

Policy MN2 Ain/Mell MN2 Aintree/Melling sites

Respondent No 286 Response Ref 1 Representor Name Stephen Gent

Organisation Name Aintree Ratepayers Association

Obj/Sup/Com Objection

Summary of Main Issues

I am writing, on behalf of the Aintree Ratepayers' Association, to record an objection to Sefton MBC's Local Plan.

The Association is totally opposed to further housing and business development upon Sefton's 'green belt' and agricultural land.

Our principle objections, as detailed below, are in respect of the proposed developments affecting Aintree Village and those which will have a consequential impact upon the residents of Aintree Village due to their proximity to the Village, particularly those in Melling and Maghull.

We 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) we do not agree that there are 'special circumstances' at play to justify the use of greenbelt for development purposes.

We are also concerned whether developers will actually provide the affordable / sustainable housing which the Local Plan suggests would be required.

Brownfield First

We have precious little open green belt and agricultural land left as it is. The loss of our greenbelt reduces the openness of the countryside and essentially leads to 'urban sprawl', resulting in Aintree Village, and other Sefton East parishes, losing their unique sense of identity and distinctiveness.

There will be a detrimental and everlasting impact on our wildlife as their habitats will be destroyed (or at best reduced as a result of relocation), our ability to produce food will also be reduced which will impact future generations.

We should therefore protect what we have and explore all other alternatives such as the utilisation of (mostly redundant) brown field sites. To this end the Association would urge the Council to put forward a Brownfield first policy.

Infrastructure

Roads - The existing local infrastructure of roads would not cope with the number of additional vehicles the proposed developments would bring, if one assumes an average two cars per household that is an additional 2,000 cars on our roads for every 1,000 properties built.

Should the Melling developments be progressed with then Aintree Village will inevitably bear the brunt of the additional traffic which this would bring about. A number of years ago when Melling saw a number of new housing estates built the amount of traffic which added to Aintree Village's roads rose significantly. The tail-backs along Aintree Lane can be quite lengthy, this all adds to the amount of pollution, both air and noise, which the ratepayer's of Aintree Village are forced to endure on a daily basis.

Public transport - We note that there is a requirement for a second rail station to serve Maghull on the Merseyrail Liverpool-Ormskirk line. There is however no mention of whether the capacity of the line has been tested to see if it would cope with increased passenger numbers as trains are already increasingly overcrowded at peak times (i.e. would additional carriages and/or trains be provided?)

Doctors / Schools - We fear that our local services, such as schools and doctors' surgeries would not cope with the significant increase in the local population. We are concerned that the increase in the population of Melling will adversely impact the schools and doctors surgery within Aintree Village.

It is not known whether Aintree Davenhill and Holy Rosary schools (both situated in Aintree Village) are in a position to meet a sudden and significant rise in the school roll; the same is likely to apply at primary and schools in neighbouring Melling, Maghull and Lydiate, and high schools in Maghull.

Community Resources - It should be noted that Sefton Council no longer directly runs any community services within Aintree Village or Melling, the Council having withdrawn from the Aintree Youth Centre and Aintree Library.

'Fracking' Fear - There is a serious concern that a developer could exploit our natural resources by introducing 'fracking' which

would have a most detrimental impact upon the lives of those who live in and around that particular sites(s).

Summary

In summary, should the Local Plan receive approval from the Inspector, then the loss of the green-belt and agricultural sites earmarked for development would prove to be to the detriment of those who live in Sefton and in particular those within the Sefton East parishes who, it would appear, are once again bearing the brunt.

The Association is therefore strongly urging the Inspector to rule that Sefton's Local Plan is 'not' sound and for the Council to revisit its Local Plan to reflect the views of the people who live and work within the Borough.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order MN2 Aintree/Melling Sites	Other Documents
Policy MN2 Ain/Mell	MN2 Aintree/Melling sites	
Respondent No 287	Response Ref 1	Representor Name Stephen Morgan
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I object to the local plan regarding Sedburgh Avenue becoming a boulevard in the plan for more housing the amount of people living in aintree village must be at maximum for doctors traffic dentist etc . Ialso object to the whole local plan regarding Aintree. I have already sent you an objection and I disagree that we continually have to battle with Peel holdings over the land at the end of my road, they obviously bought the land with the hope of receiving planning permission for homes. Hence they will make a lot more money on the land than what they purchased it for.

They are playing with people's lives just to make profit . I understand the need for more homes, but I do not think they should be built here as the local services are at breaking point as I speak, it takes 2 weeks for a doctors appointment now . The traffic is already a nightmare for people who live in the village after some brainy person came up with the idea of building shopping estate on the old waterworks site (b&q next etc). The amount of increase of traffic is unbelievable , I think the residents are the last thought when they should be the first.

Summary of Suggested Changes

Take the local plan for Aintree and put it up in Skemersdale where there are still lots of land .

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN2 Ain/Mell **MN2 Aintree/Melling sites**
Respondent No 309 **Response Ref** 2 **Representor Name** Leonard Stephen
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

I would like to object to the local plan proposed by Sefton council to build houses on sites within Aintree village. The effect on the loss of Green Belt land speaks for itself. Our open land is being lost to developers. The infrastructure with regard to the local schools, and the only doctors surgery is at breaking point at the minute, so to increase the number of houses within the village will only add to already over subscribed facility.

I live in close to the Leeds to Liverpool Canal and my fear is that if houses are allowed to be built especially on locations AS23 and AS22 there is a real danger of flooding to houses in the local area should there be a breach to the canal. These locations are flood areas which are supposed to protect the existing houses in the area. My house insurance premiums will be affected or I may not be able to insure my house at all.

Another objection is to the amount of increased traffic along with the pollution impact which would be a consequence of increasing the amount of housing in an already busy area. It is clear that the existing infrastructure already struggles to cope with the existing population and casual passing through traffic within the Aintree village area so to add to it would only bring more pressure on an already existing problem. Only five ways for cars, vans and lorries to enter and exit the village causing danger to children and adults alike. Trying to get into or get out of the village at normal times using Wango Lane, Aintree Lane, Altway, Bullsbridge Lane and Melling Road is bad enough but around peak times is an absolute disaster.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN2 Ain/Mell **MN2 Aintree/Melling sites**
Respondent No 310 **Response Ref** 2 **Representor Name** Margaret Stephen
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

I would like to object to the local plan proposed by Sefton council to build houses on sites within Aintree village. The effect on the loss of Green Belt land speaks for itself. Our open land is being lost to developers. The infrastructure with regard to the local schools, and the only doctors surgery is at breaking point at the minute, so to increase the number of houses within the village will only add to already over subscribed facility.

I live in close to the Leeds to Liverpool Canal and my fear is that if houses are allowed to be built especially on locations AS23 and AS22 there is a real danger of flooding to houses in the local area should there be a breach to the canal. These locations are flood areas which are supposed to protect the existing houses in the area. My house insurance premiums will be affected or I may not be able to insure my house at all.

Another objection is to the amount of increased traffic along with the pollution impact which would be a consequence of increasing the amount of housing in an already busy area. It is clear that the existing infrastructure already struggles to cope with the existing population and casual passing through traffic within the Aintree village area so to add to it would only bring more pressure on an already existing problem. Only five ways for cars, vans and lorries to enter and exit the village causing danger to children and adults alike. Trying to get into or get out of the village at normal times using Wango Lane, Aintree Lane, Altway, Bullsbridge Lane and Melling Road is bad enough but around peak times is an absolute disaster.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN2 Ain/Mell **MN2 Aintree/Melling sites**
Respondent No 337 **Response Ref** 1 **Representor Name** B.E. Karran
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I object to the extreme over development within the Plan for the following reasons —

1. Melling has been over developed for a decade of more
2. This development has been on mainly 'Brown Field' sites, but the proposed development would be on Green Belt and I strongly object to housing developments on Green Belt
3. There are differing opinions on the number of houses required and figures appear to be plucked out of the air
4. Loss of Grade 1 agricultural land needed for food production
5. Lack of amenities, which every developer in the past has provided very little
6. Extra burden of traffic on what are primarily country lanes
7. Only one Doctor's surgery, which is closed two weekdays
8. Only one school (210 pupils)
9. Abysmal public transport services (worse now than the 1970s)
10. Losing the historical character of a village
11. Losing wild life habitats
12. The Plan seems to have been rushed through without sufficient consultation

Summary of Suggested Changes

I would hope that Sefton Council will re-consider its proposals.

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN2 Ain/Mell **MN2 Aintree/Melling sites**
Respondent No 355 **Response Ref** 2 **Representor Name** Brian Mann
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

Very strong objection to the development of Aintree for the following reasons; Destroying of wildlife and protected species. Road network in the area has reached saturation and will have detrimental health and safety hazards for both pedestrian and vehicle user. Building on land which has been designated by the environmental agency as flood plain, and now has been down graded by them. Where is the proof and reason for this downgrade. Building on green belt land. Increase of vehicle traffic will have pollution effect on asthma sufferers, historical and factual evidence. Aintree Parish has reached its limit on schooling intake and also reached capacity in local health care practice. Modern development would be out of character with local housing stock. Along with listed building right next to site development. The over population of a parish area will have a negative and detrimental effect on the community and cause unwanted anxiety.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN2 Ain/Mell **MN2 Aintree/Melling sites**
Respondent No 356 **Response Ref** 2 **Representor Name** Patricia Mann
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Destroying of wildlife and protected species. Road network in the area has reached saturation and will have detrimental health and safety hazards for both pedestrian and vehicle user. Building on land which has been designated by the environmental agency as flood plain, and now has been down graded by them. Where is the proof and reason for this downgrade. Building on green belt land. Increase of vehicle traffic will have pollution effect on asthma sufferers, historical and factual evidence. Aintree Parish has reached its limit on schooling intake and also reached capacity in local health care practice. Modern development would be out of character with local housing stock. Along with listed building right next to site development. The over population of a parish area will have a negative and detrimental effect on the community and cause unwanted anxiety.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN2 Ain/Mell **MN2 Aintree/Melling sites**
Respondent No 362 **Response Ref** 1 **Representor Name** A Baden
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I wish to object strongly to the Sefton Council Local Plan. The loss of Sefton's Green Belt has to stop. The topography of the the land lends itself to flooding, an ever-increasing danger.

The plans to build on Green Belt in the areas of Aintree and Melling is of particular concern to myself and neighbours. The original estate has mushroomed to a situation where the schools and GP practice are full to capacity. Traffic levels, increasing WITHOUT the addition these extra homes will bring, are already at an extremely frustrating level. It is a nightmare at peak hour and even driving off-peak. It can be near impossible to cross to the left-hand lane to join Ormskirk Road Southbound to Liverpool as the traffic from Aintree Lane and Altway is contiuous.

Should permission be givenfor any more homes to be built in Aintree Village or Melling, the drains will be unable to cope with the added sewerage and rain water and flooding WILL happen. Wango Lane was in a flood area long before that land was developed for housing. The land between Oriel Drive and the River Alt was partly marshland next to the railway embankment. This land would require thousands of tonnes of earth and rubble to level it before houses could be built. The heavy lorries required on this scale would eb too heavy for the under-road drain in Sedburgh Avenue and the potential for serious road accidents with the increase in traffic is obvious.

Summary of Suggested Changes

Please do not allow any further housing in Melling or Aintree village.

Evidence Submitted

Policy MN2 Ain/Mell MN2 Aintree/Melling sites

Respondent No 380 Response Ref 3 Representor Name Ian Gent

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I wish to register my objection to Sefton MBC's Local Plan. I am totally opposed to further housing and business development upon Sefton's 'green belt' and agricultural land. My objections, are in respect of the proposed developments affecting Aintree Village and those which will have an impact upon the residents of Aintree Village due to their proximity, particularly those in Melling and Maghull.

