undoubtedly be generated by development of this scale – some 450 units - given their remoteness from local amenities such as shops within walking or easy cycling distance.

The Draft Local Plan shows no cognisance of the existing use of Bibby Road for “rat running” as an alternative to the more circuitous and congested route, via Mill Lane, Botanic Road and Manor Road, of the narrow A5267 through Churchtown towards Preston from the centre of Southport via Roe Lane and High Park. The A5267 following an ancient route, lined by historic properties.

Given the proposed removal of green belt protection to the Golf Course, the “knock on effect” on the future of that site; consequential on it becoming surrounded by residential development, and the inevitable impact on it’s financial sustainability as a result of the impact on speculative land values; should also be taken into account in drafting the Local Plan.

The development of the Golf Course in addition to the site currently proposed by Sefton would greatly exacerbate the infrastructure problems arising from the initial housing allocation of 450 units.

Southport is served by only three primary routes, the A565 from the South (Liverpool Road) and North (Southport New Road) and the A570 to the East (Southport Road).

Whilst a need to widen Moss Lane to the West towards Lane Ends and the A5267 has been identified within the Sefton Draft Infrastructure Plan in developing the draft Local Plan, the documentation is silent regarding Moss Lane to the East of the site – as it runs over the boundary into the adjoining authority of West Lancashire.

To the East of the site Moss Lane turns into Wyke Lane. , and in turn Pool Hey Lane, run some 4,800 metres from the site to adjoin the A570 Southport Road towards Ormskirk – the main route from Southport towards the M58.

Over the last 25 to 30 years, the embankment and road wearing surface of Wyke Lane have been permitted to degenerate until it is now only viable as a single carriageway with allocated vehicle passing places. The condition of the road surface being very heavily rutted, with signs warning of a risk of grounding. Speed is limited to 30 mph but even so, “particular” car owners have been known to refuse to use the route because of the perceived risk of damage to their vehicles at lower speeds.

Although not relevant to the scope of this response, in addition to it’s ecological impact on nesting birds and other wild life, the removal of the historic road side hedgerows by the local landowners may also be assumed to have exacerbated the physical decline of the roadway, embankment and drainage ditches as they are remembered from a generation ago.

It is surprising that it is considered acceptable that a development of this scale should be permitted at the end of an effective “cul de sac”, with all vehicular traffic from the developed site presumed to be exclusively directed West towards Churchtown and Southport, via the existing Lane Ends roundabout, with no provision for the up-grade work which would be necessary to enable traffic to circulate to the East along Wyke Lane in both directions simultaneously on a road of the conventional two carriageways in width. This would permit vehicular traffic serving the site to and from the East an alternative route avoiding Churchtown, Southport and the very limited width of the A5267.

However, such improvements to Wyke Lane may cost perhaps some £3,500,000.00; dwarfing the £500,000 which Sefton assume could be raised to widen Moss Lane by means of a section 106 agreement with a developer.

In considering our response to the consultation, we took advice from the Senior Partner of a respected firm of Town Planning consultants who practice nationwide. He said that he was “gobsmacked” by the lack of justification provided by the Local Authority for the inclusion of this site as a housing development area within their Draft Local Plan.

The site assessment undertaken by Sefton does not justify the “overlooking” of Government Planning Practice Guidance relating to the preservation of Green Belt and landscapes.

The allowances assumed for the appropriate development of infrastructure is inadequate, and shows no cognisance of actual existing prevailing local conditions.

The accessibility assessment undertaken by Sefton seems to be based solely on “as the crow flies” distances rather than taking into account the need to drive to existing local amenities – around the Old Links Golf Course, via Moss Lane and Lane Ends.

Too great a willingness has been shown towards compliance with Government Planning Practice Guidance 6, “Delivering a wide choice of high quality homes” to the detriment of balanced compliance with other requirements including 9, “Protecting Green Belt Land”.

Summary of Suggested Changes

Evidence Submitted

Photographs in support of traffic/road comments

Chapter 6	Plan Order Site MN2.4	Other Documents
Policy MN2.4	Land at Moss Lane, Churchtown	
Respondent No 602	Response Ref 1	Representor Name Howard Hayden
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Moss Lane just could not cope with the traffic generated by 450 houses. The only exit from Moss Lane is via Lane Ends roundabout. This exit is currently saturated at peak times. Traffic generated by new housing would damage the environment.

Anyone who visits Moss Lane would realise that destruction of prime green belt land is unacceptable. Encroachment on to a golf course is also a major concern.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I object to the housing allocation at Moss Lane.

As you are no doubt aware the proposed housing development on Moss Lane could only be accessed via Lane End's roundabout or from the single track country lane and I have strong concerns over both access points. Lane End's roundabout is an extremely busy and often dangerous intersection where many accidents and even deaths have occurred, the addition of a significant amount of additional traffic (predicted at 1000 additional vehicle movements) from 450 homes will no doubt cause extreme chaos especially at peak times.

In the morning, rush hour traffic trying to access the roundabout from Moss Lane often backs up past the Old Links Golf Club. As people get more and more impatient trying to get through the roundabout risks are taken which is when traffic and pedestrian accidents can and have happened. Traffic is already busy all day through that intersection and 1000 additional vehicle movements will surely mean chaos throughout the day.

Due to the bus stops and shops at Lane Ends there are many people trying to cross the Lane Ends roads, as a pedestrian this is already a hazardous occupation and again will only be compounded with additional vehicles in the area.

No doubt residents of the new housing estate will be inclined to access the housing estate from the country lane, as a single track lane with passing places this is already a hazardous road and again at peak times many accidents have happened. I am certain that the additional traffic will again cause further chaos and no doubt accidents on a road that is far from suited to heavy traffic. This road has been repaired many times over the past few years due to subsidence and has often been closed, I would suggest the additional traffic will cause further damage to the road causing road closure and forcing even more traffic to what will be the only exit from the area onto Lane Ends roundabout.

Moss Lane is a narrow lane with many cars parked on the street, it is simply not suitable to cope with so many additional vehicles let alone the construction vehicles that will have to access the site for many years before the development is completed.

I am very aware of the government initiatives to create significant additional housing but there are many other sites in the Southport area that are far better suited to cope with the additional traffic.

In addition to the points mentioned above there will be significant impact to the wildlife living and feeding on the green belt land. I am hoping you are aware of the Canada Geese and swans that regularly feed on the fields earmarked for the development and clearly there will be further disruption to the fish and other wildlife that inhabit the Moss Lane area.

And finally the impact on Churchtown village and its amenities. As a long term resident of Moss Lane I am very conscious of how stretched Churchtown School is as well as the doctors surgeries, dentists etc. Churchtown is a small village ill equipped for high volumes of traffic or people for that matter.

In summary Moss Lane is the wrong location for such a development, logic would clearly suggest alternative sites should be identified that have a more suitable infrastructure.

Summary of Suggested Changes**Evidence Submitted**

Policy MN2.4

Land at Moss Lane, Churchtown

Respondent No 623

Response Ref 1

Representor Name Win Beaumont

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

MN2.4 Land at Moss Lane churchtown Main objections are as follows: Greenbelt should be protected land It is wrong in principle to build on any greenbelt land which has been designated to protect our precious countryside from urban sprawl & this particular piece of greenbelt must be protected to preserve the character of the ancient village of Churchtown, Once green belt land is gone it is gone forever.

Transport problems This land is in a position very poorly served with regard to transport links. Moss Lane is exactly that, a Lane, which is very narrow with no pavement on some stretches & little possibility of this being rectified. There is only one route towards Southport & the junction/ roundabout with Row Lane Ends is already badly congested & exiting from Moss Lane towards Southport is dangerous & queues often build up currently. 530 new homes would result in an enormous increase in the number of car journeys along Moss Lane with significant congestion inevitable in the area & the surrounding roads of Churchtown which already suffer severe traffic problems daily. In the other direction, away from Southport, Moss Lane connects only with a single track, bumpy road with deep & dangerous ditches on either side & sharp bends across the fields which is principally a farm track which is poorly maintained & unlit. It cannot provide the sort of traffic connection that the number of houses planned would require. Practically there is little that can be done to improve access to Moss Lane & I suspect little that could or would be done to improve the farm track (which lies in West Lancs & NOT Sefton) to make it fit for purpose to support such the enormous expansion in housing as outlined. Given all the above, apart from the daily problems of normal traffic congestion, access for emergency vehicles would also be exceedingly difficult, if not impossible & therefore safety of residents would be seriously compromised.

Lack of Local Facilities. This particular site is very poorly served with the range of facilities that new residents would want & need. Schools could not be accessed without resorting to travelling by car. The 3 nearest primary schools, one of which is already heavily oversubscribed & has no ability to expand further, are not within easy walking distance and the 2 nearest secondary schools would also necessitate car journeys as there is no suitable local bus route serving the schools & certainly no bus that runs along Moss Lane. Similarly, there are no nearby doctors surgeries & limited shops within walking distance.

Nature Conservation This greenbelt area has a wide range of wildlife, some of which is protected. It is likely to be lost if development proceeds. A wide range of birds rely on the site for feeding including many rare bird species that rest and feed in the area as they journey to and from Martin Mere, a worldrenowned ornithological site used by thousands of migrating birds every year. Other animal species including bats, bees, butterflies, hares, hedgehogs, field mice, foxes, insects, rabbits, red and grey squirrels, stoats, voles and weasels have all been identified in the area. Three Pools Waterway which borders the site currently supports a diverse range of fish including roach, bream, perch and carp. Building development would be highly likely to result in pollution of the waterway & have an adverse effect on all of the natural wildlife & the beauty of the area, no doubt resulting in irreversible destruction of natural wildlife habitat. The area is currently used by ramblers, bird spotters, dog walkers horse riders, cyclists and anglers. All these recreational activities provided to local residents would be lost forever.

Poor quality building land. There are also significant issues regarding the suitability of the land due to the high water table, the risk of flooding & the sub structure which is peat & clay based & therefore highly unstable & would require extensive deep piling. Thus it is far from ideal for building land for the density of housing proposed.

Summary of Suggested Changes**Evidence Submitted**

Policy MN2.4

Land at Moss Lane, Churchtown

Respondent No 624

Response Ref 1

Representor Name W Miles

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

Main objections are as follows: Greenbelt should be protected land It is wrong in principle to build on any greenbelt land which has been designated to protect our precious countryside from urban sprawl & this particular piece of greenbelt must be protected to preserve the character of the ancient village of Churchtown, Once green belt land is gone it is gone forever.

Transport problems This land is in a position very poorly served with regard to transport links. Moss Lane is exactly that, a Lane, which is very narrow with no pavement on some stretches & little possibility of this being rectified. There is only one route towards Southport & the junction/ roundabout with Row Lane Ends is already badly congested & exiting from Moss Lane towards Southport is dangerous & queues often build up currently. 530 new homes would result in an enormous increase in the number of car journeys along Moss Lane with significant congestion inevitable in the area & the surrounding roads of Churchtown which already suffer severe traffic problems daily. In the other direction, away from Southport, Moss Lane connects only with a single track, bumpy road with deep & dangerous ditches on either side & sharp bends across the fields which is principally a farm track which is poorly maintained & unlit. It cannot provide the sort of traffic connection that the number of houses planned would require. Practically there is little that can be done to improve access to Moss Lane & I suspect little that could or would be done to improve the farm track (which lies in West Lancs & not Sefton) to make it fit for purpose to support such the enormous expansion in housing as outlined. Given all the above, apart from the daily problems of normal traffic congestion, access for emergency vehicles would also be exceedingly difficult, if not impossible & therefore safety of residents would be seriously compromised.

Lack of Local Facilities. This particular site is very poorly served with the range of facilities that new residents would want & need. Schools could not be accessed without resorting to travelling by car. The 3 nearest primary schools, one of which is already heavily oversubscribed & has no ability to expand further, are not within easy walking distance and the 2 nearest secondary schools would also necessitate car journeys as there is no suitable local bus route serving the schools & certainly no bus that runs along Moss Lane. Similarly, there are no nearby doctors surgeries & limited shops within walking distance.

Nature Conservation This greenbelt area has a wide range of wildlife, some of which is protected. It is likely to be lost if development proceeds. A wide range of birds rely on the site for feeding including many rare bird species that rest and feed in the area as they journey to and from Martin Mere, a worldrenowned ornithological site used by thousands of migrating birds every year. Other animal species including bats, bees, butterflies, hares, hedgehogs, field mice, foxes, insects, rabbits, red and grey squirrels, stoats, voles and weasels have all been identified in the area. Three Pools Waterway which borders the site currently supports a diverse range of fish including roach, bream, perch and carp. Building development would be highly likely to result in pollution of the waterway & have an adverse effect on all of the natural wildlife & the beauty of the area, no doubt resulting in irreversible destruction of natural wildlife habitat. The area is currently used by ramblers, bird spotters, dog walkers horse riders, cyclists and anglers. All these recreational activities provided to local residents would be lost forever.

Poor quality building land. There are also significant issues regarding the suitability of the land due to the high water table, the risk of flooding & the sub structure which is peat & clay based & therefore highly unstable & would require extensive deep piling. Thus it is far from ideal for building land for the density of housing proposed.

Summary of Suggested Changes**Evidence Submitted**

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I believe that the Local Plan in relation to area MN2.4 is not 'sound' for the following reasons :

Loss of Greenbelt – the Local Plan is not 'Positively prepared' and is 'Not consistent with national policy' (National Planning Policy Framework March 2012) because:

-The initial Draft Greenbelt Study 4 stage assessment process appeared to contain contradictions in assessing the area MN2.4 against the assessment categories of 'Prohibitive' and 'Severely Restrictive' constraints particularly in relation to flood zone 3a rating. The assessment was based on a flood map which appeared to show that the area to the east of Three Pools Waterway (all in West Lancs) was part of the flood zone 3a together with the area to the west of the waterway on the north side of Moss Lane (in Sefton) but the area on the south west side (MN2.4 also in Sefton) was not part of the flood zone 3a.

This does not seem to be a credible situation particularly as water levels rise to high up the banks of the waterway at times throughout the year with a consequent rise in the groundwater levels. The fields between Pitts House Lane and the waterway are regularly flooded during prolonged periods of rain as the underlying peat in the ground is already charged with a high water table and there is little natural drainage.

The initial assessment in the Local Plan also referred to some further work by the Environment Agency to reassess the flood map for this area but the outcome of this still appears to be unclear.

The National Planning Policy Framework (NPPF) also requires future climate change considerations to be taken into account in these situations.

-Another surprising aspect of the initial Stage 3a Assessment was that most of land parcel S004 (of which MN2.4 is part of) and the adjacent golf course were classified as a National and International Nature Sites or a Local Nature Site and yet a portion of parcel S004 (area MN2.4) was selected for possible development. The environmental designations on these areas provide Prohibitive Constraints in assessing changes to Green Belt which are protective showstoppers. Can a future large housing development effectively be allowed to encircle these nature sites without detriment?

-Some other assessments made in relation to Green Belt site development were just both misleading and incorrect; like, the assessment conclusion that there is an existing bus stop within 400m of the proposed development. A more accurate assessment would be 1000m.

-The effect on wildlife. This area provides a habitat for a variety of wildlife in the waterways, fields and adjacent woodland. Herons, ducks, swans, pheasants, wood pigeons, squirrels, rabbits, water voles and many varieties of small birds all inhabit the area in large numbers.

-Green Belt changes will diminish character of area. If the development were to proceed the adjacent Old Links Golf Course (a Local Nature Site) will be surrounded by housing and lose its openness as a result of the advance of urban sprawl caused by this development. Both these conditions are against the principles of the NPPF. Also, the safety aspects of a development in close proximity to the golf course warrant consideration.

-The development will result in the loss of some high grade agricultural land as well as the crops produced and the local employment it provides.

-The area currently provides many leisure facilities that would be lost. There are several stables and horse riding is a primary feature of the area. Locals and visitors from surrounding areas also use the open land, tracks, waterway and woodland for dog/pleasure walking, fishing and game shooting and the golf course also provides leisure and sporting facilities.

Impact on local community/infrastructure – the Local Plan is not 'Positively prepared' , 'Justified', 'Effective' and is 'Not consistent with national policy' and overall it is unsustainable because:

-The area MN2.4 is currently in a rural setting located tight up against the boundary of another authority (West Lancs). It has restricted road access from both the Sefton side and the West Lancs side.

Adequate road access into the proposed development area MN2.4 at the lower end of Moss Lane and other infrastructure such as

drainage/sewerage/services provision will be prohibitively difficult and costly due to the geography of the area and the constraints imposed by the border with West Lancs.

This area is only really accessible by road from the Southport side unless Wyke Lane (basically a farm road across 'the moss' to Ormskirk) is upgraded by West Lancs. It is difficult to imagine what benefit West Lancs would gain by collaborating or contributing towards this development for it will only encourage the 'rat run' effect and increase traffic volumes through an already congested Ormskirk town centre.

In their 'Report On Consultation Document' Sefton continually referred to the benefits of using the (currently being built) Thornton to Switch Island Link Road to ease access to the motorways from Southport. This presents a false perspective as road users from the north side of Southport (like Churchtown) will still head through Ormskirk to join the M58/M6 motorways.

Moss Lane is also severely restricted as it contains only a single sided pavement and deep ditches over parts of its length. Any new development would require substantial upgrades to many adjacent roads in the Churchtown/Blowick area to cater for increased traffic volumes.

My concern is that the Local Plan has given little consideration to providing safe road access with adequate capacity to cater for the inevitable increased traffic from any proposed development. The MN2.4 site is effectively at the end of a cul-de-sac with only a limited outlet route towards Ormskirk.

Whilst it may be possible for the developers to upgrade the roads locally on the Southport side at some considerable expense and local disruption (it would probably need to also include upgrading some roads around Churchtown Village) there is no evidence of any meaningful cross-authority strategy to upgrade the road access from West Lancs. The NPPF requires a cross-boundary strategic approach on these matters which the Local Plan does not incorporate. The Local plan is therefore not 'effective' in this respect.

-The development will require a bus service along Moss Road as the current nearest bus stop on Roe Lane/High Park Place is beyond desirable walking distance. Moss Lane may have to be widened further to cater for bus routes.

-Schools/doctors/dentists/shops /care facilities etc will have to be provided to service the increased population in this area.

-The development is scheduled to take place over a long period of time (possibly over more than a decade) and this will result in ongoing prolonged disruption and reduced quality of life for local residents through increased levels of traffic, noise, dust and inconvenience.

Impact on the wider Churchtown area - the Local Plan proposes a number of development sites within Churchtown area to currently provide around 1500 new houses. Churchtown village is a designated conservation area so the Local Plan is not 'Justified' or compliant with NPPF because:

-The increased traffic will have a negative impact on Churchtown as a visitor attraction and as a conservation area

-The existing road system around Churchtown is unsuitable to take further capacity. It already has several routes (like Botanic Road) which are speed controlled at 20mph by traffic humps. There is a major traffic controlled junction at Cambridge Road/Preston New Road which has queueing traffic most of the day and there are a number of mini roundabouts to route traffic in and around the village. Recent utility emergency repairs (a regular occurrence in the area and particularly along Moss Lane) have required awkward temporary diversion traffic routes along speed restricted residential roads unsuited for this purpose.

-The number of sites selected around the Churchtown area within the Local Plan appears disproportionate compared with other parts of Sefton as several sites are squeezed into a small area the very northern tip of Sefton adjoining the border with West Lancs and this results in a lot of negative environmental and sustainability issues.

Summary of Suggested Changes

In summary I regard the development of area MN2.4 as lacking in terms of sustainability and some aspects of compliance with the National Planning Policy Framework for all the reasons stated previously and therefore ultimately detrimental to the local environment, population and infrastructure. I believe that Sefton should further interrogate vigorously the use of existing vacant land, brownfield sites, windfall sites and other prospective opportunities for development instead of taking Green Belt land.

Evidence Submitted

Organisation Name**Obj/Sup/Com** Objection**Summary of Main Issues**

I object to the proposed development of the greenfield site adjacent to Moss Lane/Pitts House Lane/Three Pools Waterway. The following is a summary of my objections.

1. Traffic and access

Access to and from the site is solely along Moss Lane. There is no alternative route. Moss Lane is very narrow and is already extremely busy, especially at peak times. A development of 450 houses would account for at least an additional 1200 journeys per day along Moss Lane. The road was never built to withstand this sort of volume of traffic, and structurally is unlikely to be able to do so. Indeed, neither Moss Lane, nor Churchtown itself, can cope with this sort of increased traffic. The distance of the site from the existing public transport network, would make it likely that a bus route would be required to service the development. This is simply not viable along Moss Lane.

The minor roads which lead on to Moss Lane are already "rat runs" during the daily commute and school run, and Moss Lane and Wyke Lane have become short cuts for traffic coming into and leaving Southport, to avoid the route through Meols Cop. West Lancs Council have already expressed concern at the knock on effect this is having on significant traffic problems in Ormskirk, especially at peak commuter times.

2. Risk to Properties

The properties adjacent to the roundabout at the end of Moss Lane/Mill Lane, and other similar buildings, are former shrimpers' cottages which fall under the Churchtown Conservation area. For the properties along Moss Lane itself, there are concerns with existing heavy vehicle movement affecting the structures. Increased traffic (including heavy plant and equipment) will compound this problem further. These properties, and properties in the conservation area, need protection from the issues associated with large scale development.

3. Health Risks

It is well documented that even low level exposure to traffic fumes raises the risk of lung cancer. Lung cancer is the biggest cancer killer in the UK. The chances of a person developing lung cancer increases with greater exposure to small sooty particles generated by diesel exhausts, which are known to lodge in the lungs. This risk is already present as a result of the traffic congestion affecting Churchtown, and an increase in traffic volume, can only increase the risks associated with this.

4. Green Belt Land

The essential characteristics of green belts are their openness and permanence. Green belt land is designated, inter alia, to preserve the setting and special character of historic towns, and to assist in urban regeneration by encouraging the recycling of derelict and other urban land.

The NPPF states that green belt boundaries should be altered only in exceptional circumstances. The last published figures by the Council indicate that there are over 3000 empty properties in Sefton (excluding properties awaiting demolition), which is more than twice the national average. Sefton has identified the re-use of "void" properties as a main objective in its strategic housing services (Sefton Empty Properties Strategy 2009-2012). The use of green belt land should not be considered to satisfy the requirement of an exceptional circumstance until all other options are exhausted. Whilst the Council suggests that the supply of brown field sites is running out, this is not borne out by its published figures as to the number and location of such sites locally, or indeed, nationally. Once green field land is built on, it is lost for good, and it should never be regarded as a quick fix to a short term, or more particularly, a political pressure.

It is well recognised that the social and economic factors associated with building development are short lived, and do not long survive the immediate development period. It is unclear what other potential job creation the Council has identified. Realistically, these objectives may be met by alternative sites.

5. Suitability of the site

The area of land in question is affected by a high water table, and its composition would arguably make it undesirable and potentially uneconomic for development. The geological issues would be a major concern for potential homeowners in terms of insurance and maintenance, and may make borrowing against the properties by way of mortgage a difficulty.

6. Protected wildlife, sports and recreational facilities.

The land is host to a variety of wildlife, some of which is protected. This will be lost if the area is sacrificed to development. The area is currently used by ramblers, dog walkers, horse riders, cyclists and anglers. These are facilities for benefit of the wider

public, and not just residents in the immediate vicinity. This will all be lost, and there are other sites which would enable the Council to satisfy its obligations without depriving the existing community of a valuable recreational resource.

7. Local resources

The proposal to include Churchtown greenbelt was swept through on a Labour majority vote by councillors who are predominantly South Sefton based. Southport councillors, who have a proper understanding of the impact of a development of this size on the local transport infrastructure and existing community services, all voted against it. Schools in the area are already at capacity, and health services are overstretched. Southport does not even have its own children's A and E department. This is a problem which would be brought to a critical level by further strains on the transport network and pressures on the route to Ormskirk where the nearest service is located.

I urge the Council to consider these objections, and the availability of alternative sites which do not have the particular difficulties associated with this site.

Summary of Suggested Changes

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I urge the Council to consider these objections, and the availability of alternative sites which do not have the particular difficulties associated with this site.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

We wish to object to the possibility of using green belt land adjacent to Moss Lane, Pitts House Lane and Three Pools Waterway for development. In our opinion, if this land were to be developed, it would be a terrible loss to the local community and visitors.

People need places like this to get away from the built up areas. They need places to breathe and relax and there are very few places at this end of Southport where people can do this.

In our opinion this area would not be suitable for development due to the following points:

- The area has rich agricultural land and if built on, this would be a waste. Once our agricultural land has gone, it is lost to us forever.
- This land is peat which is difficult to build on and it would be a real waste of a valuable resource.
- There is a real issue with sewage and drainage of the area and more buildings would put further strain on an already stretched system.
- If houses were built along the edge of the golf course, this would affect the enjoyment of the golfers and stray golf balls could be hazardous to new homeowners.
- Such a large estate would require a new school, Doctor, Dentist, Shops, Policing etc. This would place a huge strain on the area.

- If Moss Lane had to be dug up to lay extra electricity, gas and other utilities there would be a lot of disruption as there are no other routes available to use.
- Large vehicles that would need to travel down Moss Lane would cause damage to the road and to existing properties. The road is not wide enough and there are deep ditches at the side of the road.
- Lane Ends roundabout is very congested at times and extra traffic would make this worse and dangerous. There have been several accidents at this roundabout over the years.
- The lanes going to Ormskirk and Carr Cross have had problems with potholes and bumps for many years. These are very narrow, single-track lanes and definitely could not cope with any more traffic.
- There is a very narrow bridge across Three Pools Waterway which would be unsuitable for any volume of traffic.
- Moss Lane is a very popular route for cyclists, including allotment holders, especially at the weekend. More traffic would be very hazardous for them.

- The land currently has varied uses, such as for the livery and grazing of horses, and the growing of crops. It provides excellent habitats for many small creatures and plants. Many people get a lot of enjoyment from this area – by walking their dogs and watching the horses, grey herons and other birds that often put in appearances.
- The biodiversity of the area would be affected as there would be a risk of habitat disturbance for the many birds, butterflies and waterfowl that visit here. I have also seen evidence of many moles which live in the area.
- It would be better to develop other land rather than use green belt.
- Building close to the Three Pools Waterway would spoil the enjoyment of people who like to go fishing there and there would be a risk of contamination to the waterway during the building and from the subsequent residents who may live there.

We are against the use of any use of green belt land where possible and hope that Sefton Council considers the above points, drafted from our local knowledge and does not decide to use any of this land for development.

Summary of Suggested Changes**Evidence Submitted**

Policy MN2.4

Land at Moss Lane, Churchtown

Respondent No 654

Response Ref 1

Representor Name T nd B Miller

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

Listed below are our main objections:-

- Green Belt should only be released under exceptional circumstances and we have not been convinced that these have been proven by Sefton Council.
- Moss Lane is a very busy road which only leads up to two poor farm roads, one is used as a 'rat run' between Southport, Ormskirk, and Burscough by cars and lorries and farm vehicles. The other lane the continuation of Moss Lane leads to a gravel farm track which leads to Rufford. It is unsuitable for cars. Both of these lanes are accessed by a single line bridge. There is not a footpath all the way to the bridge, and not even over the bridge which is the boundary between Sefton and West Lancashire. Part of the pavements are already in a very poor state of repair making walking on the pavement especially for the elderly and people pushing prams. This problem is partly due to the fact that the Lane is not very wide and cars and vans park on the pavement, especially towards 'Lane Ends' roundabout. I do not see a solution to the Lane being widened, so construction traffic will make life very difficult for residents, fire engines, ambulances and police. Moss Lane is the only access road for residents travelling into Churchtown or into Southport itself. A couple of weeks ago the part of the Lane between Warren Road and the round-a-bout was closed making it very difficult for residents to make appointments on time.
- In this area there is also a complicated sewerage system which struggles to cope now, especially when there is heavy rain. Raw sewage has been known to flood into Moss Lane, especially near to Southport Old Links Golf Club. The pumps have to be checked each week to help prevent flooding. If this new estate is to be built there would have to be a new sewerage system as at present I believe the present system is connected to Churchtown and Rufford. What are the plans for this and who will pay. Will we get a temporary reduction in our Community Charge with all the potential disruption and inconvenience.
- The proposed developemnet will not just affect the residents of Moss Lane but also the surrounding area. Especially Churchtown village itself. There is already a lot of congestion driving in and through the village. It is a conservation area with several historical shrimpers cottages, church, two public houses etc. It is an area of historical importance in the area and to Southport. It is already suffering damage from the ever increasing flow of traffic and pollution, the increased number of vehicles from the development would cause even more damage.
- At the present time I believe all the Schools, Doctors and Dentist practices in the area are at full capacity. What are the plans for building more and where is the land to build them?
- This land provides a haven for many animals, birds and insects. E.g water voles and barn owls and sparrow hawks which are all endangered species. It also provides recreation for walkers, cyclists, horse riding, anglers etc. It is also a valuable piece of arable land. The Government suggests that this country needs to be more self sufficient by growing more food thus cutting down our carbon footprint with less imports. How can we do this if Council Planners are giving in to the Builders by providing green belt land instead of brown field sites and 3000 empty homes which need refurbishment. I think that the Labour dominated council and planning authority swept through these plans based on Ordnance Survey maps and totally ignored Southport Councillors voting against the plans.

The proposed plan does not satisfy the Governments requirements and it is totally unfeasible in practice. I believe that this proposed development will cost the Developers a great deal more by the time the necessary roads and infrastructures are built, as well as new schools, doctors and dental premises.

Summary of Suggested Changes**Evidence Submitted**

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

This site is not suitable for development and maintaining its green belt status will provide a green buffer zone between MN2.5 Land at Crowland Street, Southport and MN2.2 Land at Bankfield Lane, Southport.

Moss Lane and Pitts House Lane are narrow roads with bends and a pinch point adjacent to the Old Links Golf Club. This road is an accident hotspot with incidents occurring regularly resulting in damage to property and street furniture; over the last 15 years I have observed many of these.

Only a couple of weeks ago a street lamp was demolished in a traffic incident.

The "5 Lane Ends" roundabout struggles to cope during peak times with traffic volumes at present and the junction size will prohibit any engineering solutions to this problem. Again I have seen a number of accidents and near miss incidents occur on an almost daily basis.

The road itself is built on a peat bed which is unstable with the peat contracting. To dig this out to produce a stable road surface for the extra traffic movements would not be economically viable.

Churchtown Village is gridlocked now at school and commuting times and will be unable to cope with the additional traffic the development will create.

A long length of Moss Lane has no pavement and pedestrians are more than twice as likely to be struck by vehicles in these locations. Unfenced ditches throughout the area are unsuitable for a developed area and may result in drowning incidents

As a Consultant Environmental health officer I am acutely aware of the dangers of air pollution caused by cars. The unsuitability of the Moss Lane site will result in all traffic being directed down the one route into the main trunk roads of Southport. I have mentioned previously the problems at the "5 Lane Ends" roundabout. Particulate matter air pollution contributes to lung cancer incidence in Europe; the inevitable queuing traffic will pollute the air and cause ill health.

New developments must have two access roads and this development will in effect only have one - Moss Lane, the only access road to the Sefton infrastructure. The other access road to Scarisbrick across the moss is single track with passing places; it is impassable by large vehicles such as Fire Engines. The road is dangerous at night and in frosty conditions as it is flanked by deep drainage culverts. It is often closed for by repairs. Vehicles often leave the road and end up in the ditches. If an incident were to occur in Moss Lane the new houses would effectively be cut off as would Emergency services.

Only last month a sewer repair caused a closure of Moss Lane. (Evidence enclosed "Picture showing the road closed adjacent to the Lane Ends roundabout"). The diversion route was a tortuous one and would have been virtually impossible for Emergency Vehicles, HGVs and buses. I consider this proves my point.

No matter how much money is spent on upgrading Moss Lane this issue remains and is insurmountable.

The underlying ground structure is of sand. This can easily be washed away if a leak occurs in a water main. This happened recently in Churchtown and the road is still closed. Imagine the consequences if this were to happen in Moss Lane. See Appendix 1.

One developer/land agent in their submission suggests there is a road link across the moss from Moss Lane, Southport to Rufford; this is in fact an unmade farm track and the cost of purchasing the land and upgrading it to adopted road standards would be prohibitive. The same applies to the numerous farm tracks in the North Southport hinterland.

The proposed land has a very high water table and was until recently classified as flood zone 3. I would challenge the science involved in amending this classification which coincidentally occurred just around the call for development sites. This land is on the edge of Martin Mere and only Victorian Engineering allowed drainage of the land. The Environment Agency intended to end pumping and only the intervention of West Lancashire District Council resulted in them changing the decision.

I submit as evidence the partnership website Alt Crossens and in particular the videos showing the issues that the future holds www.altcrossens.org

I submit as evidence the Environment Agency "Alt Crossens Catchment Flood Management Plan"

I quote from this document's key messages

"Martin Mere" (adjacent to the proposed site)

"We do not plan to increase our management activities to adapt to the impacts of climate change, as a result there will be greater wetting up of land during periods of high rainfall

"Proposed actions to implement the preferred policy

The essential actions to achieve our policy aim are listed below:

- Review the status of some of the main river watercourses.
- Review the use of satellite pumping station operation throughout this sub-area and use the findings to help identify opportunities for wetting up and linking areas of ecological value to create ecological networks.
- Develop the Lower Alt with Crossens Pumped Drainage Strategy involving key Catchment stakeholders.
- Review the potential for rationalisation of pumping station capacity."

"Southport" – The proposed site is in this area.

"Decreased maintenance activities or a reduction in the pumping regime could potentially lead to increased flood risk to as many as 4,000 properties."

The key messages

- Surface water flooding does present a flood risk to people and property although information on the scale or location of this risk is incomplete
- Properties in the low lying areas of Southport rely solely on the operation of Crossens and satellite pumping stations to manage flood risk. Reduction of capacity, failure or removal of these pumping stations could lead to a significant increase in the number of properties at risk."

The Environment Agency have attempted to argue that continued pumping is unnecessary and with continuing budgetary constraints it is only a matter of time before pumping will cease and the land will return to Mere.

How can land on one side of a drainage channel be at risk and slightly high (currently- but subject to peat shrinkage).

Martin Mere Wildlife and Wetland Centre together with the Royal Society for the Protection of Birds (RSPB) reserve at Marshside form the focus of wildlife and wetland conservation but the importance of the low lying land between the two cannot be understated. The proposed development land is often waterlogged and the temporary home to many important migrating birds as well as indigenous species. This land is too important to wildlife conservation to be developed with housing.

The land is a peat bed and whilst it is possible to build houses on such land with expensive and environmentally costly concrete piling the road and pavements together with foul drainage and utilities cannot be similarly protected. The peat will inevitably shrink and thus put homes at risk of blocked drains and leaking gas mains. Paved areas including roads and footpaths will suffer continual damage placing a long term burden on the local authority and householders to maintain safe access and egress

The existing utilities are unsuitable for further development. The sewage has to be pumped up to the main sewer and the pumps require constant, costly high level of maintenance. The pitch fibre sewer in Moss Lane is unsuitable and under capacity by modern standards.

The gas main struggles to provide sufficient gas at peak times for the existing houses.

I accept a developer may pay for these to be upgraded but this will place further pressure on Section 106 monies which will threaten.

The cost of providing and maintaining a pumped waste water system is not cost effective, ethical or green.

Summary of Suggested Changes

MN2.4 Land at Moss Lane, Churchtown is not released for development.

Evidence Submitted

Photograph showing the road closed adjacent to the Lane Ends roundabout

Article from the Southport Visitor 12 March 2015 re Sink Hole in Churchtown

Organisation Name**Obj/Sup/Com** Objection**Summary of Main Issues**

We strongly believe that greenbelt status should be preserved and that land designated as such should never be considered for development, especially when the land in question is best quality agricultural land-as is the case with Moss Lane.

While we recognise that Sefton needs to identify land suitable for housing, this particular area (SR4.03) is totally unsuitable for a number of reasons.

The Southport Old Links golf course will separate the existing urban area from the proposed development. As a consequence, the Local Plan seeks to remove the current Green Belt status of the golf course. This is so that the development does not compromise the function of the Green Belt here. This is unacceptable. Greenbelt status should only be removed from an area if it is designated for development.

4 Access to this site from the rest of the urban area can only be from Moss Lane which is simply not practical. At peak times there are already queues of cars trying to leave Moss Lane via the roundabout at the end of the road. Sefton commissioned their own Traffic Assessment which indicates a 5 fold increase in traffic leaving Moss Lane at peak times if the proposed development goes ahead. Although the TA says this will not be an issue, we believe it will in practice lead to horrendous and unacceptable delays at the roundabout. Traffic trying to get through Churchtown village at peak times already backs up from the traffic lights in Churchtown all the way to Mill Lane - a distance of several hundred metres. The extra traffic from the proposed development would make this route completely impassable. The extra traffic problems would therefore make Moss Lane and the roundabout junction less safe, especially for pedestrians and cyclists.

5 Appendix 1 of the draft Plan states that for safety, the road should be a minimum of 6m wide with 2m footpaths on both sides continuously from Lane ends roundabout to the Three Pools waterway. It also states that the improvements needed to achieve this can be accommodated within the existing highway. This is factually incorrect. Adjacent to the golf club, the carriageway is less than 8m wide including both road and footpath. The strip of grass adjacent to the road on the south side is privately owned by the golf club and they will not give permission for it to be used for road/footpath widening. The stretch of road from Fosters Close to the Three Pools waterway, i.e. adjoining the proposed development, is for the most part less than 6m in width. Although there is one footpath, widening the road to 6m and adding a second footpath cannot be done within the existing highway.