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.

The loss of our greenbelt reduces the openness of the countryside and essentially leads to 'urban sprawl', resulting in our local communities losing their unique sense of identity and distinctiveness. We have precious little open green belt and agricultural land left as it is. There will be a detrimental and everlasting impact on our wildlife as their habitats will be destroyed. Our ability to produce food will also be reduced which will impact future generations. We should protect what we have and explore all other alternatives, such as the utilisation of redundant brown field sites. I would therefore urge the Council to put forward a Brownfield first policy.

Roads - The existing local infrastructure of roads would not cope with the number of additional vehicles the proposed developments would bring, if one assumes an average two cars per household that is an additional 2,000 cars on our roads for every 1,000 properties built. Should the Melling developments be progressed, then Aintree Village will inevitably bear the brunt of the additional traffic, which this would bring about. A number of years ago when Melling saw a number of new housing estates built the amount of traffic which added to Aintree Village's roads rose significantly. Aintree Lane regularly has lengthy tail-backs, which adds to the amount of pollution, both air and noise, which we are forced to endure on a daily basis.

Public transport - I note that there is a requirement for a second rail station to serve Maghull on the Merseyrail Liverpool-Ormskirk line, which I'm sure would be very much in demand given the significant number of new homes which will be built both in Maghull and in the neighbouring villages of Lydiate and Melling. However, there is no mention of whether the capacity of the line has been tested to see if it would cope with increased passenger numbers, as trains are already increasingly overcrowded at peak times (i.e. would additional carriages and/or trains be provided?)

Doctors / Schools - I fear that our local services, such as schools and doctors' surgeries would not cope with the significant increase in the local population. I am concerned that the increase in the population of Melling will adversely impact the schools and doctors surgery within Aintree Village and schools in neighbouring Melling, Maghull and Lydiate. Community Resources - It should be noted that Sefton Council no longer directly runs any community services within Aintree Village or Melling, the Council having withdrawn from the Aintree Youth Centre and Aintree Library.

In summary, should the Local Plan receive approval from the Inspector, then the loss of the green-belt and agricultural sites earmarked for development would prove to be to the detriment of those who live in Sefton and in particular those within the Sefton East parishes who, it would appear, are once again bearing the brunt. I do not consider that the Council has engaged in meaningful consultation over the last 2-3 years reference the Local Plan, the various consultation exercises have resulted in the same questions being raised by residents which have gone largely unanswered. There appears to be a general disregard for the views and wishes of residents. I therefore strongly urge the Inspector to rule that Sefton's Local Plan is 'not' sound and for the Council to revisit its Local Plan to reflect the views of the people who live and work within the Borough.

Summary of Suggested Changes

Evidence Submitted

Policy MN2 Ain/Mell MN2 Aintree/Melling sites

Respondent No 423 Response Ref 1 Representor Name Moya Middlehurst

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I am very concerned about the loss of green belt land in and around the Aintree and Melling area. This will mean a loss of excellent agricultural land - once this is lost we will never be able to reclaim it as agricultural land again. Why isn't Sefton council concentrating on using brownfield sites for development. Surely there are enough brownfield sites available on which to build.

What about the increase in traffic in Aintree. We already suffer with traffic jams especially at the Old Roan junction. An increase in the number of houses in Melling will impact greatly on the traffic in Aintree. I live on Bull Bridge Lane and have over the last few years have noticed a big increase in traffic. Another 300 homes in Melling will further impact on this. The only way out of Melling (apart from going through Kirkby) is via Aintree. The roads in Aintree are already congested. The main road into Melling for emergency service vehicles is past my house. The increase in houses and traffic could well have a detrimental affect on those vehicles being able to get to Melling.

With an increase in traffic we will then suffer with an increase in pollution and carbon emissions - not to mention noise! I find that most worrying.

It seems to me that no infrastructure is in place. We already lack certain facilities. Sefton council closed our library. We only have one doctor's surgery in Aintree and there is only one part time surgery in Melling. We have no dentists in the area.

The nearest supermarket is Asda. The way to Asda for the people in Melling is via Aintree past my house on to Altway or Aintree Lane to the Old Roan junction. This junction is just so congested already, I cannot imagine what it would be like with an increase in traffic.

The 3 local primary schools (Holy Rosary, Davenhill and Melling) do not have sufficient spaces to cope with an influx of pupils. Where do you propose these children go to school? Build a new school? Where? And who would pay? As far as I know Sefton council don't have any money.

The drainage in this area leaves a lot to be desired. My garden already floods when it rains. How will the drains cope. I understand in Formby new houses were built on a higher level thereby leaving the existing houses in a position that they have suffered from flooding. This could make houses un-insurable.

If green belt land is built on then we risk the loss of wildlife and their habitats.

Please reconsider this local plan.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN2 Ain/Mell **MN2 Aintree/Melling sites**
Respondent No 453 **Response Ref** 1 **Representor Name** Alan Middlehurst
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

The proposed building areas around Aintree and Melling are on greenbelt land, this land is prime agricultural land and once built on will be gone forever. Why isn't Sefton council concentrating on using brownfield sites for development. Surely there are enough brownfield sites available on which to build.

What about the increase in traffic in Aintree. I believe a traffic census was carried out on Bull Bridge Lane, however this was done during the school holidays so clearly would not reflect the correct volume of traffic using this route. We already suffer with traffic jams especially at the Old Roan junction. An increase in the number of houses in Melling will impact greatly on the traffic in Aintree. I live on Bull Bridge Lane and over the last few years have noticed a big increase in traffic. Another 300 homes in Melling will further impact on this. The only way out of Melling (apart from going through Kirkby) is via Aintree. The roads in Aintree are already congested. The main road into Melling for emergency service vehicles is past my house. The increase in houses and traffic could well have a detrimental affect on those vehicles being able to get to Melling.

With an increase in traffic we will then suffer with an increase in pollution and carbon emissions potentially leading to health issues, not to mention noise and vibrations.

It seems to me that no infrastructure is in place. We already lack certain facilities. Sefton council closed our library. We only have one doctor's surgery in Aintree and there is only one part time surgery in Melling. We have no dentists in the area.

The way to the Ormskirk Road retail park and Asda for the people in Melling is via Aintree past my house on to Altway or Aintree Lane to the Old Roan junction. This junction is just so congested already, I cannot imagine what it would be like with an increase in the volume of traffic from 300 more houses in Melling.

The 3 local primary schools (Holy Rosary, Davenhill and Melling) do not have sufficient spaces to cope with an influx of pupils. Where do you propose these children go to school? Build a new school? Where? And who would pay? As far as I know Sefton council don't have any money!

The drainage in this area leaves a lot to be desired. My garden already floods when it rains. How will the drains cope. I understand in Formby new houses were built on a higher level thereby leaving the existing houses in a position that they have suffered from flooding. This could make houses in-insurable!

If green belt land is built on then we risk the loss of wildlife and their habitats.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN2 Ain/Mell **MN2 Aintree/Melling sites**
Respondent No 456 **Response Ref** 1 **Representor Name** T R Blake
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Loss of green belt. Loss of agricultural land. Loss of farming communities. Loss of countryside. Loss of wildlife and habitats. Lack of infrastructure. Increased volume of traffic, as Old Roan congested already. Brownfield sites priority for building houses.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**

Policy MN2 Ain/Mell **MN2 Aintree/Melling sites**

Respondent No 483 **Response Ref** 1 **Representor Name** Ken Dennis

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I live along the A5036 corridor and have done so since as far back as when it was not the main route to the docks. Since that time it has undergone many changes and continues to do so even still. It is and must be, one of the busiest "A" roads in the country and with the soon to be completed new docking facility, can only get worse. No matter what the planners may forecast (and they seem to suggest just a couple of percent increase in vehicle usage) it is this road that will take the strain. If the new dock proves to be a success and we must wish it well, then gridlock will ensue for certain. Switch Island is now a critical hub for all traffic in this part of Merseyside as it brings together Two Motorways and Two major A roads, plus another bypass road.

We the locals not only have to brave all this traffic on a daily basis, but more importantly have to endure all the pollution that it creates. This is not acceptable. Having just lost another large tract of top grade agricultural land to the bypass road, any further encroachment on what remains would be adding insult to injury. Therefore I would argue that the sort after development of more top grade agricultural land adjacent to the M57 at Switch Island should not be even considered. The port should not be inflicting more loss of well-being on us. This development would only increase the congestion and pollution in the area even more.

Just going back to greenbelt land and farmland in particular, it is a precious commodity. With an increasing population, we have the need to grow as much food as we can in this country, we need food security and sustainability. The land around here is top quality, I know, as my garden is part of it. So no more of it should be sacrificed to further development. The thoughtful use of previously already used land should be the way to go.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**

Policy MN2 Ain/Mell **MN2 Aintree/Melling sites**

Respondent No 488 **Response Ref** 24 **Representor Name** Ian Brodie Browne

Organisation Name Sefton Council Lib Dem Opposition Group

Obj/Sup/Com Objection

Summary of Main Issues

These two huge sites to the west and east of Lydiate/Maghull fall within a similar category to AS17 in that they are both high grade agricultural land that is presently being farmed. To turn them over to housing is unthinkable in environmental sustainability terms. AS14 is right next to SR4.48 (MN2.28) which Sefton Council has already designated as a 'reserve' site for development in its own draft Local Plan. Bearing in mind that a further and much larger 'reserve' site (SR4.47) is the other side of SR4.48 this would have the effect of vastly increasing the size of Lydiate's population. Just developing the two reserve sites will increase Lydiate's size by 35%! What's more AS14 will develop Lydiate right up to the West Lancashire (Aughton) boundary and we are aware that West Lancs Council already have concerns about the two 'reserve' sites for this very reason. Taking the 3 sites together Lydiate would be subject to an urban extension of considerable proportions.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN2 Ain/Mell **MN2 Aintree/Melling sites**
Respondent No 488 **Response Ref** 27 **Representor Name** Ian Brodie Browne
Organisation Name Sefton Council Lib Dem Opposition Group
Obj/Sup/Com Support

Summary of Main Issues

These two huge sites to the west and east of Lydiate/Maghull fall within a similar category to AS17 in that they are both high grade agricultural land that is presently being farmed. To turn them over to housing is unthinkable in environmental sustainability terms. AS14 is right next to SR4.48 (Tyson's Triangle) which Sefton Council has already designated as a 'reserve' site for development in its own draft Local Plan. Bearing in mind that a further and much larger 'reserve' site (SR4.47) is the other side of SR4.48 this would have the effect of vastly increasing the size of Lydiate's population. Just developing the two reserve sites will increase Lydiate's size by 35%! What's more AS14 will develop Lydiate right up to the West Lancashire (Aughton) boundary and we are aware that West Lancs Council already have concerns about the two 'reserve' sites for this very reason. Taking the 3 sites together Lydiate would be subject to an urban extension of considerable proportions.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN2 Ain/Mell **MN2 Aintree/Melling sites**
Respondent No 565 **Response Ref** 2 **Representor Name** Paula Maguire
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

These proposed sites, along with AS17, would make Aintree Village an 'urban sprawl' and would increase the size of the parish by almost 50%; we already have 'urban sprawl' with Liverpool. The local infrastructure of roads, schools, doctors' surgeries etc. would not cope with the number of additional people which the development would bring.

The proposed accesses to these sites are simply insufficient, and the building work would cause severe inconvenience, noise, distress etc. to existing residents. Again, residents would face additional water problems due to the already high water table and the flood plain of the River Alt and the area would face the loss of green belt and prime agricultural land. The loss of amenity and wildlife habitat of the existing field would have a detrimental impact on wildlife.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN2 Ain/Mell **MN2 Aintree/Melling sites**
Respondent No 566 **Response Ref** 2 **Representor Name** Craig Maguire
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

These proposed sites, along with AS17, would make Aintree Village an 'urban sprawl' and would increase the size of the parish by almost 50%; we already have 'urban sprawl' with Liverpool. The local infrastructure of roads, schools, doctors' surgeries etc. would not cope with the number of additional people which the development would bring.

The proposed accesses to these sites are simply insufficient, and the building work would cause severe inconvenience, noise, distress etc. to existing residents. Again, residents would face additional water problems due to the already high water table and the flood plain of the River Alt and the area would face the loss of green belt and prime agricultural land. The loss of amenity and wildlife habitat of the existing field would have a detrimental impact on wildlife.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN2 Ain/Mell **MN2 Aintree/Melling sites**
Respondent No 569 **Response Ref** 1 **Representor Name** Nuala Kranas
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I wish to object to Sefton's Local Plan: Housing figures do not give `special circumstances` for building on greenbelt Sefton is already in danger of becoming an urban sprawl and risks losing what little distinct areas it has left. The loss of good grade agricultural land and farming communities; loss of future food production Loss of wildlife and habitats; Loss of valuable flood plain; Increased flooding to existing properties; Lack of infrastructure for additional housing; Added pressure on health and educational services; Dr's surgeries already full, lack of school places; Increased volume of traffic on already congested roads: any incident on or near switch island already gridlocks Aintree; additional housing in Melling , Maghull or Lydiate has a direct effect on Aintree as people use the back roads coming out into Aintree to avoid switch island; pollution levels from the increased traffic will have detrimental effects on the local community, air, noise and light and the well being of the community is not being considered. Brownfield sites should always be used first The local plan is a living document and can be revisited anytime in the future

Summary of Suggested Changes

Build on brownfield sites first Take into consideration the destruction of valuable agricultural land Look at the empty/abandoned houses already existing in Sefton Do not build on or near flood plains Listen to your residents Look at the local plan and does it really serve Sefton

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN2 Ain/Mell **MN2 Aintree/Melling sites**
Respondent No 577 **Response Ref** 2 **Representor Name** Paul Maguire
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

These proposed sites, along with AS17, would make Aintree Village an 'urban sprawl' and would increase the size of the parish by almost 50%; we already have 'urban sprawl' with Liverpool. The local infrastructure of roads, schools, doctors' surgeries etc. would not cope with the number of additional people which the development would bring.

The proposed accesses to these sites are simply insufficient, and the building work would cause severe inconvenience, noise, distress etc. to existing residents. Again, residents would face additional water problems due to the already high water table and the flood plain of the River Alt and the area would face the loss of green belt and prime agricultural land. The loss of amenity and wildlife habitat of the existing field would have a detrimental impact on wildlife.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN2 Ain/Mell **MN2 Aintree/Melling sites**
Respondent No 607 **Response Ref** 1 **Representor Name** Glenys Burkey
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I wish to object to the current plan to build more houses on green belt land in and around Aintree Village, Melling and Maghull. We already have had quite a large development in Melling in the past number of years which has put a big strain on the local roads in Aintree Village.

More houses mean more cars! More cars mean more parking required. There is already a great problem at school time over parking and through traffic not being able to pass parked cars without going on the pavement.

More houses mean more strain on the infrastructure - flooding still occurs in some parts after heavy rain.

More houses mean more people needing schools, Doctors, Dentists etc. We in Aintree Village have just lost our one amenity the library!

Regarding Sefton needing new houses we have been led to believe the population in Sefton is actually falling so why the need for more houses?

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN2 Ain/Mell **MN2 Aintree/Melling sites**
Respondent No 617 **Response Ref** 1 **Representor Name** James Quinn
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I believe that Sefton are pursuing inappropriate areas of development in the Melling district. Faults with the locations selected in Waddicar village include the problems of access, the area is at present mostly served by lanes which are already dangerous to use due to the weight of traffic both local and through. Facilities in the area are virtually non-existent with no apparent plans for future expansion. The area has known drainage problems which took many years to solve (if they are?) in the last building development undertaken and both of the 2 areas selected by the authority have severe accumulation of surface water whenever it rains - and for quite a while after! Public transport is very limited, goes almost nowhere and only runs for very limited times! The 2 areas are also both home to a considerable amount of wildlife including - frogs and toads, amphibians which are somewhat endangered and the areas are regularly visited by bats. Whether the bats are local or just visiting appears to be unknown and could turn out to be an unexpected problem.

Summary of Suggested Changes

Evidence Submitted

Policy MN2 Ain/Mell **MN2 Aintree/Melling sites**

Respondent No 646 **Response Ref** 1 **Representor Name** Peter Gill

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I live in Aintree Village and object for the following reasons :-

You are building on the greenbelt when it is not necessary, there are sufficient brown sites available for building. The greenbelt being talked about for building is grade one agricultural land, 10 years ago the population was 50 million, it is now over 60 million, how are we to feed everybody? You are allowing building on floodplain, this will cause problems down the line. Infrastructure will be overwhelmed, the roads are close to limits now, the schools are almost full so would not be able to take many children in, our children have to travel by public transport to their secondary schools.

The increase in traffic would cause an increase in pollution and carbon emissions.

The local doctors are very close to closing their patient lists, this isn't helped by the doctors in Melling going part time, therefore putting a lot of pressure on Aintree Park Group Practice.

The building of houses in Melling will have a direct effect on Aintree Village as the main access/egress will be through Aintree, Aintree Lane/Altway. Loss of greenbelt, increased flooding, increased pressure on infrastructure, boundaries overlapping, please think again.

Summary of Suggested Changes

Evidence Submitted

Policy MN2 Ain/Mell **MN2 Aintree/Melling sites**

Respondent No 704 **Response Ref** 3 **Representor Name** A Donnelly

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

Small extension to site MN2.32

Our client wishes to put forward a larger area than allocated as site MN2.32 which could accommodate some 29 dwellings. More detail is provided in the representation to policy MN7. The site does not function as Green Belt, and the only impact would be that Melling comes slightly closer to Aintree. We agree that the reduction is not material. The recognition that the site is previously developed land and can deliver affordable housing is a clear benefit.

Our client controls the site and would develop it either themselves or with a developer within 12 - 18 months of the adoption of the Local Plan.

Summary of Suggested Changes

Evidence Submitted

Policy MN2 Ain/Mell **MN2 Aintree/Melling sites**

Respondent No 859 **Response Ref** 1 **Representor Name** Oli Caffrey

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I wish to strongly object about the "Local Plan" which is attempted to be imposed on the people of Aintree and Melling against their wishes. There are a number of specific objections:

The plan does not take wildlife and habitat into consideration. It will have a disastrous effect on our community. I am a younger member of the community and the local plan does not bring me any closer to obtaining affordable housing in my area. There is provision for smaller housing but is very clear that there is no compulsion to make developers build a set amount of affordable homes. All that will happen is that 4 or 5 bedroom houses will be built on greenbelt land.

This building will increase the real chances of flooding in this area. I would happily show you areas that regularly flood and building will make things worse. I have researched this issue and I fully expect it is not the new houses that will flood but existing ones.

I am a regular bus user (When there is one available). The Old Roan lights /Altway area is often overflowing with traffic going towards the Aintree retail park. There is the issue of where new cars will exit Melling. They will go through Aintree and make things worse.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I wish to make a strong objection to the proposed local plan in Sefton. I have taken a keen interest in the process and have been shocked by the unsuitability of the plan the inability of our elected representatives to provide a suitable plan for our future. There are a number of in points I wish to make: Congestion — Anyone who lives in the Aintree Village area is already landlocked at the weekends. Queues for Asda and the local retail park regularly go halfway down Altway. Our council managed a traffic study (Taken on a wet Wednesday during school holidays) that actually said some roads were underused (The filter lane in Ormskirk Road). This is because of the congestion waiting to get in the lane at the Old roan traffic lights. An independent traffic survey carried out for the Aintree Village Residents Action Group concluded that over 600 cars use Hancock's Bridge (Close to a new proposed development) on a quiet Monday afternoon.

Any development in the Melling and Aintree areas will inevitably place an unbearable burden on to our, already full roads.

Infrastructure - Aintree and Melling do not currently have capacity to be developed. The practice manager for Aintree Group Practice has already reported that there is no capacity for new patients. Residents already have a wait to see the GP and this situation has been exacerbated by a reduction in the surgery at Melling, the very area that has a proposed development.

There is also a major issue with the local schools. Aintree and Melling do not have a secondary school and this leads to a great deal of congestion between Melling, Maghull and Aintree. There is no current capacity in both of Aintree's primary schools and no opportunity to increase the capacity. In my road we have brothers and sisters who attend different primary schools due to a lack of capacity. This situation will become intolerable if further development takes place.

I attended the recent Sefton Council debate and vote on the Local Plan. I was shocked to see this issue was largely glossed over. Councillors were only willing to discuss Sefton as a whole. Their willingness to impose an unsuitable plan meant that children will be expected to be bussed to various points in and out of the borough to "solve" this issue. Potential for Flooding — The proposed plan includes land set aside off Wango Lane for housing. A visit to this area would illustrate the total unsuitability of this land for this purpose. The residents group received a report from a quantity surveyor which highlighted a number of specific points.

If this could happen I am wondering why the council officials could not do this. Are they so blinded by the actions of developers? There are a number of specific issues including:

- Until recently this land was designated as flood plain but re-assigned to help developers.
- The land lies approximately 20 feet below the attached stretch of the Leeds- Liverpool Canal
- There is a major sewer running underneath this land
- Access is almost impossible. Valley Close is only 8foot 6inches wide and has a grade 2 listed building on the corner
- Any access through Wango Lane would have an unacceptable effect on Hancock's Bridge (One of the 3 main ways into Aintree Village — 2 of them single lane) already mentioned earlier
- The only alternative access would be to demolish houses in Taunton Drive and build a road around. Taunton drive is already overcrowded, tight and with residents unable to get out to Aintree Lane due to high traffic levels.
- If this course of action were followed it would pave the way for further inappropriate development along the new road causing the potential for further problems for flooding and congestion and changing the nature of the whole area.
- Any building on this land would need work to prevent flooding. If this took place there is no way of knowing the detrimental effect this would have on Taunton Drive properties. The surrounding area does flood. The owner of Mill Farm House (Who now seems keen to sell to developers) had to be recovered from their property by the fire service in the recent past due to flooding. I have photographic evidence of this supplied by a resident in Canterbury Close. That is before any further development has taken place.

The proposals that have been put forward see a future where the Aintree Village area becomes an urban sprawl. Our council (With an inbuilt majority from Bootle) appears to be happy to sell the crown jewels of the green belt and allow £250 - £350,000 houses to be built on there with little interest of the consequences. At the same time, these proposals do not address any of the issues of urban regeneration. Sefton council has several thousand empty homes. It has a "Plan" to start dealing with this but no action has taken place other than the initial report.

Brownfield First? - Another area not tackled in the Local Plan is the opportunity to redevelop neglected urban areas within Sefton. Our local MP has highlighted the need for brownfield first but our councillors and officials seem intent on putting all their efforts into making the sell off of the green belt possible.

Once sold, the green belt cannot be reclaimed. The council's vigour in this area is highlighted by the fact they are keen to make the plan a 15 year one. This is far longer than any statutory requirement. Once passed the Local Plan will be a living document and developers will have opportunity to bring further, unsuitable, proposals unfettered. I have witnessed this process with the proposed additional site plan which was rejected last year. Any process which allows developers twice as long to present their case as local residents appears lopsided to the outside observer and must be questioned.