6 There is a bend in Moss Lane which as the Sefton TA states makes it difficult for drivers to see and cars to safely pass, as the road narrows at this point to less than the recommended 6m. (As per the Site Specific Requirements in Appendix 1 of the plan). There is no footpath on the south side of the road. Although the developer claims that widening the road and providing a footpath adjacent to the Golf Club will be easily achieved, it is clear that it will not be possible. The road is simply too narrow to accommodate a 6.0m road and two 2.0m footpaths utilising the existing highway. There have been numerous accidents here, which are not necessarily reported. People living locally can recall several over the years. I can recall seeing a car on its roof in the garden of no. 47 Moss Lane after clipping the kerb on the bend. The police were called but this is not listed as a reported accident. Extra traffic will make this bend even more dangerous to both pedestrians and vehicles.

7 Cars leaving Moss Lane in the other direction have a pinch point at the single track bridge over Three Pools waterway (which has no proper footpath meaning it is dangerous for pedestrians) followed by the road over the moss (Wyke Lane) which subsides regularly despite attempts to repair it. More single track roads with passing places lie further on which is bound to lead to severe congestion at peak times. The neighbouring authority of West Lancashire, in their comments on the Local Plan, expressed concerns over any possible development that would potentially increase traffic leaving Southport and using the A570. Traffic wishing to travel on the A570 from the new development will certainly use the narrow moss roads which are totally unsuitable for any increase in current traffic levels.

8 There is no assessment of the cumulative effect of increases in traffic generated by all the proposed developments in the Churchtown area – SR4.02, AS01, AS28, & SR4.03 (i.e. impacts on the roads near the developments themselves and the centre of Churchtown) included in the latest Local Plan. In the previous Draft Plan, Sefton noted in its assessment of potential traffic problems that, quote : "Cumulative traffic impact likely to be unacceptable if both S004 (I assume this is now SR4.02 & SR4.03) parcels consulted on at the Options stage were proposed for development". These comments have been deleted from the latest draft Local Plan. There are now 2 extra developments (AS01 & AS28) so the situation will be much worse. An assessment should be done before the planning permission stage.

9 Damage to properties in Moss Lane / Mill Lane. There are a number of cottages in Moss Lane and Mill Lane which are part of the Churchtown conservation area. Some of these are already experiencing problems with the fabric of the properties due to

traffic - extra traffic from the proposed development will make things worse.

10 Damage to health - due to fumes from traffic including increased risks of cancer (as recently reported in the Lancet Oncology journal). As noted above, there is already standing traffic at peak times in the area. Extra traffic will make this much worse.

11 Loss of wildlife habitat. The area is a mixture of deciduous woodland, meadow and arable farmland adjacent to a wide waterway. This provides an excellent habitat for a rich variety of wildlife, including some scarce species which have special protection such as barn owls (nesting at Pitts House farm in spring) and water voles on Three Pools waterway. We have seen over 60 species of birds in this area over the last 12 months (see the list below). We walk this area regularly and are keen birdwatchers (WWT and former RSPB members) and know from personal observation that these species either feed, nest or pass through the area in question. This habitat should not be lost and the wildlife should be left undisturbed. A proper study would need to be conducted over at least a twelve month period to confirm these sightings to allow for seasonal fluctuations in different species. This should be done before Green Belt status is removed.

12 Loss of a local amenity. Many people like to walk in this area recreationally, as well as horse riders, etc. The loss of this amenity would affect local people as well as many others.

13 Effect on Old Links Golf Course. As a consequence of the development, two thirds of the eastern boundary of the Old Links golf course will adjoin housing rather than the current open views of the greenbelt farmland. This would be detrimental to the course. This goes against the Council policy of trying to encourage things like golf as a tourism attraction.

14 Effect on open aspect of the remaining greenbelt land. If the developments in Moss Lane and Crowland Street goes ahead, the residual greenbelt land (the Old Links Golf Course) will become an island of greenbelt, almost totally surrounded by built up areas. This goes against the idea of keeping the views from greenbelt land open.

15 The proposed development in Moss Lane barely adjoins the existing urban area. It is only joined by a short strip of land that contains a few houses. This creates an island of greenbelt to the west of the site where the golf course is. New developments should not "leapfrog" over existing greenbelt land.

Summary of Suggested Changes

Remove land parcel SR4.03 – Moss Lane – from the areas proposed for development. and leave the Green Belt status of the land unchanged.

This will address the very real concerns of the local residents about safety and suitability of the site for development, who feel at the moment that their views have been ignored.

Appendix 1 of the Plan, para MN2.4, states a footpath is required on either side of the road. This is ambiguous and should be reworded to say "both sides".

Appendix 1 of the Plan, para MN2.4 is factually incorrect (see point 5 above) and should be reworded to state that improvements to the road CANNOT be made within the existing highway

Evidence Submitted

Policy MN2.4

Land at Moss Lane, Churchtown

Respondent No 682

Response Ref 1

Representor Name Michael Halsall

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I object to the proposed housing allocation SR. 4.3 "Land at Moss Lane. Churchtown. Southport on the basis of the unsuitability of the land for development and the inadequacy of the traffic access and the services to the site.

The land is, in general, a rich peaty loam on top of a wet clay. It is unstable and prone to flooding. Over the last 35 years, or so, when a property has been erected or extended and piling has been used considerable and expensive damaged has occurred to properties in the area as any vibration is transmitted through the wet clay. The thought of the vibration created by the construction operations and the construction traffic are concerning and would blight the area.

Moss Lane is a single carriageway which for some of its length is just over five metres wide, hardly enough for a car and agricultural vehicle to pass. Moss Lane commences at the Churchtown end with a roundabout which already has a significant queue of car in the morning waiting to exit Moss Lane This delay is due to the continuous flow of traffic from Mill Lane wishing to travel into Roe Lane or Highpark Road. With the existing traffic and the addition of the traffic from the proposed developments at the "Phillips Site" and the "Bankfield Lane Site" wishing to travel into Southport or to Ormskirk the drivers from Moss Lane would be "prisoners" until the morning traffic peak is over. There is an escape route down Warren Road but this "rat-run" is unsuitable and would be unacceptable to the residents of the area and to the staff and pupils of Bishop David's School. At the other end of Moss Lane, over a single lane bridge crossing the Three Pools Waterway, Moss Lane divides into Straight Up Lane and Wyke Lane. Straight Up Lane has been described as connecting to Rufford but in practice is a gravel farm track full of pot holes, only suitable for tractors and 4wd vehicles. Wyke Lane is for some of its length a narrow country lane of about 4 metre wide with deep ditches on either side, which regularly have a car in them, but for a significant part of its length it is a single lane with passing places. Both entry and exit options to Moss Lane are totally unsuitable for the additional traffic that would be generated by the proposed development of 450 properties on the land adjacent to Moss Lane.

The water, sewage, electricity gas services are barely adequate for the existing properties. The water supply drops to a dribble in a hot summer, the sewage is pumped and unreliable, the overhead electricity regularly fails and the gas supply fails to maintain the pressure required to serve modern heating appliances in winter conditions. Some of these problems could be solved but at a very considerable cost and disruption to the existing property owners. The local schools and medical services are over stretched and confirm that they cannot serve an addition population.

For the above reasons I object to the proposed development of the removal of the Greenbelt status and the development of 450 properties on the land adjacent to Moss Lane.

Summary of Suggested Changes**Evidence Submitted**

Policy MN2.4

Land at Moss Lane, Churchtown

Respondent No 684

Response Ref 1

Representor Name Barbara Halsall

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I object again for the following reasons:

Moss Lane is a narrow country lane, used by pedestrians, cyclists, horses and cars as a means of access to the countryside of West Lancashire. It has a unique character not found in the rest of the region. At the south end there is a very busy roundabout where traffic congests, especially in the morning and evening rush hours. The road is narrow and floods regularly especially at the bend close to the entrance to the Old Links Golf Course. There is no public transport down this road and people who live there have to walk to the roundabout to catch a bus into town.

The local Doctors, Dentists, Health Centres and Schools are already at full capacity, with waiting lists for new patients and school children.

Building on this land would take away virtually all the available greenbelt at the north end of Southport.

Southport has insufficient employment to sustain a large increase in the population that this development would bring.

The transport links to the North are poor with just a bus service and no railway link

The Health and Safety issues could be enormous as the potential development takes place with huge plant and blocked roads making life difficult and frustrating for the present local residents and an increased burden on the roundabout access at four lane ends.

Is it right to cover good agricultural land with concrete?

The proposed development is a threat to the local wildlife.

In summary, my main objections are the taking away of our entitlement to Greenbelt land in our community and to the use of a narrow country lane as a main artery to a large housing estate taking away the unique character of the locality, which once gone will never be regained.

I would like to think that all my previous objections and the objections of the vast majority of the local population to this proposal will be taken into account as this plan moves into its next stage.

Summary of Suggested Changes**Evidence Submitted**

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

Whilst this site may well contribute to the high affordable housing need in Southport I feel there are many reasons why this site should not be used for this development and they are as follows:

1) Significant Impact on traffic and public transport -

In the likelihood that 450 houses were to be built on this land this would significantly increase the amount of cars in the area by at least 450 and possibly upto 900. The increase and introduction of building vehicles would also be horrific and could potentially cause problems to the roads especially on Mill Lane and Churchtown Village where the impact of increased traffic already make houses shudder.

Possibility of serious accidents due to lack of pedestrian crossings and traffic signals in this area

As recent as March 13th Sinkholes have been a problem in this area (see link below)
http://www.liverpoolecho.co.uk/news/liverpool-news/huge-sink-hole-means-busy-8839653

The infrastructure of the roads in the surrounding area in my opinion would need to be significantly improved with traffic lights, pedestrian crossings etc.

The roundabout at Moss Lane leading to Mill Lane (A5267), Old Park Lane, Roe Lane (A5267) is a very busy roundabout already, especially at school times, peak hours and holiday periods.

Travelling to Preston - The A5267 Mill Lane would be the main road out from Moss Lane through Churchtown Village through to Preston New Road onto Preston Or alternatively through the village via Bankfield Lane which is also very busy and has many road restrictions in place causing many drivers to head through the village to Preston New Road. This area is already a highly congested area at peak times

Travelling to Liverpool/Ormskirk/M57/M6 - Roe Lane (A5267) is the main road from Moss Lane heading to Liverpool/Ormskirk and M57/M6. Again this road is a very busy road.

The whole area around this roundabout can be dangerous to cross at times. I would hope that significant improvements would be made to install new signal controlled junctions with traffic lights and pedestrian crossings being put in place for school children and elderly to cross especially.

The other alternative to get to Liverpool/Ormskirk from Moss Lane which may be end up being used more by residents who would live on Moss lane could be:

- Moss Lane - Wyke Lane - Pool Hey Lane - Southport Road (A570)
Moss Lane - Wyke Lane - Wyke Cop Road - Snape Gree - Southport Road (A570)
Moss Lane - Wyke Lane - Wyke Lane - Wyke Cop Road - Woodmoss Lane - Southport Road (A570)

In my opinion this alternative would be quite dangerous. This road is not currently used by a heavy load of traffic and is used mainly as a back road to get to Southport Road (A570) by limited people in the Churchtown area. The infrastructure and conditions of the roads via Moss Lane - Wyke Lane can be treacherous it is one single track with passing points in the road for people to pass each other. This road struggles to accommodate two cars going in opposite directions. There are also very steep ditches where there have been many incidents of cars landing in the ditch (see links below)

- http://www.otsnews.co.uk/merseyside-police-arv-bmw-x5-crashes-into-ditch-wyke-lane-churchtown-southport/
http://www.southport.gb.com/southport/news_photo/RTC_%96_Churchtown_Moss__Southport-50408829.htm

There is limited pavement access on Moss Lane and in some places it is non-existent. Public transport (Buses) would struggle to get up and down Moss Lane and this would need to be taken into consideration and changes would need to be made to widen the roads to accommodate them.

2)Impact on Sewage pipes and Water utilities etc

This area has suffered over the years with problems relating to really old sewage pipes many dating back to Victorian times the

increase in the usage of these facilities could potentially cause significant damage in my opinion and would hope that the community would be given reassurance that changes will be made to ensure sinkholes like above do not become a regular occurrence due to the impact of introducing such a large amount of houses and significant increase to the population of Churchtown.

3)Facilities and Services

Churchtown has a wide range of facilities and services and these facilities and services currently serve the community well but they are not suitable or would not be sustainable of supporting a large scale development of this kind

Doctors and Dentist surgeries are already difficult to get appointments at due to the high population and demand for their services in this area

Schools are already at full capacity with little chance of being extended due to the small amount of land they are built on.

4) Environment / Golf links / Fishing / Horse riding and other Community activities in the area

The area around Moss Lane is considered by the community of Churchtown to be an area of outstanding natural beauty and is used for many recreational activities such as Golf, Fishing (Three Pools Waterway), Horse Riding stables, Walking, Cycling, Bird Watching etc the impact of building on this land would be significant to the community and would seriously hinder these activities and some may cease to exist. This would be dreadful.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.4	Other Documents
Policy MN2.4	Land at Moss Lane, Churchtown	
Respondent No 696	Response Ref 7	Representor Name Robin Buckley
Organisation Name Redrow Homes Ltd		
Obj/Sup/Com Support		

Summary of Main Issues

THIS IS A SUMMARY

The Council has approached the review of the Green Belt boundary in a rigorous and systematic way. Following the Green Belt study a methodology has been applied for selecting Green Belt sites for development. This resulted in almost half the potential development sites identified in the Green Belt Study being excluded from further consideration. In relation to the land at Moss Lane (South) in Churchtown, the outcome of this systematic approach to appraisal is that the site is suitable for housing. The inclusion of Land at Moss Lane, Churchtown as a housing allocation is fully supported (Site reference MN2.4). It has emerged as an allocation following the Sefton Green Belt Study and the Methodology for Selecting Green Belt Sites. Development on this site is vital if Sefton is to meet its objectively assessed need for housing. It can support parallel objectives in Southport to strengthen the economic base, particularly in the tourism sector and will add significantly to the stock of affordable housing for which there is a distinct need in the town.

However, the division between Housing and Urban Golf Course shown on the Local Plan Policy Map needs to be adjusted to take into account current land use and land ownership. The adjusted boundary is shown clearly in the landscape appraisal document (Appendix 4).

Summary of Suggested Changes

There has been a drafting error in the Local Plan Policy Map that does not accurately reflect the extent of the Urban Golf Course. Existing land use and the adjusted distinction between Housing Allocation and Urban Golf Course is shown in Appendix 4. This results in a slightly larger housing allocation.

Evidence Submitted

Stage 1 Flood Risk Assessment; Transport Assessment; Preliminary Geo-Environmental Risk Assessment; Appraisal of Landscape Context and Site Masterplan

Chapter 6	Plan Order Site MN2.4	Other Documents
Policy MN2.4	Land at Moss Lane, Churchtown	
Respondent No 703	Response Ref 7	Representor Name Jackie Copley
Organisation Name CPRE Lancashire		
Obj/Sup/Com Objection		

Summary of Main Issues

We are strongly opposed to the redesignation of this 'detached site' for residential development. Contrary to the officer assessment, we believe the rear gardens do constitute a well-defined Green Belt boundary.

Site MN2.4 as delineated is not a rational entity for consideration. The officer assessment acknowledges this, referring to a more rational entity as the roughly triangular area bounded by Moss Lane to the north, the West Lancashire/Sefton boundary to the east, and the urban area to the west. But this larger area would require redesignation of the golf links too, otherwise it would result in a poorly contained area, as the south and south-west boundaries would have no physical geographical basis.

The development of the whole of the larger site would be in our view be a major encroachment of the countryside and an unacceptable enlargement of an already large existing built-up area. Redesignation of this site would encourage speculative development on the golf links land.

CPRE believes redesignation of the site would cause insoluble loss of neighbourhood and landscape character for residential development of the northeast area.

CPRE attributes significant weight to the fact that 90% of the site comprises best and most versatile agricultural land. This fact is omitted from the concluding remarks in the officer assessment of the site.

Development of the site would require sophisticated SUDS to control surface water flooding.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.4	Other Documents
Policy MN2.4	Land at Moss Lane, Churchtown	
Respondent No 716	Response Ref 15	Representor Name Robert Swift
Organisation Name Robert Swift and family		
Obj/Sup/Com Objection		

Summary of Main Issues

Our advisors have discounted site MN2.4 'Moss Lane, Churchtown' in its entirety.

The site is physically separated from the remainder of the settlement by the Southport Old Links Golf Course and feels rural in nature. The development of the site would result in disjointed segregated development, which again is very separate from the settlement. It is also currently in use for equine purposes, and across from the site are orchards.

Both the Sustainability Appraisal and Proforma Assessment score the site poorly in relation to accessibility, and this is reaffirmed upon viewing the site. There are also concerns about the impact of the site on the surrounding area in terms of landscape as it is visually open with views extending along Wyke Lane and is particularly rural in nature. There are also highways and access considerations to overcome particularly as the access road at the bottom is single track with passing places. The site should therefore be discounted.

Summary of Suggested Changes

Delete this site (MN2.4) from policy MN2 site allocations.

Evidence Submitted

Policy MN2.4

Land at Moss Lane, Churchtown

Respondent No 718 Response Ref 1 Representor Name Brian Kenyon

Organisation Name Southport Old Links Golf Club

Obj/Sup/Com Objection

Summary of Main Issues

Objections:

The current road network, i.e one main road - Moss Lane, is currently unsuitable for existing traffic requirements without adding a potential of 450 further properties to the scenario. The present daily bottleneck at the junction of Moss Lane with Roe Lane and Mill Lane - Lane End Roundabout - would be probably trebled or quadrupled.

If the development were to go ahead, we would lose our 2nd and 11th tees to the development, thus costing us in the region of £10,000 to £20,000 to rebuild further down the fairway.

More seriously would be that the development would impose on our 4th fairway, thus making it unplayable in its present situation owing to the possibility of golf balls being played into the new housing with the distinct probability of house owners taking out injunctions to stop golfers playing this hole. To overcome this problem, we would have to either re-align the hole at an anticipated cost of up to £100,000 or close the hole completely, thus making our course an 8 hole course which being honest is unheard of.

As a members club, this cost would have to be borne by the members, which we believe in the current economic climate, would be beyond the majority of our members who would then leave the club. In a worst case scenario, if we could not raise the funding, we would possibly have to close the course as we would not be in a position to obtain insurance cover for the current layout of the course.

We trust that Sefton Council will consider our dilemma sympathetically and not allow the change from Greenbelt to Development for this parcel of land.

Summary of Suggested Changes**Evidence Submitted**

Policy MN2.4 Land at Moss Lane, Churchtown

Respondent No 728 Response Ref 7 Representor Name Martyn Sayer

Organisation Name Churchtown Green Belt Action Group

Obj/Sup/Com Objection

Summary of Main Issues

THIS IS A SUMMARY

Local services

The Moss Lane site is not sustainable. Local roads and schools are already at capacity. With the additional development sites crammed into the area, e.g. in Crowland Street (e.g., SR4.04) there is a real risk local services will not be able to cope. The Local Plan is therefore unsound. It has been acknowledged that the site is not within easy walking distance of services at Churchtown.

Ecology, Wildlife and Leisure (Minor Constraint in Site Assessment)

The site is likely to threaten a wide range of protected and unprotected wildlife that live and use this area. The development would affect the migratory activities of rare bird species that rest and feed on their journeys to and from Martin Mere. Three Pools Waterway is stocked with fish such as, roach, bream, perch and carp. It is also a vole habitat. The development would increase the risk of contamination and drive away the voles from their protected habitats.

The area is frequented by ramblers, bird spotters, dog walkers and horse riders, and on the WLDC side - there are game bird shoots. This openness provides important recreational facilities that benefits Southport residents, and visitors to the area.

No approval should be granted for housing until a formal and thorough ecological survey is completed by independent and recognised ecology experts.

Flood risk (Moderate Constraint in Site Assessment)

Part of the site is designated a flood plain - a risk that should not be ignored. As the UK weather conditions continue to get more extreme, flooding and high water table risk will increase exponentially.

Heritage - Southport Old Links Golf Course (Minor constraint in Site Assessment)

The Old Links GC is one of the oldest club courses in Southport, and is an important asset to Southport's reputation as England's golfing capital. The links-pasture land course gives it special character, and a development of housing to the east and along its border, would result in urban sprawl and would fail to maintain the integrity of the greenbelt and the aspect of openness.

The close proximity of new property would present safety risks to residents and golfers, and mean additional safety measures would need to be implemented, including changes to the course. The consequence of such restrictions would affect playing conditions (as fairways would be sheltered from NW, E, and SE winds), leading to loss of key features of its links challenge and its countryside outlook.

The site is located to the south east of the Conservation Area and provides an open setting which corresponds with the recognised parkland character of the Conservation Area. The development of the site will potentially impact on views into the Conservation Area from Wyke Lane and views out of the Conservation Area towards the open fields surrounding it. This aspect of open fields will be lost in relation to site SR4.03 and would be detrimental to the Conservation Area. Local Listed Buildings could also be affected.

Pollution (No constraint in Site Assessment)

A significant increase in traffic congestion would lead to increased carcinogenic/health risks from car and large vehicle movements for pedestrians, children and residents. Sefton should commission an environmental assessment to evaluate these in conjunction with a Strategic traffic assessment with WLDC/Sefton.

Site Access (Moderate constraint in the Site Assessment)

Appendix 1 of the Local Plan indicates Moss Lane road must maintain a 6 metre width with 2 metre pedestrian lanes on each side of the road. This requirement will not be achieved in front of the Old Links Golf Course.

The Three Pools Bridge on Moss Lane only provides for single vehicle crossing with priority from the west direction cars. The bridge is a chokepoint and is unsuitable for large volumes of vehicles. It may need investment to improve its resilience to increase traffic and weight of vehicles that will use the back route to the site. The bridge has very poor provision for pedestrians (about 18 inches each side). Vehicles exiting through Churchtown would increase the already known heavy traffic choke points of Mill Lane and Manor Road, and increase the unnecessary traffic and environmental pressure on Churchtown Village and conservation area.

Network Capacity (recorded as Moderate Constraint in Site Assessment)

Moss Lane, and linked road networks would not be able to cope with a large development. A large development off Moss Lane would result in hundreds of new commuters using these roads, e.g. travelling towards Ormskirk and the M6 motorway. Vehicles travelling to and from Southport would clog up the road network at the Lane Ends roundabout.

Estimates suggest that up to 1000 vehicle journeys could occur each working day on Moss Lane, for a development of about 450 houses. This would increase exponentially as commuters from other new local developments use this shortcut route to Ormskirk. Moss Lane is too narrow at the part leading to the Mill Lane roundabout at the end of Roe Lane and High Park Road. It is a choke point during peak commuting times, and would be highly restrictive for site access. Other Moss Lane issues include a steep ditch alongside the road, limited paving, and a sharp/blind bend on the corner by Fosters Close - where the pavement has already been fitted with concrete posts to stop traffic using the pavement.

Wyke Lane (in WLDC) is an exit lane for Moss Lane housing development traffic travelling away from Southport to the east or south destinations. It is poorly maintained (re-surfaced in 2013 and already falling apart), and largely 1 way country lane (with occasional passing places) which connects WLDC with Sefton at the Three Pools Waterway bridge. The lane is only suited for very light traffic and farm vehicles (hence being labelled as a 'lane'). It has deep and steep ditches on most sides and has been subject of land slip and vehicles accidents along most of its length. The formal traffic surveys have indicated a low incidence of accidents along its length, but local residents (e.g., farmers) will confirm occasions when they have used their tractors to recover vehicles from the ditches - events which will not have been recorded.

The cumulative effect of all the developments - over 3,000 houses in the Churchtown area and adjacent to Southport General Hospital will exponentially generate a significant increase in the pressure of traffic at the northern and north-eastern ends of Southport which are already operating at peak capacity levels during prime commuter times.

Commuters travelling from the developments close to Churchtown towards Ormskirk and the M6 or Liverpool (as it is the shortest and quickest route) will add to the already traffic overload through Ormskirk. Commuters travelling towards Preston will use the fastest routes to exit Southport, e.g. Crowland St, Bispham and High Park roads.....all of which channel through Churchtown via Mill Lane. It is unacceptable to expect these minor roads to sustain this level of increased traffic volumes.

Accident risks will inevitably increase for commuters, as Wvke Lane is the quickest (no traffic-lights etc ,) and the shortest route towards Ormskirk /M6 /Manchester and Liverpool - with the potential for more serious injuries due to traffic speed/volume of vehicles and the state of the road (very narrow in places for cars to pass).

With no road improvements planned, a detailed independent study, open to public scrutiny should be commissioned between West Lancashire District Council and Sefton, to assess the cumulative impact of all of the combined developments across the north/north-east areas of Southport, before any planning applications are approved by Sefton. In its current state the Local Plan is unsound.

Additionally, there are already significant highway problems in the area, with accidents occurring more frequently on adjacent roads to and from the roundabout feeding into Roe Lane and Moss Lane. Current data does not provide an accurate representation of non-reported accidents. A more substantial road safety study using forecasted traffic levels, would need to be undertaken before further consideration is given to a new housing development. The highways assessment would confirm vehicle volumetrics and the unsuitability of the local road networks for such a cumulative level of new housing developments. The snapshot traffic survey completed by Hydrock in 2013, on behalf of the CGBAG confirms this risk, which will now be exacerbated with the increased development plans.

In the Redrow Traffic Assessment there is a reference that Upper Straight Lane (the continuation of Moss Lane) ultimately connects to Rufford. This reference is misleading and implies an option for entry/exit to Moss Lane (e.g., for a new housing development). This lane leads to farm tracks within 1/4 mile of the Three Pools Waterway bridge which is only suitable for farm machinery and four-wheel drive vehicles. This road should be wholly discounted from any transport assessment unless a detailed consultation is held with WLDC to assess infrastructure changes.

Accessibility improvements (No Constraint in Site Assessment)

With the increasing popularity of battery powered disabled vehicles and the considered view from Sefton that large numbers of elderly residents would be accommodated in a new development. Disabled user traffic could become quite significant as local services are not easily accessible. Careful consideration to provide a safe environment for such residents should be carefully considered, as their overall alertness becomes more impaired as they age.

BMV Agricultural Land (Minor Constraint in Site Assessment)

This grade 1/2 agricultural land is a precious resource, and the developments from Crowland St through to Bankfield Lane are on some of the most fertile areas for crops in the UK. This agricultural land should be protected and retained. There is insufficient drive and commitment from Sefton to redevelop brownbelt areas in which there is already good road and services infrastructure close to town centres.

The development site comprises top-grade soil, peat, and clay, and is notoriously unstable for any surface development. Covering

the land with new properties and concreting surfaces will cause the underlying ground to suffer from drying, as drainage is re-directed. This is likely to result in more land movement (affecting paving, roads, utilities (sewerage etc.) that are not underpinned). An assessment of the Foul Lane tip and the Meols Cop Trading Estate provide clear visual evidence of this risk.

Utility Infrastructure (Minor Constraint in Site Assessment)

There are well-recognised drainage issues along the length of Moss Lane. Where sewerage is pumped up from Upper Straight Lane over the Three Pools Waterway Bridge, and stored in sewerage tanks located under the road by Foster's Close. The system is antiquated and has not been upgraded over the years as small discrete housing developments have grown up along Moss Lane. It requires regular onsite maintenance attention, and would require a substantial upgrade to resolve these problems, but would need significant and costly upgrade for such developments, and cause major traffic disruption for road users.

Openness/Landscape

The removal of Site MN2.4 from the Green Belt and allocation for residential development will have a significant impact on the openness of the Green Belt and the local landscape. The site is located in an area of very flat land and as such is extremely visible on approach from Wyke Lane. The site is currently in agricultural use and forms part of the wider landscape; it is indistinguishable from the rest of the Green Belt in this location. If the site is developed for over 500 houses then this will have significant impact on the appearance of the local landscape. The allocation of site will have a significant impact on the identified Landscape Character Area in neighbouring West Lancashire.

The draft Local Plan does not propose that land to the north, south, east or west of Site MN2.4 should be removed from the Green Belt. As a result the site juts out from the existing developed area of Churchtown: it is not contained in any way by the existing urban area. The adjacent golf course, as previously referred is located in the Green Belt and there are no proposals for this designation to change. Site MN2.4 is, for all intents and purposes, an island site in the Green Belt and as an island site its impacts on the landscape and openness are unquestionable.

Sport and Recreation

The golf course forms part of the Green Belt and is surrounded by Green Belt to the south and east. This provides a setting for the golf course which is commensurate with the sport. The loss of the adjacent openness and setting for the golf course will detract from it and reduce this opportunity for sport as it becomes a less attractive proposition for golfers and potential golfers. The impact of site's development on this recreational facility has not been fully considered by the Council in their assessment of the site. The development of this site will have a physical impact on the playability and viability of the golf course.

The Three Pools forms the eastern boundary of the site and is the local authority boundary with West Lancashire Council. Three Pools is a very popular angling location and is administered by Southport and District Angling Association (SDAA). The removal of this site from the Green Belt will have a detrimental impact on the use of Three Pools for angling making it a less attractive location discouraging people from using the Green Belt for recreational purposes.

Summary of Suggested Changes

Evidence Submitted

Local Plan Representations, Matthews and Goodman September 2013
Transport & Highways Review September 2013

Chapter	6	Plan Order	Site MN2.4	Other Documents
Policy	MN2.4	Land at Moss Lane, Churchtown		
Respondent No	1011	Response Ref	2	Representor Name WJR Stuttard
Organisation Name				
Obj/Sup/Com	Objection			

Summary of Main Issues

Objection to the proposed number of houses off Moss Lane, given the inherent access restrictions via Moss Lane.

Moss Lane Churchtown does not have the advantages of these other potential areas. The road was not designed for major vehicular movement, is narrow in places, and the section between Roe Lane Roundabout and the cottages from Number 63 Moss Lane onwards includes two blind bends (by the Golf Club and by Fosters Close). It barely copes with the existing traffic, and there is already a

significant traffic build up queuing for the roundabout at peak times, and the proposal to build approximately three times as many houses in the area as there are currently houses which require access to Moss Lane seems entirely untenable

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

This development is proposed for high grade agricultural greenbelt land on the Southport and West Lancashire boundary. The first aspect of soundness is whether there is adequate justification for the decisions that have been made. I feel the council have failed in this regard on this site and I will set out why below.

Primary Schools Figures – As a Governor of Bishop David Sheppard schools I was surprised to see the suggestion in the document that 99.92% of this site would have high accessibility for Primary Schools. This is based on the fact Bishop David Sheppard is within 800m of 99.2% of the site. This is true as the crow flies but given that the school teaches children, rather than crows, I feel the site selection should have reflected the true difficulty in accessing a primary school from the site.

To walk from the school in actual fact is approximately 1,287meters which would move the grading from high accessibility for 99.2% of the site to low accessibility. Added to this there is currently no public pavement down part of the side of Moss Lane on which the children would be walking meaning they would have to cross a road which is being made busier and more dangerous by the plan. This flawed research also seems to have been applied to the neighbourhood park figures.

Heritage – The Heritage assessment acknowledges what it feels will be a minor impact on the North Meols Conservation Area due to an increased sense of suburbanisation. This is of course true but there are a number of other concerns which have gone unmentioned. Later in the site selection it talks about major highway works to Moss Lane which would encroach within meters of the North Meols Conservation Area. This does not seem to have been taken into account for the Heritage section but clearly changing a lane into a much larger route into and out of Southport will have a significant effect on Heritage. It is for this reason I feel Heritage should have been classed as a Moderate Constraint on the constraint severity assessment.

Site Access – This has partially been covered above and the site selection documentation acknowledges it as a Moderate Constraint. However one issue that is not discussed, perhaps due to the lack of co-operation with West Lancashire is how the widening of the road will effect traffic at the boundary. Specifically a widened road would have to narrow to gain to enter West Lancashire because it will need to go over the bridge at the three pools waterway. I do not recall seeing any detailed plans for traffic heading in this direction.

Network Capacity – The site selection document acknowledges that network capacity is insufficient and says that it would have to consult with West Lancashire on the specifics. This is another example of the failure to cooperate across boundaries. Despite this being brought up by the site selection report the final draft of the local plan does not have a site specific requirement to deal with the network capacity issues which include but are not limited to, drainage and a shortage of electricity in the area.

Agricultural Land – 90% of the site is classified as “best and most versatile”. This has only been seen as a minor constraint. I feel that is a understatement of the importance of agriculture to our area and especially in helping to keep food prices low in difficult economic times.

Greenbelt Purposes – The report acknowledges the likely sprawl with 90% of the site not currently adjoining an existing built up area and also acknowledges the sites current agricultural use. However on point 2 it claims there would be no narrowing of the existing gap between settlements. This is clearly not the case as Sefton would build right up until the boundary of West Lancashire bringing it to the doorstep of both Banks and Scarisbirck parish councils. It also means that Sefton would no longer be able to use its land to apply a green gap should West Lancashire wish to develop further westwards. This again stems from lack of consultation with West Lancashire.

Point 4 refers to the setting and special character of historic towns and claims there is no constraint because the site is adjacent to a modern development. It is true the site is adjacent to a modern development but what has not been taken into consideration is the new wider road. That will impact upon the entrance to Meols Hall. The historic building was built in the 12th century and it would reduce the charter of that building and others on that side of the road if Moss Lane were to become wider.

Summary of Suggested Changes**Evidence Submitted**

Policy MN2.4	Land at Moss Lane, Churchtown
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Respondent No 1014	Response Ref 1	Representor Name Peter Dewhurst
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Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I object on the following grounds:

I believe that potential problems resulting from the proposed development to Moss Lane are being grossly underestimated. The road cannot be made wide enough to accommodate the increase in traffic together with pedestrian access. Allowing for the fact that a significant proportion of the new occupants will be either elderly or families with young children the footpath needs to accommodate the capacity for disability scooters and prams. This is already a problem at certain points where cars park across the footpath due to the narrowness of the road.

If this is the sole access point to the development, there are going to be bottlenecks at the roundabout with Roe Lane. This will be compounded by the proposed development at Crowland Street with commuters using the roundabout and Mill Lane for journeys West.

Traffic will also increase on the road going over the Moss to access areas in the south of the borough. This is already used as a 'rat run' for people going to Maghull, Ormskirk or Liverpool. This road is single track in places and suffers badly from subsidence. It is not suitable for the amount of traffic already using it without the increase.

During the construction period, heavy vehicles could lead to damage to the road and possible damage to the old cottages at the end of Moss Lane. Vibration from "heavies" can already be felt.

In addition this area is prime agricultural land and the banks of the watercourse contain many species of wildlife including barn owl and heron. I personally use Pitt House lane and the banks of the waterway to walk my dogs and this is widely used as an amenity by other dog walkers, horse riders from the nearby stables, and anglers.

Summary of Suggested Changes

Evidence Submitted

Policy MN2.4	Land at Moss Lane, Churchtown
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Respondent No 1027	Response Ref 1	Representor Name David Cobham
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Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I consider the proposals for the housing development at Moss Lane will be severely damaging to the environment and to the ancient listed Churchtown village, which is already blighted by severe traffic congestion. At peak times traffic in many areas are at a standstill, at approx 2 cars per house the overload will far too much.

The proposed site is in a virtual cul de sac, with a very busy and dangerous through roundabout at one end of Moss Lane and a single lane passing places undulating farm road at the other end. It is utter madness to even consider further overloading an area which is already experiencing traffic flow problems. The problem will be further exasperated if other developments in Bankfield lane go ahead.

Churchtown school is one of the largest primary/ infants school in the country it is full and has no room for expansion. The traffic around the school is already a nightmare.

I consider ruining greenbelt land to cause disruption and pollution to be irresponsible and Southport especially the North end is taking an unfair proportion of the plan. The Site off Moss Lane is not in Churchtown it is designated as the High Park area of Southport.

Summary of Suggested Changes

Photos attached of entry and exit points.

Evidence Submitted

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

My main objections are threefold. Firstly the use of greenbelt land for development should only be used in extreme circumstances as a last resort when all other options have been exhausted. These circumstances have not been met by the Sefton Local Plan. The choice of Moss Lane is particularly bad as it would be an island of development surrounded by greenbelt, with little or no connection to the rest of Southport.

Secondly the geographical distribution of the proposed developments is very concentrated. The entire proposed development of 1,500 houses for the whole of Sefton is clustered on 4 sites within a very short distance of each other at the most northern extremity of the area. Needless to say it is as far geographically and politically as it could possibly be from the Labour run council in Bootle. Focussing the development so far from Liverpool, and also from Preston; makes no sense in terms of jobs and transport links. Likewise the concentration of development will focus pressure on local services, utilities, and roads; and disproportionately disadvantage the local area and residents.

Thirdly the Moss Lane site SR4.03 is poorly located for road and transport links. A large proportion of the new residents are likely to have to commute to work, and access from Moss Lane to local main routes is very poor. Wyke Lane which leads on from Moss Lane onto the moss is on a raised embankment, single track with passing places. To all intents and purposes the only access to Southport and main routes is via the Lane Ends Roundabout at the top of Mill Lane. At peak times Mill Lane is a "rat run" and extremely busy. From there access to Preston is through Churchtown Village, which is narrow and windy through a conservation area containing many grade II listed buildings. Access to Ormskirk and Liverpool is via a series of minor roads and traffic lights up to the Kew Roundabout. On this route Norwood Road in particular is extremely busy with stationary traffic during rush hour.

However the focus of the Sefton Local Plan should be on the centre of the area closer to transport links. A new road is under construction from the end of the M57 to the Formby bypass further improving access to this area.

Summary of Suggested Changes**Evidence Submitted**

Policy MN2.4

Land at Moss Lane, Churchtown

Respondent No 1049

Response Ref 1

Representor Name James Rimmer

Organisation Name**Obj/Sup/Com** Objection**Summary of Main Issues**

Outline planning applications on said land refused in the past. If a hint of possible use of this land for building, the landowners could make an application again and if refused possible compensation and awards for costs against the Council at a public enquiry. A trustee of Southport Old Links (SOL) I had a meeting with a Senior Planning Officer some years ago and was told that the land would never be built on, as it was green belt except for leisure purposes.