At public meetings our councillors have asked the residents to think about a number of issues such as smaller family homes and the need to house the elderly. Neither one of these issues will be advanced by the plan. If allowed the vast majority of houses built will be 3 or 4 bedroom houses on current green belt land. Once passed, the council has little or no recourse to change this for the better and include sectors where there may be need.

In its current state the Local Plan is a developer's charter. The issues outlined above illustrate its total unsuitability. If implemented, the plan will diminish the quality of life in the borough. This will be done without tackling the issues that may occur in future such as the building of affordable housing. The people of Sefton hope the Government Inspector can see what our council cannot (Or are unwilling) to see.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order MN2 Aintree/Melling Sites	Other Documents
Policy MN2 Ain/Mell	MN2 Aintree/Melling sites	
Respondent No 861	Response Ref 1	Representor Name Frances Byrne
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I welcome the opportunity to voice my feelings and objections to the Local Plan. I live in the Aintree/Old Roan area and have witnessed the build up of through traffic over the years. Any more housing/building locally will only aggravate an at times intolerable amount of traffic.

Our local services of doctors, schools will also be greatly affected since we have already had a large number of houses built in Melling which already use our schools and doctors. We have observed the roads around our developing problems due to underground springs eroding the sub soil. I am concerned that any building near to the River Alt will disrupt the natural flow of water and create problems for the existing houses. Finally we are recently retired after working for 40 years. We really enjoy walking only a short distance to find open countryside and help lead a local walking group. This will not be available to us if the plan goes ahead.

Summary of Suggested Changes

Evidence Submitted

Policy MN2 Ain/Mell	MN2 Aintree/Melling sites
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Respondent No 867	Response Ref 1	Representor Name Lynn Caffrey
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Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I wish to make an objection to the Sefton Local plan. This plan, if implemented, will greatly change the area in which we live for the worse.

There are so many reasons why this ill thought out "plan" should not be allowed. It proposes building in the Melling and Aintree area that will have a dreadful effect on already congested roads. Due to traffic at the Aintree Retail Park we are already can't move at weekends. Two of the three major routes out of Aintree rely on single lane bridges. There are no plans to change this so any increase in traffic will only add to a worsening problem. Neither Melling nor Aintree has the appropriate infrastructure to take further building. We have no social amenities to speak of. Our bus services are limited to daytimes and are non-existent at weekends.

These issues are also reflected in our school. Aintree schools are oversubscribed with siblings having to attend different schools. There are no plans to improve this situation and building more houses will make this situation worse.

I work in the local GP surgery. We are always very busy and patients often wait a good deal of time to get the care they require. Any further developments in our area will make our plight worse. This comes on top of recent restrictions to the GP surgery in Melling. None of these issues have been addressed by the local plan. Indeed, the quality of life will be diminished.

I am also greatly concerned about the risk of flooding on the areas surrounding where houses have been built. Aintree has a number of areas that already flood and I would be happy to show you. Although residents have brought this to the council and officials this has not been addressed. I do not doubt that a good deal of work needs to take place to make land fit to build on, I am very concerned of the effects that this will have on existing properties. This is particularly true in my specific area if land adjacent to Wango Lane is built on.

Summary of Suggested Changes

Evidence Submitted

Policy MN2 Ain/Mell	MN2 Aintree/Melling sites
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Respondent No 934	Response Ref 1	Representor Name Jean Cole
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Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

The proposed development will change Aintree Village forever. So many residents have said they will move if the development happens because of all the negative impact. We are a settled community and this would be destroyed by these proposals. None of our infrastructure can cope and too many people are now wanting to move away- is this what officials want? To make people feel they need to move from their homes?

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**

Policy MN2 Ain/Mell **MN2 Aintree/Melling sites**

Respondent No 935 **Response Ref** 1 **Representor Name** David Cowley

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

My objection is the increased volume of traffic that this will cause to a already busy Ormskirk Road, Bradfield Ave, Altway and Molyneux Way.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**

Policy MN2 Ain/Mell **MN2 Aintree/Melling sites**

Respondent No 945 **Response Ref** 1 **Representor Name** P Anthony

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I object most strongly about using green belt land for any development. In North Liverpool we do not have a decent sized park. The open spaces are vital to the health and well being of the existitng community. A concrete jungle would increase stress levels. In Aintree village traffic is already a serious problem and any extra housing would make life unbearable. The roads are narrow and totally unsuitable for the heavy vehicles required for a building project. We have the worst bus service on Merseyside and no amenities whatsoever after the closure of the Library.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**

Policy MN2 Ain/Mell **MN2 Aintree/Melling sites**

Respondent No 948 **Response Ref** 1 **Representor Name** D Bradley

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I strongly object to proposed building on green belt land in Aintree village. The council has a very large plot of Brownfield sites for sale at the moment on bridle way, Netherton. This land is near to existing houses and would provide all development required without using our green belt land.

The council have just approved our sixth Gym wihtin a couple of miles. This land (JD Sports site) could have provided housing, its next to sheltered accomodation. Far more suitable for houses than green belt and to Gyms will not be able to all make money. Aintree is too busy already.

Summary of Suggested Changes

Evidence Submitted

Policy MN2 Ain/Mell MN2 Aintree/Melling sites

Respondent No 1000 Response Ref 1 Representor Name Elizabeth Wilson

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I object to the whole of this Local plan and all the proposed sites of building on Green belt land within the plan. I am aware a Local Plan is needed but this is the wrong Local Plan for Aintree.

There is an increased risk of flooding (not surface water) of existing properties and the plan to build on flood plains is insane. This area floods constantly. Drive along Aintree Lane past Wango Lane bridge in times of heavy rain and the road is flooded and often has to be closed. This is after work was done to rectify the problem.

Our road infrastructure will not cope with further homes and the heavy wagons required thundering through our already congested roads will cause untold damage to roads which have sewer pipes running through them such as Sedburgh Ave. I am aware the Oriel Drive site is not included at present but it will be again in the future as this plan is a living document.

The plan takes no account of the loss of green belt in Sefton and good agricultural land. Surely in times of food poverty this land should be used to produce crops to feed starving people. We want a Brownfield first policy in the Local Plan. There are according to Sefton Councils own figures 5,500 empty houses in Sefton. Why do we need then to build more? These vacant properties should be renovated to a living standard and made available- Sefton do not want this as it will not help their relationship with the prospective developers!

We have 2 schools full to capacity and 1 GP practice in Aintree. We are having to wait up to a week for a GP appointment now and the practice admits it could not cope with thousands more patients. Holy Rosary school in Oriel Drive has erected ballards outside the school before a child was killed, to stop parents parking and blocking the roads. So parents now park right up Oriel Drive as far as Winchester Ave blocking the roads again.

The whole area of Aintree is congested. More houses will mean more pollution and carbon emissions affecting the health of the population of Aintree. We have a pedestrian crossing at the top of Altway nearby the local shops- this was erected after 2 local residents were knocked down by a driver driving too fast turning into the slip road at Old Roan shops. The crossing is useless as most cars do not stop for pedestrians and \fyci'a take your life in your hands stepping on to the crossing! Building the retail park has caused traffic to increase a hundred fold. Sefton Council produced a traffic survey and stated the junction at Old Roan and Ormskirk Rd was "under used". This survey was carried out in school holidays! Traffic even on a Sunday down Aintree Lane to the Old Roan lights is horrendous. I and many others have sat in traffic for 20 minutes- we know — we live here! It can take my family 20 minutes to get from Switch Island past Asda superstore to my home as the traffic is so heavy.

The plan to build so many more houses is ludicrous. We have no library as Sefton Council chose to close it, we have no local banks- they were both closed and we have no facilities in this area- we cannot even get our roads cleaned. God help us if we have to contend with thousands of trucks full of aggregate to throw over flood plain land destroying our roads and environment with little concern for residents or all the wild life in the area.

Sefton Council cannot provide residents with a good standard of services now so how it will cope with extra responsibilities for more wetlands, ditches and verges beggars belief. All our services are being cut to the bone, we cannot cope with any more. Come to the area and see for yourself. Imagine what it will be like to live here in the future. Its bad enough already. A civil engineer at a recent meeting said he thought it was a joke when he read the Local Plan. That says it all!

Summary of Suggested Changes

Using brown field sites first policy to be added to the plan- not green belt land first because it would be in interest of developeprs to build on green belt.

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**

Policy MN2 Ain/Mell **MN2 Aintree/Melling sites**

Respondent No 1047 **Response Ref** 1 **Representor Name** Linda Rushton

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I would like to object to the local plan on the following grounds:

Aintree village has not got the infrastructure in place to accommodate more house building. There will be added pressure on our services the Doctors, Dentists, Schools and Hospitals.

The volume of traffic on our two main roads out of the village is already highly congested and will cause an increase in pollution and carbon emissions.

I am also very concerned about the increased risk of flooding to the existing properties, by building up this land to above river level it will cause a lack of drainage and cause flooding to the existing properties which are at a lower level than the proposed new properties.

The affordable houses being built will not be affordable as they are being built on green belt which will put a premium on them making them unaffordable.

Finally the loss of the green belt, once the houses have been built on this land it will be lost for ever.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**

Policy MN Melling **Melling Response Sheet**

Respondent No 1069 **Response Ref** 1 **Representor Name** A Wilson

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

Site A MN8.2 (tick)

Site B MN2.30 - No way

Site C MN2.31- No

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**

Policy MN Melling **Melling Response Sheet**

Respondent No 1071 **Response Ref** 1 **Representor Name** Ann Woods

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

Site A MN8.2- Good Infrastructure, proposed railway station, closer to Maghull amenities, take traffic away from Waddicar Lane, bigger site,

Site B MN2.30- Poor infrastructure, school and GP are full, minimal services, drainage probs, heavy traffic+ congestion waddicar lane not suitable

Site C MN2.31- As above

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1073 **Response Ref** 1 **Representor Name** Gerry Woods
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2- Good Infrastructure, proposed railway stn closer to Maghull amenities, take traffic from waddicar lane, bigger site.

SITE B MN2.30- Poor infrastructure, school full, GP full, Minimal services, drainage, heavy traffic/ conges, waddicar lane not up to use as ingress route

SITE C-MN2.31-As above

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1080 **Response Ref** 1 **Representor Name** Lyn Tunstall
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2-Positives:infrastructure: roads, rail, motorway,access to shops,school choice, all already in place.

SITE B MN2.30 - Positives:None Anybody buying a property would have none of the benefits of Maghull site.
Negatives: Village appeal would be lost forever, access on waddicar lane increases traffic where in places houses are close to road, noisy and dangerous

SITE C MN2.31- Positives: As above none
Negatives: Drainage in Melling is poor and added pressure would make worse. Melling has no amenities for young families or the space to provide them.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1081 **Response Ref** 1 **Representor Name** A Halsall
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN 8.2- Positives: Further away from village area

SITE B MN2.30- Positives:None
Negatives: Potential impact on Rainbow park. There are already limited childrens facilities in Melling area. Congestion on side roads.

SITE C MN2.31- Positives: None
Negatives: Potential impact on waddicar farm nursery.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1082 **Response Ref** 1 **Representor Name** Andrew Horrocks
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2 Positives: Bigger area, more shops, doctors and schools, new station to help with traffic. New houses in keeping with area of new builds.
Negatives: N/A

SITE B MN2.30 Positives: N/A
Negatives: Melling Village is already overcrowded. Traffic is worse than ever before and parking is a nightmare, more houses will add to problems.