This land is skirted by Fine Jane's Brook, (Three Pools), a main drainage source of the surrounding farmlands. It terminates out to sea through the pumping station at Banks. This in turn sometimes presents a flooding problem as at high tides and rain storm weather, drainage of the farm land is not possible. (Strategic Flood Risk Assessment (SFRA's). Planning Policy Statement 25. Development and Flood Risk (PPS25). This river also breeds various types of fish, roach, bream, gudgeon, rudd, perch, bullheads and three types of carp. Rudd is an endangered species. Different types of birds and geese use the river and adjacent land. Swans, herons, Canada geese, pink-footed geese, grey lag geese. Barn owls,, hawks, pheasant, partridge and many others. The land farmed is Grade 2, farmed at the moment by Hunterpak.

Lack of jobs. With no plans to provide more employment, schools, medical care etc.(All in short supply).There is no main sewerage in the proposed development area of Moss Lane.The sewerage from existing properties between SOL and Pitts House Lane is piped to holding tanks and then pumped by small bore pipes past the bridge adjacent to SOL. (The only way to get over the road bridge). Land drainage (Top water) is piped to the river at the bridge. This in turn travels through Meols Hall then the Botanic Gardens, through the stray and out to sea at Crossens. This pipe work is at full capacity now. In heavy rain storms Moss Lane Floods from entrance to SOL with water backing up through the drains.

The proposed development is on a peat bog and any development would have to be piled including any sewage and drainage systems, as the ground is unstable. This work would create noise and vibration over a large area. To build a development on this land will change the ecology of the area, as it will be like capping the area with concrete. The peat will shrink and drop creating an unstable surface, as it does now.

The existing road north east of Pitts House Lane will not be adequate for any further development traffic. The road is only 5.6 metres wide and has two bends with little or no line of sight. The traffic at the roundabout at Lane Ends during peak times is already a problem, sometimes with 10 or more vehicles trying to enter the roundabout. Imagine the problem with the additional cars from the proposed development. The area has no bus route and no near access to a railway station.

The golf club faces the possibility of being served with injunctions to close both the 2nd and 4th holes if golf balls hit houses in the proposed development. The Golf Club would close down with a loss of facilities for 500+ golfers playing golf on their course. The members are not a company they own the Golf Club and course. The club also enables 50 junior golfers to learn the game and make them into young gentlemen and ladies. The club also allow schools to use their facilities and also to introduce the game of golf to young disabled children and those with learning difficulties. With the trend for early retirement, people living longer, the game of golf has never been more appropriate.

Summary of Suggested Changes**Evidence Submitted**

Photographs

Policy MN2.4

Land at Moss Lane, Churchtown

Respondent No 1051

Response Ref 1

Representor Name David Evans

Organisation Name**Obj/Sup/Com** Objection**Summary of Main Issues**

Objections:

- The land has been greenbelt for many years and over these years the environment has grown and wildlife has expanded. I enjoy looking out for the animals in the area, including water voles (a protected species), pink footed geese (again, a protected species) as well as the swans, ducks, geese and other birds that are regularly found in the Three Pools Waterway, adjacent to the land you may build on.

- Not only do I enjoy looking at all these animals, including the horses in the fields, but my two year old daughter also delights in it. It is amazing to have such wildlife almost on our door step and I appreciate the benefits and happiness it brings into my daughters life, as well as other parents I regularly see taking their children out and about.

- As I have mentioned I have a daughter who will be going to school in two years time. I am feeling very concerned where my daughter will be able to go to school if 450 additional houses are being built around the corner? This could easily add an extra 1000 children into the local area all needing to go to school. Local schools are already over subscribed and places can be hard to come by. I have heard you plan to expand local schools, but I did not particularly want my daughter having to attend such a large school, I had a smaller school in mind. (Surely Churchtown Primary couldn't be expanded further anyway, it is already huge) What worries me is that I have been a resident here my whole life, but that I might not get a choice in what is one of the biggest decisions I will have to make for her. It is taking away my right for choice if I am simply allocated one school for her to attend. This isn't to

mention the other sites you are considering building in the local area and the children coming from that development, where are all of these children expected to go to school?

- In addition to this I am worried about the impact traffic will have on the local roads (particularly around the schools) and how this is going to be managed effectively? I know on my way into work the roads can become incredibly congested and can become gridlocked at times.

With 450 extra homes being built, just in this one development. This could also add a possible 900 cars to the roads. The roads around these areas are not suitable for such heavy traffic. As it is, Moss Lane only has a pedestrian pavement on one side and down Wyke Lane (the back road heading into Ormskirk from Moss Lane) conditions are even worse. The roads are damaged, narrow and very dangerous. I have seen cars fall down the steep ditches on several occasions and cars struggling to get past one another if they have not waited and used one of the passing places. This road can already become very busy at peak times and I genuinely do not think it could handle any extra traffic without a fatal accident happening, which I am sure you do not want to have on your hands.

I hope you take my thoughts and opinions into consideration and conclude that this land is not suitable for your plans. I am sure that if these houses need to be built you could find some other land more suitable for them in Sefton, such as the many brownfield sites, many of which are currently laying vacant. Please appreciate that this land is used and enjoyed by many and the impact

it would have would be destructive to the local community.

Summary of Suggested Changes**Evidence Submitted**

Policy MN2.4

Land at Moss Lane, Churchtown

Respondent No 1053

Response Ref 1

Representor Name David Mannheim

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I consider this land to be completely unsuitable for your proposed plans of building 450 houses here and I would like to share with you why I believe this to be true.

Firstly, as I am sure you are aware the main road that would be alongside your proposed planning land is Moss Lane. This is a fairly narrow road which only has a pedestrian pavement on one side, not to mention how uneven and unstable the road is. However, what is even worse than Moss Lane is the back road into Ormskirk, Wyke Lane. This road is incredibly dangerous (particularly in winter when the fog stops you from seeing more than a couple of metres in front of you), has deep ditches on either side and is very narrow at places. There are occasional passing places but at busy periods these are often ignored and cars try to squeeze past one another. I travel down this road frequently and have seen many a car and van that have fallen down the ditches. If you intend to build 450 houses right by this road it will obviously become very busy and will need a vast amount of work to be done on it. However, this road is part of West Lancashire, not Sefton. I do not know therefore whose responsibility it would be to improve and maintain this road?

What I do know is that West Lancashire do not want this land to be built on and recently said that they think the land needs to be kept as greenbelt due to the wildlife in the area and to protect the environment. West Lancashire believes that Wyke Lane already deals with too much traffic for it to handle and they understand the dangers it holds.

Also, as I mentioned before the land around Moss Lane is very unstable, particularly around your proposed planning site and the houses in the local proximity have had to be piled because of this. As the land is so unstable every single house you build will therefore need to be piled. The cost you intend to sell the houses for will need to have the piling costs taken off. If you were to build in other areas there wouldn't be a need for piling and your building costs can stay much lower. I am interested to know why you have not considered more closely your option of building on more brownfield sites where you will not have this issue?

Another reason why I feel this land is unsuitable for your plans is that I do not know where the residents of these homes are expected to get jobs? If you plan on building the 450 houses in the Moss Lane area of Churchtown where are these people expected to work? Surely it would make more sense to build the houses closer to where there are jobs? The nearest bus stop is 800 metres away on Roe Lane so unless the residents drive (adding up to 900 cars on the road each day, if we go by the assumption there will be two adults living in one house and both will need to drive) they would not be able to get very far (assuming everyone in the houses will need to drive due to lack of public transport).

There is also not just the amount of cars from this planning development to consider, one must also acknowledge the other sites you intend to build in Churchtown, adding even more cars to the roads, such as the Crowland Street development. I do not understand how you think these small local roads can deal with this huge increase in traffic. The roads were never built to deal with the amount of traffic you are intending on putting on the roads.

I think that overall it would be such a shame to ruin this lovely area. My friends that visit me from across the country love walking with me down the country lanes and say how peaceful and tranquil it is. Places like these seem to be few and far between these days, why take it away unnecessarily for some houses that would be easier to build somewhere else, at less of a cost and without ruining the environment and wildlife? I still occasionally see red squirrels in the area, but I am also aware there are water voles living in and around the waterways, a protected species. How will you protect these animals?

To conclude, there are other sites available to you to build these houses on, which already has some sort of infrastructure, (such as around Woodvale near Ainsdale which is already close to a main road, built to deal with larger numbers of traffic or other brownfield sites in Sefton). I simply feel that this land is unsuitable for your plans, roads will be congested, damaged and dangerous and the environment and wildlife destroyed forever. Please look at your other options.

Summary of Suggested Changes**Evidence Submitted**

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

Objections:

There are several points that this area is unsuitable for the very large quantity of homes proposed, and several others that any form of development on this land should be avoided.

Finally I would like to point out that there are other areas on the periphery of Southport that would make more logical places for expansion.

1 - Reasons why any form of development on this land should be avoided:

Flooding risk - The area proposed is identified by the Environment Agency as one at risk from flooding and has no existing mitigating measures to protect the site.

Risk to exacerbate flooding downstream. If this land is developed, it is inevitable that there will be increased surface-water run-off into the neighbouring drainage ditches and waterways, whether intentional or accidental. This water that will no-longer be absorbed by open farmland and slowly released into waterways will exacerbate flooding risks downstream in Churchtown (which are expected to increase with heavier and more increased wet weather incidents in winter with climate change). Unlike the other properties on Moss Lane which are established on very free-draining remnants of sand dune activity around 5m above sea level the proposed area of development is 3m or less above sea level. The reliance of this area on effective drainage is much greater, and the mere action of such a large proposed development will cause significant compaction of the peat soil, and reduce its capacity to absorb and freely drain water.

Risk to wildlife including European Protected Species. Great Crested Newt have been recorded by naturalists near the proposed development, and have been recorded by Sefton MBC around various locations of Southport. Development on such a great scale increases the likelihood of pollution entering these drainage ditches and waterways. All species of bats are protected, and several species use and roost in the small areas of woodland adjacent to Moss Lane that would be enveloped by this large development, and would adversely affect their food sources and flight paths.

2- Reasons why this area is unsuitable for the very large quantity of homes proposed:

Lack of infrastructure - by the admission of Sefton Council's own Draft Infrastructure Delivery Plan, there is an expectation of 17.5 primary school places per 100 homes. The proposed 450 homes at Moss Lane (or any of the proposed developments in Southport) are not backed up by a concrete plan to meet these needs in the Infrastructure Delivery Plan. In spite of statements that most children should be able to walk to school, the nearest school to this development (Bishop David Shepard, current distance to edge of proposed development 1.2km) is already over-capacity, and does not have the physical footprint to be expanded. In addition this school is of a religious affiliation, and therefore not necessarily suitable for a proportion of the expanding population of Southport. The next closest school is Churchtown Primary (1.7km distant to edge of proposed development), which is also already heavily over capacity, and has already been expanded to a maximum viable size. The next closest school (Norwood 2.1km distant) currently has a capacity of 10 places, but falls much more centrally in Southport and will no-doubt be filled with the expanding population within its own catchment area. The only school that was identified in the Draft Infrastructure Delivery Plan as potentially suitable was Larkfield (2.4km distant), which from personal experience is a 25 minute walk with children from the junction of Roe Lane and Moss Lane, therefore a 40+ minute walk from the proposed housing in Moss Lane - well over the council's own desired commuting time.

Sefton's Local Plan states the need for accessibility to public transport infrastructure (EQ 10.10). The nearest bus stops to this proposed development (High Park Road or Roe Lane) are over 850m away from the entrance to the proposed site. The Local Plan identifies the increasing average age of the Sefton Population, and the need for suitable housing to mitigate this, but it appears this proposed development will be unsuitable for children and the aged. The alternative (which is not identified with certainty by Sefton) is that a new bus link to the estate would have to be established, which would mean further increasing traffic using Moss Lane, and requiring the proposed development have sufficient land set aside for a bus to be able to turn around and return down Moss Lane.

Having read the document there is a specific point Sefton MBC raises with MN2.4 Land at Moss Lane, Churchtown: "Development of this site must:

provide for the widening of Moss Lane between the Roe Lane/Mill Lane roundabout and

Three Pools Waterway, to a minimum width of 6 metres with 2 m wide footways on either side. This can be achieved within the existing highway boundary. "

I suggest that you must visit Moss Lane for yourself, and you will see that the area of road nearest the proposed development MN2.4 does in fact not have sufficient space within the existing highway boundary along most of the road between the junction at Fosters Close and the bridge that crosses the Three Pools Waterway. At grid ref approx. SD3686 1781 there is a pavement south of the road 2.6m wide, and the road is exactly 6.0m wide. There is no space to further widen the highway by the minimum 1.4m specified by Sefton MBC to provide a 2m footway on the other side as the edge of the road drops almost immediately into a drainage ditch. At approx SD3710 1777 the available highway is even narrower, the pavement being 1.4m wide and the road 6.3m wide. If Sefton MBC stipulate this is a minimum requirement for development to take place at the proposed site, and such stipulation is not possible, then I suggest other justifications for the choice of this site are also highly dubious, and should be treated with great caution.

Road risks - Moss Lane is a long straight road that unfortunately encourages speeding and reckless driving. Sefton MBC have made no recommendations for speed humps or other devices to reduce traffic speed along this road, which by their expectations will have upwards of an additional 80 children living in the new development. If you make an internet search you will see reports of car accidents along Moss Lane caused by speeding (most recently involving a tractor). Since West Lancashire council invested in improving the condition of the road that joins Moss Lane at SD3737 1769 in 2013 there has been a large increase in traffic using Moss Lane as a short-cut to enter and leave Southport avoiding the busy roundabout on Scarisbrick New Road. This was a quiet country lane, heavily utilised by farming traffic and cyclists, but now is a much busier and more dangerous place. It is very likely that the majority of car users (which according to Government statistics is very likely to be in excess of 1 vehicle per home) are also going to use this country road as a convenient access point, and subsequently the rate of traffic accidents on this road is likely to increase.

How can a council be allowed to spend such great time proposing numbers of new homes without identifying and listing the necessary infrastructure to support such new populations? This is not achieving "sustainable development"

Other More Logical Places For Expansion

It is important as a disinterested party reviewing this proposal, that you are reminded that the reasons for the suggested location of the development, is not because it is an ideal site (Sefton MBC's Local Plan states that there is no suitable land remaining around Southport that is not green belt that has not already been developed), but because of the completely artificial boundary that separates Sefton MBC from West Lancashire District Council. If you looked at a map of Southport and imagined that the MBC boundary did not exist (as Sefton MBC planners should have done) then it would become apparent that development and expansion of the built-up areas of Southport continue and merge to the north of the town with the extension of neighbouring Banks. Expansion to the east of Southport continues over the county border following the A570 Southport Road - this area in particular would be able to accommodate new housing and infrastructure including a primary school. It already has a road system capable of absorbing further urbanisation (including regular bus service), several existing new small housing estates that could be expanded, plus derelict houses, and brownfield sites such as the ex-chicken farm that could be made use of before any mention of swallowing up swathes of high quality agricultural land. The roads are already wide enough for pedestrians and cyclists to be kept safely away from traffic. I suggest that Sefton MBC and West Lancs Council be made to consider expansion in more logical locations such as these before settling upon areas of high-quality farmland in flood-risk sites, simply because they fall one side of an arbitrary line.

(Another suggestion of brownfield land available for development is the unused park and ride area to the north end of the Marine Lake which stands at over 2.5 Ha at SD341187 - I suggest you drive and see for yourself)

I hope that you take these concerns seriously into consideration before making a decision one way or the other about Sefton MBC's proposed housing developments across Southport.

Summary of Suggested Changes

Evidence Submitted

Policy MN2.4

Land at Moss Lane, Churchtown

Respondent No 1055

Response Ref 1

Representor Name Laura Lattimer

Organisation Name**Obj/Sup/Com** Objection**Summary of Main Issues**

I object again for the following reasons. I understand that you have lowered the number of houses you are considering building here but the land is still completely unsuitable and needs to be kept as greenbelt. Aside from obviously destroying the environment and wildlife in the area by taking away the beautiful openness of the land, I have listed below some other reasons as to why this land is unsuitable and why you must consider your other options. The roads around this area of land, particularly Moss Lane, would not be able to cope with the increased traffic on it. I travel down these roads frequently and know how dangerous it is, how quickly people drive down it and also how dangerous the deep ditches are on either side of the road.

There is barely any scope for you to widen the roads so I do not understand how you think this could cope with such an increased number of cars on it, not just from the Churchtown site but from all the other sites you are considering building in the area. This is the quickest route to Ormskirk, and therefore the motorways, so undoubtedly there will be high numbers of people in cars using this road. There is already a small bridge situated on this road which allows for only one car to pass at a time so I am unaware how this could cope with more pressure from an increased number of cars. What if the bridge ends up with so much traffic on it it falls down?

Traffic lights would at least need to be put up as it certainly would not be able to stay as it is. Once over this bridge you are then into West Lancashire so I am also interested to know who will then have to improve the road here, Wyke Lane, as this would also definitely need work doing to it. Does this fall onto West Lancashire to deal with, even though the issues that will arise from it are because of Sefton? I have seen at least ten cars that have fallen down the ditches here over the last couple of years because of how dangerous the road is and it must be improved upon.

Also if the houses are built here what are going to be your plans for the people living in these houses? There is no public transport close by, such as bus routes, will you put more buses on? (Will two buses even be able to pass on the narrow Moss Lane, as mentioned above?) Aside from this obvious problem you face regarding the roads, where are all of these people expected to work? How will these people join a doctors surgery? (They are currently all full) Where are the children going to go to school? The local primary schools are already full and will not be able to accommodate any more children. Do you plan to open more schools? Extend the current schools? (Although I do not see how Churchtown Primary could possibly expand any further considering the size of it already and the problems this causes on the roads).

I am surprised at what I was told to do by Sefton when I raised this concern during a planning meeting you held, when I was told to simply open my own school if I was worried? I should not have to open my own school, I should hope when I have children that there will simply be space at a local primary school of my choosing and I do not have to open my own school simply for my child to get a good education.

The ground around this area is also very unstable and most of the houses where you are considering building are already piled. You will then obviously need to pile all of the new houses you intend to build, an extensive and expensive task. I do not feel this land is appropriate to be built on and that there are much more suitable, and easier, options available.

There is no infrastructure around this area, there is no way in or way out, the local roads are narrow, have ditches either side, some sections have passing places — others do not, and an important point to remember again is that these roads are not even in Sefton, they are West Lancashire. So whose fault will it be if the increased traffic on these roads causes more accidents and fatalities because the roads simply could not handle the added traffic? Sefton or West Lancashire? If you build the intended 450 houses, this could equate to an extra 900 cars on the road — just from this site! When you consider the additional traffic that will also come from the other sites you intend to build on in the local areas we could be nearing 2000 extra cars. The roads just cannot cope with this and would become damaged extremely quickly, even more dangerous, and cost you even more money to repair, or build new ones.

I urge you to rethink about more suitable land to build on which already has some basic infrastructure in place (what about brownfield sites?) and can cope with this change. This particular area just cannot cope and I am very concerned about the damages and accidents it will cause.

Summary of Suggested Changes**Evidence Submitted**

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

Objections are as follows. There are many, many reasons why this site is unsuitable and I hope you take not only mine, but all the local residents opinions on board, we have lived in the area for years and have a very strong understanding on the area and the negative impact this will have on Churchtown.

Churchtown is just a small village, which is barely able to cope with the large amounts of traffic on the roads as it is. If you continue with your plans and decide to allow development on this land it will ruin all Churchtown has to offer. Roads will become gridlocked and dangerous. Moss Lane in particular is an awful road to drive down, filled with pot holes and unevenness from where the land frequently moves. Just this road would not be able to handle the increase in traffic, not to mention the road further beyond this, Wyke Lane, which as the name suggests is more of a country lane than a road equipped to deal with large quantities of cars driving down it. This road is also within West Lancashire, not Sefton, will you still be improving this road or will it fall to West Lancashire to improve?

Also, how are you anticipating access to this development site? If you are planning for it to be by Pitts House Lane, again as the name suggests, this is a lane, more like a mud track, completely unsuitable to be used a main road. If you plan on Moss Lane as being the main access point, how will you make the roads wide enough and have pedestrian access? The road is currently as wide as it will go, a ditch on the other side prevents it being widened further, which is what you would need to do if you considered using this road. As far as I can see those are your only two options, both of which are far from ideal and not feasible options.

Also you must consider the Roe Lane and Moss Lane roundabout by the local shops. There is no way this would be able to cope with the increased amount of traffic on the roads, it is just not big enough. Something else you must consider is that the houses in this area are built on railway sleepers, not secure foundations. What do you think will happen to these houses with the increased amount of traffic on the roads, not to mention the heavy building vehicles that will need to pass by on a daily basis?

Thorough research will need to be undertaken by yourself to assess the damage you cause, or will you be putting secure foundations under these houses before building work commences?

What is also going to happen to quaint Churchtown village with this huge increase in cars on the roads? The roads around here get very blocked and busy as it is, Churchtown village has a small one way system and will simply not be able to cope with this huge increase in traffic. As I understand you are not just planning on building on the greenbelt site by Moss Lane, but also building several other sites in the close vicinity of this. If these houses each have two cars we could be looking at upwards of 2000 additional cars on the roads, Churchtown cannot cope with this. I have been a local resident my whole life, I know these roads well, I know the busiest times of the day, I know all the short cuts and simply these roads are going to become a major thoroughfare for people to pass through and it will destroy Churchtown village.

This land is also a site of beauty and many of the local residents enjoy spending time amongst this area, whether it be bird watching the birds that annually migrate and return to these areas, horse riding, fishing, or just generally bringing their children to this area to enjoy the openness of the land. I find it incredibly upsetting to think that future generations will not get to enjoy this land and that it is instead going to be replaced with hundreds of houses and the land will be lost forever. There are so many reports currently being done to say that children are obese and they need to spend more time outside, doing exercise and leisure activities, yet you are taking this land away from them, soon there won't be any places left to enjoy.

Surely you must have other options better suited, rather than building on a piece of greenbelt land. This must be one of your most expensive land options, the cost of piling the houses, repairing and rebuilding the road, putting in new and additional traffic lights where needed, extending or building new schools (none of the current local primary schools are able to take any more children), getting more doctors into doctors surgeries — again, doctors surgeries are already full to the brim and not taking on new patients, repairing and replacing all the drains and sewage system that are already struggling with the amount it deals with, the list is endless. It is not simply a case of building some houses here, there is an awful lot of additional work to do as well if you do decide this land is where you feel you have no other option other than to destroy. Please take the local residents views on board. We are the ones that know the area best.

Summary of Suggested Changes**Evidence Submitted**

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I am writing to share my concerns with you to the proposed development of 450 houses adjacent to Moss Lane, Pitt's House Lane and Three Pools Waterway. I have in the past lived in the area of Churchtown and frequently visit this part of Sefton. While I fully understand that plans have to be made for construction of new homes, I have concerns that the development of this piece of countryside would be a loss to this community.

I would have thought that there are many options open to Sefton to accommodate additional housing without development in this sensitive and probably challenging area. While most problems can be overcome with expenditure, in these times I would have thought there were more cost effective options available.

The infrastructure in this area is almost at its maximum, with a road system that can effectively only use one access point, this being the Three Lane Ends junction. The route into West Lancashire is only suitable for low volume traffic and farm access. The existing road system would put the development at the end of a virtual cul-de sac.

The local residents inform me that utilities are at their limit during peak times of the year, investment of a substantial nature would have to be made if the new development and the existing homes were to have a satisfactory level of utility services.

Additional problems could be encountered with the construction of the foundations of homes, as this area has historically had a problem with land stability and extensive ground preparation and piling would be required.

The golf course has provided a popular recreational destination for local residents and visitors, however any development would have an impact on the course. This could result in compromising the course layout, of what already is only a nine hole course and may well impact on its long term viability.

The area of the proposed development has for many years brought pleasure and recreation to residents and visitors. Activities enjoyed include horse riding, dog walking and bird watching. One of the area's benefits is its accessibility to many local residents as it is reached easily on foot, bicycle or by public transport.

I believe much of the proposed area is productive farm land, that provides fresh food and in a world that has to take into account the true cost of food in food miles this must be a resource that can't be lost.

As a Sefton town dweller, I can only ask that careful consideration is given to all the options, as to lose this area will have a detrimental effect on a well integrated community where the edge of town enjoys the benefits of a rural environment.

Summary of Suggested Changes**Evidence Submitted**

Policy MN2.4 Land at Moss Lane, Churchtown

Respondent No 1058 Response Ref 1 Representor Name Christine Lattimer

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I object as this is an extremely large development to be absorbed by an already stretched infrastructure.

Moss Lane in its present format is a road that contains a sharp bend and has limited footpaths, in some areas only a single pavement. Moss Lane terminates at the southerly end at Lane Ends roundabout which is at peak times a heavily congested area, as all the traffic in this area of the town converges on it, for journeys in the directions of Southport, Ormskirk and Preston. The proposed development could potentially change what is already a congested area into complete gridlock with the impact of a possible extra 2000 car journeys per day. To the north is Wyke Lane, a single track road with passing places and deep ditches that can be hazardous in the winter months and is ill equipped to take any volume of traffic safely.

One of the jewels of the area is The Old Links Golf Club, which is a widely used facility for local Sefton residents and visitors alike to the area. It is also a haven for a number species of wildlife that have inhabited the area for many years. The Golf Club is currently only a 9 hole course and I understand the proposed development would have a direct impact by reducing the land area, this could result in the restricted lay out of the course being no longer viable. In addition the proposed new houses will be in very close proximity to the course and leave it almost completely surrounded by housing.

The area under proposed development is rich in recreational and sporting activities for Sefton residents, in addition to the golf course is angling on Three Pools Waterway, walking, horse riding and bird watching. The waterway, banks and surrounding fields are home to many wild creatures including swans, herons, geese, water voles and a wide variety of fish for example roach. Eel perch, pike amongst others. The impact on conservation will not only be negatively affected by the development from an ecological standpoint, but from a visual perspective too. At present the blend of countryside merging with urban living is a subtle vista as the town is approached from the north via Wyke Lane.

The land on which the proposed development would take place is essentially a peat bog on a layer of wet clay. As I know from experience my house had to be underpinned over twenty years ago due to subsidence problems, piles had to be driven down 70 feet to ensure the structural safety of the house. The house is sound now of course but the garden, driveway and paths are moving and even have to be relaid every so often. Will the developer really want the expense of piling to a depth of 70 feet every house? Are we to be compensated for any damage to our homes which could occur during the necessary piling work.

Another point I would like to make is that one of the proposed entrances to the development would be down Pitts House Lane, which is a very narrow track at present and would be unable to take a two way road with pavement on either side, as there is not enough room between the existing houses. I live in one of these houses and as I am opposed to this development, I would be reluctant to release my land for this purpose.

The consideration of developing on the outer ring of an urban area is always costly as essential infrastructure is unavailable and will have to be constructed or we will have a heavily car dependent area. The schools in this area are already over subscribed as are the doctors surgeries. The nearest bus stop is on Roe Lane which is 800 metres from the proposed development. Churchtown has a rich diversity of historical buildings in the Moss Lane and Mill Lane area. Over the years the increased traffic flow has had a negative impact on these buildings, any extra could result in serious deterioration of the fabric of these valuable Sefton assets.

In conclusion, I feel a decision to commence with the proposed development will have long term implications for the area and once these assets have been lost they will be lost for over. For the residents of Sefton the damage will be irreversible.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.4 **Other Documents**
Policy MN2.4 **Land at Moss Lane, Churchtown**
Respondent No 1059 **Response Ref** 1 **Representor Name** D Barker
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Objections: The roads are narrow and unstable and the estimated 1500 plus increase in traffic especially at peak times will be unmanageable and can only lead to more damage to properties, expensive road repairs traffic jams and accidents. The area is a haven for wildlife, some of which are protected. The bird variety is extensive and enjoyed by ramblers and bird spotters, Anglers also regularly use the three pools waterway and the red squirrel population is increasing.

All this will be lost including the historical value of the area and the village. We feel the risk to wildlife, unmanageable traffic build up, unsuitable access, damage to existing properties and roads and further expense to householders, Council and council tax payers old and new have not been seriously considered. Please reconsider.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.4 **Other Documents**
Policy MN2.4 **Land at Moss Lane, Churchtown**
Respondent No 1060 **Response Ref** 1 **Representor Name** RS and NC Holt
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Our reasons for objection are numerous but feel that the following are the most important:

1. The road infrastructure would be completely inadequate to cope with the additional traffic. This principally relates to Moss Lane and Wyke Lane. The cost to widen Wyke Lane would be extremely high and any widening of Moss Lane would be impractical.
2. Sewerage and Drainage. At the present time the services are in need of updating and a major upgrade would be needed to manage this large development. The cost would presumably be borne by the council and any developer.
3. Local schools are already at full capacity. Who would bear the cost of any new building or extensions to existing premises.
4. Sefton politicians appear to have passed the spread of building new houses unfairly to the Southport area.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.4	Other Documents
Policy MN2.4	Land at Moss Lane, Churchtown	
Respondent No 1063	Response Ref 1	Representor Name CD & AN Abberley
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I feel that at present this area is not a healthy option for people to live. For some forty years or so I used the roads around the proposed area to get to the Ormskirk Road in order to get to work. At certain times of the year a mist would rise out of the surrounding fields and make it impossible to drive along these roads. I had to abandon that route for a while when this mist was prevalent. It is reasonably healthy where it is built on accumulated sand, but not on the marshland behind the sand. The proposed estate would create a number of health issues (e.g. pulmonary problems) for its residents.

Also arising from my experience of using the road across the moss one is aware of the unsuitability of this area for building on. No matter how often this road was repaired or rebuilt, in very little time it was in a bad state again. The same problem would arise with the proposed estate, though the individual houses would presumably be built on piles, the roads and services, water and sewage particularly, would require constant attention - at a cost to ratepayers?

Could there also be claims against the local council for wrongfully allowing this land to be built on, as there has been elsewhere? Finally we wish to express our concern about the Sefton Council's openness, one suspects that our representatives are working to a different agenda than the people they represent would.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.4	Other Documents
Policy MN2.4	Land at Moss Lane, Churchtown	
Respondent No 1064	Response Ref 1	Representor Name Hazel Burt
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

The reasons for objection are as follows:

- 1- Pipistrelle Bat population in the vicinity of The Three Pools waterwa
- 2 - Water voles living within the banks of The Three Pools waterway
- 3 - Barn owls in the vicinity of the whole area outlined
- 4 - Red Squirrel community which has gradually increased over the last 10 years

The above species are all protected by the Wildlife and Countryside Act 1981 and will be severely damaged if not destroyed, by the noise, light pollution, loss of feeding sites and shelter caused by building development and subsequent urban settlement.

The presence of these species indicates that there are key ecological constraints to the proposed area which has been severely overlooked by the Planning Department. We request that a serious review should take place on the planning of this area. We have been residents of Moss Lane for over 30 years and take the threat of habitat loss, of legally protected species seriously.

Summary of Suggested Changes

Evidence Submitted

Policy MN2.4

Land at Moss Lane, Churchtown

Respondent No 1074

Response Ref 1

Representor Name Pamela Stones

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

My objections are as follows: This area is designated Green Belt and as such you have a duty to control urban growth, to resist urbanisation and to preserve public open spaces for the enjoyment of outdoor leisure.

This development will put you in breach of your statutory duties. I live in Roe Lane and this development would have a serious detrimental effect on my quality of life.

There is no realistic access to Moss Lane save via the Roe Lane/Mill Lane roundabout. This junction is already over busy especially during commuter times. Wyke Lane, and Upper Straight Lane are far too narrow and totally unsuitable. To providing access for a large building site.

The additional heavy traffic movements during the construction of such site and residential traffic movements following completion of over 450 living accommodations will vastly overload the capacity of Roe Lane/Mill Lane. Alterations to Wennington Road have already caused noticeably increased traffic on Roe Lane. My house, and my neighbours' houses have, for a number of years, suffered from acute vibration. This is apparent in the number of cracks in the structure and fabric of our homes. It became a serious problem a few years ago when a drain collapsed in the road necessitating a repair which took three weeks to complete and needed traffic lights for traffic control as the road was reduced to half its normal width. The vibration is still with us. Any increased traffic will accelerate the point at which the next repairs are required.

One of your duties in relation to Green Belt is to safeguard the countryside from encroachment and maintain an attractive landscape near to where people live. I use Moss Lane on a very regular basis for walking and cycling. I do not wish to walk and cycle through a housing estate. Similarly, the area brings pleasure through its birds and wildlife. I chose to live in close proximity to the open countryside. I and countless others would be deprived of this.

Other options in the area (MN2.1, MN2.2, MN2.3 and MN2.5) are adequate to fulfil your duty; option MN2.4 is not justified and should be struck out.

Summary of Suggested Changes**Evidence Submitted**

Policy MN2.4	Land at Moss Lane, Churchtown
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Respondent No 1075	Response Ref 2	Representor Name P Abbott
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Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

Moss Lane at the end of Churchtown, diverts off on its own at a tangent from a busy roundabout. This then narrows into a country lane with an unpathed northern edge side with no scope to widen the road or create another walkway at this point.

The proposed housing allocation is on green belt land, it is disproportionate and unacceptable. Sefton promises to maintain the identity of and enhance existing settlements but this would turn our countryside into a housing estate and alter the whole character of our rural area.

It would also impact on the character of Churchtown village and overdevelopment can lead to anti-social behaviour. Proposed land unsuitable as 10% on a flood plain, covered in peat bog. When this dries up by concreting, subsidence occurs. Although houses will be built, gardens and outhouses will be affected, a problem already experienced by existing properties. Extra heavy vehicles and piling could cause more structural damage and extensive noise pollution, outdated sewerage system also creates local problems.

The only access to Moss Lane is by the busy roundabout at Lands End. Increased traffic would bring the narrow village roads to a standstill, it would also impact on the already busy A565 leading north. Totally unsustainable. Drivers travelling towards Ormskirk speed down Moss Lane, and over the narrow one way bridge to use Wyke lane, a narrow lane used for rat runs.

West Lancs have also raised concerns regarding the possible additional volume of traffic. Moss Lane is unsustainable, socially, environmentally and economically in terms of development.

Summary of Suggested Changes

Evidence Submitted

Policy MN2.4	Land at Moss Lane, Churchtown
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Respondent No 1076	Response Ref 1	Representor Name PH Fowler
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Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

My main concern is it would be disastrous for the community of Churchtown. My main reason is the huge increase of traffic that this development would generate. As many as 900 cars entering Moss Lane and negotiating two bad bends on being by the golf club.

Both these bends when you add the weight of traffic that already uses Moss Lane as a route across the Moss to Ormskirk and Ormskirk to Churchtown would be real accident black spots.

Queueing will also be a problem at the roundabout blocking of Warren Rd and Farm close all these things will cause a huge safety issue to the people that live around and visit the golf club down Moss Lane.

This development will also have an impact on country pursuits especially horse riding, leaving closure of the stables and job losses. The fishing club that have just paid out for new fishing club that have just paid out for new fishing pegs rushes and reeds on Three Pool will also be effected.

There is also concerns that this golf course cottages and allotments on Moss Lane may flood due to the water being close to the surface. This is real good grade A Agricultural land and needs to be kept for generation to come, to change it into housing would be a planning disaster for this future when more and more local produce will be needed. There must be better places to build with better access for commuting with not as much value as this farmland.

Summary of Suggested Changes

Evidence Submitted

Organisation Name**Obj/Sup/Com** Objection**Summary of Main Issues**

I am writing to strongly object to the proposed housing development for Moss Lane. This massive development will have a detrimental affect on the whole area and would have a huge impact on Churchtown Village. One of my main concerns is the increase in traffic. The lane is very narrow and already has significant traffic problems at peak times ie.queuing at the roundabout to get onto the main road is already common place.

If this development was to happen this cumulative traffic impact would be dangerous, and undoubtedly put peoples lifes at risk, I also must mention the health risks of traffic fumes, there is evidence that low level exposure can raise the risk of lung cancer. So this potential increase in traffic has to be a health concern. When your considering the facts, please remember that this is greenbelt land which is habitat to many species. It is not only home to many wildlife, but it is also agricultural land.

I would be a great loss if we were to lose this land with prices reaching record levels. It doesen's make sense to buy from abroad when we can grow it on our own doorstep for now and for future generations. I have enclosed photos.

The greenbelt land is surely more beneficial as agricultural. Once greenbelt is gone there is no coming back. I hope you take into consideration my points of view and make the right decision to leave this greenbelt land out of development.

Summary of Suggested Changes**Evidence Submitted**

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

There are many issues against the building of houses adjacent to Moss Lane/Pitts House Lane/Three Pools waterway and I would like to point out a number of these for your attention.

Moss Lane was originally a road for access to farms and agricultural land up to and beyond the Three Pools bridge. I would suggest that for traffic using this road now it is just about adequate. However, it is only 5.6 metres in width and has two bends with little or no line of sight. The junction of Pitts House Lane is particularly dangerous and I would consider it a "blind corner" for traffic movement. The other coincides with the entrance to the Old Links Golf Club (OLGC) and both bends are a great safety concern. Between Pitts House Lane and the Three Pools bridge on the north easterly side of the road there is a steep banking of approximately 8 feet down to a ditch and fields for tree production. There is no footpath/public pavement for the whole of this stretch of roadway which I would suggest is a major concern regarding health and safety and would need major work to instate pathways here.

The traffic at the "Lane Ends" roundabout, this being the junction of Moss Lane/Roe Lane/Mill Lane/Old Park Lane is already a problem, particularly at peak times, with vehicles accessing the village of Churchtown. This junction takes traffic heading for the village and Churchtown primary school. Should this development of houses go ahead, there would be considerable additional traffic created, I understand at least an extra 1200 vehicle journeys per day, in and out of Moss Lane. I feel that to cope with this (and I'm not sure that whatever changes implemented would be adequate) it would need a major change in the organisation of traffic at this junction to make the area a safe environment for motor vehicles and particularly pedestrians, I think that it would be a serious hazard to have so many vehicles using Moss Lane and Lane Ends. For Southport and Churchtown Village there is only one way in and one way out for the proposed development.

There is well documented evidence that low level exposure to traffic fumes can raise the risk of lung cancer. With the amount of traffic backing up at peak times this risk is already present. Increased traffic will raise this risk further. I feel that the health of people, particularly children, walking the route to and from Churchtown School, and also Bishop David Shepherd school should be a primary concern to anyone thinking of increasing the traffic flow all around this area.

As regards access, I am confused by the choice of land at the furthest point of the borough for a housing development of this nature. Coinciding with the above traffic problems, is the lack of employment in the Southport area. A large proportion of residents from this development would have to travel out of town for their employment. The only other route away from Moss Lane which could be used is Wyke Lane in West Lancs. Already many people use this as a "rat run" but again it was only built for access to farm land. It is very narrow with a number of bends and steep drops on either side, making it a dangerous road because drivers tend to travel at high speeds across this route. Again I think that with traffic added to this area another safety problem will occur, resulting in yet more collisions than are happening at present.

Summing up on the situation, I feel that a great deal of change in access, needing a massive spend of money, would have to be made to keep the area safe from the increase in traffic and pedestrians. At present there is no main sewerage in the proposed development area of Moss Lane. The sewage from houses between the OLGC entrance and Pitts House Lane is piped to holding tanks at Pitts House Lane corner and then pumped back through small bore pipes to Lane Ends.

When there is excessive usage and also the addition of some surface water into the system the manhole cover on Lane Ends side of the OLGC entrance comes off and the road is flooded with sewage which then runs into the gullies and into the brook opposite the OLGC entrance. It travels through Meols Hall grounds, then into the Botanic Gardens lake, (causing another health hazard) then out to sea at Crossens. United Utilities are aware of this system, and its problems, and will have a record of some of the flooding situations encountered by residents as I have on a number of occasions had to request them to come and clean up the roadway and several driveways on this corner. Basically it boils down to the fact that already the sewerage/drainage system is at full capacity now and will need a whole new system to accommodate any more houses. I feel that the developers and the council should be aware of these problems and I would be happy to discuss them further should this explanation seem rather complicated.

The land suggested for this development is far from suitable as it is on a peat bog and very unstable, I would imagine that there would have to be very deep piling and virtually a capping of the area with concrete to make the land ready for building. I am sure that

although this work could be carried out at great expense it is only "papering over" the reality of the unstable land which would surely cause problems such as subsidence in these properties in the future. There are a number of properties in Moss Lane, including my home, which have had serious subsidence trouble and needed underpinning.

I am also sure that however deep the piling was done, over a period of time the paving, road and movements of the sewerage system because of the instability of the land would create problems in time to come. Again, regarding the choice of land for this development and its position alongside the Three Pools gives a strong risk of flooding as this water course is a main drainage source for surrounding farm land and rises and falls with heavy rainfall and high tides, (I understand the water table in the area is rising) so I would think that building houses so close to the stretch of water would cause considerable problems, not least those of home insurance issues for the householders.

This water course and adjacent land is home to many species of wildlife which would be severely affected if a development on green belt land goes ahead. In the water there are various types of fish, roach, bream, perch and others, but also rudd, which I understand to be an endangered species. Also in and around the banking and in the water are another endangered species, water voles, they certainly have been here for some time and obviously breed here.

On the actual green belt land are swans, and this spring/early summer, as in most years, they have produced cygnets here and live along the river bank. Many pheasants and partridge breed in the area and more importantly Canada geese and pink footed geese come back here from the Arctic, using the area as their winter home. I am sure that these species should be protected and not driven away from a natural environment that they have frequented for many many years.

Swallows return to the area every spring and nest in the barns and farm buildings on Moss Lane and at the far at the end of Pitts House Lane. All these animals and birds are special and their habitat should be preserved rather than concreted over. Probably the most important residents here are the bats! They live in the barns and outbuildings at Pool House farm and at Pitts House farm. These are without question a protected species and serious thought must be given to their future if this proposed change of green belt land is to go ahead. The bats need their nesting places, which would be lost if the land was developed.

Apart from the birds, animals and fish here, a large proportion of the land is used for agricultural purposes. The main production throughout the year is of salad and vegetable crops, which "turn round" quickly and produce substantial amounts of food. In this time when we speak of the population eating healthily I would think it of great importance to protect this grade 2 farmland and continue to produce the salad and vegetable crops that are cultivated here. I believe that we are trying to reduce the percentage of imported food into the country so it seems counter productive to take away land that produces what we want, thereby creating more need to import. I have given much thought to the change in status suggested for this green belt land and I feel that there are so many negatives and virtually no positives to consider it necessary to change the land at all. I am sure that there are other sites within the borough of Sefton that would be more appropriate from all aspects than the one put forward adjacent to Moss Lane and Pitts House Lane.

I hope that you will give serious consideration to the points I have raised before this green belt land and natural habitat is lost forever and we are left with an extremely worrying traffic problem.

Summary of Suggested Changes

Evidence Submitted

Chapter	6	Plan Order	Site MN2.4	Other Documents
Policy	MN2.4	Land at Moss Lane, Churchtown		
Respondent No	1079	Response Ref	1	Representor Name Howard Hayden
Organisation Name				
Obj/Sup/Com	Objection			

Summary of Main Issues

Objections include: the narrow Moss Lane could not cope with the traffic generated by 450 houses. The only access road to Moss Lane is via Lands End roundabout which is saturated at peak times. Traffic generated by such a large housing development would damage the environment. Anyone who visits Moss Lane would realise that destruction of agricultural green belt land here is unacceptable. Find another site to build these houses, Moss Lane is not suitable.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.5	Other Documents
Policy MN2.5	Land at Crowland Street, Southport	
Respondent No 227	Response Ref 1	Representor Name Marianne Welsh
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I do not think the Local Plan is sound because I believe it is not positively prepared in that the infrastructure requirements would not be able to cope with these massive developments. Firstly in the case of the proposal for Crowland Street, this road already has a lot of traffic and there are delivery trucks every day travelling down this road to a reprocessing site. With 670 houses proposed to be built here and with an average household having not one but at least two vehicles this could potentially see traffic increase dramatically and result in regular congestion and safety issues.

Also the road at the end of Crowland Street, Butts Lane, goes into a main route into and out of Southport. This is Norwood Road and Meols Cop Road where traffic congestion is known as being high on a daily basis. There are no Primary Schools or GP's/Health Centres in this area, this would mean a journey for the new residents to elsewhere and put a strain on them.

Summary of Suggested Changes

I would suggest that other areas of Sefton are looked at in depth to identify more suitable areas for potential housing developments, in areas that are not already heavily congested with traffic and have the infrastructure needed for such large housing developments.

Evidence Submitted

Chapter 6	Plan Order Site MN2.5	Other Documents
Policy MN2.5	Land at Crowland Street, Southport	
Respondent No 263	Response Ref 1	Representor Name Susan Anderson
Organisation Name		
Obj/Sup/Com	Comment	

Summary of Main Issues

Can I ask where the extra schools are going to be built, when these houses are filled with families, Also where is the extra traffic on the roads going to be directed.

As its is, Canning Road in particular is overused with heavy traffic and vehicles, which in turn is damaging to the properties on that road. Could it be suggested that Wennington Road and Clifton Road at the junction with Crowland Street and Butts Lane, be opened up to traffic once again, Russel Road have its humps removed and Four Lane be opened up to through traffic to alleviate the traffic on Meols Cop Road.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.5	Other Documents
Policy MN2.5	Land at Crowland Street, Southport	
Respondent No 350	Response Ref 1	Representor Name Carol and Stephen Hosker
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

We are objecting to this aspect of the Local Plan on the grounds that the existing "business park" in this area is significantly underused, an increasing proportion of the concreted expanse on one side of the road there being clearly devoid of all activity and populated by a disorganised miscellany of sheds and mobile office units, all empty and decaying. The two-storey offices building on the opposite side of the road also has an increasingly derelict appearance.

There can be no justification whatsoever in the extending into unspoiled land of an industrial area which, industry having largely abandoned, has been allowed to degenerate into an industrial graveyard.

We have brought this matter to the Council's attention several times already, at every opportunity, in fact, furnished by the Local Plan consultation process, repeatedly in writing and also in a conversation with a planning officer in July 2013, where we were given an assurance that the existing site would be visited and investigated. Since that time the dereliction has only increased. This does nothing to engender confidence in the Council's willingness to listen to or to act upon concerns and objections elicited.

We would appreciate some confirmation from you that your consultation process is more than a paper exercise and that plans to extend this site will be replaced by plans to clear, regenerate and properly utilise the existing space.

Summary of Suggested Changes

Remove MN2.5 as an allocation. Develop the existing Crowland Street industrial area instead.

Evidence Submitted

Chapter 6	Plan Order Site MN2.5	Other Documents
Policy MN2.4	Land at Moss Lane, Churchtown	
Respondent No 665	Response Ref 4	Representor Name Tony Dawson
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

The sudden and late decision to build over 600 houses on Crowland Street, Southport, in addition to the considerable development already of the second stage of the Kew estate is placing unacceptable pressure on the Borough to permit extra large shopping areas on the eastern fringes of the town of Southport: a form of 'Kew Town' which will adversely affect an already suffering retail sector in the town centre. The plan is insufficient, in my opinion, about addressing the need to protect and enhance the town centre shopping area.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.5	Other Documents
Policy MN2.5	Land at Crowland Street, Southport	
Respondent No 678	Response Ref 1	Representor Name James A Ford
Organisation Name Ormskirk, Preston and Southport Travellers Association		
Obj/Sup/Com Objection		

Summary of Main Issues

The strategy for the plan fails to take account of present and future rail transport needs for the town of Southport and its close neighbour of West Lancashire including the need to provide park-and-ride facility for the towns' commuters to Wigan, Bolton and Manchester where the current Kew Park and Ride site is proposed for inclusion for housing development.

1.The houses that are proposed for this locality, together with existing housing in the Kew area and the needs for access to the hospital from both Southport and West Lancashire (it is a joint hospital) will create a demand for transport infrastructure themselves. Houses built in the Kew area of Southport will naturally attract owners and occupiers who will wish to commute to the east of the town, so it would be imprudent to build on the natural site of the station and its car park. Permanent loss to the community of an extensive Car Park and Bus Interchange including Customer Service facilities (and used daily by workers/visitors to Southport & Formby NHS Trust Hospital).

2.The result will be the permanent loss to the community of a sustainable Public Transport facility forcing yet more vehicles into the town centre and the permanent loss (wasted) of major capital investment of £5 million putting at risk tax payer money to repay the grant should the site no longer be used for its original purpose, together with the permanent loss to the community to site a future railway station with bus interchange and car-parking facilities.

3.There will also be a permanent increase in carbon emissions from enlarging the housing development by inclusion of S008 in the Local Plan and a permanent Increase in traffic congestion at the Norwood Road roundabout area and a permanent increase in traffic generally as a consequence of developing Crowland St and impact as Kew's importance grows as a commercial/retail centre, together with a seasonal permanent increase in traffic congestion during major tourist events including the Southport Air and Flower Show.

4.Towards the end of the consultation, the rail line adjacent to the site has been prioritised for electrification so the plan needs to be revised to take this into account.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.5	Other Documents
Policy MN2.5	Land at Crowland Street, Southport	
Respondent No 703	Response Ref 10	Representor Name Jackie Copley
Organisation Name CPRE Lancashire		
Obj/Sup/Com Objection		

Summary of Main Issues

The Preferred Option of Sefton's emerging Local Plan recommended this site for mixed employment and residential use. The Director of the Built Environment has since indicated (see par. 7.7 of his report to Council on 22nd January 2015 concerning Sefton's Publication Draft Local Plan) that this site should be used exclusively for residential development, because a study has shown that an employment use on the site would not be viable; in consequence, an additional allocation for employment uses on land to the south of the Formby Industrial State (viz. site MN2.49) has been proposed.

Although site MN2.5 is Green Belt, and we would prefer to see it serve its Green Belt purpose, we would not strongly oppose redesignation for residential development. However, we are strongly opposed to the development of site MN2.49 for any purpose. For this reason and the fact that the land to the north is in employment use, we wish to see the Crowland Street site developed mainly for employment purposes. We are waiting for disclosure of information concerning the viability study referred to before commenting further.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.5	Other Documents
Policy MN2.5	Land at Crowland Street, Southport	
Respondent No 716	Response Ref 25	Representor Name Robert Swift
Organisation Name	Robert Swift and family	
Obj/Sup/Com	Objection	

Summary of Main Issues

Land at Crowland Street, Southport (Site MN2.5) Only 18.6 ha of the site is available rather than the 25.8 ha cited by the Council within the proforma as the park and ride is still in operation and the facilities are relatively new and in good condition and the landowner has expressed no intention to change this. Whilst the Council has cited that this may change in the future, this cannot be relied on. Furthermore, it is identified within the SA as being more suitable for employment rather than residential, and the view within the proforma that it is suitable for 100% housing is contrary to that put forward in the 2013 Green Belt Study, Sustainability Appraisal and Green Belt Assessment. The loss of the land will also result in a negative impact on a sensitive area, particularly as there is a designated SPA and landfill site within 250m of the site with wide reaching views. There are also amenity issues, as it is located to the rear of an industrial estate and feels quite isolated. Any development of the site should be brought forward in conjunction with employment uses, as a mixed use development , and the capacity has been reduced accordingly.

Summary of Suggested Changes

Reduce the indicative capacity of Site MN2.5 from 678 to 200 dwellings.

Evidence Submitted

Policy MN2.5 Land at Crowland Street, Southport
Respondent No 737 Response Ref 4 Representor Name
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

Our clients, who own site MN2.5, confirm that they support the allocation of this site for residential development.

Whilst the Authority previously envisaged that the site should be developed for a mix of employment and housing through the emerging Local Plan, we have previously expressed significant concern with the viability of delivering employment development at the site as initial investigations indicated that more housing would be required on the site to make it viable (considering highway concerns, low land values, ground specification and services and infrastructure costs).

We have accordingly investigated the deliverability of developing the site for 100% residential use and as part of this, undertaken highways and viability assessments. The results of highways investigations are that, in line with Appendix 1 of the Publication Local Plan, vehicular access can be gained from Foul Lane to serve residential development at the site. Viability work concluded that the site would be viable for 100% residential development even when considering the full costs of construction including site abnormals.

Our own assessments reflect that of the Keppie Massie and White Young Green Local Plan Community Infrastructure Levy, Economic Viability Study (December 2014) which we accordingly support.

The report tested three mixed use development options (residential and employment), the first being for 265 dwellings (reflecting the Preferred Options consultation), the second option with increased residential dwellings (360 dwellings) and the third proposing 413 dwellings. We agree with the conclusion that options 1 and 2 are “unlikely to result in a viable development” and option 3 is “unlikely to be attractive to potential commercial developers given the limited extent of employment provision proposed in this option”.

The site presents the opportunity to deliver new high quality dwellings which would help contribute to the current upgrading of the local area and would link new dwellings with existing services and amenities within Southport (for example within walking distance of Meols Cop Retail Park and Sainsbury’s).

The site will deliver a range of houses and tenures (including affordable housing provision) and will also integrate new green infrastructure into a scheme which is distinctive and well designed to create an attractive urban edge to Southport near to a key gateway into the town.

We can confirm that the client owns the whole site and planning permission can be sought immediately after allocation in the local plan. We see no reason why development could not start as soon as planning consent is obtained and average house building rates achieved dependent on market conditions.

We therefore trust that the proposed allocation site “Land South of Crowland Street” (site ref: MN2.5) will be included within the submitted version of the Local Plan, reflecting the opportunity to deliver much needed new dwellings for Southport at a sustainable and viable site.

Summary of Suggested Changes

Evidence Submitted

Organisation Name**Obj/Sup/Com** Objection**Summary of Main Issues**

I believe the Plan is unsound and my objections are as follows:

Firstly I should point out that I will consider MN2.4 and MN2.5 together as they are adjoining. I am not entirely sure why this site has been split into two other than the fact the park and ride site was added late. In my opinion the site should have been looked at on its merits as one site which in practical terms it is. Whether that would have had any impact on the selection I cannot say but it would seem appropriate that this is looked into. Initially Kew park and ride was not part of the plan and the council had intended to make Crowland Street a mixed housing and employment sites. The plan was changed to make it housing only this is severely to the detriment of employment prospects in the area. Not only now will there be hundreds more people with which to complete with for jobs they will have to travel to Formby.

Increased travel to work time worsens work life balance, increases stress, ruins out environment, increases congestion and worsens road safety. The lack of jobs on this site is a massive lost opportunity. However it is not the biggest missed opportunity. The Kew park and ride was originally set up with the vision of a train station coming to the area. Helping ease congestion, improving our environment and boosting connectivity with our neighbours to the east through West Lancashire. Again the lack of eastward outlook from the council is preventing the best decisions from being taken. There was once a Kew Gardens railway station near to the proposed site.

Both the abandoning of hope of a train station and the removing of the employment land would be bad news anywhere. In this area though it is particularly depressing. The Lower Super Output Area directly adjacent to the site is the lowest ranking decile in Southport and Formby for both employment and income deprivation

I feel the council in this case have failed to satisfy that this is the best option as compared with other realistic alternatives including their former plan for a mixed site containing employment opportunities. I hope that the following concerns are taken into consideration and that you will consider altering the plan to address a number of the issues surrounding soundness and legality.

Summary of Suggested Changes**Evidence Submitted**

Chapter 6	Plan Order Site MN2.5	Other Documents
Policy MN2.5	Land at Crowland Street, Southport	
Respondent No 1065	Response Ref 1	Representor Name Christine McGregor
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Object for the following reasons:-

1. Permanent loss to the community of an extensive Car Park and Bus Interchange including Customer Service facilities (and used daily by workers/visitors to Southport & Ormskirk Hospital NHS Trust)
2. Permanent loss to the community of a sustainable Public Transport facility forcing yet more vehicles into the town centre
3. Permanent loss and waste of major capital investment of £5 million into the Kew Park and Ride putting tax payer money at risk to repay the original grant should the site no longer be used for its original purpose
4. Permanent loss to the community to re-locate a future railway station with advantage of existing bus interchange and car parking facilities
5. Permanent increase in carbon emissions from enlarging the housing development by inclusion of S008 in the Local Plan
6. Permanent Increase in traffic congestion at the Norwood Road roundabout area
7. Permanent increase in traffic generally as a consequence of developing SR4 04 (Crowland St) and impact as Kew's importance grows as a commercial/retail centre increasing the need to expand not contract car park and public transport facilities
8. Permanent increase in traffic congestion during major tourist events including the Southport Air and Flower Show

The demolition of a park and ride and bus interchange facility (which includes a permanent brick built shelter and toilet facilities) is not sound. The increase in population and vehicular traffic will cause problems if not matched by sustainable public transport infrastructure. The site should be protected for potential re-siting of a new railway station where the track and gradient are suitable. There are no alternative sites that could be developed for a replacement park and ride and this cannot be justified as it fails to support "green" public transport. This is contrary to the stated aims and policies of the UK and EU to limit carbon emissions by facilitating the greater use of public transport into town centres. The inclusion of this site also suggests that the restrictions placed on its disposal within a specified time limit for a contrary use, imposed by the original grant which might involve the repayment of several million by Sefton Council, is being ignored.

Summary of Suggested Changes

Protection should be given to the the complete Site S008 to meet existing and future demand for car parking and a viable bus interchange and allowing for the potential development of a new rail station east of Foul Lane. Currently the park and ride facility is under exploited not least due to poor signage on the A570, but the increase in population generated by the Crowland Street development will inevitably result in the greater demand for parking and public transport facilities.

Evidence Submitted

Chapter 6	Plan Order Site MN2.6	Other Documents
Policy MN2.6	Land adjacent to Dobbies Garden Centre, Benthams Way, Southport	
Respondent No 350	Response Ref 7	Representor Name Carol and Stephen Hosker
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

There is a threat to water voles from development in Bentham's Way. (The water vole and its habitats, as the Council is aware, is a species which is fully protected under the Wildlife & Countryside Act 1981). The Benthams Way site, additionally provides an urban greenfield site, a valuable amenity to both humans and wildlife.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.6	Other Documents
Policy MN2.6	Land adjacent to Dobbies Garden Centre, Benthams Way, Southport	
Respondent No 716	Response Ref 26	Representor Name Robert Swift
Organisation Name	Robert Swift and family	
Obj/Sup/Com	Objection	

Summary of Main Issues

Land adjacent to Dobbies Garden Centre, Benthams Way, Southport (Site MN2.6) is a council owned urban site, and there is an identified high risk of surface water flooding to the south. It is a relatively contained overgrown site. There is however access constraints associated with the site which require further investigation. A density of 30 dph has been applied.

Summary of Suggested Changes

The indicative capacity of Site MN2.6 should be reduced from 215 to 195 dwellings.

Evidence Submitted

Chapter 6	Plan Order Site MN2.7	Other Documents
Policy MN2.7	Land at Lynton Road, Southport	
Respondent No 45	Response Ref 1	Representor Name Pam Cowen
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I would like to register my strong objection to the addition of the site at Lynton Road to the local plan on the following points:

This site is green belt land and in fact was left off the initial local plan last year. I do not see any justification for it to be added now when it remains greenbelt land.

The site is also a Site of Local Nature Interest. This is a very important point. Part of this site is presently designated for Sand Lizards and despite there not be large open sandy areas (as mentioned in the Network Rail Ecological Appraisal) they do infact breed here,

Additionally Natterjack Toads and Red Squirrels and bats are among the wildlife found here. The site also has supporting habitat for many bird species, hedgehogs and badgers. Network Rails own ecological appraisal of the site points out that " Ecological surveys are limited by factors that affect the presence of plants and animals such as time of year, weather, migration patterns and behaviour. The survey was undertaken in May and therefore the survey data may not be representative of other times of year"

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.

Summary of Suggested Changes

Evidence Submitted

Organisation Name**Obj/Sup/Com** Objection**Summary of Main Issues**

I am well aware that the need for housing must be met however, there are innumerable brownfield sites in the borough and I feel that MN2.7 must be protected for the wildlife to survive in this area. It can be said that this land is just full of brambles and scrub, therefore should be cleared. However, hundreds of creatures use brambles at different times of the year. Insects visit the flowers for pollen and nectar. Spiders spin webs to catch the bounty of visiting insects. Moths, peach blossom and fox moths lay their eggs on bramble as it is their larval food plant. Blackbirds, wrens, thrushes, chaffinches, starlings, robins, pheasants, foxes, mice and other small mammals eat the fruit. Robins, wrens, thrushes, blackbirds, warblers and finches will nest in brambles and small mammals use it for protection from predators. One relatively small piece of land but if it is used for housing there will be catastrophic results for the wildlife. If the land is stripped the wildlife habitat is gone forever.

Summary of Suggested Changes**Evidence Submitted**

Policy MN2.7

Land at Lynton Road, Southport

Respondent No 76

Response Ref 1

Representor Name Ann McLennan

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

The site is small and putting even 20 houses on the site is completely unfeasible. Siting new properties so close to existing properties would completely ruin the current area. Houses are proposed far too close to existing properties. There are houses for sale in Lynton Road and Lynton Drive which have been for sale for a considerable time. Why attempt to build new houses when available houses are not selling?

The site is designated as a Site of Local Biological Interest and contains a habitat for sand lizards, a EU and UK priority species. If Wardell Armstrong undertook an Ecological Appraisal and found no sand lizards, then they were looking in the wrong place as they have been seen by a number of residents of Lynton Road. I personally have had a baby red squirrel in my garden. Other residents have also seen have seen red squirrels on the land and also bats and natterjack toads.

The development of the site would harm the landscape.

The land at present is an area of green land peace. For Network Rail to term this "brownfield" is a cynical ploy.

The number of homes that could be provided would not significantly help to support any local services or facilities in the local area. Network Rail say a broad range of facilities in the local area are readily walkable.

Hillside Railway Station is within easy reach (if you are fit and able!). The steep steps down to the platform are no use for the elderly, disabled or people with toddlers and pushchairs. The fact that there is no disabled access to the platforms is unacceptable. The bus service along Waterloo Road is infrequent – one every hour.

The parade of shops on the corner is excellent - if you want to have your hair cut or you want to buy a bathroom! There is no post office, no bank, no ATM and nowhere to buy food provisions.

There are no local doctor's surgeries or dentists in easy reach and the local primary school, Farnborough Road Junior School, is already full. Where would all the new children go to school?

Many local residents opposed the development of the site.

Although residents on Lynton Drive are not at all happy about the proposed development it is the Lynton Road residents who have strongly opposed this development as it will impact greatly on their lives for the above reasons.

I am looking forward to Network Rail undertaking a public consultation with the residents. Every resident in Lynton Road and Lynton Drive is appalled at the possible development. Most agree that to use a greenbelt site with such wildlife activity would be unacceptable. Everyone agrees that the positioning of the new proposed road would be dangerous as it will access Lynton Road on a bend where cars are parked, and that the traffic at the junction with Waterloo Road would be impossible to handle.

Number 34 Lynton Road has been acquired by Network Rail with the intention to demolish what was a lovely family home to provide access to the site. It is astonishing for Network Rail to state that the feedback from Sefton's Highway Department has been positive and that the access strategy is likely to be considered acceptable.

The junction of Waterloo Road, Lynton Road, Lynton Drive, Sandon Road, Hillside Road and the shop parade slip road is recognised by everyone who lives in the area as a nightmare junction particularly at certain times of the day. There have been several major accidents recently including the demolition of a substantial post-box.

The idea of new houses and more car owners joining into this already busy and hazardous area is a frightening thought. It would be extremely difficult for immediate residents to get into and out of their driveways. It would seem that it is impossible to site traffic lights at that junction as there are so many slip roads involved. At times - when the coast road is closed, or when the Flower Show is on or a Golf Tournament is taking place at Royal Birkdale or Hillside Golf Club, it can be virtually impossible to cross the junction.

Summary of Suggested Changes**Evidence Submitted**

Chapter 6 **Plan Order** Site MN2.7 **Other Documents**
Policy MN2.7 **Land at Lynton Road, Southport**
Respondent No 125 **Response Ref** 2 **Representor Name** Nick Moulton
Organisation Name Amphibian & Reptile Conservation Trust
Obj/Sup/Com Comment

Summary of Main Issues

We do have concerns over two of the site allocations included within the Sefton Local Plan, namely MN 2.7 and MN 2.8. MN 2.7 is identified as a Local Wildlife Site and ARC would object to loss of this habitat and site designation. It is probable that this site supports protected reptile species and may also include the European Protected Species (sand lizard) which is noted along the immediately adjacent SSSI (unit 30). As such we consider that this site should be “screened in” as part of the HRA, as development would have direct and indirect impact on SSSI habitats and EPS.

Summary of Suggested Changes

As such we consider that this site (MN2.7) should be “screened in” as part of the HRA, as development would have direct and indirect impact on SSSI habitats and EPS.

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.7 **Other Documents**
Policy MN2.7 **Land at Lynton Road, Southport**
Respondent No 265 **Response Ref** 2 **Representor Name** Michael Brown
Organisation Name North Merseyside Amphibian and Reptile Group
Obj/Sup/Com Objection

Summary of Main Issues

Land west of Lynton Road, Birkdale, is identified as a Local Wildlife Site and part of a Site of Local Biological Importance, mainly because of the presence of Sand Lizards (a European Protected Species) in the area. NMARG is concerned about the loss of this habitat and site designation.

Common Lizards (*Zootica vivipara*) have been found during surveys of this site (see Wardell Armstrong Ecological Appraisal, Southport, Hillside, report for Network Rail, June 2013). This species is protected under Schedule 5 of the Wildlife and Countryside Act 1981. The site may also contain the Sand Lizard (*Lacerta agilis*), which is a European Protected Species, and strictly protected under both the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2010. The Sand Lizard is also a Priority Species of principal importance for the conservation of biodiversity in England under Section 41 of the Natural Environment and Rural Communities Act 2006.

Sand Lizards have definitely been recorded along the immediately adjacent SSSI, surrounding the railway line, and Hillside Golf Course (see Merseyside BioBank records). Site MN 2.7, in its current condition, would still provide suitable Sand Lizard habitat for connectivity between adjacent Sand Lizard populations, close to the railway and Hillside Golf Course. This connectivity is very important in preventing the isolation and fragmentation of declining Sand Lizard populations.

Summary of Suggested Changes

NMARG believes that if the Council were to accept the loss of Local Wildlife Site designation, and develop the site, a process of mitigation would be required, whereby as many Common Lizards as possible would be caught and translocated to a suitable receptor site outside the development site, together with Sand Lizards, if any were found on the site. To prevent any Common or Sand Lizards from entering the site during development, exclusion fencing would need to be placed around the perimeter of the site. These measures may ensure that this site is developed in a manner which is legally compliant and sound.

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.7 **Other Documents**
Policy MN2.7 **Land at Lynton Road, Southport**
Respondent No 350 **Response Ref** 3 **Representor Name** Carol and Stephen Hosker
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

The development at Lynton Road would wipe out the designated wildlife site in this area and threaten its effectiveness as a wildlife corridor (vital in such a built-up area). The loss of its dense, mature woodland would significantly add to the plight of already depleted bird and other wildlife populations which are currently reliant on it as a habitat.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.7 **Other Documents**
Policy MN2.7 **Land at Lynton Road, Southport**
Respondent No 376 **Response Ref** **Representor Name** Michael Gradwell
Organisation Name Network Rail
Obj/Sup/Com Support

Summary of Main Issues

Network Rail's position that the Hillside site has the capability of making a substantial early contribution to the shortfall in Sefton's 5 year housing land supply and that the site is able to be brought forward for development in the short-term. It is a brownfield site.

The Local Plan proposes an indicative capacity of 25 dwellings on the site. However, it is Network Rail's case that the site could comfortably accommodate 30 — 36 dwellings through good design and with no loss of amenity to neighbouring residents.

This site is deliverable, in that it is available now, it is a suitable location for development now, has a realistic prospect of delivery with the 5 year period and it is viable.

Many of the sites allocated in the Local Plan are significant large scale strategic developments, which by their very nature will present significant lead-in times to development. In contrast, the Hillside development is relatively small scale. Given the absence of any significant constraints, it is clear that the site has the potential to deliver housing at an early stage of the Local Plan period, making a valuable early contribution to the housing shortfall in the borough.

The submitted Ecological Appraisal and the Extended Phase 1 Habitat & Reptile Survey confirmed that no sand lizards were present on site and that the majority of the site did not contain suitable habitat. Any impact could be mitigated.

The ground conditions have also been investigated. They are not considered to be a barrier to development given the neighbouring residential development.

The site access can be approved by forming a new vehicular access to Lynton Road facilitated by demolishing a house that Network Rail have acquired. Secondary access can be provided via the existing single track off Lynton Drive.

The site is well-located and many local facilities are within walking distance.

Network Rail do not consider that the site meets any of the 5 purposes of including land in the Green Belt.

The site is currently part of the operational railway. Network Rail's permitted development rights would enable a broad range of rail-related development to be carried out without planning permission. The development of the site for residential use would remove this use and secure / safeguard residential amenity for the adjacent residents.

Summary of Suggested Changes

Increase the indicative capacity of the site from 25 dwellings to 30 - 36.

Evidence Submitted

An Ecological Appraisal and the Extended Phase 1 Habitat & Reptile Survey (Wardell Armstrong, June 2013).
Technical Note relating to access (SBA, May 2013)

Organisation Name**Obj/Sup/Com** Objection**Summary of Main Issues**

I am writing to voice our very deep concerns at the prospect of the plot of land at the back of Lynton Road being used for housing by its owner Network Rail.

This site of scientific interest is just recovering from the damage done by Network Rail in recent years and is once again becoming a bio-diverse site. Housing on this site would be disastrous for the rich and varied plant-life and animals (some of which are extremely rare!) The area is home to a countless and hugely diverse range of creatures, but notably the very rare Sand Lizard and Natterjack Toad both of which I have seen at the rear of my property. The rarity of these creatures is recognised by numerous wildlife groups and to destroy their habitat would I believe contradict the Wildlife Act of 1981.

The area at the rear of my house is used by bats and any building will directly impact the bat population. The Red Squirrels use this area as a corridor and if you read about the work being done by "Red Squirrels North England" you will note that this area is clearly in the buffer zone. I have taken great interest in the conservation work carried out to save Red Squirrels a precious and indigenous creature. Red squirrel conservation work in the local area is of international importance. Parapox almost wiped out the local Red Squirrel population and as the Reds recover and their numbers grow they clearly need to be able to move around the buffer zone. One of the few Red Squirrels showing immunity to the deadly parapox has been tracked in Ainsdale and there have been many sightings of Red Squirrels in the Lynton Road area. This area provides a corridor this side of the railway line for their continued expansion.

Building on this area would clearly block the advance of Red Squirrels and close the door on the expansion of Seftons' Red Squirrel population... The ultimate aim of this nationally important conservation project going on. Red Squirrels Northern England state: "The red squirrel is a protected species in the UK and is included in Schedules 5 and 6 of the Wildlife & Countryside Act 1981 (WCA) (amended by the Countryside & Rights of Way Act 2000). It is an offence to intentionally kill or injure a red squirrel or intentionally or recklessly damage or destroy any structure or place a red squirrel uses for shelter or protection, or disturb a red squirrel while it occupies such a place. Therefore you must be very careful about when and where you fell any trees."

There are numerous mature trees in the plot. Some of these trees have grown to considerable height. Many are native British trees, home to countless birds and insects. We have a mature Silver Birch Tree at the rear of our property. During a recent count this tree was visited by 10 different species of bird during a one hour period. The tree is home to a massive range of insect wildlife. To destroy such trees would be an assault on nature. I believe that building on such a bio-diverse piece of land would be wrong for wildlife, wrong for local endangered species and wrong because there are other less environmentally sensitive sites in Sefton as outlined in the draft plan.

The proposed building would impact significantly on the surface water/drainage/flooding. According to Environment Agency maps the area is prone to surface flooding and any building and loss of naturally draining sandy ground will increase this risk.

I have a number of serious concerns re traffic if the proposed development was allowed. The proposed access road is on an already tricky bend. I have had a car parked outside written off in an accident and more houses will inevitably mean more traffic/more incidents. The proposed access site will make parking for us, number 36, number 32 and the houses opposite very dangerous as we would basically have to slow and turn on a junction. The junction in my opinion would be dangerous to all and should not be allowed on the basis of safety to motorists and pedestrians. In addition the Junction of Lynton Road/Lynton Drive as it joins the main road is a notorious accident spot. There have been six accidents at this junction identified in a report from Sefton Council:

<http://modgov.sefton.gov.uk/moderngov/documents/s47316/21%2006%2013%20-%20CMT%20-%20LSS%20Ped%20Crossing%20review.pdf>

Four side roads joining a main road and a zebra crossing make for an already difficult crossing for motorists and pedestrians. The proposed development would undoubtedly make this situation considerably worse for all drivers and pedestrians.

There is the issue on whether the immediate local area has the services and infrastructure for a further influx of residents. Pressure on schools and local health services are already considerable. For example I find it almost impossible to get a same day appointment at my GP surgery. Demand for school places is set to rocket in the next few years and more residents is bound to affect provision of school places in the local area. There is no local grocery shop or cashpoint. Hillside station has no disabled facilities and bus services are infrequent.

I acknowledge that Sefton must provide land for affordable housing but all the indicators are that houses are not being bought in

this area. Number 40 Lynton Road (a very desirable 3 bedroomed semi) was empty and unsold for about 2 years. There was little interest in number 34 Lynton Road before Network Rail bought it. There are many other houses for sale in the area. There clearly is a need for affordable housing in the borough but the types of houses proposed would not be that type of affordable. Because of the location they would be highly priced and I do not think that housing on this plot of land would be beneficial to Sefton in terms of providing the right type of housing.

In summary this proposal for houses on this area of land would be an unacceptable destruction of a wildlife habitat used by creatures that have a national profile in terms of conservation. It would be violation of a green space enjoyed by countless animals and plants and much appreciated by those of us lucky enough to see it each day. The proposed development would have a serious impact on the view at the back of my house and this would consequently affect the value of our property substantially. There would be two very serious traffic issues at the proposed junction and at the start of Lynton Road. The type of housing proposed is unlikely to be in the affordable bracket, so much needed by first time buyers and although our economy is improving, the housing market in this area is flat. Clearly the market dictates no more housing needed here. Sefton Council has already earmarked several suitable areas for housing in the draft plan that would clearly meet the needs of the Borough in the near and medium term future and on these grounds we urge you strongly to reject this proposal to include this plot of land in Seftons' Plan.

Summary of Suggested Changes

Remove this plot of land from the plan.

Evidence Submitted

Chapter 6		Plan Order Site MN2.7		Other Documents
Policy MN2.7		Land at Lynton Road, Southport		
Respondent No 488		Response Ref 35	Representor Name Ian Brodie Browne	
Organisation Name Sefton Council Lib Dem Opposition Group				
Obj/Sup/Com Objection				

Summary of Main Issues

MN2.7 is a site where environmental considerations are of great significance and a recent bio-diversity report on it makes compelling reading. It may not be, in this case, high grade agricultural land but the bio-diversity factors brought out by the report mean that we strongly oppose any development on it.

Summary of Suggested Changes

Evidence Submitted

Policy MN2.7

Land at Lynton Road, Southport

Respondent No 513

Response Ref 1

Representor Name Jenny Todd

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

The site is Green Belt land. Whilst we have been told that some Green Belt land will have to be released for development I would query that in the case of Southport. There are ample brownfield sites which could be developed.

The site is SLBI. The nature aspect of this site is very important. Numerous residents have reported sightings of sand lizards, natterjack toads, red squirrels and bats. We have some photos of natterjack toads and red squirrels taken this year.