SITE C MN2.31 Positives: N/A
Negatives: Waddicar Lane is still a fast road for cars despite road signs and bumps. Speeding cars are still an issue, more traffic will cause accidents. No public transport that could cope with extra people.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1083 **Response Ref** 1 **Representor Name** David Bamber
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: New train station, will match new builds in Maghull, closer amenities
Negatives:

SITE B MN2.30
Positives:
Negatives: Congestion, drainage, not very much transport.

SITE C MN2.31
Positives:
Negatives: Poor infrastructure, Not very much transport.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1084 **Response Ref** 1 **Representor Name** Alan Bolton
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Plenty open space also a very good road structure. Plus a new rail station?

Negatives:

SITE B MN2.30

Positives: None

Negatives: Roads cannot cope with increased traffic .

SITE C MN2.31

Positives: None

Negatives: It would be madness to build a new estate, at this location, drains could not cope also.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1085 **Response Ref** 1 **Representor Name**
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: New railway station + good infrastructure

Negatives:

SITE B MN2.30

Positives:

Negatives: Roads are not safe for potential 400 more cars.

SITE C MN2.31

Positives:

Negatives: Drainage needs updating now

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1086 **Response Ref** 1 **Representor Name** A Miller
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Closer to more amenities can fit more houses
Negatives:

SITE B MN2.30
Positives:
Negatives: To many houses built already in Melling

SITE C MN2.31
Positives:
Negatives: This is no longer a village it's a small town with no amenities what so ever.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1087 **Response Ref** 1 **Representor Name** Jonathan Lock
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Excellent links to M57+ M58, minmal disruption to residence of Maghull, Maghull has the capacity for more Housing
Negatives: None

SITE B MN2.30
Positives: Only 1 road in and out of Melling so disruption expected, Local facilities would struggle to cope, Melling PS wont have spaces for pupils, houses not required.
Negatives:

SITE C MN2.31
Positives: As above
Negatives: As above

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1088 **Response Ref** 1 **Representor Name** A F Jones
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives:

Negatives: Not wanted

SITE B MN2.30

Positives: Do not want it Melling can not take any more traffic. All over greenery is slowly going do you not care.

Negatives:

SITE C MN2.31

Positives:

Negatives: Not wanted

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1089 **Response Ref** 1 **Representor Name** Edna Lawley
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives:

Negatives: Against All

SITE B MN2.30

Positives:

Negatives: Against All

SITE C MN2.31

Positives:

Negatives: Against All

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1090 **Response Ref** 1 **Representor Name** J Cleary
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: No comment
Negatives: Cannot see anyone wanting to live there

SITE B MN2.30
Positives:
Negatives: Waddicar lane cannot carry any more traffic drains problems!

SITE C MN2.31
Positives:
Negatives: Spoiling a naturally attractive area- village becomes a sprawl.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1091 **Response Ref** 1 **Representor Name** L Green
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Easy access to motorways also close to Maghull town centre ie shops, banks etc.
Negatives:

SITE B MN2.30
Positives:
Negatives: More houses equal less greenery for Melling

SITE C MN2.31
Positives:
Negatives: Over crowded local school + less like a village if more houses are built here.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Nearer to motorway network would take the strain from the country roads.

Negatives:

SITE B MN2.30

Positives:

Negatives: Our roads around Melling are not withstanding present traffic flow an increase in massive transport capacity is not acceptable

SITE C MN2.31

Positives:

Negatives:

SITE A MN8.2

Positives:

Negatives:

SITE B MN2.30

Positives:

Negatives: Traffic flow through Melling greatly increased on an already dangerous roads. Melling is a village + does not wish to be a joined up town.

SITE C MN2.31

Positives:

Negatives: Along with traffic plans we do not have infrastructure we have a school full to capacity, one part time doctor. More building is not acceptable.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives:

Negatives:

SITE B MN2.30

Positives:

Negatives: Lack of area facilities, developers will not improve them, very poor drainage in eg archers field again developers wont address.

SITE C MN2.31

Positives:

Negatives: Much as above, builders only motivated by profit.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1094 **Response Ref** 1 **Representor Name** BE Karran
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives:

Negatives: As below

SITE B MN2.30

Positives:

Negatives: Development on Green Belt Melling has been overdeveloped for the last decade or more.

SITE C MN2.31

Positives:

Negatives:Ditto

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1095 **Response Ref** 1 **Representor Name** Susan Mooney
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Motorway access,new station infrastrucutre drainage,

Negatives:

SITE B MN2.30

Positives: None

Negatives: Green Belt good farm land. Loss of farm worker jobs. Urban sprawl, Increased traffic- country lanes. Grade 1 root crop land

SITE C MN2.31

Positives: None

Negatives: Sewage issues, overhead electric cables. Strong village community.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1096 **Response Ref** 1 **Representor Name** Stephen/Lynn Collins
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Closer to Maghull Amenities
Negatives:

SITE B MN2.30
Positives:
Negatives: Waddicar lane heavily congested, over expansion not wide enough waddicar lane.

SITE C MN2.31
Positives:
Negatives: potential extra cars, school + doctors already full drainage updating.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1097 **Response Ref** 1 **Representor Name** C Wilson
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: As a hospital/ prison already proposed the infrastrucutre will be more readily in place for roads acess to the motorway and the new proposed railway station.
Negatives: The proposed of numbers of building is too high for the amenities which presently exist residential properties so close to a prison.

SITE B MN2.30
Positives:
Negatives: lack of schooling, lack of doctors surgery/dentists in Melling. Drainage/ flooding is as the pipes are not adequate for the housing which aalready exists, The areas around melling rock- sandy/ school lane after have problems with sewage + flooding due to inadequate pipes more properties would impact on this.

SITE C MN2.31
Positives:
Negatives:

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1098 **Response Ref** 1 **Representor Name** William Driscoll
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Ideal for development close to M58 and A59
Negatives:

SITE B MN2.30
Positives:
Negatives: Green Belt land should retain so melling village already over developed.

SITE C MN2.31
Positives:
Negatives: Green Belt land should remain so Melling village already over developed.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1099 **Response Ref** 1 **Representor Name** David McGarvey
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Easy Road access
Negatives: None

SITE B MN2.30
Positives: None
Negatives: Too many cars people, no services poor drains, in this area. To accommodate more homes.

SITE C MN2.31
Positives:
Negatives: Too many cars/people not enough for the people who live here now! Poor Drains.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1100 **Response Ref** 1 **Representor Name** Erica Skelton
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Yes
Negatives:

SITE B MN2.30
Positives: No
Negatives:

SITE C MN2.31
Positives: No
Negatives:

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1101 **Response Ref** 1 **Representor Name** Pam Quigley
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Please use useless land up here, instead of agricultural land.
Negatives: No

SITE B MN2.30
Positives: See above
Negatives: Yes

SITE C MN2.31
Positives: (Tick)
Negatives: Yes

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1102 **Response Ref** 1 **Representor Name** Tony Thomas
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Undeveloped area, great traffic routes, good all round facilities, schools, shops, parks etc

Negatives: None

SITE B MN2.30

Positives: None

Negatives: Doctors no appointments available now, more people will damage this further . Dangerous road traffic levels.

SITE C MN2.31

Positives: None

Negatives:Green Site, traffic in village upto max . Drainage and sewers still not correct in Melling, no infrastructure.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1103 **Response Ref** 1 **Representor Name** J Hallahan
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: N/A

Negatives: N/A

SITE B MN2.30

Positives: Not enough drainage systems or road access.

Negatives: Overcrowding

SITE C MN2.31

Positives: Same as above

Negatives:Same as Above

Summary of Suggested Changes

Evidence Submitted

Policy MN Melling **Melling Response Sheet**

Respondent No 1105 **Response Ref** 1 **Representor Name** Sue Cutts

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Larger community. Links to Motorway bus services. Schools, shops.

Negatives: Green Belt land.

SITE B MN2.30

Positives: None

Negatives: Green Belt land. Village already big enough. Part time Drs not enough schools, no shops. No bus or train services (except 1 bus)

SITE C MN2.31

Positives: None

Negatives: As above Green Belt. Part time Drs surgery, no shops, not enough schools, country lanes. Only one bus service.

Summary of Suggested Changes

Evidence Submitted

Policy MN Melling **Melling Response Sheet**

Respondent No 1106 **Response Ref** 1 **Representor Name** Ian Doyle

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Excellent motorway links, good schools, nearby, less traffic congestion, less drainage problems for village

Negatives: None

SITE B MN2.30

Positives: Close to railway

Negatives: More congestion in Melling village, more drainage problems, Already lots of problems.

SITE C MN2.31

Positives: None

Negatives: Too much congestion, access problems village already too populated, more vehicles, drainage problems.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1107 **Response Ref** 1 **Representor Name** John Hart
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Good
Negatives:

SITE B MN2.30
Positives: Good
Negatives:

SITE C MN2.31
Positives: No
Negatives:Flood Risk

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1108 **Response Ref** 1 **Representor Name** B Thomas
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Already to be built on.
Negatives: Too much traffic.

SITE B MN2.30
Positives:
Negatives: No amenities

SITE C MN2.31
Positives:
Negatives:Green Belt

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1109 **Response Ref** 1 **Representor Name** Steven Glanister
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Good motorway links, less traffic in urban areas ie Melling + Aintree, rail network, shopping amenities
Negatives: None

SITE B MN2.30
Positives: Closer to railway than MN 2.31
Negatives: More vehicles, more population

SITE C MN2.31
Positives: None
Negatives: Poor roads, poor drains, more populated ie children, more vehicles.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1110 **Response Ref** 1 **Representor Name** S Noon
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: New station + motorway access infrastructure for the new houses in Maghull.
Negatives:

SITE B MN2.30
Positives:
Negatives: More traffic on already busy roads, loss of green belt.

SITE C MN2.31
Positives:
Negatives:

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1111 **Response Ref** 1 **Representor Name** PJ Noon
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives:

Negatives:

SITE B MN2.30

Positives:

Negatives: The roads are already over used.

SITE C MN2.31

Positives:

Negatives:

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1112 **Response Ref** 1 **Representor Name** A Owens
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Good infrastructure, close to Maghull stop near 58, reduce traffic through Melling.

Negatives:

SITE B MN2.30

Positives:

Negatives: Roads too narrow as is overdeveloped already drains, school/doctors etc.

SITE C MN2.31

Positives:

Negatives:As above

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1113 **Response Ref** 1 **Representor Name** JV Copeland
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives:
Negatives: Over development in Melling

SITE B MN2.30
Positives:
Negatives: Drainage problems

SITE C MN2.31
Positives:
Negatives: Losing to the Green Belt.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1114 **Response Ref** 1 **Representor Name**
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: No houses at all costs
Negatives:

SITE B MN2.30
Positives: No houses at all costs
Negatives:

SITE C MN2.31
Positives: No houses at all costs
Negatives:

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1115 **Response Ref** 1 **Representor Name** B McCarthy
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives:

Negatives: Will have an impact on increase in traffic.

SITE B MN2.30

Positives:

Negatives: Cant cope with existing traffic and amenities over stretched.

SITE C MN2.31

Positives:

Negatives:

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1116 **Response Ref** 1 **Representor Name** Debbie Ritchie
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Direct links onto roads designed for heavy traffic flow, shop etc, already in existence.

Negatives: Yet more houses!

SITE B MN2.30

Positives: None

Negatives: Increased traffic via waddicar Lnae, pressure on existing services.

SITE C MN2.31

Positives: None

Negatives: Increased traffic via waddicar lane, pressure on existing services.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1117 **Response Ref** 1 **Representor Name** Ann Powell
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: More space near ashworth hosp for houses.
Negatives: Once again traffic problems.