The site was omitted from the Plan last year [Preferred Options 2013] due to the above facts. I believe 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. The site was omitted last year due to people having seen sand lizards, natterjack toads, etc and these having been noted. 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 as behind our house there is a large sunny sandy area. We know that they never came near our end of the site in May 2013 due to no disturbance of surrounding brambles. Whilst we have not seen any sand lizards for two years, we have seen them in the past, and have seen natterjack toads and redsquirrels on this area this year. We did not realise until recently the importance of these sightings.

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. The site was omitted due to Green Belt and SNBI status. Network Rail's proposals and plans to you should have no bearing in any decisions on this site.

However the Wardell Armstrong report did seem to say that if the site was left untouched it could soon revert to land suitable for sand lizards and natterjack toads. Their report also says that the development lies adjacent to the railway corridor which is SSSI. We also have a report from BioBank Merseyside - Biodiversity Information Report dated 25th July 2014 - which states that the whole site is almost bordered by SSSI sites and consequently any rare species could easily travel to the site. I am not an expert of these issues but if needed we can certainly get more expert opinions.

For Network Rail to keep referring to the site as brownfield' is unacceptable and I enclose a quote from the Council to Network Rail concerning this site [Correspondence provided]. 'Nevertheless, it is extremely disappointing that you have misrepresented the planning situation. 'The land is not "within what is currently classified as GreenBelt". It is in the Green Belt and will remain so for the foreseeable future.' Interestingly Network Rail's comments upon fly tipping on the site, would imply that they will be doing the fly tipping as the site is secured by them with fencing and locked gates.

We are astonished that Network Rail state that feedback from Sefton's Highway Department has been positive and that the access strategy is likely to be considered acceptable. The junction of Waterloo Road, Lynton Road, Lynton Drive, Sandon Road, Hillside Road and the shop parade slip road is recognised by everyone who lives in Southport and particularly Birkdale and Hillside as a nightmare junction.

There have been to major accidents at the corner this year alone. Most people who live in the area avoid the junction if possible. All through the day it is hazardous but it is positively dangerous between 8am and 9am. Where No.34 is situated is on a bend in Lynton Road. There have been three minor accidents along there in recent times. The idea of say 35-50 new houses and say 70-100 new car owners joining into this already busy and hazardous area is a frightening thought. Also it would be extremely difficult for ourselves and our close neighbours to get into and out of our driveways.

It would seem to be impossible to site traffic lights at that junction as there are so many slip roads involved. In winter when the coast road is often closed then traffic tails back for miles along Waterloo Road. When the Flower Show is on or a Golf Tournament at Royal Birkdale or Hillside Club people try to plan their holidays as they know it will be virtually impossible to cross the junction.

Network Rail say a broad range of facilities are readily walkable! We have already commented on the lack of facilities in the area. 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.

We have spoken to almost every resident of Lynton Road, Lynton Drive, Clovelly Drive and Hillside Road. In total just over 200 houses. We have only met one resident who didn't want to hear about it and a couple who said they weren't bothered about it. The vast majority of residents in the whole area are totally opposed to any development and I believe many of them have already

sent comments in to the Local Plan Team.

Wildlife Site at rear of 32 Lynton Road

We have used the land to the rear of our house, around 100 sq.m., for almost 30 years. We have used it as an allotment and used it openly and without the consent of Network Rail. In fact, the site always used to be called wasteland and children would play on it and nobody really knew if it was Council land, railway land or common land.

In September 2013 a land surveyor came on to our land and said that they were doing a land measure for Network Rail. In May 2014 we received a letter from Network Rail about this land. They offered us a Licence Agreement for £50pa to continue to use the land or for us to get off the land in 28 days. Our Solicitor responded to them and said that we had no need to do this and that we were claiming the land through Adverse Possession. Network Rail have never replied to this and we are intending to have our names entered at the Land Registry as owners of this land. It is currently unregistered land.

In view of the current situation and our love of nature and wildlife we are making this area into a small wildlife and nature reserve. The soil is so sandy in this area and sand is a few inches under the soil. Consequently we have dug up the top layer and now have a sunny sandy area with a shallow pond, perfect for wildlife, including sand lizards, lizards, toads, butterflies, red squirrels and rare birds. I have taken advice from Natural England, the Wildlife Trust, the Reptile Association and various local experts. A large number of residents have seen our site and consider it to be a perfect future haven for wildlife. As we live next door to the house that Network Rail want to demolish, any disturbance or laying of a busy road would make it impossible for the migration of wildlife to other areas and we have been told building so close to our site would be unacceptable.

We think the reason that we have not seen sand lizards over the last couple of years may have been due to a neighbour's cat which prowls around that area. She said that the cat often brings lizards back and recently she managed to get hold of the remains! We have been told that this is a sand lizard's tail. We did see a couple of natterjack toads in June but did not manage to get photos. We are sure they were natterjacks due to the colouring and also the fact that they ran away rather than hopped away. At the moment we have a family of toads living on our site. We have photos of our site and toads and still have the lizard's tail. We would be happy to send in a further information about this or for anyone to visit the site.

Finally, although we realise that this will not be considered relevant in your decisions, I would like to point out a couple of things. Our neighbour is 96 years old and has lived here for 60 years and is currently in hospital having had a stroke, partly brought on by worrying about this. Another neighbour is 90 and has lived here for a similar length of time. She is also constantly fretting about the thought of this possible development. We have lived here for nearly 40 years and at least 10 other households on this side of the road have been here for a similar length of time. We have stayed here because it has been a secure, quiet area in which to raise our families. At least 10 neighbours have said that if any development went ahead they would either leave the area to live with family, go abroad to live, or move nearer their employment and out of Sefton, as the only reason they are living here is because it is a pleasant area. Consequently Sefton would have at least another 10 houses to sell as people move out of the area. There are already 3 empty houses in Lynton Road. There are 8 houses for sale in the Road and Drive, none of which are selling.

We realise that Network Rail and a possible developer will be putting pressure on Sefton Council. However we have already over 200 names who would be happy to sign a petition against any development.

Would it really be worthwhile to cause total upheaval and distress for so many people just for the sake of using a small Green Belt SLNI site to produce 35 houses.

Summary of Suggested Changes

Evidence Submitted

Correspondence btween respondent and Council.

Chapter 6	Plan Order Site MN2.7	Other Documents
Policy MN2.7	Land at Lynton Road, Southport	
Respondent No 567	Response Ref 1	Representor Name Janette Miller
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Green Belt Land should not be used for housing development. There are numerous properties lying empty in Sefton and Brownfield sites available to build more houses. Residents buy properties near the Green Belt understanding that Green Belt designation will protect the countryside and character of the area. To build on this site would negatively alter the character of the area. It would destroy a pleasant area for residents and wildlife. Housing figures do not give "special circumstances" for building on the Green Belt. Sefton's population is decreasing.

Reports and figures presented by Sefton Council have been thoroughly analysed by local action groups. The conclusion is that only a fraction of the proposed building is necessary. Over 6,000 properties lie empty in Sefton and there are Brownfield sites available to build several thousand more. Request that the Local Plan be rewritten, excluding all Green Belt Land and adopting a "Brownfield First" policy. Loss of Wild Life and Habitats site (MN2.7) is designated as a Local Wildlife Site and a Site of Special Scientific Interest. The lives and habitat of these creatures should be protected. Where are these creatures to go! The natural environment should be protected. This should be a priority. In the Sefton Green Belt study (June 2013) the conclusion was "The ecological constraints relating to this site mean that it is not suitable for development" and it was not included. The same species are there and will be badly affected. Local Wildlife Sites and Sites of Special Scientific Interest should not be lost. They should be protected. Risk of Flooding to Existing Properties Green Belt land can help with natural drainage slowing down the passage of water into ditches and water courses avoiding flooding. Concrete for new housing will increase the risk of flooding. The site is in very close proximity to the electrified railway line with live wires.

The local station has notices to warn passengers about the danger of going near live wires. This site is not suitable as the live wires make it a dangerous location for housing development, with the risk of fatal accidents. Safety should be a priority. Quality of Life The numbers of houses proposed and therefore the density of the housing development proposed for this site are totally inappropriate for the size of the plot available. They are also inappropriate when compared to the existing homes. This will have a detrimental effect on the quality of life of existing residents. No account has been taken of this. The effects are as follows: Lack of privacy and light

Noise pollution due to overcrowding on a very small area. Increased air pollution and carbon emissions because of the additional vehicles in the area.

Social Issues Increased risk of crime due to housing development which would cause overcrowding on this small site. Increased risk of anti-social behaviour due to housing development which would cause overcrowding on this small site.

Traffic Congestion Development of this site would result in increased numbers of vehicles in a small area. This would cause traffic congestion. Due to the layout of existing roads and houses in the area there are very limited measures available to relieve such congestion and it is something which cannot be resolved. Bottlenecks will be created. As a result the area will be more dangerous increasing the risk of accidents on its roads.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.7	Other Documents
Policy MN2.7	Land at Lynton Road, Southport	
Respondent No 703	Response Ref 34	Representor Name Jackie Copley
Organisation Name	CPRE Lancashire	
Obj/Sup/Com	Comment	

Summary of Main Issues

This site is already included in the list of sites to be developed i.e. MN2.7 the land to the rear of Lynton Road, Hillside, Birkdale. Also, identified on the map, south of Broomes Cross Road, is MN2.7, this appears to be an error as MN2.7 is the land to the rear of Lynton Road, Hillside, Birkdale as abovementioned.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.7	Other Documents
Policy MN2.7	Land at Lynton Road, Southport	
Respondent No 716	Response Ref 16	Representor Name Robert Swift
Organisation Name	Robert Swift and family	
Obj/Sup/Com	Objection	

Summary of Main Issues

The 'Land at Lynton Road, Southport' (Site MN2.7) is an identified site of local biological interest and habitat for sand lizards, which is an EU and UK Priority species. The Sustainability Appraisal and Green Belt Assessment have identified that the development of the site would significantly harm both the habitat value of site and landscape (although the latter of which is considered could be offset). It is identified within the Sustainability Appraisal and Green Belt Assessment (2013) as being unsuitable for development due to the impact on protected species/ecology constraints. The site should be discounted.

Summary of Suggested Changes

Delete site MN2.7 from the policy MN allocations.

Evidence Submitted

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

The proposed development is not in keeping with the existing and well established housing, in terms of density and design. This is not in keeping with stated aims of the planning department. The proposed density while in spec for similar developments does not take account of the shape of the plot and the houses that adjoin it.

The proposed development does not afford sufficient parking for the number of houses proposed. This will result in chaotic parking on the estate and spill over onto existing roads causing nuisance and traffic problems. In current times it is entirely unrealistic to assume each household will have only one vehicle, any new development should be self sufficient in this respect and not be planned to be detrimental to existing residents.

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.

The houses in Lynton Rd are already blighted due to the uncertainty and cannot be sold for prices that they would otherwise be valued at prior to the considered development, this will continue until the matter is decided upon, and values will be harmed should the proposal be accepted. People like ourselves who have purchased property in recent years will be pushed into negative equity situation.

The ratio of new properties gained by the development is not in justifiable proportion to the number of existing properties that will be devalued, with their owners/residents lives will be upset, their enjoyment and quality of life diminished. It would seem more or less that for every new household that might be created there is an existing household that would suffer a great loss. This proportionality is not justifiable, the council have a duty to consider the existing "actual" population and not only a theoretical population, many of whom if they materialise might be completely new to the area and would be equally happy living in a different development that had been planned in a more considerate way.

There is a large stock of first time buyer housing for sale in Southport, building more and more estates with subsidised funding will continue to cause the rundown of established areas of the town.

Traffic at the Hillside crossroads is already difficult for local residents, adding a new estate will exacerbate this.

Building too many small low cost homes that are not actually needed invariably leads to these estates being bought up by private landlords just a few years down the road, this effects the long term makeup of the estates and harms the investment made by the remaining owners.

It is my view that land in the NW is not at such a premium that new house need to be built so close to railway lines. Young families and children should not need to live so close to working lines, it is not Hong Kong, even if it is classed as low cost housing.

The owners of the land (Network Rail) have clearly planned this development or some time as demonstrated by their purchase of a house in Lynton Rd for demolition. The value of their own funded wildlife survey must be compromised by the way they have used the land in recent times. They have created a large area of hardstanding right in the centre of the plot and in recent years erected a portacabin (since removed again). This is not consistent with the parcel being treated as a wildlife sanctuary. The land should be cleaned up and left to recover for several years before any accurate survey can be performed.

The council have also put forward a similar parcel of land in Crosby, again adjacent to a station. However it is noted that on this parcel the target build number is only 14 dwellings, ie, 1 below the cut off for inclusion of low cost and social housing. The Crosby site has better access, is more regular in shape and would cause virtually no impact on bordering neighbours. I suggest that the council is not treating the North Sefton area ie. Southport with the same consideration as the South Sefton areas.

The very nature of the development proposed means that in the end it will largely be owned by private landlords who will profit from the land disposal and the development costs to the council.

Summary of Suggested Changes**Evidence Submitted**

Chapter 6

Plan Order Site MN2.7

Other Documents

Policy MN2.7

Land at Lynton Road, Southport

Respondent No 1039

Response Ref 1

Representor Name John Nichols

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

This refers to rep #1044.

Summary of Suggested Changes

Please see attached letter

The change we are requesting is the removal of site MN.2.7 (Land behind Lynton Road) from Sefton's Local Plan.

Evidence Submitted

Policy MN2.7

Land at Lynton Road, Southport

Respondent No 1044

Response Ref 1

Representor Name Julie Preston

Organisation Name Lynton Road Residents

Obj/Sup/Com Objection

Summary of Main Issues

We believe the inclusion of this site in the local plan is not 'sound', because it is not consistent with national policy and is not justified. In order for our opposition to be considered, we have compiled a joint objection, which has been countersigned (see Appendix Five). Our objection covers the following points concerning this plot of land.

- 1) Bordered by SSSI with rare, rich and varied flora and fauna
- 2) Local infrastructure - roads
- 3) Environmental concerns: flooding
- 4) Local infrastructure — education
- 5) Network Rail and Merseyrail

We trust this document conveys the strength of feeling regarding the protection of this valuable land and welcome the opportunity to discuss this further with you. We also believe that there are lots of opportunity for back land and brownfield development within Sefton which seems to have been ignored in the preparation of the Local Plan. Additional contact details can be found in Appendix Five.

1) Bordered by SSSI with rare, rich and varied flora and fauna The site included in the local plan proposal is bordered by a SSSI. The land itself has local designation as an important site. The proposed development would destroy the fringes of a coastal ecosystem and rich biodiversity.

The proposed development will directly impact on the habitat of the natterjack toad (*Epidalea calamita*, formerly known as *Bufo calamita*). The natterjack toad is one of only three protected amphibians due to its threatened status. It is ironic that a species, which is threatened due to loss of habitat and reduction in habitable coast, should be further threatened and habitat reduced due to this proposed housing development. This would directly contradict the Wildlife and Countryside Act 1981. Several residents have reported hearing the distinctive mating call coming from this land. Furthermore, photographic evidence of this species of toad and others, found in the local area, can be found in Appendix One.

The sand lizard (*Lacerta agilis*) is another rare and endangered species which inhabits the local area. It is another species which is in serious decline due to habitat loss, with the Sefton coast hosting one of the largest populations. It is protected by the Wildlife and Countryside Act (1981) against sale, killing and injury. One resident has seen sand lizards basking on a sandy bank in her garden and another has retained the tail which was found in his garden. The Government's Biodiversity Action Plan includes the sand lizard as a priority species. Sefton Coast Partnership are actively creating new habitats to ensure the survival of the sand lizard. This species, along with other lizards and reptiles are commonly seen within the area surrounding the proposed development. Furthermore, photographic evidence of this species of lizard and others can be found in Appendix One.

The red squirrel (*Sciurus vulgaris*) is a protected species within the UK and can regularly be seen in the local area. The proposed development is on a site known to be used by the red squirrels as a corridor and, as identified by the conservation work being completed by 'Red Squirrels North England' it is clearly in the identified buffer zone. In fact, when the local population of red squirrels became infected with parapox, which almost caused the demise of the local population, one of the few red squirrels which showed immunity to the disease had its drey behind a property in Lynton Road. The red squirrels are known to use the local area as a source of food as well as breeding. The Wildlife and Countryside Act 1981 (amended by the Countryside and Rights of Way Act 2000) states it is an offence to intentionally damage or destroy any place a red squirrel uses for shelter or protection. We strongly believe that building on the land to the rear of Lynton Road would have a detrimental impact on the habitat and movement of the red squirrel. Documentation linked to their sightings can be found in Appendix One.

Residents regularly see bats in the local area, including the land within the proposed development. Sadly, all efforts to photograph them have not been successful and therefore we cannot identify which species are present but several species of bats are classified as European Protected Species. However, we believe that one of their roostings is a powerhouse bordering the proposed development which is owned by Network Rail and the local area is a site of foraging and commuting habitat. Legislation dictates that

any structure that bats use for shelter should be protected from destruction whether occupied or not. We strongly believe that bats will be affected, by changes to their roosting, foraging and commuting habitats, by the proposed development.

The established trees on the land provide a valuable habitat for common birds such as pheasants, magpies, blackbirds, tits, robins, sparrows, bluejays and woodpeckers and thrushes. In addition, the land also attracts less common species, with a recent sighting of a sparrowhawk and several of a trio of buzzards. During a recent RSPB bird count one resident, who backs onto the land included in the proposal, counted ten bird species within the hour-long audit. We believe that any development on this land

would have
a detrimental effect on birds by removing their habitat and hunting ground.

The land included in the site for proposed development has a rich ecosystem which is recovering from the recent disturbance by heavy machinery during maintenance work by Network Rail. However, many other animals and insects can be found on this and surrounding land. These include:

- Hedgehogs (a UK Biodiversity Action Plan Priority Species)
- Owls
- Foxes
- Butterflies including Common Blues, Walls and Small Heaths
- Beetles
- Dragonflies
- Bees
- Spiders .
- Rabbits/Hares

The land included in the local plan has a number of well-established trees, bushes, brambles and plants. Some of the mature trees have thrived and stand at a considerable height. These include common and less common species. To destroy such trees would be an assault on nature. These contribute to the ecosystem and their regeneration following the land disturbance by Network Rail, has been noticeable. These provide the rich and dynamic habitats for the diverse fauna found on this land as well as allowing shelter and foraging sites. Although specific flora cannot be identified without accessing this land directly, it is thought locally that orchids and other rare species have historically flourished here.

At the start of Lynton Road is a very busy junction of five roads and a service road for local shops. These roads are Lynton Road, Lynton Drive, Waterloo Road, Sandon Road and Hillside Road. There is also a Zebra Pedestrian Crossing (across Waterloo Road) at this road junction. To the south of this junction there is Birkdale High School, and recreation ground. To the north of the junction there is a train station and Greenbank High School. There is a row of shops on both sides of Sandon Road to the east of the junction and residential streets to the west of the junction. At any time of the day there are problems with vehicle access to this junction because of the residential nature of the side streets and with Waterloo Road being the main access route in the area to both Southport to the north and Liverpool to the south. Congestion in this area is made worse with the proximity of Greenbank High School for Girls and Birkdale High School for Boys. The shops at Sandon Road make this a popular meeting place for pupils of both schools before the school day starts and after it finishes. There are a significant amount of school age children in this area at these times and additional vehicles dropping pupils off and picking them up.

During the working day there are additional cars parked around the junction due to the proximity to the Hillside Merseyrail train station. Merseyrail do not provide dedicated official parking to their passengers for this station. The additional parked vehicles also contribute to the difficulties of vehicles accessing this junction.

A report from Sefton council to the Cabinet Member Transportation Date of Report dated 24 June 2013 reported that during a three year period there had been six accidents within 50 metres of the junction. The proposed development, and the resultant increase in traffic, would undoubtedly make this situation worse for all pedestrians and drivers increasing the risk of accidents. Appendix Two (2.1) shows the layout of the junction.

Appendix Two (2.2) details accidents that have been witnessed by the local news reporters at the junction including two reports of children hit by vehicles on the pedestrian crossing. These incidents are indicative of the problems encountered by motorists and pedestrians and there have been many more incidents that have not been reported. Appendix Two (2.3) photographs of cars being parked around the station which are adding to the traffic congestion.

The proposed building would impact on the surface water/drainage and increase the risk of flooding. According to the Environment Agency maps the area is prone to surface flooding and the water table is at only 18 inches. The impact of this high water table was seen last year with the flooding and partial closure of the Coastal Road between Ainsdale and Birkdale. Building on this site will only worsen the risk of flooding to the local area and potentially affect the water table further.

The main drains and sewers for the local area which carry both the surface water run off and the normal sewage from the existing properties are already at capacity. United Utilities have stated that the flooding that had occurred in a house on Clovelly Drive (a road off Lynton Road) was due to the hydraulic inadequacy (lack of capacity) of their sewer network, which could not cope with the existing run off from the roads and roofs of the existing properties.

Increasing the demands on the sewer network by increasing the number of houses, thus increasing the demands for both sewage and surface water run off will only make the issues of overloading the system worse causing more issues with flooding. Please see supporting evidence in Appendix Three, including two letters from United Utilities explaining recent localised flooding and the local flood map.

Within the local area, primary schools are already at, or near, maximum capacity. Many are currently undergoing expansion programmes to cater for the recent influx of pupils and to meet the demand of the future. The nearest mixed secondary schools are also close to their capacity, with the three closest schools declaring they are full for 2014 September Y7 intake. Additional housing would put the local schools under increasing pressure with new residents having to transport their children some distance to gain a school place. Data to support this is widely available within Sefton.

As the local area has a very limited bus route this would prove very difficult. Although the area is close to a Merseyrail station, it has no disability or pram access rendering it inaccessible to many. Therefore, new residents would be forced to use their own transport which would further impact on the road network as outlined in point 2. Similar pressures also exist on medical facilities in the area, including doctors and dentists.

The land in question is currently owned by Network Rail. They claim it is no longer in use although photographic evidence (Appendix Four) shows this land is frequently used to provide access for Merseyrail track maintenance and storage of track supplies.

Two years ago, Network Rail used the land to lay new tracks on the Northern Line, Merseyrail. At this time the land was significantly disturbed by heavy machinery and human use. We feel strongly that the land is slowly recovering from this damage and that the ecosystem and equilibrium of the land is returning to its former state. This may explain the lack of findings in the Ecological Appraisal (Extended Phase 1 Habitat & Reptile Survey) commissioned by Network Rail to support the inclusion of this parcel of land in the Sefton Local Plan, which was carried out shortly after this disturbance. This survey was also carried out in April and early May and was therefore at the wrong time of year to demonstrate the true biodiversity at this site. Even the survey states that it may not be representative of other times of year.

Since Network Rail purchased the property at 34 Lynton Road, it has been left to decay. This detached property was well maintained until it was sold. Neighbours were informed that this would be rented out, although this has not happened in the two years since Network Rail acquired it. It clearly demonstrates that Network Rail purchased it purely so it could be demolished so access to the land could be obtained. It is worth noting that a covenant was established, signed by at least one of every pair of houses, to prevent any property being sold with the intention of destruction to allow access to the land. Although this has since expired, without residents being aware it needed renewing, this demonstrates the long-standing opinion that residents want to protect this environmentally valuable and nature rich land.

Summary of Suggested Changes

Please see attached letter

The change we are requesting is the removal of site MN.2.7 (Land behind Lynton Road) from Sefton's Local Plan.

Evidence Submitted

Photographs and letters of correspondence

Chapter 6	Plan Order Site MN2.7	Other Documents
Policy MN2.7	Land at Lynton Road, Southport	
Respondent No 1300	Response Ref 1	Representor Name
Organisation Name Lynton Road Petition		
Obj/Sup/Com Objection		

Summary of Main Issues

We object to the inclusion of site to rear of Lynton Road being included in the Sefton Local Plan

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 3	Response Ref 1	Representor Name Margaret Barr
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

- a) Understood that, as part of the sporting legacy following the Olympic Games, that the Government gave an undertaking NOT to sell off playing fields
- b) The report treats very lightly the importance of local protected species which are regularly seen in the vicinity of the field
- c) Having raised the issue of low water pressure at a consultation meeting this is not mentioned
- d) The issue of where the children from additional housing would attend school and the extra pressure this would put on school places – should we not be rebuilding the school rather than knocking it down?
- e) Local roads barely cope with existing traffic and congestion around Ainsdale Station and in the village at peak school times is already extremely high
- f) Failed to find any reference to the need to apply to the secretary of State for Education for consent to change of use and have previously been advised by the EFA that this is a statutory requirement (copy letter is attached)

Summary of Suggested Changes

None

Evidence Submitted

Letter from Education Funding Agency

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 46	Response Ref 46	Representor Name Barry Marsden
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

It is suggested that approximately 220 properties could be built on this land. The knock-on effect of this would be catastrophic for Ainsdale Village. At present on Station Road between the roundabout and the level crossing there is only space for roughly 100 vehicles at most with yellow and white lines restricting parking all through the village. Traffic from a further 200 plus homes will cause even more chaos than at present. This in addition to the congestion at the level crossing for Ainsdale Station. With 8 trains per hour going through and with the gates closed for between 3 and 4 minutes for each train the gates are only open for about 30 -35 minutes in every hour and at peak times it will be almost impossible to get through from Shore Road to the top end of the village within a reasonable amount of time.

Furthermore, at present all the surrounding roads have parked cars for most of the day presumably for people using public transport. What are you going to do to relieve this? Once the site is developed have you considered the extra traffic using Osborne Road, Sandringham Road, Chatswoth Road etc. Will there then be a bus service providing transport for the new residents. If so have residents of these roads been consulted of the likelihood of this and maybe even having a bus stop outside their house (extra noise, litter etc). It would be interesting to know what surveys have been carried out based on current traffic levels compared with the effect of the volumes of anticipated traffic.

The influx of the additional population will require educational facilities. Is the High School to re-open to educate the children of families moving onto the new development? If so what about sports field facilities. Finally I believe there is a proposal being put to Council for the playing fields to be developed into an extension of the Nature Reserve. Surely this would be a better way to utilise this land in keeping with the surrounding environment.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 50	Response Ref 1	Representor Name Patricia Marsden
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I am writing to strongly object to the proposed building on the school fields. Regular queues exist at the railway crossing. The thought of hundreds of more cars is incredible. Sandringham road is quite narrow and has many cars parked there all day. More traffic would be chaotic. Are you proposing bus routes down this road and Osborne Road which is also narrow and residential. Also, all these houses will produce more children and there is no school for them! There are plenty more suitable sites for houses. Why choose our fields that have a proposed wildlife plan in action.

Summary of Suggested Changes**Evidence Submitted**

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 59	Response Ref 1	Representor Name Claire Heaton
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

There are only two roads that will lead to the estate. This will cause a backlog of cars especially when the train crossing is down, this will cause absolute bedlam, and will result in accidents and I believe ultimately fatalities. Secondly why build on green fields when in Sefton there are many brownfield sites that could be used to create truly affordable housing and in turn regenerate those areas. A better use of this land would be to create a nature reserve which will generate tourism to the area and also a nice place for our children to play as other than the beach area, which in my opinion is not safe due to busy roads, children around here have nowhere to play, no sports stadiums etc.

Summary of Suggested Changes**Evidence Submitted**

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 61	Response Ref 1	Representor Name Peter Walters
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Amongst the main issues are the following: Would site involve redevelopment of Brownfield land? Yes. Would the development provide new or improved Road / Rail infrastructure? No. Would the site offer any other specific benefit? No. Would the site contribute to the wider regeneration of a deprived area? No. Would the site create jobs in an area of high unemployment? No. Would the site provide affordable housing in an area of high need? Yes (particularly Southport). Would the site meet any other wider need or provide other benefits? No.

Looking at the questions and answers above 5 out of 7 answers are no, the development of this plot is not beneficial to the surrounding area. There are no bus stops, there are no schools, yet the site was a school which you want to bulldoze to make way for housing which will lead to children and a requirement of a school. If anything, leave the existing school, or rebuild it and put it back to the use that it was originally intended.

The infrastructure for a school is already there and has been accepted for years by the local residents, by building a housing estate you will impact on hundreds local people's lives and cause untold stress and anxiety. With new homes come more people and children and pets and noise, the local sand dune will become even more covered in dog mess. If you don't live in the area then you're not affected but the rest of us will be for years to come. By building homes here many existing residents will not wish to remain in the area, and it will have a detrimental effect to the atmosphere and spirit of the village. There are plenty of empty homes around locally that should be used by the council first to create new homes for people and are already established within the community, put these to better use rather than taking open greenbelt land away from local residents. I strongly object to the proposed redevelopment of this site for housing.

Summary of Suggested Changes

To make it 'sound' isn't the right wording. To make it 'common sense' is more appropriate. Schools will need to be built!!! It already is a school so why pay to build another, it doesn't make sense. There are other designated areas for building homes use these first then use the brown belt footprint of the existing school and re-vamp, modernise, re-build the school, the facilities already pre-exist. Look at empty properties first.

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 62	Response Ref 1	Representor Name Ken Pickard
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Aside from the environmental concerns that the 'Ainsdale Community Wildlife Trust' are quite rightly pursuing, consideration should be given to the lack of local amenities the council provide in the Ainsdale area. As you know you have fenced off the dunes now which limits the access to the dune area with dogs which is extremely annoying. There are no sports centres, youth clubs (to my knowledge). A few things to consider; how would the needs of the conservative estimate 1000 new residents be accommodated, (doctors, dentists, schools etc - my children have to travel to Formby to attend a mixed sex school). How would the new residents access the land without a very large volume of traffic 'in and out' on 2 roads. How would residents cross the train track at the level crossing at Ainsdale train station safely? Currently if you cross the track from the village side of Station Road and wish to turn right on to Sandringham Road you find vehicles waiting on the level crossing in a line of traffic. This situation will increase ten fold.

If the work goes ahead I want you and the contractors take cognisance of the fact that the school fields are at least 4 feet higher than the gardens of the houses that back on to the field in Knowle Avenue. This could potentially lead to; drainage problems and being overlooked by houses on the higher ground. I was led to believe that the land was built on what was a tip and consequently there are underground gases in the earth, hence the school is built on stilts as are the houses in Knowle Avenue. You can walk around under mine. Is this being considered and proper arrangements? One of the biggest attractions is North Sefton is the dune and beach area especially as the town centre has and is slipping in to disuse on a monthly basis. The plan to make the area even more unattractive is ill conceived as needs to be reconsidered.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 63	Response Ref 1	Representor Name Sue Pickard
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Aside from the environmental concerns that the 'Ainsdale Community Wildlife Trust' are quite rightly pursuing, consideration should be given to the lack of local amenities the council provide in the Ainsdale area. As you know you have fenced off the dunes now which limits the access to the dune area with dogs which is extremely annoying. There are no sports centres, youth clubs (to my knowledge). A few things to consider; how would the needs of the conservative estimate 1000 new residents be accommodated, (doctors, dentists, schools etc - my children have to travel to Formby to attend a mixed sex school). How would the new residents access the land without a very large volume of traffic 'in and out' on 2 roads. How would residents cross the train track at the level crossing at Ainsdale train station safely? Currently if you cross the track from the village side of Station Road and wish to turn right on to Sandringham Road you find vehicles waiting on the level crossing in a line of traffic. This situation will increase ten fold.

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Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 65	Response Ref 1	Representor Name Graham & Susan Lowe
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

There are currently only two means of access. Sandringham Rd as a point of access to the site is debatable because of obstruction by the continued use of the old school buildings by the Council for office accommodation, the Corporate Learning Centre and the site overlapping a private estate road. There is no existing direct road access to the site from this direction. Normal access to Sandringham road is via Ainsdale Village and the Ainsdale Station level crossing or from Shore Road via the Coastal Road. It should be noted that approximately the first third of Sandringham Road is regularly used for over spill parking for the station, making the level crossing junction congested.

Harewood Ave is a very short, narrow road, there are only about 30metres of clear space at the end of Harewood before it merges into the SSSI (sand dunes) at a public access. Normal access to Harewood Ave, is via Osborne Road and estate roads leading from Shore Road and the Coastal Road. Bearing in mind that the proposed housing site is bounded by an area of Special Scientific Interest, Hillside golf course, a private estate, the Southport / Liverpool railway line, Southport and Ainsdale golf course and an Avenue of high quality housing, it is unlikely that an additional means of access to the site could be achieved.

Sandringham and Osborne Roads suffer from lack of maintenance. The pavements are uneven, the road surfaces are crumbling and the road drainage gutters (cobble stones in places) collapsing. No maintenance except for token patching has taken place for many years. The intensified use generated by construction traffic and the comings and goings of hundreds of additional residents vehicles will be potentially fatal to a weak and already decrepit road system. Would it be the Authorities intention to include the renovation / re - making of the roadways within the development costs?

Both Sandringham Rd (6.2m wide) and Harewood Ave (6.1m) adjacent to the "potential" housing site are very narrow and traffic congestion will occur if use is intensified. With the use of the old school buildings for office accommodation and the Corporate Learning Centre apparently being used more intensively, road parking is already becoming an issue in Sandringham Road and Knowle Avenue. Additional traffic will only make the current problems worse. Currently Ainsdale village as a whole becomes easily congested and parking is in very short supply.

The railway gates at Ainsdale station close 8 times per hour, as the 4 passenger trains in each direction pass through the station. This rises if repositioning and track cleaning trains are taken into account. This means that the crossing gates are closed for 28 to 30 minutes (possibly more) per hour. This is not speculation we have observed and timed the process. The village can come to a halt when the gates are closed. The occupants of 200 plus homes with their vehicles, will greatly increase the traffic levels through the gates into an already overcrowded village. Will the appropriate rail company be consulted regarding the gates and additional flow. When the village is busy and the railway gates closed, Salford Rd, Halifax Rd. and Chesterfield Rd. are frequently used as "rat runs" to the Kenilworth Road railway bridge and Shore Road for back access into the existing shore side housing estates. These village roads are already too narrow for both traffic and parking. It should also be noted that the Ainsdale level crossing is need of major renovation and repair, it has been neglected by all parties for many years. The road surface is collapsing in several places.

Drainage - The existing foul and surface water drainage is barely adequate for the existing homes. Many residents have had to have remedial drainage work carried out. On many occasions there is a foul stench of sewage at the junction of Sandringham Rd, and Shore Rd outside the station entrance, indicating there is something wrong with the system. If the system has to cope with an additional 200 plus homes it will fail with public health implications. Major investment would be required to connect the new housing to a viable main foul and surface water drainage system. Water - In the 39 years we have been resident in Sandringham Road, the existing potable water supply has at times been barely adequate. At times the pressure drops severely. It will not cope with an additional 200 plus houses without major investment. In 2014 there was a major burst in Mossziel Avenue due to "the old and decrepit condition" of the mains pipe. The mains water pipes in Sandringham Road and surrounding streets are of a similar age. Gas, electrical, telephone and broadband supplies - They are currently appear to be adequate for the existing residential area, what effect a further 200 plus houses would put on the gas, electrical, telephone and broadband infrastructure is an unknown quantity and potential unknown cost.

The proposed housing site is enclosed by a golf course, an area of SSI (sand dunes), private quality houses and gardens, Council offices and the Southport / Liverpool railway line. Following the closure of the Ainsdale Hope school, wild life (red squirrels, foxes, bats, reptiles [the Natterjack Toad is indigenous to the area] and many bird species) and plant life are now re - colonising the field from the SSI. We understand that many rare species of plant (over 100) have been identified in the grasses on the former school field.

Disappointingly the Council continues to mow the field ignoring resident's objections. The "Ainsdale Community Wildlife Trust",

have prepared a scheme to return the area of the playing field to its original natural state as a benefit for the whole community. This is the local residents preferred long term use for the site. We understand that there is the potential for 500 plus houses here, so some of the problems set out above will be greatly magnified should that occur.

Summary of Suggested Changes

Evidence Submitted

A disc of 47 photographs and index, of the current roadway infrastructure

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 69	Response Ref 1	Representor Name John Bungey
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

My objection relates to the proposed use of the former Ainsdale Hope School site for housing. This is based on the unsuitability of the location in terms of vehicular access on the scale proposed through quiet residential streets which are relatively narrow, coupled with the increased congestion which will be caused by turning traffic at the already congested and dangerous nearby level crossing. This level crossing provides the only direct access route to Ainsdale Village. Drainage issues are also to be expected from this Low lying area.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 74	Response Ref 1	Representor Name Kim Woodham
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I wish to state my objection to the proposed development at Ainsdale Hope School site, I was dismayed when the school closed and feel the area needs a secondary school. If the site is to be developed at all let it be for a new highschool. Why should children from Ainsdale have to commute to Formby or Birkdale and beyond? New housing will bring more custom to support local business but equally will put strain on local services. Anyone travelling to Liverpool between 8 & 9 am by train is lucky to get a seat until Hightown as pupils travel to Formby, once in Formby the children have a long walk to the high schools or risk squashing on to an overcrowded school bus. The station platforms too are overcrowded with pupils trying to get to school.

The proposed site would be perfect for a local community wildlife area as it sits next to the sand dunes home of rare Sand lizards and Natterjack toads, not to mention the flora and fauna that make the Sefton Coast an area of special scientific interest. Thus if we can't have a secondary school then let us have an area of outstanding natural beauty, let us have a nature reserve that will demonstrate Sefton's commitment to being Green, to being environmentally friendly, to being conscious of conserving the nature of the area for future generations. There are many areas with dilapidated housing that could be demolished to make way for new housing as is happening to great effect in Litherland and Bootle but Ainsdale doesn't need such housing. This is a small, quiet village such an estate will completely alter the ethos of the village.