SITE B MN2.30
Positives: No positives
Negatives: Traffic heavy know we do not need more houses here.

SITE C MN2.31
Positives: No positives
Negatives: Will spoil the landscape for people living around farm site, also traffic problems.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1118 **Response Ref** 1 **Representor Name** A Harland
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Infrastructure and amenities already in place to facilitate a development.
Negatives:

SITE B MN2.30
Positives:
Negatives: Lack of amenities, Melling does not have the curretn infrastructure to cope with any further housing developments.

SITE C MN2.31
Positives:
Negatives: Lack of amenities. Melling also does not curently have the infrastructure to cope with any further housing developments.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1119 **Response Ref** 1 **Representor Name** John Higgins
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Motorway Maghull town shops/banks, infrastrucutre, rail station.
Negatives:

SITE B MN2.30
Positives:
Negatives: Expansion village infrastrucutre, negative traffic impact over expansion village.

SITE C MN2.31
Positives:
Negatives:

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1120 **Response Ref** 1 **Representor Name** Mona P Fletcher
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Much preferred to Melling
Negatives:

SITE B MN2.30
Positives: None
Negatives: No more building in Melling, far too much traffic now.

SITE C MN2.31
Positives: None
Negatives:Melling roads will not take any more traffic.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**

Policy MN Melling **Melling Response Sheet**

Respondent No 1121 **Response Ref** 1 **Representor Name** Paul Lamb

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Better schools and services, more buses + direct rail links more shops+ services.

Negatives:

SITE B MN2.30

Positives:

Negatives: Melling has a lack of facilities, Doctors, schools, bus services no shops/church very busy poor drainage/sewers

SITE C MN2.31

Positives:

Negatives:Melling has a lack of services, Doctors, schools, bus services, poor drains/sewers, no shops/church very busy.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**

Policy MN Melling **Melling Response Sheet**

Respondent No 1122 **Response Ref** 1 **Representor Name** C Collinge

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Roads will take extra traffic, better access, better rail links better school access, better access for construction traffic safer around.

Negatives: None

SITE B MN2.30

Positives: None

Negatives: 178x2 Car journeys + 356 P/D 356x7 =2192 P/W, Roads wont take extra traffic. Extra schooling needed is none extra bus needed around, no rail links.

SITE C MN2.31

Positives: None

Negatives: Wont take main services Waddicar floods now, present drains wont cope with water + sewerage roads wont take extra cars, buses, lorries etc.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1123 **Response Ref** 1 **Representor Name** Tim Ritchie
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Dwelling onto roads designed for heavy traffic now. Shops already in existence.
Negatives:

SITE B MN2.30
Positives: None
Negatives: Increased traffic via waddicar lane. Pressure on existing services.

SITE C MN2.31
Positives: None
Negatives: Increased traffic via waddicar lane. Pressure on existing services.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1125 **Response Ref** 1 **Representor Name** K Milward
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: No overdevelopment, not grenbelt, Infrastructure in place.
Negatives:

SITE B MN2.30
Positives:
Negatives: Using up Green Belt, drainage problems, overdevelopment, no facilities,

SITE C MN2.31
Positives:
Negatives: Using up Green Belt, drainage problems, overdevelopment, no facilities,

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1126 **Response Ref** 1 **Representor Name** Maggie Hannigan
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Good Infrastructure at new site
Negatives: Poor infrastructure

SITE B MN2.30
Positives: Will match new builds in Maghull.
Negatives: School full, Doctors full

SITE C MN2.31
Positives: Proposed new railway station
Negatives: drainage needs updating

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1127 **Response Ref** 1 **Representor Name** Elaine Butchard
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Proposed new railway station, closer to amenities, good road link, safe exits etc, bigger site- will fulfill Sefotn's requirements.
Negatives: No negatives from my perspective

SITE B MN2.30
Positives: Do not believe this is a positive development
Negatives: Poor infrastructure, poor drainage, minimal services, school, doctors have no capacity.

SITE C MN2.31
Positives: Do not believe this is a positive development,
Negatives: Blind bends will create a significant safety issue, poor infrastructure, Extra Cars will create congestion.

Summary of Suggested Changes

Evidence Submitted

Policy MN Melling **Melling Response Sheet**

Respondent No 1128 **Response Ref** 1 **Representor Name** L and T Shaffrey

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Closer to shops, Doctors bigger site for more houses, no traffic more on waddicar lane will match Maghull New builds.

Negatives:

SITE B MN2.30

Positives:

Negatives: Waddicar Lane cant cope with the amount of traffic already, my children play on woodland road.

SITE C MN2.31

Positives:

Negatives:Will lose the feel of the village, we have trouble with thye drains as it is, schools already full.

Summary of Suggested Changes

Evidence Submitted

Policy MN Melling **Melling Response Sheet**

Respondent No 1129 **Response Ref** 1 **Representor Name** Cheryl and Wayne Kevan

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Next to a major road network(M58) close to amenities Maghull

Negatives: None which will directly affect my household.

SITE B MN2.30

Positives: None

Negatives: Village to small to sustain more dwellings

SITE C MN2.31

Positives: None

Negatives: No public transport network, sewage/ drainage overloaded.

Summary of Suggested Changes

Evidence Submitted

Policy MN Melling **Melling Response Sheet**

Respondent No 1130 **Response Ref** 1 **Representor Name** M Egerton-Jones

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: New motorway access, Infrastructure already in place, new train station.

Negatives:

SITE B MN2.30

Positives:

Negatives: Flooding is already extensive has issue on Waddicar lane cannot take increased volume of traffic.

SITE C MN2.31

Positives:

Negatives: Insufficient facilities, transport inadequate.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1131 **Response Ref** 1 **Representor Name** Barbara and Roy Nickson
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: 1. Less disruption as new roads have already been built for the prison. 2. not as many residents to upset. 3. Station to be built, more public transport, to support the housing.

Negatives: None

SITE B MN2.30

Positives: None

Negatives: 1. Extra traffic, including lorries etc when building the houses, Waddicar cant cope. 2. More traffic fumes, especially by a nursery. 3. More dog fouling, this has been noticed since the last lot of building so it will get worse. 4. Dogs will be taken to the parks where children play. 5. No public transport to support more housing. 6. The school is not big enough to take extra children.

SITE C MN2.31

Positives:

Negatives:

Waddicar Lane cannot possibly take more traffic from 313 houses. It would appear Sefotn Council will not take notice until there is a bad accident on that road. When cars park outside the shops, the road becomes narrow. Cars cant pass. As for the Zebra crossing you take you life in your hands trying to cross there. Cars simply do not stop for you. There have been many accidents at the junction with Giddygate lane+ tithebarn lane, if 2 access roads were to be put on Waddicar Lane, where the sites are proposed, it would be too dangerous.

A MN8.2 Sitw ould be the better option. New road structures have already been built to accommodate HMP Kennet, these would serve a housing development. This would be much safer. There are not as many residents to upset by using this site. A new train station is to be built to serve HMP Kennet , this would also serve the new development. Melling doesetn even have public transport after 6:30 pm or at all on Sundays, how would this be sustainable?

If tthese housing development go ahead, I will be contacting Sefon Council to ask for a reduction in my Council Tax, as this village will no longer be a village and as it was when the Council Tax rates were asesed, plus all the inconvenience we will suffer, Melling will be ruined.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1132 **Response Ref** 1 **Representor Name** Graham and Amanda Murphy
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: This land is in need of redevelopment. Near to new train station M58 Motorway, larger roads to take traffic.
Negatives: None

SITE B MN2.30
Positives: None
Negatives: Move to Melling because small village, this would not make small village, roads unable to take traffic, drains, ASB my house decreasing in value.

SITE C MN2.31
Positives: None
Negatives: ASB-Melling more ASB if another 300 Homes built, increase in ABA, roads/Drains, farm land, wildlife.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1133 **Response Ref** 1 **Representor Name** C Lomax
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Closer to Maghull shopping centre, Main road can take the extra traffic, will match Maghull housing.
Negatives:

SITE B MN2.30
Positives:
Negatives: Waddicar Lane too narrow to takeaway more traffic, drains need updating, blind bends.

SITE C MN2.31
Positives:
Negatives: Worried for my Grandchildren playing, poor infrastructure, over expansion.

Summary of Suggested Changes

Evidence Submitted

Policy MN Melling **Melling Response Sheet**

Respondent No 1134 **Response Ref** 1 **Representor Name** Gill Jones

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Closer to Maghull which has better infrastructure, more schools, more Drs, Dentist better, bus routes, train stations, shops, pubs

Negatives: Roads would be busy. Choice of high for melling Children would be restricted to maybe 1/2 schools instead of 3.

SITE B MN2.30

Positives: None

Negatives: No infrastucutre in Melling to have more homes. Only 1 primary school, poor bus service, no Doctor appointment, no dentist, lack of shops.

SITE C MN2.31

Positives: None

Negatives:All as above

Summary of Suggested Changes

Evidence Submitted

Policy MN Melling **Melling Response Sheet**

Respondent No 1135 **Response Ref** 1 **Representor Name** Joseph Earley

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Easy access to motorways and shops. Infrastructure already in place. Bigger site. Less impact on homes.

Negatives:

SITE B MN2.30

Positives:

Negatives: Roads are too narrow, To close to the village, traffic flow, no public transport, no longer a village.

SITE C MN2.31

Positives:

Negatives:Drainage. Access to the site. Building work too close to houses. Traffic flow.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1136 **Response Ref** 1 **Representor Name** Terry Magee
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: M58 Junction, Infrastructure in place will allow less traffic into our village.

Negatives:

SITE B MN2.30

Positives:

Negatives: Poor road network, no/ poor facilities, too many cars, vans, buses at present, so more cars will cause chaos.

SITE C MN2.31

Positives:

Negatives: We have had lots of new houses recently the village cant take any more development.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1137 **Response Ref** 1 **Representor Name** T Maloney
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Close access to motorway, no disruption to local residents due to easy access to new site.

Negatives: None

SITE B MN2.30

Positives: None

Negatives: Will cause too much traffic through small roads. Congestion during rush hour, disruption to local residents during completion.

SITE C MN2.31

Positives: None

Negatives: Traffic congestion, spoiling landscape of area, disruption to local residents whilst completion of development.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**

Policy MN Melling **Melling Response Sheet**

Respondent No 1138 **Response Ref** 1 **Representor Name** B&J Mullholland

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Good infrastructure at new site, proposed new railway station, closer to Maghull amenities traffic shouldn't use waddicar lane as much bigger site to accommodate all mellings quota

Negatives:

SITE B MN2.30

Positives: None

Negatives: Waddicar lane heavily congested, school full Drs full minimal services, over expansion of the village feel waddicar lane heavily congested.

SITE C MN2.31

Positives: None

Negatives: All traffic enters/ exits village alone waddicar lane access to this site is dangerous it exists on a blind bend, poor infrastucutre, drainage needs updating.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**

Policy MN Melling **Melling Response Sheet**

Respondent No 1139 **Response Ref** 1 **Representor Name** James Barrett

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Location, softer impct, good access, possible new rail link.

Negatives: None

SITE B MN2.30

Positives: None

Negatives: Loss of village feel and community. Noise parking problems in the village, more traffic congestion, loss of scenic views, impact on House Prices.

SITE C MN2.31

Positives: None

Negatives: As above

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Good infrastructure at new site will match new buildings in Maghull. Bigger site, sloe to Maghull, shop doc, restaurant etc

Negatives:

SITE B MN2.30

Positives:

Negatives: Drainage needs updates over expansion of village. Waddicar lane heavily congested. Extra cars, road already too much morning + evening.

SITE C MN2.31

Positives:

Negatives: Poor infrastructure school full + doc full, minimal services, road not wide enough blind bends.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: The site is closer to all amenities in Maghull, it will keep much of the traffic away from Waddicar Lane which is already a problem, also creates a problem for Aintree Old Roan

Negatives:

SITE B MN2.30

Positives:

Negatives: The traffic on waddicar lane is going to be worse than ever if building goes ahead. Trying to get out of the driveway is a nightmare at times.

SITE C MN2.31

Positives:

Negatives: The drains already need attention, puddles everywhere, any extra traffic will also have effect on the roads.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1142 **Response Ref** 1 **Representor Name** Elise McDonald
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives:

Negatives:

SITE B MN2.30

Positives:

Negatives: Detrimental effect to the environment

SITE C MN2.31

Positives:

Negatives: Total waste of Green Belt land.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1143 **Response Ref** 1 **Representor Name** Henry McDonald
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: A small town needing more amenities such as new railway station

Negatives:

SITE B MN2.30

Positives:

Negatives: Negative effect on the environment. Ie noise and air pollution, roads and local services, ie police health are overstretched.

SITE C MN2.31

Positives:

Negatives: We cannot afford as a nation to lose more productive land. We cannot feed ourselves. There is an abundance of brown land.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**

Policy MN Melling **Melling Response Sheet**

Respondent No 1144 **Response Ref** 1 **Representor Name** V Davies

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Better for traffic, plenty of open spaces

Negatives:

SITE B MN2.30

Positives:

Negatives: Roads already too busy with cars cutting through.

SITE C MN2.31

Positives:

Negatives: Traffic already busy in this area, will be worse if building here.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**

Policy MN Melling **Melling Response Sheet**

Respondent No 1145 **Response Ref** 1 **Representor Name** Louise Horrocks

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Lots of transport in area, new station proposal. Various access roads such as M58. Bigger site for ability to add more housing, less traffic.

Negatives: N/A

SITE B MN2.30

Positives: N/A

Negatives: More traffic when traffic is already a problem on Waddicar Lane. Not enough public transport in area. Waddicar lane is not big enough to take extra traffic.

SITE C MN2.31

Positives: N/A

Negatives: Poor drainage, over expansion, not enough schools, shops, doctors or chemists, parking problems at amenities already, cannot park near shops or doctors now.

Summary of Suggested Changes

Evidence Submitted

Policy MN Melling **Melling Response Sheet**

Respondent No 1146 **Response Ref** 1 **Representor Name** Carol Mosey

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Closer to Maghull which already has many amenities eg Doctors, dentists, shops, etc. Regular bus services + better routes. Bigger site, so more accomodation less disruption. Roads already established, Senior schools + primary.

Negatives:

SITE B MN2.30

Positives: None

Negatives: Only one road through village which is already busy enough! Road is narrow and cant be widened, due to houses on both sides. This will lead to even heavier congestion if more houses are built off waddicar.

SITE C MN2.31

Positives: None

Negatives: Only one primary school which is full. Drains would need updating to meet needs. Our village will not be classed as a village if this goes ahead.

Summary of Suggested Changes

Evidence Submitted

Policy MN Melling **Melling Response Sheet**

Respondent No 1147 **Response Ref** 1 **Representor Name** Gillian Woods

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Infrastructure already there, near M58

Negatives:

SITE B MN2.30

Positives:

Negatives: Too much traffic already, flooding,

SITE C MN2.31

Positives:

Negatives: Too much traffic already, flooding,

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1148 **Response Ref** 1 **Representor Name** Pam Kinnear
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives:

Negatives: Too many houses already. Problems with drainage, gangs and traffic.

SITE B MN2.30

Positives:

Negatives: As above

SITE C MN2.31

Positives: Fewer residential properties.

Negatives:

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1149 **Response Ref** 1 **Representor Name** Kenneth Robinson
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Should build here as no impact on people

Negatives:

SITE B MN2.30

Positives: None

Negatives: Disruption to the Neighbourhood, devaluation to properties, safety issue

SITE C MN2.31

Positives: N/A

Negatives:

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1150 **Response Ref** 1 **Representor Name** Ian Moorcroft
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Plenty of vacant land+ old moss side Hosp + M58
Negatives:

SITE B MN2.30
Positives:
Negatives: Roads not adequate to support volume of traffic

SITE C MN2.31
Positives:
Negatives:As above

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1151 **Response Ref** 1 **Representor Name** J Al Ramadhan
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Maghull has more services and would be able to withstand more housing.
Negatives:

SITE B MN2.30
Positives:
Negatives: No infrastructure to cope with more housing

SITE C MN2.31
Positives:
Negatives:As above

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1152 **Response Ref** 1 **Representor Name** Janet Flannery
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: More suitable place as this is not over looked, but

Negatives: Theres loads of empty houses all over Sefton, why not fill all these first.

SITE B MN2.30

Positives: None

Negatives: Road congestion, overcrowded, no amenities turn into town instead of village when we moved into a rural area+ paid higher for housing. Brownfield first + empty housing, wildlife exists.

SITE C MN2.31

Positives: None

Negatives: same as above, Beautiful land + views turn into a town. Walkers, ramblers, dogwalkers all use this area, road congestion, noise pollution.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1153 **Response Ref** 1 **Representor Name**
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: great location near motorway, lots of room.

Negatives:

SITE B MN2.30

Positives: Great location but make bigger to accommodate all homes.

Negatives: Access to Melling will cause congestion. Access should be via prescot road.

SITE C MN2.31

Positives: NIL Terrible location

Negatives:Massive flood risk. Rock View floods all the time, it's the lowest point in Melling flooded 20 times+

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1154 **Response Ref** 1 **Representor Name** Hugh Porter
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives:
Negatives: To near to hospital

SITE B MN2.30
Positives:
Negatives: To much traffic

SITE C MN2.31
Positives:
Negatives:Village over loaded with housing.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1155 **Response Ref** 1 **Representor Name** T Robb
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Large new site, near to new rail station, roads not congested.
Negatives:

SITE B MN2.30
Positives: None
Negatives: Too much traffic through village, congested now drains, need to cope, not much in way of commuting to Town etc

SITE C MN2.31
Positives: None
Negatives:Same as above- with the addition of ruining the village image. No shops etc.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1156 **Response Ref** 1 **Representor Name**
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Closer to vital amenities to support this site, good infrastructure for this site, new station,

Negatives: None

SITE B MN2.30

Positives: None

Negatives: Minimal services to support such a site. Infrastructure could not cope! Schools full, Doctors full!

SITE C MN2.31

Positives: None

Negatives: Insufficient drainage to cope. There would be massive nuisance through increased traffic, waddicar could not cope!

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1157 **Response Ref** 1 **Representor Name** J Buchan
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives:

Negatives:

SITE B MN2.30

Positives:

Negatives: Big traffic problem if you like on waddicar lane. Cars on -pavements, big problem now.

SITE C MN2.31

Positives:

Negatives: Doctors + schools cant cope. Poor Bus service facilities not good hasn't changed since I lived here from 1960, much worse.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**

Policy MN Melling **Melling Response Sheet**

Respondent No 1158 **Response Ref** 1 **Representor Name** C Cuddy

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Better community facilities

Negatives: Other than for immediate Neighbours none

SITE B MN2.30

Positives: I cannot think of any positions

Negatives: waddicar lane too narrow for large amounts of traffic, poor drainage village status lost.

SITE C MN2.31

Positives: As above

Negatives:As above, poor transport + shopping facilities, no local amenities.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**

Policy MN Melling **Melling Response Sheet**

Respondent No 1159 **Response Ref** 1 **Representor Name** Julie Elliot

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Ideally located for motorway, local bus route passes through, close to local shops + amenities nearby

Negatives: Too close to high security prison

SITE B MN2.30

Positives: None

Negatives: No public transport after 6:30, no train access. Too much traffic congestion through the small village.

SITE C MN2.31

Positives: None

Negatives: Access to this site would cause manic congestion re traffic dangerous to children who use nearby facilities (scout hut) plus as above.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**

Policy MN Melling **Melling Response Sheet**

Respondent No 1160 **Response Ref** 1 **Representor Name** A Claus

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Good infrastructure, closer to Maghull amenities, traffic should not use Melling as much, will match new buils in Maghull.
Negatives: None

SITE B MN2.30

Positives: None

Negatives: Schools full, doctors full, drainage needs updating, road heavily congested as it is, would mean about 300 more cars on road, over expansion of village

SITE C MN2.31

Positives: None

Negatives: School full, doctors full, drainage needs updating, waddicar lane heavily congested, would mean about 300 more cars on road, over expansion of village.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**

Policy MN Melling **Melling Response Sheet**

Respondent No 1161 **Response Ref** 1 **Representor Name** K&A Joy

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Already good infrastructure, traffic would not use waddicar lane as much, proposed new railway station, will match Maghulls new build
Negatives: Cannot think of any

SITE B MN2.30

Positives: We do not know of any

Negatives: Will spoil Melling as a small village, no infrastructure to cope. Already too much traffic, on waddicar lane + spencers lane, and too many accidents.

SITE C MN2.31

Positives: Can think of no advantages

Negatives: As above for site B waddicar+ spencers lane not built to carry out heavy movement of traffic, + these two lanes are main exit from Melling to L,pool.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1162 **Response Ref** 1 **Representor Name** Helen Carr
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Will join onto existing housing development, train and road links in place
Negatives:

SITE B MN2.30
Positives:
Negatives: Transport infrastructure cannot cope with additional traffic, worried about child safety with increase in traffic, cont

SITE C MN2.31
Positives:
Negatives: School already over subscribed.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1163 **Response Ref** 1 **Representor Name** Derrick Martin
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Does not affect other houses, ideal for motorway, network and northway, better school facilities + health centre
Negatives:

SITE B MN2.30
Positives:
Negatives: Adding more conjection to Waddicar lane, very limited school facilitiesm very limited doctors surgery, etc sewage system will not cope with demand causing the 21 houses to flood again

SITE C MN2.31
Positives:
Negatives: As above

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1164 **Response Ref** 1 **Representor Name** Alex Pruden
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Better access to motorway access

Negatives:

SITE B MN2.30

Positives: Community feel to development

Negatives: Traffic congestion caused in Melling

SITE C MN2.31

Positives: Nice clear views to be seen from development area.

Negatives: More countryside being built upon.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1165 **Response Ref** 1 **Representor Name** P&D Hendrick
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Close to motorway + amenities, with adequate infrastructure

Negatives:

SITE B MN2.30

Positives: None

Negatives: Additional traffic on already over-stretched road network, insufficient utilities

SITE C MN2.31

Positives: None

Negatives:le sewage, drainage, lack of medical/ gp service, increase in traffic through village, increased hazards. Destruction of Greenbelt.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1166 **Response Ref** 1 **Representor Name** John Hillier
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Infrastructure will be close to Maghull facilities, less traffic through Melling.
Negatives:

SITE B MN2.30
Positives:
Negatives: Roads not wide enough, too much traffic at present, no infrastructure drain etc

SITE C MN2.31
Positives:
Negatives:As above we have had enough development already in a small village.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1167 **Response Ref** 1 **Representor Name** Philip Ledwidge
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Infrastructure will be in close to Maghull facilities, less traffic through Melling.
Negatives:

SITE B MN2.30
Positives:
Negatives: Roads not wide enough, too much traffic at present, no infrastructure drains etc,

SITE C MN2.31
Positives:
Negatives:As above we have had enough development already in a small village.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1168 **Response Ref** 1 **Representor Name** Graham Pugh
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Excellent links to M58 and M57, limited impact on existing properties, larger site providing scope for more dwellings
Negatives:

SITE B MN2.30

Positives: Increased footfall for local businesses
Negatives: Increased traffic through main road, already busy, impact on adjacent properties of noise and view, large QTY of houses will change the village/community feel.