I would make another suggestion that the site could be developed for allotments, giving local families, schools and groups (such as beekeepers) the opportunity to develop a community market garden scheme, this would encourage healthy eating, develop fitness and would be educational for all ages. There is always a waiting list for allotments , the nearest being Formby, and the council would still own the land, it would benefit the local & wider community there may even be European/ government/lottery funding available for such a project. I appreciate there must be change but an estate of the size proposed will be catastrophic, far better to encourage visitors to the area and build stronger community links with a nature reserve or allotments.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.8 **Other Documents**
Policy MN2.8 **Former Ainsdale Hope School, Ainsdale**
Respondent No 112 **Response Ref** 1 **Representor Name** Alan Sharples
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

This site is adjacent to the Sefton Coast SSSI and I believe that the site would be better utilised as a Nature Reserve. I support the proposal by the Ainsdale Community Wildlife Trust to develop a low dune Nature Reserve on this site, it is already used by many bird species. Converting the site into a Nature Reserve would encourage existing a new species to colonise the site. This approach has been successfully demonstrated at many locations including the 'strays' in Churchtown that have been successfully converted from grass fields to woodland. The council has recently been awarded an Environmental Higher Level Stewardship Agreement grant from Natural England to support the Ainsdale and Birkdale Sandhills Local Nature Reserve. This is currently being spent on scrub clearance and livestock enclosures. If the council is serious about maintaining and enhancing the existing Reserve then this is a once in a lifetime opportunity to extend and enhance Nature Reserve for the benefit of future generations.

Summary of Suggested Changes

The Sefton local plan should be amended to remove the proposal to build on the SITE REF LOCATION MN2.8. Instead this site should be converted into a low dune Nature Reserve as proposed by the Ainsdale Community Wildlife Trust to be enjoyed by generations to come.

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.8 **Other Documents**
Policy MN2.8 **Former Ainsdale Hope School, Ainsdale**
Respondent No 117 **Response Ref** 1 **Representor Name** James and Clare Brayshaw
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I am concerned that the proposed development would severely endanger the many species of wildlife Ainsdale and Birkdale sand hills protects for the benefit of both those of us here to enjoy it today but also for the enjoyment of future generations. There are, as I'm sure the council is aware, many rare plants and wildlife who use the area as their home. The site is already next to an area of special scientific interest and special area of conservation and was originally flattened from existing dunes. I believe returning the area to its natural state would only assist the wildlife in this critical area of natural beauty and scientific importance.

Further the addition of several hundred people and vehicles to the area could only add additional pollution and could in-fact endanger the existing conservation area. It is also worth noting in a separate objection that demolishing two schools in Ainsdale to make way for several hundred new houses is rather counter-intuitive ; more houses = more people, more people = more children and more children = more school places required. Ainsdale primary and infant schools are at virtual capacity and Ainsdale no longer has a high school putting considerable strain on the surrounding school infrastructure.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 125	Response Ref 3	Representor Name Nick Moulton
Organisation Name	Amphibian & Reptile Conservation Trust	
Obj/Sup/Com	Comment	

Summary of Main Issues

The site is immediately adjacent to SAC habitats and units 10, 11, 12 and 30 of the SSSI. We agree that it is “screened in” for both Habitats and Appropriate assessment. However, ARC believe that development at this locality would have significant permanent direct and indirect impact upon SAC and SSSI habitats and protected species. As such we believe it would fail HRA regulations and are unsure if this then could affect the “soundness” of the Local Plan and its consistency with national policy. We therefore believe this site may be inappropriate to allocate for housing development within the Local Plan. ARC believe that this site could best fit the requirements for Public Open Space and local community nature reserve.

Summary of Suggested Changes

Remove site MN2.8 as a housing allocation and designate Public Open Space and Community Nature Reserve.

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 138	Response Ref 1	Representor Name Roy Silcock
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Reference is made specifically to location MN2.8, former Ainsdale Hope School and more generally to other planned locations in the Ainsdale area. Little consideration appears to have been given to the provision of infrastructure such as schools, medical facilities (particularly GP and Dental surgeries) traffic (roads and car parking) Ainsdale village is already overloaded in these areas. A much more acceptable alternative would be to close down the Woodvale Airport and use the land there for the provision houses. The airport is underused and housing on the site would enable the proper provision of the required infrastructure as well as easing the traffic congestion. With reference to location MN2.8 the proposal to convert this to a community wildlife trust has much to offer and is in fact in keeping with the councils own statement on the importance of conservation in the area.

Summary of Suggested Changes

A much more acceptable alternative would be to close down the Woodvale Airport and use the land there for the provision houses. The airport is underused and housing on the site would enable the proper provision of the required infrastructure as well as easing the traffic congestion.

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 142	Response Ref 1	Representor Name Michele Coffey
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I am writing to you to note my objection at the proposals to build houses on the former Ainsdale Hope High School. I do not feel this is the correct location for so many houses for a number of reasons. The playing fields are next to a SSSI and SCA which concerns me greatly. The site has many rare plants and animal wildlife on . The traffic in this area is already bad to awful at times already so how will a few hundred more residents improve the situation. The access will be via Sandringham Road which I assume all emergency vehicles will use so making their job more difficult especially with all the parked cars near the station and down one side of Sandringham Road already. It is at times almost impossible to obtain a GP appointment so how would a few hundred more patients be dealt with? There is now no high school in Ainsdale, only two junior schools so has schooling been considered or more/better bus timetables for this?

Summary of Suggested Changes

I feel this location would be a wonderful wildlife area for the whole community, and Ainsdale has a fantastic community spirit already. I believe the Ainsdale Community Wildlife Trust are offering to manage this site for the benefit to all residents and visitors to the area which I think is a very generous offer and one to considered very seriously.

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 153	Response Ref 2	Representor Name Richard Hendry
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

The Nature Reserve would be available for use by not only Ainsdale people but the wider community of Merseyside as it is not too far from the Railway Station. The Reserve would protect the wild life & fauna of the area.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 198	Response Ref 1	Representor Name Patricia Simpkin
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

The building of so many houses would be a major intrusion into the Green Belt. Loss of recreation space in a sensitive location, close proximity to SSSI SAC boundaries. The site is of high environmental interest with many rare plants and animal wildlife. Should be preserved. Ecological surveys of 2013-2014 identified 8 regionally or nationally species qualify for local wildlife site. The western half of the fields support fixed dune vegetation listed as a priority for conservation Annex1 of EU habitats Directive. Affordable housing would cause disturbance and predation by cars to specially protected Sand Lizards. Sand Dunes are a real draw to Ainsdale and they attract many visitors. There is a great concern RE doctors, hospitals emergencies/ care, dentists, noise, parking, litter and schools. I understand the school building is well used at present.

The Sefton Coast partnership follow EU principles in developing plans and strategies for Sefton Coast. It involves communities in nature conservation, restores nature recognising that the playing fields were originally were originally created for levelled Sand Dunes. The strategies state all developers sites must not adversely alter the integrity of internationally important nature sites or their supporting habitats. This site is adjacent to both SSSI and SAC.

Summary of Suggested Changes

Maintain school building for current/future users. Alternative proposed put forward by Ainsdale Community Wildlife Trust to establish a new dune nature reserve which would protect existing habitats, which have flourished and expanded since closure of original school in 2007 and provide additional habitats for the plants and animal wildlife to develop.be protected. Nature could then be enjoyed by all including elderly, disabled and young people. School groups to learn about the environment . I understand this here been covered. Ainsdale has always been a great place to live but the aged and infirm could not previously manage the dunes but this plan of wheelchair walkways , Ainsdale would once again be attractive to all ages.

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 206	Response Ref 1	Representor Name Pamela Main
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Proximity to National and European protected Habitats on bordering land. Site adjacent to the Sefton Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC). Ecological surveys in the summer of 2013 and 2014 identified eight regionally or nationally notable species. The fields therefore qualify for Local Wildlife Site status. The western half of the fields support fixed –dune vegetation listed as a priority for conservation in Annex1 of the EU Habitats Directive. Presence of specially protected Sand Lizards on adjacent land which would be susceptible to increased disturbance and predation by domestic cats. This follows survey work by the North Merseyside Amphibian and Reptile Group in 2014. A major intrusion into the Green Belt and loss of recreation space in a sensitive location....close proximity to SSSI and SAC locations. The site holds high environmental interest with many rare plant and animal wildlife and should be protected. An HRA (Habitats Regulations Assessment) should not be dependent on a planning application.

Summary of Suggested Changes

An alternative proposal has been put forward by Ainsdale Community Wildlife Trust to establish a low dune Nature Reserve. This would protect existing habitats , which have flourished and expanded since the closure of the school in 2007, and provide additional habitats for further plant and animal wildlife to develop and be protected. This would allow nature to be enjoyed by all including the elderly, those with disabilities and young people. This would recognise the Sefton Coast Partnership who follow EU principles in developing plans and strategies for the Sefton Coast a)involve communities in nature conservation. B)restore nature recognising that the playing fields were originally created from levelled sand dunes . C) all development sites must not adversely affect the integrity of internationally important nature sites or their supporting habitats. This site is adjacent to both SSSI and SAC locations.

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 207	Response Ref 1	Representor Name Michael Main
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Proximity to National and European protected Habitats on bordering land. Site adjacent to the Sefton Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC). Ecological surveys in the summer of 2013 and 2014 identified eight regionally or nationally notable species. The fields therefore qualify for Local Wildlife Site status. The western half of the fields support fixed –dune vegetation listed as a priority for conservation in Annex1 of the EU Habitats Directive. Presence of specially protected Sand Lizards on adjacent land which would be susceptible to increased disturbance and predation by domestic cats. This follows survey work by the North Merseyside Amphibian and Reptile Group in 2014. A major intrusion into the Green Belt and loss of recreation space in a sensitive location....close proximity to SSSI and SAC locations. The site holds high environmental interest with many rare plant and animal wildlife and should be protected. An HRA (Habitats Regulations Assessment) should not be dependent on a planning application.

Summary of Suggested Changes

Community Wildlife Trust to establish a low dune Nature Reserve. This would protect existing habitats , which have flourished and expanded since the closure of the school in 2007, and provide additional habitats for further plant and animal wildlife to develop and be protected. This would allow nature to be enjoyed by all including the elderly, those with disabilities and young people.

2. Recognising the Sefton Coast Partnership who follow EU principles in developing plans and strategies for the Sefton Coast

a)involve communities in nature conservation. B)restore nature recognising that the playing fields were originally created from levelled sand dunes . C)all development sites must not adversely affect the integrity of internationally important nature sites or their supporting habitats...this site is adjacent to both SSSI and SAC locations.

Evidence Submitted

Policy MN2.8

Former Ainsdale Hope School, Ainsdale

Respondent No 232

Response Ref 1

Representor Name John and Mary Whitehead

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

We wish to object to the proposed housing development on the grounds as set out in the attached sheet. These eight points have been established following full and comprehensive scientific research by highly competent qualified persons. They both establish and prove that the proposed development is not in accordance with either National or European law, and will have a deleterious effect on the local habitat for both flora and fauna. We are strongly opposed to this scheme, and urge that it be abandoned. The plan put forward by the Ainsdale Community Wildlife Trust would provide a much better use of the site and would protect it for future generations.

Objections against Sefton Councils Local Plan include the proximity to National and European protected Habitats on bordering land. Site adjacent to the Sefton Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC). Ecological Surveys in the summer of 2013 and 2014 identified eight regionally or nationally notable species. The western half of the fields support fixed-dune vegetation listed as a priority for conservation in Annex1 of the EU Habitats Directive. Presence of specially protected Sand Lizards on adjacent land which would be susceptible to increased disturbance and predation by domestic cats. This follows survey work by the North Merseyside Amphibian and Reptile Group in 2014. A major intrusion into the Green Belt and loss of recreation space in a sensitive location - close proximity to SSSI and SAC locations.

An alternative proposal has been put forward by Ainsdale Community Wildlife Trust to establish a low dune Nature Reserve. This would protect existing habitats, which have flourished and expanded since the closure of the school in 2007, and provide additional habitats for further plant and animal wildlife to develop and be protected. This will allow nature to be enjoyed by all including the elderly, those with disabilities and young people. Recognising the Sefton Coast Partnership who follow EU principles in developing plans and strategies for the Sefton Coast. A) involve communities in nature conservation. B) restore nature recognising that the playing fields were originally created from levelled sand dunes. C) all development sites must not adversely affect the integrity of the internationally important nature sites or their supporting habitats. This site is adjacent to both SSSI and SAC locations.

8. The site holds high environmental interest with many rare plant and animal wildlife and should be protected. An HRA (Habitats Regulations Assessment) should not be dependent on a planning application.

Summary of Suggested Changes

Adoption of the plan detailed by Ainsdale Community Wildlife Trust to create a Community Nature Reserve.

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 245	Response Ref 1	Representor Name D.Stuart Livingston
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I wish to make the following comments to the above proposal:- If one considers the employment situation of residents of these new properties it must be seen that there are virtually no employment prospects within Ainsdale and only a relatively small prospect of employment within Southport itself. It must therefore be assumed that these residents will have to commute outside the area for employment. Whilst the Sefton Local Plan Site Assessment Form (MN2.8) states high accessibility to Ainsdale Train Station, this would only be of value to residents commuting for employment to either Southport itself, or for areas adjacent to the Merseyrail service to Liverpool. Indeed there are no suitable public transport services for people commuting East to areas such as Skelmersdale, Kirkby and further afield. It is concluded therefore that, as with the existing residents of the area, people will commute to work by car.

Whilst Ainsdale Village has a number of shops, access to larger Supermarkets and retail facilities such as those at Kew would need to be undertaken by car. It must also be considered that access even to local shops and medical practices for elderly or infirm residents of the proposed development is too far away for walking and therefore could only be undertaken by car.

A development of 243 properties will bring at least an additional 243 cars to the area and possibly as many as 400 plus (assuming 2 cars at most households). MN2.8 Item 7 states that site access will be via Sandringham Road or Harewood Avenue. It is suggested that most traffic from this new development wishing to cross the railway will go via Sandringham Road. This is the case now with the residents of Chatsworth Road and Knowle Avenue. Access along Sandringham Road is already restricted by vehicles parked on the East side of the road by people using the train. Currently these parked cars stretch from the station to beyond Hatfield Road with cars also being parked outside residences on Belvedere Road and Hatfield Road. Indeed, it has already been necessary to put double yellow lines on the West side of the road from the station to Hatfield Road in order to maintain access especially for delivery vehicles, refuge vehicles and emergency services. It is a fact that a percentage of these parked vehicles are from residents of Chatsworth Road and Knowle Avenue who drive and park to reduce the distance they have to walk to the train. Undoubtedly the residents of this proposed development will also do likewise so further limiting the flow of traffic along Sandringham Road.

There will be difficulty with an increase in the amount of traffic exiting from Sandringham Road and wanting to turn left over the railway crossing. More importantly, an increase in traffic wishing to gain access to Sandringham Road when travelling West from Station Road over the crossing will create a blocking of the crossing. This will impede the flow of traffic from Station Road to Shore Road and create a safety issue with the crossing. This proposed development would cause considerable problems as the existing access roads would not be able to cope with the extra traffic and parked cars. Furthermore, the distance from the site to the station, local shops and medical facilities is too far for elderly and infirm people to walk. As such the Sefton Local Plan is not sound.

Summary of Suggested Changes

An alternative use for this site should be considered such as the Nature Reserve being proposed by the Ainsdale Community wildlife Trust.

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 265	Response Ref 1	Representor Name Michael Brown
Organisation Name North Merseyside Amphibian and Reptile Group		
Obj/Sup/Com Objection		

Summary of Main Issues

MN2.8 is immediately adjacent to SAC habitats and units 10, 11, 12 and 30 of the SSSI. One of the principal reasons for these designations is the presence of Sand Lizards in the area. Sand Lizards have been regularly recorded in the area of the Ainsdale and Birkdale Sandhills Local Nature Reserve very close to the Western boundary of the proposed development site and a particular colony is located on the south-east facing slope only about 50 metres from this boundary. A map showing the location of the 10 individual Sand Lizards recorded in 2014 is attached [see separate annotated aerial photo which shows 'Locations of Sand Lizard records for 2014, Upton Avenue dunes (blue - adult male, red – adult female, yellow – juvenile)']. Sand Lizards are also regularly recorded along the railway verges adjacent to the school, along Sandringham Road.

The Sand Lizard is strictly protected under European and U.K. legislation (the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2010), which means that it is an offence *inter alia* to damage or destroy a breeding site or resting place, or to cause disturbance which is likely to impair their ability to survive, breed or reproduce, or to hibernate or migrate; or to affect significantly the local distribution or abundance of the species. The Sand Lizard is also a Priority Species of principal importance for the conservation of biodiversity in England under Section 41 of the Natural Environment and Rural Communities Act 2006.

The Merseyside Sand Lizard is the rarest of the three genetically distinct races of Sand Lizard in the UK and furthermore, it has suffered severe reductions in population during the past ten years at many of the Sefton Coast sites where it still occurs. Current population estimates for the entire Merseyside race are 200 – 300 adults only.

NMARG are especially concerned about the impact the proposed housing development would have on the small colony of Sand Lizards living on the Ainsdale and Birkdale Sandhills SSSI, the colony being located only about 50 metres from the boundary of the proposed development. The construction of 243 new houses, immediately adjacent to the SAC area containing the Sand Lizards, would result in about 750 extra people, causing greatly increased recreational usage of the dunes. Consequently, there would be considerably increased disturbance to the Sand Lizards, a rare animal very sensitive to disturbance, both from humans and dogs. The specialised dense vegetation structure required by Sand Lizards for shelter and foraging, especially mature Marram Grass, would be subject to greatly increased trampling. This trampling is likely also to destroy Sand Lizard eggs, which are laid in patches of bare sand, at a depth of only 3 inches (75 mm.). Increased fouling from dog faeces would also lead to detrimental alteration of the critical vegetation species composition. Furthermore, there would be a considerable increase in litter, including discarded cans and bottles, these being death-traps for lizards, as well as other small animals.

Another dangerous consequence for Sand Lizards, if the proposed large area of adjacent housing development were to go ahead, would be the resultant considerable increase in number of domestic cats wandering onto the dunes and hunting for lizards. Domestic cats have been proven to be significant predators of lizards on the Sefton Coast (see 'Predation of the Sand Lizard *Lacerta agilis* by the Domestic on the Sefton Coast'). As well as the Sand Lizard, the Common Lizard also occurs in the SAC area adjacent to the proposed development site. This species also has a level of protection under Schedule 5 of the Wildlife and Countryside Act, 1981.

NMARG believes that the significant direct and indirect impacts, on the SAC and SSSI habitat and the protected species, of the proposed building development at the former Hope School, would mean that it would fail Habitat Regulation Assessment standards.

Common Lizards have been found during surveys of this site (see Wardell Armstrong Ecological Appraisal). This species is protected under Schedule 5 of the Wildlife and Countryside Act 1981. The site may also contain the Sand Lizard, which is a European Protected Species, and strictly protected under both the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2010. The Sand Lizard is also a Priority Species of principal importance for the conservation of biodiversity in England under Section 41 of the Natural Environment and Rural Communities Act 2006. Sand Lizards have definitely been recorded along the immediately adjacent SSSI, surrounding the railway line, and Hillside Golf Course (see Merseyside BioBank records). Site MN 2.7, in its current condition, would still provide suitable Sand Lizard habitat for connectivity between adjacent Sand Lizard populations, close to the railway and Hillside Golf Course. This connectivity is very important in preventing the isolation and fragmentation of declining Sand Lizard populations.

Summary of Suggested Changes

At SR4.06 (policy ref MN2.8 [i.e. now allocated as MN2.8]), NMARG believes that the proposed housing development would have a significant permanent direct and indirect impact on the SAC and SSI habitats and protected species (especially the Sand Lizard). Consequently, we think that it would fail HRA regulations and this would mean that the allocation of this site for housing

development within the Local Plan is not legally compliant and sound, and not consistent with national policy. We suggest that an alternative use of this site, which would be legally compliant, sound and consistent with national policy, would be develop the site as a local community nature reserve, as proposed by the Ainsdale Community Wildlife Trust.

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 269	Response Ref 1	Representor Name Brian Garston
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I have been a resident in Ainsdale for 75 years. I am therefore conversant with the area and its special environmental terrain. I have witnessed Ainsdale being converted from a very pleasant village with many recreational facilities including walks on the dunes and into the pinewoods. The surrounding farms and farmland gave the village a distinctly rural feel to the area. The population at that time was of some 3000 people, it has been transformed into an overpopulated suburb of Southport totally losing its character. The building of estates on this farmland in the 1960s and the invasion of the dune system by further building in the 1970s has transformed Ainsdale into a population of some 14,000 people, certainly not for the better. The flora and fauna of Ainsdale was decimated by the development.

The proposed building of a further 243 houses on land adjacent to an area of Special Scientific Interest is tantamount to desecration and vandalism. The Site is a very special habitat which nurtures many rare endangered species of plants and fungi some of which are endemic to the area and some of which are not to be found anywhere else in the country. The fauna in the shape of the Natterjack Toad and Sand Lizards are also vitally dependant on this type of habitat. The site has been considered by local people as prime for the development of a reserve respectful to the flora and fauna of the area. It would be sensitively landscaped in order to enjoy the sights and sounds of natural environment, in effect the creation of a nature reserve. The site could also be used for educational purposes as local schools could use the site to demonstrate the benefits of a natural environment. Wheelchair users would also be catered for. A video has been produced which graphically displays the proposed sensitive use of the area. Another reasons for not building on the site is the presence of a vast pool of subterranean methane gas which necessitated the previous school building having to be built of stilts.

To build on this site would therefore potentially be a threat to health for residents of the proposed houses. In addition there is concern that the present issue of traffic congestion in Ainsdale village would be compounded by the presence of a further 243 houses on the site since each house will attract at least one if not two extra cars per property. At times when the frequent closure of the Ainsdale Station barriers, which already cause a nuisance, happen there will be even longer delays for drivers and pedestrians waiting to cross the railway line. Adequate parking for people using the train is already deficient. Cars have to park in roads adjacent to Ainsdale station. The presence of extra vehicles wishing to cross the line will cause further congestion leading to more stress to drivers. Pedestrians would also be inconvenienced when crossing the line from one side or the other.

The increased congestion of traffic at the station end of station road will increase the hazard of crossing station road in this area as there are no pedestrian crossings at that end of station road. This factor is potentially dangerous for the not inconsiderable population of elderly people in Ainsdale. For the above reasons my wife and I strongly endorse the objections to the proposed housing development of the site but vehemently agree with the proposal to convert the site into a local community nature reserve.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 271	Response Ref 1	Representor Name Haydn Preece
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Ainsdale is limited for playing field space and the thriving and expanding Ainsdale junior section is inhibited by the lack of pitches. At a time when we are striving for health, fitness physically and mentally plus active participation in team sports it would be sacrilege to lose perfectly good playing fields in Ainsdale that have been mothballed by Sefton Council. We desperately need to keep the former Ainsdale High School playing field area as a sports field for junior sport. To allocate houses on an area which has so much potential for future generations of children/youths is totally wrong. We have already witnessed the demolition of a sports hall on the site which could easily for less than £200,000 been restored to a first class venue. The playing field strategy for Sefton has been revealed by Sports England as not up to date and I am sure the current review, led by an independent firm will reveal that in comparison with a great many towns the playing field facilities in Southport in particular are sadly well below standard.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 278	Response Ref 1	Representor Name Veronica Frear
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I have taken time to consider all aspects regarding the above Green Belt site and my reasons for making this objection to housing on the school playing field are as follows - Prior to school use a large area of the playing field was part of the sand dune eco system and, as such, important and protected species of plant and wild life are present. The site borders onto a SSSI and SAC area. Loss of local amenities and recreation space in an area where there is no local provision for all abilities. Poor access to the site for 243 houses and possibly 400 cars. Traffic flow through the village backs up on both sides of Station Road/Shore Road when train barrier is down making it difficult to exit side roads such as Sandringham, Mosgiel, Osborne and Delamere Roads.

Summary of Suggested Changes

Suggested use as follows - A plan put forward by the Ainsdale Community Wildlife Trust to create recreation amenities. The habitat, plant life and wildlife will be protected and allowed to flourish. The area will be protected for future generations. Board walks created to give access to disabled, young and elderly users. Low level dunes give access to all, something lacking in this area. No cost to the local council as funding has been secured to create and maintain the site.

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 281	Response Ref 1	Representor Name William & Barbara Watt
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

We walk through the dunes to Hillside very frequently and feel it is wrong that old or disabled people, especially those in wheelchairs are unable to enjoy the physical and mental benefits of being in nature here. The Ainsdale Community Wildlife Trust have such a wonderful plan to address this issue and also to preserve habitat for wildlife and plants. Another objection to building housing in this area is the traffic issues. One of the reasons a lot of us live in this area is the quietness and safety of our roads, to lose that would have a huge impact on us. Sandringham Road would become a nightmare when trying to get out and over the lines when the gates have opened after a train has passed. There will be queues of traffic both Sandringham and Shore Roads. Traffic in the village is busy already and parking not easy. The extra traffic would overwhelm Station Rd. Please take all these points into account, it's very important to us that these houses are not built for all the above reasons.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 297	Response Ref 1	Representor Name James Reed
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I am objecting to the proposed plan to build 242 houses on the playing fields and school area of the old Ainsdale Hope school, Sandringham Road, Ainsdale for the following reasons: This will again take away an area of natural habitat from the people of Ainsdale. The alternative proposal for the site, Ainsdale Community Wildlife Trust will give the people of Ainsdale and area that can be used and appreciated by school children, youth organisations, families, disabled people using wheelchairs etc. The existing sand dune areas are nor friendly for the use of the disabled and families with small children cannot use these areas. Plus more and more of the dune area is being closed off for cattle and sheep grazing, again excluding people. Plus the proposed reduction for cars to go on the beach again excludes those same disabled people.

Assuming at least 50% of the proposed houses have children of school age, where in Ainsdale are the schools that could accommodate 100+ extra pupils? Also there are no local facilities for the 11+ year old pupils in the area so again causing transport problems. Has this been taken into consideration? Another 200+ cars using Sandringham Road turning at the rail level crossing would also cause considerable problems in the whole area. I appreciate the fact that more housing is required nationally but I am not convinced that there is such a desperate need in the immediate area. To the best of my knowledge there has not been any industrial development creating jobs within a reasonable distance of this site again causing transport problems.

Summary of Suggested Changes

My comments clearly state why I question the "soundness" of these housing proposals. The change required are simply to consider how many extra houses are required in Sefton and then consider possible sites that have adequate road and schooling facilities local to the sites.

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 299	Response Ref 1	Representor Name Eric Norman
Organisation Name		
Obj/Sup/Com	Comment	

Summary of Main Issues

This is a site although partially brown (having a school building on it) is mostly a green site. Building some 243 houses on it seems pointless whilst there are some 6,000 properties throughout Sefton still lie empty, and there are brownfield sites available to build several thousand more. Building on this site would increase the volume of traffic on roads (mostly on Sandringham Road and Harewood Avenue) not suitable for buses, builders lorries, HGVs etc. Sandringham Road is already used as a car parking area near the railway station. The existing school (no longer a school) is built on stilts due to it being built on a previous tip which is generating methane gas slowly rising to the surface. Would anybody really want to live on an house on such a site?

Summary of Suggested Changes

I am informed by the "Ainsdale Community Wildlife Trust" that this is a site of special scientific interest and also a Special area of Conservation containing some rare plants and wildlife. Their proposal for the site would provide additional habitats for plant and wildlife to develop and be protected. Their proposal would save the Council considerable cost in upkeep and maintenance. Would provide an area for all to enjoy with easy access and paved pathways for wheelchairs, prams etc. Links would also be provided to the existing footpaths of the Birkdale Sandhills.

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 308	Response Ref 1	Representor Name Reginald Handley
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Proximity of the school land to national and European protected habitats on bordering land - adjacent to Sefton Site of Specific Scientific Interest and special area of conservation. Ecological surveys in the summers of 2013 and 2014 identified eight regional or national notable species - therefore qualifying for local wildlife status. The western half of the site supports fixed dune vegetation that is listed as a priority for conservation in annex 1 of the EU habitats directive. There is a colony of specially protected sand lizards on adjacent land that will be susceptible to increased disturbance by domestic cats should the development progress. This follows survey work by the North Merseyside Amphibian and Reptile Group in 2014. The development would be a major intrusion into the Green Belt in a location with close proximity to SSSI and SAC locations.

Summary of Suggested Changes

An alternative proposal has been put forward by the Ainsdale Community Wildlife Trust to establish a low dune nature reserve. This would protect existing habitats, which have expanded and flourished since the school closure in 2007, and provide additional habitats for further plant and animal to develop and be protected. This facility would allow nature to be enjoyed by the wider community including the young, disabled and elderly. The Sefton Coastal Partnership follow EU principles and strategies for developments along the coast, namely: Involving communities in nature conservation. Restoring Nature - the site was created on levelled sand dunes. Development sites must not adversely affect the integrity of internationally important nature sites or their supporting habitats. This site is adjacent to both SSSI and SAC locations. This site is of high environmental interest with many rare plants and animal wildlife and needs to be protected. A Habitats Regulation Assessment should not be dependent upon a planning application.

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 314	Response Ref 1	Representor Name Maureen McGuinness
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

As a long term resident of Ainsdale Village I raise my objection as I believe that the infrastructure of our village is totally inadequate to support a development on this scale. The proposed housing development will most certainly add at least another 240 cars plus other vehicles using our already congested roads. Access roads are already narrowed by the need for rail commuters to park at or near to the railway station. We already have long delays on both sides of the railway as traffic from the coastal road and surrounding areas queues on Shore Rd to come into and through the village or queues in the village waiting to drive into Shore Rd towards the Coastal Road. This new development, were it to be approved would horrendously escalate the traffic and parking problems in and around the village. The plan as outlined on Sefton's website indicates that the plan does not provide a new road infrastructure nor will it offer any specific benefits to the local community. The proposal from Ainsdale Community Wildlife Trust to create a wildlife area on this land truly deserves our support. Rare plants have been identified on the land and Curlews and Oyster Catchers regularly feed there, together with nocturnal visitors, such as Owls and Bats with some sightings of our famous Red Squirrels. Sefton's proposed building plan will provide no benefit to the community of Ainsdale, but the plan from the Wildlife Trust would certainly provide amazing benefits to the whole of our community, from the most to the least able. I firmly believe that we need to continue to preserve and conserve this area of greenbelt for our current community and for future generations of residents and visitors to Ainsdale Village.

Summary of Suggested Changes

As previously stated I am opposing Sefton's plan to build a housing development on the Green Belt Land on the site of Ainsdale Hope High School. I firmly believe that the Ainsdale Wildlife Trust plan truly deserves our full support. Once we lose this Green Belt land we can never retrieve it.

Evidence Submitted

Policy MN2.8

Former Ainsdale Hope School, Ainsdale

Respondent No 320

Response Ref 1

Representor Name Carol Davies

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

Southport is a seaside resort, noted for its rare and uncommon flora and fauna, and for the migratory birds which spend the winter here. I know of people from the south of the country who visit Southport just to view the coastal bird life. The Ainsdale sand dunes are designated as a Site of Special Scientific Interest. We are fortunate to have a local population of red squirrels, bats and owls! Sand lizards, see attached pages, have their burrows in the dune system close to this site. I understand that any potential development is obliged to observe a 50 metre boundary to any of these burrows. A proposed improvement at Hillside Golf Club was subject to modification because of this. Sand lizards are sensitive to disturbance, and an increase in the size of the local human population is bound to have some impact. They are also subject to predation by cats, whose numbers would presumably increase along with the new families. Sand Lizards are a 'threatened' species being a European Protected Species, and are strictly protected under U.K. law.

The construction of 243 homes on this site would be detrimental and damaging to the local wildlife. The Ainsdale Community Wildlife Trust has sought expert advice on the plants and wildlife currently present on this site, see attached sheets, and have prepared a plan for an alternative development on this site. This would furnish a buffer zone between the existing housing and the dunes system while at the same preserving the rare plants that are there now, and restoring the type of landscape that existed before the land was obtained from Hillside Golf Club This would benefit the local community, not least those disabled people who cannot access the sand dunes.

Having discussed the impact on the local wildlife, the impact on the local community is a critical issue. It is my understanding that this opening up of green belt land for housing development should be subject to local approval. To allege that approval by Bootle councillors constitutes local approval is inaccurate to say the least. The local population, the local councillor and the local Member of Parliament, literature enclosed, all oppose the proposed housing development on this site. This decision has been taken by councillors in Bootle, which is a separate town being, essentially, part of Liverpool, with very different priorities. It can be seen on the area maps on the accompanying Domesday Reloaded 'pages, that this site has been part of well defined green belt which has been preserved over the years, and the majority of the site remains 'green '. To construct housing would be a further erosion of the green belt. That began with the acquisition of the site from Hillside Golf Club for the purpose of building the school, which is no longer in use as a school, while children now need to travel to Formby for their schooling.

The impact on local infrastructure would be dire. Ainsdale village already suffers from traffic congestion during the day, as does the level crossing on the very busy Southport/ Liverpool line. Gates close frequently, and delays can result in cars queueing, dangerously, on the tracks, through impatience. At least two hundred more cars would only increase existing problems. I am not aware of a park within 600 metres from the site.

Regarding preserving the setting; this is absolutely not the case. This is a quiet residential area, with modest density of housing, leading into sand dunes and overlooking the green field behind the former school building. Knowle Avenue has a low traffic flow, which would change for the worse and become a noisy pollutant. My understanding of the background to this decision is that it is in response to a Central Government directive based on forecasts of future housing needs. The weather forecast is just that, a forecast, which can produce local exceptions. I would suggest that a kneejerk reaction, like this one, needs very close examination. There is a call for unoccupied properties, that have been allowed to fall into disrepair, to be taken over and converted into housing stock. I pass such a property on my way into Ainsdale which has been an eyesore for years. Literature enclosed. The site itself is not good building land. The presence of methane has been recognised, and can apparently be mitigated with modern building methods. One can only hope that these methods are infallible! They will presumably increase construction costs, as, also, presumably will measures to deal with the flooding which is a fact of life on site. Is it wise to construct more housing on a naturally wet area bearing in mind the terrible consequences for such developments in the recent past? What are the implications for occupiers trying to obtain house insurance? There are underground tidal waterways in the Souport area. I know of one on Hillside Golf Club, which drains into a lake; I understand that there is also one on Hesketh Golf Course. Such waterways can lead to land subsidence because of the erosion caused by the tidal action. I enclose the only documented evidence I have found, which concerns 'The Ream which flows from the drained land to the east of Southport to the sea. In my opinion, Ainsdale village is full to capacity.

Summary of Suggested Changes

Remove site MN2.8 as an allocation.

Evidence Submitted

Enclosures;
DOMESDAY RELOADED. Ainsdale Nature reserve 1. 2. and 3.

Ainsdale Hope School playing fields- further ecological studies.
Philip H. Smith & Patricia A. Lockwood, June 2014
Personal e-mail from the office of Dr John Pugh MP.
Sefton Local Plan: Site Assessment form, page 1 Site Reference SR4.06.
Lib. Dem. NHS Focus. Who governs Southport?
Lib. Dem. Ainsdale ward Focus. Empty Homes Scandal
Fun Trivia. The Ream
Sand Lizard. From Wikipedia.
Available to view; Ainsdale wildlife Community Trust visual 'visual walk through' of proposed alternative development of the site., at www.acwt.org.uk

Policy MN2.8	Former Ainsdale Hope School, Ainsdale
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Respondent No 321	Response Ref 1	Representor Name Nigel Williams
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Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

We have presented our objections under two separate headings, as this site covers the Sports/Playing Field and the Educational Buildings to the East of this site. This includes an objection to the closure of the Centre(s) due to the projected need for additional secondary class places in the near future, and the lack of demand for new homes.

This land [7.6ha] is designated Green Belt and was so ascribed to prevent urban sprawl between Ainsdale and Hillside/Birkdale. The Sefton Local Plan proposes to create significant urban sprawl, precisely what the designation of Green Belt was intended to prevent. Ecological surveys conducted by Dr Philip H Smith & Patricia Lockwood in 2013 and 2014, on behalf of the Ainsdale Community Wildlife Trust [ACWT], identified eight regionally or nationally notable species of flora. Report submitted by ACWT. This land is in close proximity to National and European protected Habitats on bordering land. It is adjacent to the Sefton Site of Special Scientific Interest (SSSI) and Special Area of Conversation (SAC). The western half of this land supports fixed dune vegetation, listed as a priority for conversation in Annex I of the EU Habitats Directive. There is a significant colony of Red Squirrels in the woods that are adjacent to the North boundary of this land. Building on this land will endanger the natural habitat for this fragile Red Squirrel population, which is protected under Law. From early Spring to late Autumn, Bats feed over this land daily at dusk. Again, Bats are a protected species. The proposal by Ainsdale Community Wildlife Trust to create a Nature Reserve which will include shallow ponds of water, are designed to provide a natural habitat for Natterjack Toads, another protected species in this geographical area. Specially protected Sand Lizards on adjacent land to this Site would be susceptible to increased disturbance and predation by domestic cats.

The buildings formally known as Ainsdale Hope High School [1.6ha] are currently operating as two separate educational establishments, employing a total of 90 educational staff. The buildings are located at the East end of Site MN2.8. The school place crisis has been fuelled by a 'baby boom' that began more than a decade ago, rising immigration and hard-up parents opting out of the private sector. Councillor David Simmonds of the Local Government Association said "we fear a tipping point could soon emerge when Councils and Schools can no longer afford the massive costs for the creation of places, nor find the space necessary for new classes, if this crisis is not properly dealt with". We draw this point to the attention of the Independent Inspector, because we believe that the Sefton Local Plan to bulldoze the Ainsdale Hope Centre and Corporate Learning Centre for housing, will deprive the Community of much need secondary education places in the future. At best this proposal can only be described as 'short sighted', and displays a total lack of forward planning.

The Sefton Local Plan proposes the building of 2,183 homes in Southport/Ainsdale area [MN2.1 to MN2.11], this will be in addition to 1,633 homes built between 2012 — 2014. A survey of 20 leading Estate Agents in Southport/Ainsdale in February 2015, established that there are 1,679 homes on the market for sale or rent. This figure will increase in Spring as more homes come onto the market, following the market's normal annual trend. Bellway built 100 new homes on the original Saint Thomas More site in Ainsdale, less than 1 mile from the MiN12.8 site, in 2013. In February 2015, 20 homes remained unsold [20%]. The economic law of diminishing returns, is already taking place! It is simply a matter of supply and demand. The fact is that the housing market is saturated with homes for sale or rent in the Southport/Ainsdale area, with many homes for private sale having been on the market for over a year. There simply isn't any demonstrable evidence that there is sufficient demand for new homes in the Southport/Ainsdale area.

Summary of Suggested Changes

We support 100% the aims and objectives of the Ainsdale Community Wildlife Trust, to establish a low dune nature Reserve. This will protect existing habitats and provide additional habitats for further plant and animal wildlife such as Natterjack Toads, to develop and be protected. The Trust aims to provide a Nature Reserve which is accessible to all in the community, the young, the old and the disabled. Paths will be built on the level, with wheelchair access uppermost in mind. Whilst the Birkdale Sandhills Reserve is recognised as a site of Special Scientific Interest, it is not accessible for many, due to the rough and uneven nature of the land.

The Sefton Coast Partnership follows EU principles in developing plans and strategies for the Sefton Coast, in particular:- To involve communities in nature conservation. As is being proposed by the Ainsdale Community Wildlife Trust. Restore nature recognising that the Sports/Playing field was originally created by levelled sand dunes. That all development sites must not adversely affect the integrity of internationally important nature sites or their supporting habitats. Please note that MN2.8 is adjacent to a Site of Special Scientific Interest and Special Area of Conversation. Ainsdale Community Wildlife Trust aspires to protect and maintain the natural beauty and habitat of site MN2.8 not only for all members of our Community today, but even more importantly protecting nature for future generations.

Evidence Submitted

Chapter	6	Plan Order	Site MN2.8	Other Documents
Policy	MN2.8	Former Ainsdale Hope School, Ainsdale		
Respondent No	329	Response Ref	6	Representor Name Michael Collier
Organisation Name	Wildlife Trust for Lancashire, Manchester & North Merseyside			
Obj/Sup/Com	Objection			

Summary of Main Issues

LWT objects to the allocation of this site for housing, primarily because of a likely significant adverse impact upon a colony of Sand Lizards on adjacent dunes within the Sefton Coast SAC. Information about the presence and extent of this colony has only recently come to light. Survey work carried out in 2014 by the North Merseyside Amphibian and Reptile Group, who are the recognised experts on this species on the Sefton Coast, located a number of animals, including breeding females, as close as 50 metres to the school site, the boundary of which is contiguous with that of the SAC. Details of these sightings have been passed on to MEAS and are attached to this document. This information was not available at previous stages of the preparation of and consultation upon the Local Plan and has therefore not been taken into consideration. In consequence no Habitats Regulations Assessment has been carried out in relation to this site. In LWT's view such an assessment must be carried out. Sand Lizards are listed as a Species of Principal Importance for the conservation of biodiversity in England under section 41 of the Natural Environment and Rural Communities Act 2006. They are also given special protection under the Habitats Regulations which make it an offence inter alia to damage or destroy a breeding site or resting place or to cause disturbance which is likely to impair their ability to survive, breed or reproduce, or to rear or nurture their young, or to hibernate or migrate; or to affect significantly the local distribution or abundance of the species.

The presence of 243 new houses immediately adjacent to this area of the SAC would result in a local population increase of perhaps 750 or more people, resulting in a very significant increase in recreational usage of the dunes. Increased disturbance of the Sand Lizard colony and damage to its critical habitat would be inevitable with consequent adverse impacts on the population. Impacts of this increased public pressure would include trampling of the thick, tangled tussocks of Marram and other vegetation which are essential for this species (Moulton N., Corbett K. 1999. Sand Lizard Conservation Handbook, English Nature), destruction of buried eggs and more discarded cans and bottles which can be death traps to lizards. In addition to the impacts of human disturbance any housing development is likely to give rise to a significant increase in the number of domestic cats in the area, many of which are likely to frequent the adjacent dunes. Domestic cats are known to be significant predators of Sand Lizards. A study by Larsen and Henshaw at Big Balls Hill, Ainsdale found that a single domestic cat may kill 2-3 lizards per week.

Taken together, increased human disturbance and damage and increased predation are likely to have significant adverse impacts upon this population of Sand Lizards, in contravention of the Habitats Regulations. The proposed housing development site itself is also of very significant value for wildlife. Floristic surveys conducted in 2013 and 2014 revealed outstanding botanical interest with 153 vascular plants recorded, eight being regionally or nationally notable. (The survey reports are attached). The vegetation in the western half of the site was considered closely to resemble a calcareous fixed-dune community, which is listed as a priority for conservation under Annex 1 of the EU Habitats Directive. Accordingly, the site has been recommended to Merseyside Environmental Advisory Service as a proposed Local Wildlife Site as it meets the guidelines for such designation on grounds of habitat rarity, and the diversity and rarity of its higher plants. It is also arguably of SSSI quality and may merit inclusion in the Sefton Coast SAC.

This site originated from levelled sand-dunes adjacent to the Birkdale Sandhills Local Nature Reserve, the latter being part of the Sefton Coast SSSI and SAC. Since the playing fields ceased being used its habitats have begun a slow process of reversion towards habitats resembling Priority dune habitats. This has occurred without any significant management interventions other than regular mowing and there is no doubt that the site would become an important wildlife site if managed for nature conservation as proposed by the Ainsdale Community Wildlife Trust. LWT supports these proposals and considers that the ambitious plan put forward by ACWT accords well with Local Plan policies under NH2, namely to protect, enhance and extend the green infrastructure network. It could also be viewed as partial compensation for proposed intrusions into the Green Belt and Local Wildlife Sites elsewhere in the Borough.

Summary of Suggested Changes

LWT supports these proposals and considers that the ambitious plan put forward by ACWT accords well with Local Plan policies under NH2, namely to protect, enhance and extend the green infrastructure network. It could also be viewed as partial compensation for proposed intrusions into the Green Belt and Local Wildlife Sites elsewhere in the Borough.

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 343	Response Ref 1	Representor Name K Seddon
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Having been resident in this village for some 38 years, it would be fair to say we have a sound knowledge of Ainsdale and all its current problems which would be exacerbated to a totally unacceptable level were the plan to be approved. Schools in Ainsdale are oversubscribed, our grandchildren have been removed from the local primary school, because class sizes are far too big, and are now in private education. An influx of some 250 families would, without doubt stretch the schools to breaking point and beyond! There are no longer the buildings or the staff to cope with such an increase in numbers! The Council state that they have had a traffic survey carried out by their highways department and have been assured that there are no problems now or in the future. We can only conclude that "the survey" must have been carried out in the early hours of a Sunday morning!

The roads are too narrow, parking is at a premium, and for up to 30 minutes in every hour the level crossing barriers are closed, a total of 8 times per hour! This means that for long periods there is standing traffic on the approach in and out of the village. Building an extra 250 homes would mean at least 400 plus extra cars in and around the village, not an enticing prospect for anyone! The existing roads in and around the proposed site are in a very poor state of repair being narrow and littered with potholes. All the roads around the railway station area are doubly narrowed by commuter parking as there is insufficient space on the station car park. Here again, an increase would occur with all the extra cars from the new housing, walking would not be an option.

The infrastructure in the existing state is inadequate, water pressure low and served by old crumbling pipework. This would have to be replaced and extended on a massive scale to service an extra 250 homes. At the moment all doctors and dental practices are at full capacity, making it very difficult to obtain treatment, appointments etc, In fact it is a lottery! How on earth can the system cope with so many extra patients? Quite simply, it can't and illustrates clearly the Planning Depts ill thought out "plan"! Apart from all the practical difficulties in the "plan" the effect on the flora and fauna at this site would be devastating. Recent surveys of the site by the Lancashire Wildlife Trust have discovered many and varied and indeed, rare and protected species this includes rare orchids, red squirrels and sand lizards (protected under EU law). Any building work on the site would have a catastrophic effect.

Summary of Suggested Changes

An alternative proposal has been made by Ainsdale Community Wildlife Trust to establish a nature reserve on the site which would benefit thousands of people. Locally this has been supported with a real enthusiasm and would be the preferred option for the residents of Ainsdale.

Evidence Submitted

A number of photographs to support written text.

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 345	Response Ref 1	Representor Name Irene Trim
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I object strongly to the building of houses for three reasons. Part of Ainsdale school was built on stilts because of the water table. There is very poor drainage there. Many sewers will need to be laid. Where will they carry the contents? The railway crossing is closed frequently with a 15 minute service to and from Liverpool this means there will be an almost continuous lines of cars waiting to cross over to the village. At present there are cars parked along the railway side of Sandringham Road with people travelling to Liverpool. When the houses are there, there will be a tremendous increase in traffic going both ways. People living at the beginning of Sandringham Road will be marooned. I live there and need my car and I am elderly and disabled.

Summary of Suggested Changes

The Community Wildlife Trust idea for a nature reserve is an excellent idea, providing enjoyment and interest for many people as well as preserving fauna and flora. The land will be returned to natural habitat.

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 349	Response Ref 1	Representor Name John McNamara
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I would like to object to any future housing redevelopment of this site. For I believe this site to be an important area for flora and fauna which should be conserved. At a time when crop spraying is reducing the natural habitat of our country, efforts should be directed to retaining and preserving natural sites. This is also the general position of the Open Spaces Society and Civic Voice. My more detailed objections centre on the fact that ,prior to school use ,a large area of the playing field was part of the sand dune eco system . Because of this important and protected species of plant and wild life species are present. In addition under EU law this area may well have legal protection.

The following reasons are also I believe valid:- The site borders onto a SSI and SAC area. Loss of local amenities and recreation space in an area where there is no local provision. Poor access to the site for 243 houses and possibly 400 + cars. Traffic through the village, at the present time ,backs up on both sides of Station Road. Access to side roads such as Sandringham, Mosgiel, Osborne & Delamere is then difficult. In addition the poor road structure and existing road traffic has meant that in the last twenty years there have been several fatal accidents and serious collisions.

Essentially I think it must be possible to propose a more ambitious and imaginative scheme rather than another mundane housing complex. For the above reasons I support the following suggestions:- A plan put forward by ACWT to recreate a wild park. The habitat, plant life and wild life will be protected and allowed to flourish. The area will be protected for future generations. Board walks would be created to give access to all the community; the disabled, the young and elderly citizens. Recreational amenities would be available to all using the low level dunes. Something that is lacking in this area at the moment. No cost incurred to Sefton Council as funding has been secured to create and maintain the site.

Summary of Suggested Changes

Remove MN2.8 as a proposed housing allocation. Essentially I think it must be possible to propose a more ambitious and imaginative scheme rather than another mundane housing complex. For the above reasons I support the following suggestions:- A plan put forward by ACWT to recreate a wild park. The habitat, plant life and wild life will be protected and allowed to flourish. The area will be protected for future generations. Board walks would be created to give access to all the community; the disabled, the young and elderly citizens. Recreational amenities would be available to all using the low level dunes. Something that is lacking in this area at the moment. No cost incurred to Sefton Council as funding has been secured to create and maintain the site.

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 350	Response Ref 5	Representor Name Carol and Stephen Hosker
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Whilst acknowledging that the former Ainsdale Hope School site is mainly brownfield and playing field, we are concerned about the impact of bringing development so close to the adjacent internationally important nature sites; development on this site would remove a "buffer" to encroachment.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 396	Response Ref 1	Representor Name David N Smith
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I wish to submit an objection to this proposal on the grounds that it is unsound and unjustified. As an alternative I would commend the idea proposed by the local community for the conversion of the site to use as an open nature reserve. I am a previous resident of Ainsdale. However, I remain a frequent visitor to the area attracted by the environment of coast and dune systems and the unique natural habitat it contains. Indeed, I have on occasions brought friends and colleagues to visit the area with me. The area of land referred to in the Sefton Local Plan is, in effect, part of that landscape. I understand that it is adjacent to a Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC). I am also aware that a local charitable organisation - the Ainsdale Community Wildlife Trust – has proposed a far more suitable alternative use for the site. Having read the evidence and references assembled by this group I am of opinion that the site is unsuitable for housing development.

It is not just its proximity to a SSSI and SAC but the implications for protected habitats and wildlife that make the use of the site for housing totally unsound. For example, the presence of specially protected sand lizards is part of the evidence for the sensitive nature of the area. It is, I would contend, a priority for conservation and there is evidence to support this contained in Annex 1 of the EU habitats Directive. However, I also consider that the Ainsdale Community Wildlife Trust has put forward an eminently sensible and sustainable plan for the more effective use of the land as a low dune Nature Reserve. This would conserve the natural environment and its ecology for current and future generations to enjoy and learn from. It is important to recognise that it is not just a proposal to preserve but to conserve in a positive sense both the ecology and its amenity value. This reserve would provide a much needed interface between the urban and reserve environments through better access for all. I am sure this would include new learning opportunities as well, being of positive value for young people who need to learn about the value of such landscapes and their underpinning scientific systems and also for those with disabilities otherwise denied access to this unique landscape.

Summary of Suggested Changes

Ainsdale Community Wildlife Trust (ACWT): alternative plan for the effective use of the land at Hope High School Ainsdale as a low dune Nature Reserve. The ACWT has provided a list of benefits and positive impacts which is commendably clear. I would reinforce my support for this alternative use and would reference the uplift in community participation in nature conservation that lies at its heart. By supporting the conservation of the landscape it would preserve rare plant and animal wildlife and be entirely consistent with the aims and principles of the Sefton Coast Partnership who follow EU principles in developing plans and strategies for this coastal area.

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 397	Response Ref 1	Representor Name Barbara Joan Smith
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I would contend that the proposal for development on this site is unsound and unjustified. Instead I put forward a plea for the retention of the area of the former playing fields for use by the community as open nature reserve. As a long standing resident of Ainsdale I have seen many changes that have impacted gravely on the natural environment that is one of the area's priceless assets. First, I witnessed the loss of open farmland to housing development and shops at Woodvale in the 1960s. Later, further extensive housing development by Brosley and Wimpey extended radically into a huge area of what was previously open sand dunes. Where I and many others had taken our children to observe and enjoy the natural habitat of the dune system was tragically lost forever. Anyone who remembers those areas of dunes still mourns the loss of the unique character of the environment, expressed most poignantly perhaps by the absence of sky larks and their distinctive song that once filled the summer air above the dunes.

As a local resident I have already found that local services, especially water supply and sewerage systems, are over extended. There is also likely to be an adverse impact from a huge increase in the number of private cars and associated delivery/collection vehicles as local roads can provide only limited access. I am also convinced that there is substantial scientific evidence of the site's unsuitability for housing development. The site is adjacent to a Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC) and is proximal to National and European protected Habitats. I understand also that ecological surveys (conducted in 2013 and 2014) identified eight regionally or nationally notable species that qualifies the land in this area for Local Wildlife Site status. Indeed, I would support the contention that part of the site, particularly that part lying to the western half of the fields, hosts the sort of fixed –dune vegetation listed as a priority for conservation in Annex1 of the EU Habitats Directive. Other ecological aspects that make the site unsuitable as a zone for further housing development include the presence of specially protected sand lizards on adjacent land which would be susceptible to increased disturbance and predation by domestic cats (I cite survey work by the North Merseyside Amphibian and Reptile Group in 2014). The use of these fields for housing would constitute a major intrusion into the Green Belt and, with it, a loss of exactly the sort of recreation space in a sensitive location, that I have personal experience of in earlier phases of the area's development. The close proximity to SSSI and SAC locations evidences the importance of the area.

Another Use I would however not just oppose the suitability of the site for housing, but would commend an alternative use proposed that would preserve and enhance the natural environment and its ecology for current and future generations to enjoy and learn from. This is the scheme proposed by the Ainsdale Community Wildlife Trust to establish a low dune Nature Reserve. This would protect existing habitats and also provide additional habitats for further plant and animal wildlife to develop and be protected. As a former teacher and head of school I also support this scheme not just because it would conserve the ecology of the area and its amenity value but because it would greatly extend access to new learning opportunities for all – including the elderly, those with disabilities and young people. This accessible learning zone would be invaluable. It would also contribute to the ideas enshrined in the Sefton Coast Partnership who follow EU principles in developing plans and strategies for this coastal area. It would inter alia: involve communities in nature conservation to restore nature recognising that the playing fields were originally created from levelled sand dune to protect the integrity of internationally important nature sites by supporting habitats – essential because of the presence of rare plant and animal wildlife that should be protected rather than lost due to inappropriate housing or other forms of urban development.

Summary of Suggested Changes

In summary, I am of the view that the plan for housing development on this site is both unsound and unjustified on the basis of the evidence stated above. There is however, a significant opportunity to combine the need to conserve and protect the ecology of this special site with a scheme for a Wildlife Reserve. This scheme would have the major positive impact of increasing access to the learning and amenity opportunities of a low dune system, whilst simultaneously protecting for present and future generations the rare plant and animal wildlife that already exists on the site.

Evidence Submitted

Policy MN2.8

Former Ainsdale Hope School, Ainsdale

Respondent No 404

Response Ref 1

Representor Name Brian Sutcliffe

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

My first encounter with this site was in 1956 before the properties to its southern side were fully developed. The majority of the site formed part of the land leased by Southport Corporation to Hillside Golf Club. Its course interfered little with the natural terrain of stabilised low sand-hills and course maintenance positively supported local fauna and flora. Thereafter, the site was changed to provide an artificially level surface to act as the playing field of Ainsdale High School, re-designated Ainsdale Hope School and then abandoned, though maintained as a mown level grassed field.

The clear choice for future use is between 243 dwellings and restoration of the original ancient sand-hills with improved access for people of all levels of mobility. I share the concerns others have expressed about the lack of infrastructure planning, added pressure on health and social services, and the lack of provision of secondary education in Ainsdale. My primary personal objection, stated here, is based on the increased volume of traffic on roads that are already suffering congestion at the time of exit from and return to a dormitory area (which is what shore-side Ainsdale solely is) serving Liverpool, Southport and their environs. Transport facilities serving the existing area are based on Merseyrail and on private cars with a little support from buses. These facilities are used to get secondary school students to school elsewhere in Sefton and workers to their employment, there being a long-standing shortage of this in Ainsdale. The existing traffic bottleneck is the level crossing by the station which is at the confluence of seven vehicle entry points and which is not helped by a shortage of parking for rail commuters. The car park reserved for their use is invariably packed on weekdays and the overflow into unregulated parking on Sandringham Road then reaches far from the crossing. The Stop sign there is rarely obeyed otherwise the queueing in that road would be worse still.

The site would produce traffic from 243 dwellings, each of which may be assumed to contribute one private vehicle needing to access the site by whatever routes are provided. The school site would permit egress only to Sandringham Road with unacceptable congestion as a result. It is obvious that another access point would be required and that this could only be by extension of Harewood Avenue. Once accepted, a further major incursion into the natural high dunes would be inevitable with houses in the west side of the extended road, gardens to their rear, and sculpting and removal of more dunes to prevent accidental slippage and damage to property. My amateur estimate of the loss of these ancient dunes would be 7 – 10 acres, which seems not to have been considered or at least presented in public. This extra access in no way would diminish the overload on the transport interchange which is the area of the railway level crossing. Public transport in the form of local circular bus route(s), though welcome, would be likely to have little effect on the stated congestion. Traffic engineers' best efforts would be needed to make the situation at the crossing tolerable for existing and future new residents.

The alternative use of the site put forward by Ainsdale Community Wildlife Trust suffers from none of these problems. The traffic it will generate can easily be accommodated. Others more qualified than I have extolled its ecological credentials that I too recognise. I commend this superior use.

Summary of Suggested Changes**Evidence Submitted**

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 405	Response Ref 3	Representor Name Michael Perkins
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

There is a proposal to create an Ainsdale Community Wildlife Trust, which would improve the dunes environment by extension into the Ainsdale Hope School playing fields curtilage that would return the land to its original quality and provide a commendable attraction to the Sefton area. This would much improve the Sefton Coastal area and be popular with visitors. This would be a much more acceptable solution than stacking the beautiful scenery with yet more urban despoliation. Most Ainsdale residents including myself support this proposal and it should be commended and recommended as an asset to Southport in general, rather than a housing scheme based on dubious government figures, which Sefton Council seems to treat as gospel and is suspect of being a political stance.

The site is presently used as a North Sefton Educational Centre and provides jobs for around 80 people (I am informed) – surely this is a more appropriate use of the site? Also birth rate has increased demand for more school places at primary school level, which will feed through to secondary schools in the next 15 years, shouldn't school premises such as Ainsdale Hope School be protected for future use? By reconfiguring schools to take different age ranges this could lead to a shared occupation. Demolishing a school in a green belt area against this background is not common sense (just to achieve questionable government targets). The playing fields have been unused since 2007 despite a shortage of such amenities, I believe. I am told that at the end of 10 years that would be justification for their removal – although I think that the council has prevented such use, and spent a huge sum on demolition of the old school gymnasium.

Summary of Suggested Changes

I am against the housing proposals in green belt area and my property overlooks the site. The development of the Ainsdale Community Wild Life Trust and its wildlife park scheme would better serve the residents and visitors to the Southport and Ainsdale area. Consideration should be given to this and not to increased housing.

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 413	Response Ref 1	Representor Name Brian Frear
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Proximity to European protected habitats on bordering land as the site is adjoining to an SSSI. The fields qualify for local wildlife status due to the identification of eight regionally and nationally notable species. The western half of the fields support fixed dune vegetation listed as a priority in Annex 1 of the EU Habitats Directive. Any increase in cats and domestic pets would lead to an increase in the disturbance of sand lizards. This plan to build houses on the site would be a major intrusion into the Green Belt in close proximity to SSSI and SAC locations. The lack of a secondary High School on this site has meant that hundreds of pupils have been dispersed and many having to travel 5 miles to Formby or Range High. Access to the site is not easy and the creation of 200 plus homes on this site would place a tremendous pressure on the Ainsdale railway crossing and the 5 junctions that are central to it. Brown field site and empty homes should be considered well in advance of ruining important Green Belt sites.

Summary of Suggested Changes

I support the alternative proposal put forward by the Ainsdale Community Wildlife Trust to establish a low dune Nature Reserve. This would protect existing habitats and provide additional habitats for further plant and animal wildlife to develop and be protected. It would allow nature to be enjoyed by all, children, the elderly and those with disabilities.

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 424	Response Ref 2	Representor Name Ian Brandes
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

This proposal is not only short-sighted, but not fit for purpose. Te access to any development of this area is quite frankly laughable. Worse still, it is downright dangerous. Residents of any development here would need to access and exit via Sandringham Road, a fairly narrow thoroughfare, which is bounded at one side by the main Southport-Liverpool railway line. This is not a suitable road to cater for such intensive development, and major road safety dangers are apparent, especially at the junction with Shore Road when motorists turning left also face a busy level crossing. Traffic queues from Sandringham Road will be huge, posing physical dangers and dangers of pollution.

The possibility of 243 homes (and maybe 1000 new residents) poses special problems for the whole area. Great strain will be placed on both the supply of water, and the wastewater systems, and, in your deliberations, scant attention has obviously been placed on the resulting strain on essential services like the NHS, GP Surgeries, and the local Education system.

What kind of local authority stresses the need for more school places without explaining, in full, why this need exists, and then allows a perfectly fine purpose built school site to fall into decay, even demolishing buildings on the site without thorough consultation with the local community? When many areas of the UK are under pressure from the EU's Freedom Of Movement provisions, decisions to close and re-develop school sites with housing and then presumably spend more public money providing educational facilities elsewhere smack of planning madness.

Self-financing plans for a nature reserve, as proposed by local residents, a wildlife trust, and eminent academics have seemingly been disregarded. This, in itself, is disturbing. Crucial elements put forward include access for disabled people to a natural dunes reserve, replete with protected species and rare flora and fauna.

To my mind, such amenitieson't exist at all within the Southport area, especially because of the disabled-unfriendly state of the beaches, particularly Birkdale, areas of which can be considered dangerous. As a person, whose mobility has been reduced by an unforeseen accident, I would certainly like to be able to access areas of flat terrain with user friendly paths as suggested by opponents of this huge out-of-keeping development. There are apparently many vacant or derelict homes in Sefton, and many areas of decay, especially on exiting the city of Liverpool into Sefton Borough, and the planning priority should be the revitalisation of such areas, instead of the despoilment of open spaces.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 445	Response Ref 1	Representor Name David Tyson
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

The School at Ainsdale Hope was built on stilts because it was discovered that methane gas was present. The methane gas comes from the sea and surfaces inter alia at Ainsdale. If this is still present if any are not built on stilts problems may arise in the future. To overcome this problem the option proposed by the Ainsdale Community Wildlife Trust is a very void one. In addition it would be a superb centre for local school children to study local flora and fauna.

Summary of Suggested Changes

Evidence Submitted

Organisation Name**Obj/Sup/Com** Objection**Summary of Main Issues**

I realise that government policy is to build more affordable houses, but the properties already existing are of the higher end of the price scale and more traffic will be a problem to their accessibility to exit and entrance an already busy road. There must be pockets of land where a more reasonable new build could take place, without the destruction of such a unique asset to this coastline. Once destroyed it can never be re-covered. Surely there is a need for quiet, beautiful walks where people and families can relax in peaceful surroundings with easy access for the very young and also disabled to enjoy this previous god-given asset away from life's stress.

This site is of natural importance as it is increasingly full of rare wildlife and flora. An Ainsdale Community Nature Reserve is essential in this age of forever building houses etc. All natural landscape is being lost, not only in the immediate future, but for generations to come. Ainsdale is becoming a place with no facilities - car parking, useful shops, schools not to mention doctors. The traffic is increasing and the hold ups at the railway barriers are already dangerous. With more houses on the proposed site it is a disaster waiting to happen.

Summary of Suggested Changes**Evidence Submitted**

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 461	Response Ref 1	Representor Name Brenda Porter
Organisation Name	Ainsdale Community Wildlife Trust	
Obj/Sup/Com	Objection	

Summary of Main Issues

As a Trust we are objecting to the proposed house building on the above site, in particular the playing fields as we consider the Local Plan unsound. As a Trust we are putting forward an alternative proposal to create and maintain a Low Dune Nature Reserve. We are supporting this site, in particular the playing fields, to create a nature reserve taking into account the richness and environmental importance of the playing fields and surrounding area of this location.

The site lies adjacent to the Sefton Coast Site of Special Scientific Interest (SSSI), Special Area of Conservation (SAC) and supporting a fixed- dune vegetation...listed as a priority for conservation under an EU Habitats Directive (ecological reports enclosed). There is an alternative proposal being put forward to create a Low dune Nature Reserve. This will provide both ecological and environmental benefits as the planned development will provide additional habitats for further plant and animal wildlife to flourish, while protecting existing habitats allowing nature to be enjoyed by all.

Ecological Survey Reports (enclosed) in 2013/2014 on the playing fields identified outstanding botanical Interest...153 vascular plants with 8 being regionally or nationally notable (reports enclosed). A recommendation to the Merseyside Environmental Advisory Service for Local Wildlife Site status following 2014 survey, this location we are advised may merit inclusion in the Sefton Coast SAC.

A colony of Sand Lizards including female breeders has recently been identified within 50 Mtrs of this site by the North Merseyside Amphibian & Reptile Group much respected within Sefton. They are regarded as a Species of Principal Importance for the conservation of biodiversity and are protected in England under Section 41 of the Natural Environment and Rural Communities Act 2006 and a Habitats Regulation Assessment. This information is still to be recorded and taken into account.

The playing fields originated from levelled sand dunes adjacent to the Birkdale Sandhills Local Nature Reserve which is part of the Sefton Coast SSSI and SAC. Because the playing fields have not been used for this purpose since the closure of the school in 2007 its existing habitats have begun a slow process of reversion towards those resembling priority dune habitats. This process has occurred without any management of the site other than twice yearly mowing...this site if managed as is the proposal by the Ainsdale Community Wildlife Trust would become an important wildlife site (survey reports enclosed). The above are some of the issues which we believe should be taken into account to meet our request for a Low Dune Nature Reserve at this location. This would require a change to be made within the Local Plan.

All the above facts indicate this location is rich and environmentally important in its own right recognising its heritage, recently identified plant and animal wildlife and its close proximity to both SSSI and SAC locations. The site assessment form refers to this location as brownfield, it is considered Greenbelt?

Having identified both rare plant and animal wildlife either on site or in close proximity (SSSI and SAC locations) an HRA should not be dependent on a planning application but should be carried out in its own right recognising the plant and animal wildlife identified.

We recognise the right to build on the current footprint of the former school buildings. However building on the footprint of the school and the playing fields would have a detrimental effect on SSSI and SAC locations because of the close proximity to the planned housing.

The development of a low dune nature reserve with planned management will provide a safe and secure environment for all age groups including the elderly, those with disabilities and young people. Educationally there will be the opportunity for young people, adults and organisations to take advantage of the environmental richness of the reserve. The planned project will provide additional habitats for further plant and animal wildlife to flourish while protecting existing habitat allowing nature to be enjoyed by all. The Trust will provide the community, and the wider area of Sefton, with a nature reserve that can be easily accessed, and enjoyed, creating a sense of wellbeing to all those who visit the site.

This project will be fully funded, and maintained to the highest of standards, by the Trust who will work closely with the Council and other organisations in the best interest of communities and the wider area of Sefton. (business plan enclosed)

Summary of Suggested Changes

We request that the former Ainsdale Hope School, Ainsdale MN2.8 be removed from the Local Plan as a proposed site for house building to a nature reserve which will recognise the current and past environmental importance of this location.

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 469	Response Ref 1	Representor Name Arthur & Jennifer Blackhurst
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

The site would not meet the NPPF's requirement to meet sustainable development. Nor would the site be supported by sound infrastructure. The financial outlay to bring infrastructure to the required standard would be prohibitive.

The specific points why we consider the proposed development of this site to be unsustainable are: The site was previously part of Hillside Golf Club and has Green Belt status. There are no proven 'exceptional circumstances' to use Green belt land. There is a lack of credible evidence to support the number of homes proposed. The last census showed that population in Southport and Sefton is in decline. There are already schemes granted permission in the Southport area for homes [e.g. Town Lane]. The possible access points are inappropriate for 243 homes. The adjacent roads are often busy with parked cars of people using the rail station. It is unlikely that an alternative means of access could be gained other than through the existing road network. The road through Ainsdale Village can be grid-locked and would unlikely to be able to cope with any additional pressure that the new homes would bring.

The railway gates operate 8 times per hour, making the crossing unpassable for 30 minutes every hour. The nature reserve is a SSSI and a Special Area of Conservation. These are both National and European protected habitats. There are numerous protected species and birds associated with the site. Inevitably these will be subjected to increased disturbance. Some of the existing buildings on the site provided employment opportunities. Existing drainage facilities are barely adequate and to connect to the system would be extremely costly. It is considered that it would not be viable to connect to the existing system under any circumstances. Mains water supply is barely adequate and improvements will be extortionate and prohibitive. There must be reservations that existing gas, electrical and telephone suppliers would meet additional demands. It is unlikely that doctors, dentists, schools could cope with the increased number of residents. The nearest shop is in Ainsdale Village, a distance of 1.5 miles. It is a similar distance to local amenities, services and churches. The Ainsdale Community Wildlife Trust has been formed as an alternative this site should be to create a low dune nature reserve. The existing buildings should be retained to be used as a school to meet a future need.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 481	Response Ref 2	Representor Name Barrie Partington
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

The fields of Ainsdale High School have sand lizards and beed orchids on adjacent land and Ainsdale Community Trust propose a dune nature reserve.

Summary of Suggested Changes

Evidence Submitted

Policy MN2.8

Former Ainsdale Hope School, Ainsdale

Respondent No 492

Response Ref 7

Representor Name

Organisation Name Craig Seddon SIPP

Obj/Sup/Com Objection

Summary of Main Issues

The Former Ainsdale Hope School site comprises 9.2 ha of land identified for 243 dwellings. The site is located in the Green Belt. The site is adjacent to an internationally important nature site and yet this is only assessed as being a moderate constraint. Our client does not agree with this assessment. Without an ecological assessment the impact upon protected habitats, species and trees within the internationally important nature site cannot be determined. This is therefore a Tier 1 constraint. The moderate assessment must be upgraded to at least a significant constraint. The Site Assessment Form (reference SR4.06) identifies that access into the site is proposed from Sandringham Road and Harewood Avenue. In order to get to these locations it is necessary to travel through the existing Ainsdale residential area. Given the number of residential properties within this area, it is questioned whether the highway network has the capacity to accommodate the number of private vehicles associated with a further 450 new dwellings. Our client considers that without a Transport Assessment, it is considered site access and the uncertainty over the highways network capacity to be a Tier 1 constraint, which is a potential constraint that cannot be overcome.

The Site Assessment Form argues that the Green Belt boundary is weak, due to it comprising of rears of existing residential properties. The Council argue that, given the strength of the protections afforded to the land to the north (internationally important nature site) this prevents any further encroachment. Our client questions this assessment. By their own definition, the development of this site would create a weak boundary between built development and an internationally important nature site. It is suggested that were the site to come forward there should at least be a progression to ensure views towards the internationally important nature site remain relatively open. It is therefore questionable whether the proposed density is suitable. The majority of the site is private sports/recreation fields. Whether private or otherwise, the Council should be seeking to retain sports/recreation fields wherever possible. Following objections from Sport England towards the Council's Preferred Options Local Plan draft, who objected to 12 housing sites because these included playing fields which would be lost to development, the Council commissioned a Public Open Space and Recreation Strategy in April 2014.

None of five specific exceptions set out by Sports England to allow the loss of recreation / sports pitches have been met. It is therefore questioned why the site has been allocated. The Council are currently preparing a Public Open Space and Recreation Strategy, which will inform the Local Plan. However, given the relatively advanced stage of the Local Plan, the Council are looking at these sites retrospectively, rather than objectively as part of an up-to-date strategy to inform the location of housing sites. The loss of these recreation/sports pitches has not been justified. Given there are significant ecological and access constraints, which have the potential to be Tier 1 constraints without further assessment, and the questionable justification for the release of this Green Belt land, our client questions the deliverability of Former Ainsdale Hope School site.

Summary of Suggested Changes**Evidence Submitted**

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 502	Response Ref 1	Representor Name Peter Muldoon
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

The site is in immediate proximity to both the Sefton Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC). The drainage of the site will impact on these areas by permanently lowering the water table. The site has been surveyed twice, in 2013 and again in 2014, and a number of regionally and nationally notable species were found which qualifies the site for Local Wildlife Site Status. The site holds high environmental interest with many rare plant and animal wildlife and should be protected, an HRA (Habitats Regulations Assessment) should not be dependent on a planning application. The presence of specially protected Sand Lizards on adjacent land which would be susceptible to increased disturbance and predation by domestic cats. This follows survey work by the North Merseyside Amphibian and Reptile Group in 2014. Recognising the Sefton Coast Partnership who follow EU principles in developing plans and strategies for the Sefton Coast. Involve communities in nature conservation. Restore nature recognising that the playing fields were originally created from levelled sand dunes . All development sites must not adversely affect the integrity of internationally important nature sites or their supporting habitats...this site is adjacent to both SSSI and SAC locations.

Summary of Suggested Changes

An alternative proposal has been put forward by Ainsdale Community Wildlife Trust to establish a low dune Nature Reserve. This would protect existing habitats, which have flourished and expanded since the closure of the school in 2007, and provide additional habitats for further plant and animal wildlife to develop and be protected. This would allow nature to be enjoyed by all including:- The elderly. Those with disabilities. Young people.

Evidence Submitted

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I wish to lodge my objection to Sefton's Local Plan for this valuable green space playing field site. I have lived in Ainsdale for over 35 years, it has changed and become an extremely congested village area. The proposal to sell off this gem of land. There is absolutely no way that the local infrastructure could support the services required by 240 homes on this site. The council state that they have consulted various utility providers and that there are 'no problems', as a utility user I strongly refute this claim. In summer our water supply is abysmal! It is not an option to use a garden hose due to lack of pressure when they are permitted. Even our shower drops to low pressure usage mode, I dread to think what would happen with so many extra homes on the system. This brings me to my next point, drainage and sewerage. During heavy rainfall, or periods of low rainfall, there is the most horrendous smell from the drains. This is particularly noticeable from the manhole covers at the junction of Knowle Avenue/Harewood Avenue, and also near the railway station.

Traffic congestion in the village and around the railway crossing is horrendous. The station car park is woefully inadequate for the number of commuters that use the service. All the roads around, within a half mile radius are full of cars parked for up to ten hours each day. Shore Road/Station Road are main bus routes, it is often difficult to drive up these due to the cars parked, the buses waiting and the many cars in the queue awaiting the opening of the crossing gates, which being closed for up to 30 minutes in the hour, cause long tail-backs in both directions. 240 more houses = 400 more cars! Just where will they go? With added congestion around the crossing, it is only a matter of time before a vehicle becomes stranded between the barriers and there is a catastrophe. I have enclosed some photographs which illustrate the problems Ainsdale already faces.

My other major concern is for the medical services in the village, the Doctor's and dentist's practices are already oversubscribed. One often has to wait for several days to gain an appointment to see a GP, that's if you can find one to register with! New residents have, in some instances, had to wait for vacancies to register with a doctor. A dangerous situation I am sure you will agree.

240 new homes means more children moving into the area, Sefton council are experts at closing facilities down, then finding they are needed. Having closed two primary schools in Ainsdale, the remaining one, Shoreside, on Westminster Rd, is now oversubscribed, it is bursting at the seams! With 34 children aged 6 years packed into a small classroom, the children are not able to be given the time they need to fulfil their educational needs. Where do the council propose to send the new influx from their proposed Ainsdale Hope High school housing scheme? Local secondary schools are also reaching their maximum capacity, in fact some secondary age children are being transported to Formby. I noticed three weeks ago Formby High school stating in an advertisement for staff 'at this oversubscribed school'.

This brings me to my final point. This field area is adjacent to part of the Sefton Coastal SSSI conservation area, which is home to many rare and protected species of plants and animals. We have red squirrels, pipistrelle bats, pygmy shrews, sand lizards, natterjack toads, ALL of which can be found at times on the periphery of the field, not to mention several rare and protected orchids and plants which can be found actually on the field. I believe there is a proposal to convert the site into a community nature reserve, which would benefit many people, providing an educational and recreational opportunity for many people. I therefore support this scheme by ACVVT.

We are the custodians of these rare and beautiful species, it is our duty to preserve them for our children and future generations. Sefton Council's proposal to cover this site with houses must not be allowed to go ahead. I trust my objection will be noted.

Summary of Suggested Changes**Evidence Submitted**

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 516	Response Ref 1	Representor Name Joan Hodson
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I should like to express my concerns on the suitability of the former Ainsdale High School site for housing. As a local resident my main concerns are: It is already difficult to get an early appointment with the doctor of one's choice. The doctor with whom I am registered is often unavailable for up to three weeks and I have to see who else is available and when. The residents of over 200 houses will add considerable pressure onto this already busy practice. Similarly with dentists — I was unable to find any dentist taking new NHS patients when I moved here several years ago and only one allowed me to go on a waiting list of over a year. Appointments have to be made first thing in the morning if there is an emergency otherwise it's a few months wait.

Since the alterations on Station Road, parking is now adequate in the village but potentially 200+ extra cars (albeit not all there at the same time) would cancel out the benefits and parking at the station is already nigh impossible apart from early birds, as cars parked on Sandringham Road testify. As an ex-teacher I am aware of the importance of class size and I see that Shoreside Primary is already over the optimum at this crucial stage in a child's education. If only half of the new residents had only one child there would be unacceptable over-crowding detrimental to staff and pupils alike. As my house backs onto the field I am aware of some of its "residents". Close to my boundary fence with the field, I have discovered two sets of baby sand lizards. Along with other wildlife and flowers it seems, on this aspect, a great shame to gradually erode what is essentially England's "green and pleasant land." In summary, the addition of so many houses and people to the area is likely to add stress to daily living and, therefore, lower the quality for everyone.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 517	Response Ref 1	Representor Name H Kingsley
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I wish to register my objection to this plan, which is ill conceived and totally impractical. I travel from Birkdale to Ainsdale daily and the traffic congestion in Ainsdale village is dreadful. This proposed housing scheme, to build yet another 240+ properties would add to the already intolerable chaos. I frequently have to wait for up to 20 minutes at the railway crossing for the barriers to lift. Parking in the village is almost impossible. If I have to take one of my grandchildren to the doctors, which is situated in the middle of the village, I cannot find anywhere to park, that's if I have managed to get a vacancy. The doctors are full. The schools are full. My grandson has been withdrawn from the infant's school he attended as there were over the recommended numbers in his class.

The trains cause the barriers to close for around 30 mins in each hour. The parking is horrendous, due to commuters parking from 8am until 6pm or after in every road around the station and leading up to it. Once buses try to stop, it's often impossible for a car to get through. Another 240+ houses would make this situation even more dangerous. This council proposal is absolute madness. All the roads in the vicinity and the village are far too narrow. Everything is at maximum capacity now, without any extras. This scheme cannot be allowed to go ahead. What quality of life will be left for my grandchildren in such an overcrowded village? I believe there is a scheme to create a wildlife area for children to visit and play, I wish to add my support to this.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 518	Response Ref 1	Representor Name J Morris
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I am unable to walk to Ainsdale village for my groceries, medical needs, bank or Post Office unless I use my car. In the last few years, the roads have become dreadfully busy and at times it is impossible to park, some of this is due to the shortage of parking spaces, much because the village is so busy. With the building of another 240 houses, it would be much worse. Some days I have to leave my home at 8.30am just then I can wait and park near a shop! The road up to the railway station is dreadful, buses coming over the crossing on the other side from all the cars parked for the railway commuters, make actually getting to the village a very difficult process. All the roads around the station are narrowed because of all the parked cars on one side. My doctor's surgery is in the middle of the village, as a diabetic, I need regular check-ups, again, parking here is nearly impossible, what would another 400 extra cars mean? I can't imagine. It's also very difficult to actually get a doctor's appointment, sometimes you have to wait almost a week. Their waiting list for new patients is quite long. Where would all these new residents go for medical care?

As well as the roads being far too congested already and inadequate, so is our water supply. In the summer months, our water pressure drops, running a bath takes ages. With another 240 houses on the same supply, we'd be lucky to even get a trickle!

Lastly, we have lots of wildlife in our gardens, which comes from the field, animals include red squirrels, voles and in the summer bats, some of which are very small and protected. There are also many species of birds which use our gardens as feeding stations and the school field as a roosting and resting place, with this in mind, any building would destroy the habitat of many, many animals and insects. I like the idea put forward of a wild life area where people could go to see the wildlife for themselves. I would support this idea.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 538	Response Ref 1	Representor Name Antoinette McLellan
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

My objection is to the fact that this field is green belt land which includes both flora and fauna which could provide an area for scientific study for our young people and an area of recreational value to all our residents. I have attended meetings and read detailed reports by Ainsdale Community Wildlife Trust and think that this trust can offer a very valuable alternative to any building development on this land. This is what is needed for Ainsdale. My very real concern is that we do not have the infrastructure to support any building on this land.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 539	Response Ref 1	Representor Name Roy Connell
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I object to the proposal on the following grounds: The site is in the Green Belt and close to a Site of Special Scientific Interest [SSSI]. It would be loss of a recreational space in a sensitive location. I understand and have read a report of surveys done in 2013 and 2014 which identified a number of regionally and nationally notable species and that the field could qualify for Local Wildlife Status. It would be a shame to have houses built on this land. I also think that the infrastructure would be put under great strain; roads and schools would not cope with the extra needs of the 243 affordable homes. If there are to be houses built I think a mixed housing scheme would fit in with the surrounding area.

Summary of Suggested Changes

I would support the Ainsdale Community Wildlife Trust as an alternative proposal for the use of the land.

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 543	Response Ref 1	Representor Name Anne Jones
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

With regard to the Local Plan to build houses on the Ainsdale High School site. My husband and I strongly object to this plan in view of the destruction to wildlife this would cause and we believe this land should be preserved for a Nature Conservation Plan as it is an area of beauty. It is not appropriate to build houses on this land and Sefton Council should be more pro-active in preserving this site to develop a nature reserve for the wonderful variety of wildlife.

Summary of Suggested Changes

The plan to build houses should be scrapped.

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 573	Response Ref 1	Representor Name Barbara Bowler
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

The plan to build houses on the former Ainsdale Hope playing fields is definitely not sound. This is an area of green belt land which is thriving with wildlife and, as a result, qualifies for Local Wildlife Site status. The ecological and environmental value of this land should not be underestimated. The existence of sand lizards, red squirrels, natterjack toads and many rare wild flowers is well documented and these would all suffer greatly if the Sefton plan is pursued. Access to this development must also be considered. There would more than likely be 300 to 400 cars coming and going. Sandringham Rd is already congested because of the numerous cars that park there all day every day to use the station. The level crossing gates come down about every 8 minutes throughout the day so there would be constant queues at the crossing which would inevitably lead to delays for the buses. Station Rd is already very busy and the dogleg in the middle of it causes problems for drivers and pedestrians alike. The extra traffic circulating and lack of suitable crossing places for pedestrians would inevitably lead to accidents. Ironically another problem of increased housing would be the lack of provision of a secondary school for children in Ainsdale and also available places in primary schools. It is already difficult for children in Ainsdale to get into the school of their choice and another 300 or so children will make matters considerably worse. These are my objections and I believe that Sefton Council should abandon their plans for a housing development and work with the people of Ainsdale to provide a more suitable development of the land.

Summary of Suggested Changes

Ainsdale Community Wildlife Trust have come up with an alternative plan for use of the land which would provide a much needed recreational facility for Ainsdale and its proximity to the station would attract visitors from all over Merseyside. The low dune reserve they suggest would provide a facility for young and old alike as well as for people of all abilities. It will enable the plants and wildlife to thrive and will be an asset for the whole borough. As the Trust will maintain the site there will not be any additional costs for Sefton. I strongly support this plan and hope that the council can agree with the local residents that this would be a wonderful recreational site for Sefton.

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 578	Response Ref 1	Representor Name Philip C Thompson
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I am writing to you as a concerned resident of Ainsdale, to inform you of my strong objection to any proposed building of housing on the land that was formerly the playing fields of Ainsdale High School; it was with complete dismay that we heard of plans to potentially build more than 200 houses on Green Belt land which lends itself perfectly to the proposed extension of the natural beauty of the sand dunes with a nature reserve as outlined by the Ainsdale Community Wildlife Trust, and which has our full support as longstanding residents of this beautiful village. The idea of building houses on this land simply makes no sense at all, given that the infrastructure just does not exist in the village to cope with such an increase in housing, and the traffic negotiating Sandringham Road into the village is already problematic and would become impossible if such a project were to go ahead. There are precious few areas of natural beauty in Sefton, and the opportunity to create and extend an existing one must be an absolute priority for the area, especially when there are ample Brown Field sites ideal for creating more houses, and in areas that lend themselves already to such development. I therefore urge anybody involved in this decision making process to see sense and support the proposal of the Ainsdale Community Wildlife Trust, so passionately supported by all the residents of Ainsdale and beyond.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 609	Response Ref 1	Representor Name M E Baylis
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I am objecting to any future residential development on the above site. During the period 1960s and 1970s there was considerable residential development in Ainsdale. During this time there was no significant increase in the number of shops, public open spaces road access etc. hence it can be seen that Ainsdale is already fully developed without the facilities for a further 243 houses and possibly 400 cars.

There would appear to be only one vehicle route from the proposed development i.e. via Sandringham Road with a level crossing at the end which closes the road eight times every hour from Monday to Saturday inclusive for access to the village and routes north. If each closure takes three minutes this gives a closure of twenty minutes in every hour from 8am to 11.30 pm. It is most likely that traffic from the proposed development would attempt to use Chatsworth road which is restricted to access for through traffic from 8 am to sunset and would obviously have to be blocked off as it could not be policed. In any event Chatsworth Road was designed as a residential road and is narrow with many parked cars on both sides of the road.

The site would provide much needed open leisure space to be enjoyed by Ainsdale residents and visitors to explore the rare flora and flora which would be destroyed by development of this site.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 610	Response Ref 1	Representor Name P Knifton
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Proposed knocking down of school which will probably be needed in the future as the population is rising. Primary schools are full so where will all the children go? Sandringham Road is already full of parked cars so more traffic is going to cause chaos at the level crossing. It is often parked as far as Osborne Road waiting for the gates to open so I can see the problem of having to wait for two trains to go through. Doctor surgeries are already full. Is the water pressure going to cope with all the extra occupants? What about the wildlife? What about the gas on the site which caused the school to be built on stilts?

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 621	Response Ref 1	Representor Name Tim Hastings
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I have examined the plans and I know the site well. I wish to object strongly to the development of these houses in this location. The site holds high environmental interest with many rare plant and animal wildlife and should be protected. Ecological surveys in the summer of 2013 and 2014 identified eight regionally or nationally notable species. The fields therefore qualify for Local Wildlife Site Status. The plans would also be a major intrusion into the Green Belt and loss of recreation space in a close proximity to special areas of conservation. A survey by the North Merseyside Amphibian and Reptile Group in 2014 showed presence of specially protected Sand Lizards on adjacent land which would be susceptible to increased disturbance and predation by domestic cats.

I understand that an alternative proposal has been put forward by Ainsdale Community Wildlife Trust to establish a low dune Nature Reserve. This unique project would provide a return to the original low dune habitat ensuring easy access for everyone to enjoy and appreciate including the elderly, those with disabilities and young people and would complement the environmental richness of Ainsdale. It would protect existing habitats, which have flourished and expanded since the closure of the school in 2007 and provide additional habitats for further plant and animal wildlife to develop and be protected.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 622	Response Ref 1	Representor Name Amanda Hastings
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I have examined the plans and I know the site well. I wish to object strongly to the development of these houses in this location. The site holds high environmental interest with many rare plant and animal wildlife and should be protected. Ecological surveys in the summer of 2013 and 2014 identified eight regionally or nationally notable species. The fields therefore qualify for Local Wildlife Site Status. The plans would also be a major intrusion into the Green Belt and loss of recreation space in a close proximity to special areas of conservation. A survey by the North Merseyside Amphibian and Reptile Group in 2014 showed presence of specially protected Sand Lizards on adjacent land which would be susceptible to increased disturbance and predation by domestic cats.

I understand that an alternative proposal has been put forward by Ainsdale Community Wildlife Trust to establish a low dune Nature Reserve. This unique project would provide a return to the original low dune habitat ensuring easy access for everyone to enjoy and appreciate including the elderly, those with disabilities and young people and would complement the environmental richness of Ainsdale. It would protect existing habitats, which have flourished and expanded since the closure of the school in 2007 and provide additional habitats for further plant and animal wildlife to develop and be protected.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 627	Response Ref 5	Representor Name C&S Belsham
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Under constraint point 12 in the Site Assessment Form MN2.8, site ref SR4.06, SC now acknowledges the presence of peat substrata at the Ainsdale Hope School site, yet despite this new knowledge SC continue to regard Ainsdale Hope School as a preferred site, regarding the presence of methane as only a moderate constraint.

This constraint severity is an optimistic evaluation, this site should be excluded from any further development because:- The low-rise school building required special design because of the presence of methane. The playing field where the proposed development is destined was originally high dunes flattened to provide the level playing field. The removal of the overburden will have allowed the underlying peat to have expanded, providing greater pore space for the methane to accumulate. Excessive building on the Ainsdale Hope fields will increase the ground pressure giving rise to continued production of methane, creating a potential safety hazard in terms of its combustible nature, an environmental hazard to an area of SSSI and a potential health problem to anybody housed there.

The safety hazard from the presence of methane arise particularly in connection with drainage, both soil and surface water, where methane can easily accumulate and would require expensive control and monitoring. SC have not currently provided any evidence to justify that they have taken the safety issues into account. Special foundations would be required to build on the field, similar to that used for the existing school. This would create accessibility issues for the elderly due to the need to raise the floors well clear of the ground level and this would significantly increase the construction costs. SC have not provided any evidence to justify that they have taken the practical aspects of dealing with presence of methane into account.

The core of Ainsdale, as currently developed, is primarily a street based housing arrangement as opposed to modern estate development. Whilst SC local plan is not specific on the type of housing development scheme, nearly all new developments adopt an estate format because of the greater housing density that can be achieved. SC have been too vague on what they proposed to build on the AHS playing field.

Housing on MN2. removes the buffer to the existing dune system with impacts on natural wildlife of established scientific importance. Under constraint point 1 in the Site Assessment Form MN2.8, site ref SR4.06, the effect of dense housing development on the existing high dune system is regarded as a moderate constraint, despite the dunes' scientific importance at an international level. For such housing developments there are a number of significant detrimental impacts on such delicate ecosystems. Of particular concern is the expected increase in the cat population and their propensity to prey on small reptiles, amphibians and birds, some of which are protected species.

SC do not make mention of an alternative proposal which has been suggested for the site, of a low dunes nature reserve, which will retain the buffer to the existing natural high dune system, and at the same time as protecting the habitat, it will continue to support some of the rare species of flora and fauna that currently exist on the site. SC have not demonstrated and, therefore, not justified that they have considered all possible uses of the Ainsdale Hope School fields.

Is SR4.06 an area in high need of affordable housing? In S.2.39 SC have identified a need for affordable housing in connection with small parts of Central Southport. Under comment point 6 in the Site Assessment Form MN2.8, site ref SR4.06, it is claimed it would contribute to the high affordable housing need in Southport. It is unsubstantiated that affordable housing in Ainsdale is an effective means of addressing the need for affordable housing in Central Southport because of the significant distance between the two locations. There is no mention of this need for affordable housing in Ainsdale from the evidence presented by SC for the number of new dwellings proposed and the link is not clear. SC have not demonstrated and justified the need for affordable housing on the Ainsdale Hope School field.

Under constraint point 6 in the Site Assessment Form MN2.8, site ref SR4.06 it is claimed there is no constraint. However, in addition to that noted under objection 5: The impact of 243 housing units will have a significant impact in terms of an increase in traffic on the local roads, which are currently subject to only light traffic. This will cause a significant increase in pollutants. This will impact on both current residents and on the flora and fauna of the dune system. Lead particulate is of particular concern. SC have not fully considered and justified the impact of such a large amount of additional housing in connection with increases in pollution. Under constraint point 8 in the Site Assessment Form MN2.8, site ref SR4.06 it is claimed that network capacity will not change as a result of building 243 additional houses and that it would be the same as when the site was in use as a school.

The use of the network when the school was in use would only occur twice a day for very short periods, only affect Sandringham Road, occur only during term time and only during day time. Clearly 243 houses would place considerably more stress on the network capacity consistently for much longer periods. SC have not accurately identified and justified the impact of the additional

housing on the network capacity.

Summary of Suggested Changes

With regard to the Ainsdale Hope School site, SC make no mention of the proposed alternative use for this site, which is the establishment of a low dune system. This would protect and encourage the existing flora and fauna on the existing field and retain the buffer to the high dune system, in addition to providing an amenity for residents and visitors. This latter point is especially important as the high dunes have no accessibility for anyone with mobility difficulties or young families with push-chairs. The proposed system would include purpose built pathways and thus give access to an important natural area to a great many more people. To be 'sound' a local plan should be justified, where Justified means that the plan should be the most appropriate strategy, when considered against reasonable alternatives, based on proportionate evidence. As detailed in our objections above we do not agree that the most appropriate strategy has been presented, as the evidence does not support the Local Plan for Sefton

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 636	Response Ref 1	Representor Name Aurea Russell
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

My concerns are:- The traffic with 243 houses will bring in almost double that amount of cars. I do not believe Sandringham Road can cope with that extra load. Parking on Sandringham road is already a problem the station car park is always full. People use Sandringham Road as an extended car park area for the train. Most of the people who buy the houses will add to the Sandringham Road parking problem as no doubt they will find it too far to walk to the station and add further congestion to Sandringham Road.

Further to this there will be the added problem of the congestion at the railway crossing. Cars coming through the village turning right into Sandringham Road will cause congestion backing up into the village (very few people give way to traffic turning into Sandringham Road). I fear it will cause both great congestion and safety issues at the level crossing. I have great concern for emergency services being able to access the area for both established and new homes.

This proposed development would cause considerable problems as the existing access roads would not be able to cope with the extra traffic and parked cars. Furthermore, the distance from the site to the station, local shops and medical facilities is too far for elderly and infirm people to walk. An alternative use for this site should be considered such as the Nature Reserve being proposed by the Ainsdale Community wildlife Trust.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 640	Response Ref 1	Representor Name Ann Paulett
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

MN2.8 Former Ainsdale Hope School. I wish to object to Sefton Council's Local Plan for this site for following reasons: The site borders National and European protected habitats. It is adjacent to the Sefton Site of Special Scientific Interest [SSSI] and Special Area of Conservation [SAC]. The site itself qualifies for Local Wildlife Site status because ecological surveys carried out in 2013 & 2014 identified 8 regionally or nationally notable species. The western half of the fields support fixed dune vegetation listed as a priority for conservation in Annex 1 of the EU Habitats Directive. Presence of specially protected Sand Lizards on adjacent land would be susceptible to increased disturbance and predation by domestic cats, as evidenced by the North Merseyside Amphibian and Reptile Group in 2014.

A major intrusion into the Green Belt and loss of recreational space in a sensitive location close to SSSI and SAC. An alternative, viable and suitable proposal has been put forward by Ainsdale Community Wildlife Trust to establish an accessible low dune Nature reserve. This would protect the existing habitat and provide additional habitats for further plant and animal wildlife to develop and be protected. The scheme would enable this special natural environment to be enjoyed by children and adults of all ages and abilities. It's potential for encouraging shared knowledge and responsibility for the local environment is inspiring and has my support. Recognizing the Sefton Coast Partnership who follow EU principles regarding plans and strategies for the Sefton Coast. This includes involving local communities, recognizing that the playing fields were originally levelled sand dunes and not adversely affecting internationally important nature sites (this site is adjacent to both SSSI and SA locations). The site holds high environmental interest with many rare plants and animal wildlife which should all be protected. An HRA [Habitats Regulations Assessment] should not be dependent on a planning application.

Summary of Suggested Changes

The Ainsdale Community Wildlife Trust's proposal to establish, develop and maintain a low dune Nature Reserve is a suitable and viable alternative and should be included in Sefton's Local Plan.

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 703	Response Ref 11	Representor Name Jackie Copley
Organisation Name CPRE Lancashire		
Obj/Sup/Com	Objection	

Summary of Main Issues

Development of this site would adversely affect the visual amenity from Ainsdale Hills looking to the east across Halsall Moss. CPRE strongly supports the proposal by Ainsdale Community Wildlife Trust to convert this site into a common area and wildlife centre for the public to enjoy. It could also become a site that is fully accessible for everyone, particular for those with restricted access. The existing school buildings could also be used for education and training and help replace the loss of the educational facilities in Sandbrook Road, Woodvale.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 716	Response Ref 27	Representor Name Robert Swift
Organisation Name Robert Swift and family		
Obj/Sup/Com Objection		

Summary of Main Issues

Former Ainsdale Hope School, Ainsdale (Site MN2.8) is Council owned previously development land, and is currently still in use. It is largely accessible, and the proforma identifies that any negative impact on the landscape could be mitigated through boundary treatment. However, as it is located adjacent to an area of local biological interest, internationally important nature zone and a high sensitivity area for pink footed geese, mitigation is required. The site is also affected by Marsh Gas Methane pipelines. Any development would require a buffer which would reduce the developable area further. Additionally, as the site is still in use, and the playing fields are protected from development until 2017, it is not a short term option. A density of 30 dph with a 50% developable area has been applied due to the sensitive boundaries of the site and as it is not readily available for development.

Summary of Suggested Changes

The indicative capacity of Site MN2.8 should be decreased from 243 to 138 dwellings.

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 725	Response Ref 5	Representor Name Paul Daly
Organisation Name Sport England		
Obj/Sup/Com Objection		

Summary of Main Issues

Paragraph 74 of the National Planning Policy Framework and Sport England's playing field policy seek to protect playing fields (and other land and buildings used for sport) from development unless specific criteria are met. In brief, Sport England would oppose the allocation of any site that would result in the loss or redevelopment of existing buildings and/or land used for sport unless it could be demonstrated that they are genuinely surplus to requirements or they would be replaced to an equivalent quantity and quality in a suitable location in line with the requirements of paragraph 74 of the NPPF and Sport England's planning policy objectives.

In the case of playing fields, Sport England would look to an up to date, robust playing pitch strategy to demonstrate that a specific site was not required to meet current and future needs. Whilst it is positive that Sefton has commenced production of a playing pitch strategy, the findings of the assessment and the strategy for addressing the issues it identifies have not yet been produced. It is therefore premature to assume that sites last used for sport will not be required to meet current or future need. The fact that a playing field or sports facility is not in current use is not a demonstration that the site is genuinely surplus to requirements. If this was the case, any landowner that wanted to develop a sports facility for a different use would simply have to stop people from using the facility to bypass the protection offered by planning policy.

In the case of sites with other types of sports facilities, Sport England would expect an assessment that complies with our guidance ('Assessing needs and opportunities guide for indoor and outdoor sports facilities - How to undertake and apply needs assessments for sports facilities') to demonstrate that they were surplus to requirement. The said guidance was produced to support paragraphs 73 and 74 of the NPPF and is referenced by National Planning Practice Guidance. No evidence has been provided that any of the proposed allocations above meet any of the exceptions set out in Sport England's playing field policy, or those set out in paragraph 74 of the NPPF, Sport England therefore opposes the allocation of the sites. The loss of the sites is not justified by evidence to showing them to be surplus to requirements, and is therefore considered contrary to paragraph 74 of the NPPF. It is also considered contrary to the objectives of proposed policy NH5 of the Local Plan which seeks to protect playing fields.

Summary of Suggested Changes

The site should be deleted as an allocation. The alternative is to make clear that if the playing pitch strategy does not identify the playing fields to be surplus to requirements based on current and future need that the playing fields would need to be replaced. However, given the number of sites and area covered, there would be no certainty that such land would be available to allow for replacement provision.

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 741	Response Ref 15	Representor Name
Organisation Name	Priory Asset Management LLP	
Obj/Sup/Com	Comment	

Summary of Main Issues

The former Ainsdale Hope School (Site MN2.8) in Southport comprises a part greenfield and part brownfield site. The site is located adjacent to a Site of International Wildlife Interest and is, in part, a Local Wildlife Site in itself. Local residents are keen to see this site developed as local open space and a wildlife area. The requirement to provide a buffer in order to respect the neighbouring site of international importance would reduce the developable land available, and the indicative capacity should be reduced accordingly. The site is currently occupied in part by playing pitches, and it is likely that Sport England will require the loss to be mitigated for. This may require a future developer to secure an additional site elsewhere to replace the lost facility or evidence will need to be provided to show that these pitches are surplus to requirement. These options could be costly and time consuming, and could delay the delivery of the former schools sites, potentially into the next plan period. The council do not explain within their document how this will be addressed through the Local Plan in order to deliver the development. The site may not be delivered within the plan period if a reasonable solution cannot be found. It is recommended that deliverability should be considered now.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 940	Response Ref 1	Representor Name G Williams
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

We believe that the building of 243 houses on the Ainsdale Hope School playing field would be detrimental to the Sefton Coast SSSI. Before the school was built the site was a part of that green belt. The site fell into disuse years ago when the school closed and the former playing field began to be re integrated by wild life from the SSSI. The proposed new building site would be disadvantageous to the natural element of the SSSI. That number of houses with the attendant road and services and the added noise, pollutants cars and waste matter of perhaps a thousand people would necessarily have adverse consequences on the immediate adjoining SSSI.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 1012	Response Ref 1	Representor Name Anne Swales
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Comment on Ainsdale High School Development I object to the development of 200+ houses due to infrastructure issues. There is already traffic congestion at the level crossing on Shore Road/Station Road with the barrier going down at least 8 times per hour more at peak times. Additional vehicles from the development would increase this problem. Sports England have also referred to there being a lack of football pitches in Sefton and this is what the land was used for when the school was open.

Summary of Suggested Changes

No development

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 1061	Response Ref 1	Representor Name Michael Follett
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Upon reading the local plan I understand that there is a need for new housing but I do feel there are some distinct inadequacies in the plan around education which is something that should be in the Governments policy at a national level. I feel that it is irresponsible to use a prime site as the Ainsdale Hope site for anything but another school or community resource in the future, the area needs excellent schooling to drive growth in the area and surely the best place to build a school would be where one was in the past. Classroom sizes are getting much larger and it should be considered how long it would take to establish a secondary school/where it would be built in the future.

New housing will bring new families to the area, who will either have children of their own or children in the future. The demographic of a lot of the area should be considered for the future in terms of the new families moving to the area will potentially have a need for schooling. If done right the facilities at the school could benefit the whole community for out of school hours for sports and social activities to make it part of the community, piling more houses into an area with no extra leisure or social facilities will be the demise of the community.

I can definitely see how the site would be attractive to developers but this should not be a consideration as it is greenbelt land that when lost will not be regained, the committee should look at whether to ring fence this site for educational purposes in the future and whether it could be merged with facilities such as the Ainsdale Cricket Club for their purposes with a shared site for the cricket club and maybe a school in the future. If this is to go ahead jobs in the area need to be considered, there are only a finite number of jobs in the Southport and Liverpool area so areas like Manchester would be under consideration, it would make this much more appealing if the rail links to Manchester could be improved.

Summary of Suggested Changes

I would like to see a full and detailed assessment of the longer term local plan to demonstrate as the demographic of the population changes through natural causes. When the existing primary school children require to move to secondary education where would the places come from and what level of travel would be expected upon the children.

Adding hundreds of houses to the area would also increase the need for school places. My understanding is that the government is trying to improve education and bridge the North/South divide so I am wanting to hear what actions are being taken to ensure we have good schools in the area that would provide a great education without overcrowding or long distances to travel to school. Upon that basis I do not feel that the plan is sound as it will deliver a large housing estate but without the long term infrastructure to sustain it.

Finally, I am not sure why the council was able to demolish some of the existing facilities on the Ainsdale Hope site which could have been used for the community. The community have paid for that site over time through various taxes so to use funds to further reduce the longer term potential facilities for the area was arguably unreasonable and inconsiderate to the local constituent.

Evidence Submitted

Chapter 6	Plan Order Site MN2.8	Other Documents
Policy MN2.8	Former Ainsdale Hope School, Ainsdale	
Respondent No 1072	Response Ref 1	Representor Name F&M Hyland
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

We wish to object to the Sefton Authority proposal within their local plan to designate the playing fields and former High School site in Ainsdale as an area suitable for new housing. The grounds for our objection are listed below:- The proposal denies the residents in that part of Ainsdale and those living in Ainsdale generally, the opportunity to enjoy a unique area of recreational and environmental interest. There are prominent national and local policies and strategies for healthier lifestyles. The development of the former playing fields into a recreational and environmental asset rather than house building, is a more appropriate use of the existing green belt land and aligns with Government Lifestyle ambitions. Presently, the local park has limited facility as a walking environment. Access to the pinewoods is limited for those living some distance from them due to the absence of parking facilities. Developing the existing land into a nature reserve would provide a much needed amenity for residents and a structure and opportunity for them to enjoy outdoor exercise, to learn more about our ecological and environmental treasures and with the potential to link to the nearby coastal area.

The ecological and environmental value of the site far outweighs the use of the land for house building. The local plan identifies the importance of the Sefton Coast Site and the importance of developing fixed-dune vegetation. During an investigation of the land for alternative, environmental use, the Ainsdale Wildlife Trust has identified rare plant and animal wildlife and this in our view requires further study. The Trust has produced a virtual walkthrough which demonstrates the significant contribution Sefton could make to the enhancement of our local coastal heritage. This would be a high value added outcome for investment and prevent the encroachment of a housing development onto land of outstanding environmental and ecological significance already designated a Site of Special Scientific Interest. The physical boundary separation necessary to ensure no encroachment from the housing site would be detrimental to the current coastal site area.

It is somewhat ironical in the proposal to build a housing estate that there is a requirement to demolish school buildings. Ainsdale residents with primary and secondary school needs are restricted by adverse, ever increasing admission criteria for schools. At primary level and at secondary level the choice continues to become harder. Birkdale and Greenbank are single sex secondary education schools. For those choosing mixed sex education environment it is becoming more difficult for children from Ainsdale. At primary level adding further to the burden without further adequate provision which will be a direct result of the increased housing puts the proposal as a significant negative outcome and risk. This is also a significant flaw in these proposals. We believe that with due consideration of the above points Sefton Local Authority should abandon its plans for a housing site and work with local residents and the Wildlife Trust to create a more amenable wildlife and recreational site.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.9	Other Documents
Policy MN2.9	Former St John Stone School, Meadow Lane, Ainsdale	
Respondent No 716	Response Ref 48	Representor Name Robert Swift
Organisation Name Robert Swift and family		
Obj/Sup/Com	Support	

Summary of Main Issues

Former St John Stone School, Meadow Lane, Ainsdale (Site MN2.9) - The site has an indicative capacity of fewer than 50 dwellings. We agree with the Council's indicative capacity on this site.

Summary of Suggested Changes

None requested.

Evidence Submitted

Chapter 6	Plan Order Site MN2.9	Other Documents
Policy MN2.9	Former St John Stone School, Meadow Lane, Ainsdale	
Respondent No 725	Response Ref 6	Representor Name Paul Daly
Organisation Name Sport England		
Obj/Sup/Com Objection		

Summary of Main Issues

Paragraph 74 of the National Planning Policy Framework and Sport England's playing field policy seek to protect playing fields (and other land and buildings used for sport) from development unless specific criteria are met. In brief, Sport England would oppose the allocation of any site that would result in the loss or redevelopment of existing buildings and/or land used for sport unless it could be demonstrated that they are genuinely surplus to requirements or they would be replaced to an equivalent quantity and quality in a suitable location in line with the requirements of paragraph 74 of the NPPF and Sport England's planning policy objectives.

In the case of playing fields, Sport England would look to an up to date, robust playing pitch strategy to demonstrate that a specific site was not required to meet current and future needs. Whilst it is positive that Sefton has commenced production of a playing pitch strategy, the findings of the assessment and the strategy for addressing the issues it identifies have not yet been produced. It is therefore premature to assume that sites last used for sport will not be required to meet current or future need. The fact that a playing field or sports facility is not in current use is not a demonstration that the site is genuinely surplus to requirements. If this was the case, any landowner that wanted to develop a sports facility for a different use would simply have to stop people from using the facility to bypass the protection offered by planning policy.

In the case of sites with other types of sports facilities, Sport England would expect an assessment that complies with our guidance ('Assessing needs and opportunities guide for indoor and outdoor sports facilities - How to undertake and apply needs assessments for sports facilities') to demonstrate that they were surplus to requirement. The said guidance was produced to support paragraphs 73 and 74 of the NPPF and is referenced by National Planning Practice Guidance. No evidence has been provided that any of the proposed allocations above meet any of the exceptions set out in Sport England's playing field policy, or those set out in paragraph 74 of the NPPF, Sport England therefore opposes the allocation of the sites. The loss of the sites is not justified by evidence to showing them to be surplus to requirements, and is therefore considered contrary to paragraph 74 of the NPPF. It is also considered contrary to the objectives of proposed policy NH5 of the Local Plan which seeks to protect playing fields.

Summary of Suggested Changes

The site should be deleted as an allocation. The alternative is to make clear that if the playing pitch strategy does not identify the playing fields to be surplus to requirements based on current and future need that the playing fields would need to be replaced. However, given the number of sites and area covered, there would be no certainty that such land would be available to allow for replacement provision.

Evidence Submitted

Chapter 6	Plan Order Site MN2.9	Other Documents
Policy MN2.9	Former St John Stone School, Meadow Lane, Ainsdale	
Respondent No 1022	Response Ref 2	Representor Name Stephen McCloskey
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

The fact that this Plan also requires St John Stone School to be demolished and replaced by at least 40 houses and the fact that the West Lancashire Local Plan is allowing at least 2 large developments to be created virtually on the boundary with Sefton at both Birkdale and Ainsdale. Those developments will attract people whom no doubt will both want and need to use amenities and schools immediately adjacent to where they live. I attended the Council Meeting where the draft Plan was voted through, and the subject of schools provision with the associated increase in population due to development was brought up. Incredulously, the controlling Labour Council comment was that if it transpired that more schools were needed, more schools "would then be built"! Quite where the new schools would be built was not discussed, but such planning ethos is neither positively prepared nor consistent with national policy, when we have the schools already.

Therefore neither Ainsdale Hope nor St John Stone Schools should be demolished and developed upon, unless 'trigger mechanisms' are put into place that would allow such development to take place once it was statistically proved that the schools would not be required to be retained for neither the current nor next Local Plan period. Alternatively, the allocations for both sites could easily be incorporated within and distributed amongst other proposed sites, on the basis that the housing numbers are effectively a 'minimum' that will transpire to ultimately be built. The proposed development of at least 40 properties on the site of St John Stone School is unsound, for the reasons mentioned above.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.10	Other Documents
Policy MN2.10	Land at Sandbrook Road, Ainsdale	
Respondent No 350	Response Ref 8	Representor Name Carol and Stephen Hosker
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

There is a threat to water voles from development at the Meadows ATC (SR4.08). (The water vole and its habitats, as the Council is aware, is a species which is fully protected under the Wildlife & Countryside Act 1981).

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.10	Other Documents
Policy MN2.10	Land at Sandbrook Road, Ainsdale	
Respondent No 492	Response Ref 8	Representor Name
Organisation Name Craig Seddon SIPP		
Obj/Sup/Com Objection		

Summary of Main Issues

Land at Sandbrook Road (Site MN2.10) is a 2ha identified for the delivery of 49 dwellings. The site is allocated in the UDP as urban greenspace and recreational open space. Such uses, particularly in the urban area, should be retained. The Site Assessment Form (reference SR4.08) sets out that there may be potential for water voles on the site. Without an ecological assessment, this is a Tier 1 constraint and should be resolved before the site is allocated for housing. Given water voles are a protected species, it is argued that their protection is more than a minor constraint.

A Transport Assessment has not been carried out to assess whether the above is feasible. Given the uncertainty of the site's access arrangement, it has not been determined that safe and suitable access is achievable. Without a Transport Assessment, the uncertainty regarding access must be considered a Tier 1 constraint. No information has been provided which assesses the cumulative impact of the development to demonstrate that there will be no detrimental impacts upon the existing highways network. Without this information it has not been demonstrated that impact of the development on the wider highway network is at acceptable levels. Given the Council's position regarding the production of the Public Open Space and Recreation Strategy, it is argued that it is premature that the Council are releasing sports/recreation fields without having completed this strategy to justify the loss of such sites. Without having a strategy in place the Council and/or developer has failed to demonstrate that the site meets one of the exceptions test to justify the loss of this recreational open space. Given the lack of information to assess the impact upon ecological and highway issues the delivery of Land at Sandbrook Road is questionable.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.10	Other Documents
Policy MN2.10	Land at Sandbrook Road, Ainsdale	
Respondent No 716	Response Ref 49	Representor Name Robert Swift
Organisation Name Robert Swift and family		
Obj/Sup/Com Support		

Summary of Main Issues

Land at Sandbrook Road, Ainsdale (Site MN2.10) - the site has an indicative capacity of fewer than 50 dwellings. We agree with the Council's indicative capacity on this site.

Summary of Suggested Changes

None requested.

Evidence Submitted