SITE C MN2.31

Positives: Increased footfall for local businesses.
Negatives: Increased traffic through main road- already busy, impact on adjacent properties of noise and view, large city of houses will change the village/community feel.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1169 **Response Ref** 1 **Representor Name** Pauline Oakley
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives:
Negatives:

SITE B MN2.30

Positives: None
Negatives: Traffic problems on already busy road

SITE C MN2.31

Positives: none
Negatives:

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1170 **Response Ref** 1 **Representor Name** K Heron
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: 4 Major roads+ motorway
Negatives: None comes to mind

SITE B MN2.30
Positives:
Negatives: Increase in traffic, one way in and one way out.

SITE C MN2.31
Positives:
Negatives: As above Melling is a village not a town.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1171 **Response Ref** 1 **Representor Name** Joanne Witterick
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives:
Negatives: We feel that building houses will have an adverse effect on the environment.

SITE B MN2.30
Positives:
Negatives:

SITE C MN2.31
Positives:
Negatives:

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1172 **Response Ref** 1 **Representor Name** Elizabeth Mitchell
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Access to motorway, local shops and amenities, close to high schools
Negatives: None

SITE B MN2.30
Positives: None
Negatives: Increase of traffic on an already busy lane, not enough shops and schools, sewage + main water drains not able to cope, this was a problem with the village estate for many years.

SITE C MN2.31
Positives: None
Negatives: Same negatives as B above

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1173 **Response Ref** 1 **Representor Name** Jacqui Neill
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Bigger site than Melling, proposed new station, easy motorway access.
Negatives:

SITE B MN2.30
Positives: None at all for positive suggestions
Negatives: No capacity in school/docs or amenities. Will cause heavy congestion.

SITE C MN2.31
Positives: None at all for positive suggestions
Negatives: In the village which won't feel like a village at all! Waddicar Lane not wide enough as it is.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1174 **Response Ref** 1 **Representor Name** C Armstrong
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Near main traffic routes, more local schools, revenue for local shops, area already set up for housing, drains/water etc.
Negatives: None

SITE B MN2.30

Positives: None, our local area would not benefit from any additional houses.
Negatives: Over populated area, infrastructure would not cope with increased traffic, small roads cannot cope with any further increase in traffic. Our drainage system cannot cope already!

SITE C MN2.31

Positives: None, would take away the beauty of Melling village!
Negatives:

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1175 **Response Ref** 1 **Representor Name** Alan Unsworth
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: 1. less disruption to the lovely village of Melling. 2. Good motorway links. 3. Less disruption. 4. A more accessible location.
Negatives:

SITE B MN2.30

Positives:
Negatives: 1. It would cause excessive traffic problem thru the village. 2. destroy green space. 3. have a negative impact.

SITE C MN2.31

Positives:
Negatives:1. Excessive traffic problems 2. destroy Melling village heritage and green space 3. Have a detrimental effect on the community.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1176 **Response Ref** 1 **Representor Name** C Clarke
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: New Railway station, bigger site to accommodate the extra traffic + people

Negatives:

SITE B MN2.30

Positives:

Negatives: Drainage, school and doctors full, congestion, road not made for that amount of traffic, accidents (blind bends) Village not big enough to accommodate this.

SITE C MN2.31

Positives:

Negatives:

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1177 **Response Ref** 1 **Representor Name** Phil King
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives:

Negatives:

SITE B MN2.30

Positives: None

Negatives: All the above + can't guarantee sales

SITE C MN2.31

Positives: None

Negatives: All the above + can't guarantee sales

Summary of Suggested Changes

Evidence Submitted

Policy MN Melling **Melling Response Sheet**

Respondent No 1178 **Response Ref** 1 **Representor Name** Terence Clarke

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: More amenities, better infrastructure, closer to main schools, trains and buses, No flooding more modern sewage,

Negatives:

SITE B MN2.30

Positives:

Negatives: Doctors surgery full, infrastructure under pressure, sewage system over capacity with regular over flooding

SITE C MN2.31

Positives:

Negatives: This field constantly floods, infrastructure for this area is already under pressure, sewage system out dated, drains have to be emptied regularly, doctors surgery over subscribed.

Summary of Suggested Changes

Evidence Submitted

Policy MN Melling **Melling Response Sheet**

Respondent No 1179 **Response Ref** 1 **Representor Name** B Carr

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: No potential disruption to nearby housing estates, on a main route to Maghull not disrupting a village.

Negatives: N/A

SITE B MN2.30

Positives: N/A

Negatives: spoiling beautiful green belt, country walks/views, increased traffic on country lane/narrow + potentially dangerous.

SITE C MN2.31

Positives: N/A

Negatives: Traffic congestion, over population of a small village, no more walks with country views.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1180 **Response Ref** 1 **Representor Name** Clare Hobson
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Close to Motorway, close to rail links, close to shops, not an already congested area

Negatives:

SITE B MN2.30

Positives:

Negatives: Traffic would be a major issue, cars speed down waddicar, road floods regularly due to inadequate drainage for amount of houses.

SITE C MN2.31

Positives:

Negatives: Congestion, speeding cars, inadequate drains, already over-subscribed schools in the area.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1181 **Response Ref** 1 **Representor Name** Frank Armstrong
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Close to M58 and Maghull infrastructure

Negatives:

SITE B MN2.30

Positives: 0

Negatives: Further impact the overstretched drainage system that has already caused issues since the village was built.

SITE C MN2.31

Positives: 0

Negatives:

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1182 **Response Ref** 1 **Representor Name** Stephen Bird
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Area is more open to build on, new railway station is planned, road system is less congested

Negatives:

SITE B MN2.30

Positives: None

Negatives:Already congested- roads/transport, sewers/drains, school facilities, doctor facilities, litter around area is not cleaned satisfactory now.

SITE C MN2.31

Positives: None

Negatives:Already congested- roads, sewers/drains, school facilities, doctor facilities, litter in area is not cleared satisfactory now.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1183 **Response Ref** 1 **Representor Name** R Soo
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: A good road system in this area for more houses to benefit from.

Negatives:

SITE B MN2.30

Positives:

Negatives: Waddicar lane is too narrow for more traffic to take another 300 houses , the drains wouldn't cope with more houses, they just about cope now.

SITE C MN2.31

Positives:

Negatives:

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1184 **Response Ref** 1 **Representor Name**
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives:

Negatives:

SITE B MN2.30

Positives: None

Negatives: Infrastructure of Melling not able to cope with additional traffic, loss of green space.

SITE C MN2.31

Positives: None

Negatives: Roads not able to cope with additional traffic, house prices affected.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1185 **Response Ref** 1 **Representor Name** P Hulme
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Good infrastructure at site, closer to Maghull amenities, traffic stays out of our village

Negatives:

SITE B MN2.30

Positives:

Negatives: No infrastructure, Doctors/schools cant take more, poor drainage, roads too small, traffic issues

SITE C MN2.31

Positives:

Negatives: As above

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**

Policy MN Melling **Melling Response Sheet**

Respondent No 1186 **Response Ref** 1 **Representor Name** Caroline Connell

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Better road access more surrounding space.

Negatives:

SITE B MN2.30

Positives: Better road access, more surrounding space

Negatives: Impact on already failing drainage. Already strained roads/schools+ doctor access.

SITE C MN2.31

Positives: None

Negatives: No simple road access, strain on already failing drainage, not enough school space, roads already over-crowded, already resource stretched for doctors.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**

Policy MN Melling **Melling Response Sheet**

Respondent No 1187 **Response Ref** 1 **Representor Name** P Corrigan

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Good infrastructure, close to Maghull area, bigger site for quota, less traffic in wadd, new railway st

Negatives: None

SITE B MN2.30

Positives: None

Negatives: School full, doctors full, drainage a problem, waddicar heavily congested.

SITE C MN2.31

Positives: None

Negatives: Over expansion, minimal services, traffic will be horrendous.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1188 **Response Ref** 1 **Representor Name** Joanne Harris
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Have lots of schools, have more public transport, lots of health facilities, lots of local amenities. A lot more space to cope with more traffic.

Negatives: None

SITE B MN2.30

Positives: None

Negatives: Congestion, not adequate public transport, not enough school places already. Doctors not open enough to cope with current patients. Don't have enough varied local amenities. Melling is a village not a town.

SITE C MN2.31

Positives: None

Negatives:

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1189 **Response Ref** 1 **Representor Name** John Harnick
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Good infrastructure at new site, less traffic through our village

Negatives:

SITE B MN2.30

Positives:

Negatives: Poor infrastructure, land flooding, narrow roads.

SITE C MN2.31

Positives:

Negatives: As above.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Site is best for new houses base infrastructure amenities more bountiful than sites B MN2.30 and C MN2.31, less traffic than Waddicar lane sites would generate.

Negatives:

SITE B MN2.30

Positives: There is no positive outcome from this proposed new housing estate for current residents. Current green belt land would be lost. Only profit seekers and Sefton Council would benefit.

Negatives: This would generate even more road traffic to an already large volume, onto a narrow, bendy, country lane. A reduction in the quality of life, an increase in danger to the public. No gain whatsoever to residents, only a decrease in life quality.

SITE C MN2.31

Positives: As above

Negatives: This would have a similar dreadful effect as above but if the traffic is routed down Rainbow Drive then this raises danger levels in Rainbow Drive, which also feeds onto Wheeler Drive where the junior school is sited. A very bad arrangement.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

Local Plan- Site B -1. limited, dangerous traffic access for cars etc, rainbow drive already a racetrack. 2. Distance to public transport route insufficient. 3. Suitability of ground- ie present collection of surface water + drainage ditches. 4. Public footpath, Site C- 1. loss of local facilities which could damage the area: ie Nursey, kennels+ cattery etc. 2. Loss of jobs for local people. 3. Public footpath. 4. Dangerous traffic routes-chapel lane. 5. Safety interruption to local church. 6. Suitability of grounds- ie collection of surface water and crossing ditches. 7. Lack of public transport and insufficiency.

B+C- Both sites are poorly located for integration into local and national travel, infrastructure compared to site A. No easy access to shops or businesses inc schools.

Site A- Much better position for travel to local and national travel. Wider + safer roads rather than lanes. This area has more local business and employment than B+C.

* Sites B+C - Disturbance of wildlife-frog,toads, definite- hedgehogs, probably- bats?

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1192 **Response Ref** 1 **Representor Name** Joyce Tanner
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

To Melling Parish Council.
I found all the maps of the proposed area to be too small to get an accurate picture of the intended access in relation to sites B+C, I do not have a computer so could not access the website. I feel that Melling will become an overpopulated residential area, with insufficient infrastructure to take the heavy load of extra traffic- commercial as well as private- trying to get out of the area or pass through it, having major roads and two motorways as boundaries. I can't therefore make any preference and can only hope that neither sites are passed.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1193 **Response Ref** 1 **Representor Name** John Wilson
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Closer to new development of proposed Maghull north station, best site of three
Negatives: None

SITE B MN2.30
Positives:None
Negatives: Impacts on services- schools + sewage. Eats into greenbelt, strain health provision

SITE C MN2.31
Positives: None
Negatives: As site B

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1194 **Response Ref** 1 **Representor Name**
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives:

Negatives: Over development in Melling

SITE B MN2.30

Positives:

Negatives: Drainage wont take any more work

SITE C MN2.31

Positives:

Negatives: Closing Green Belt.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1195 **Response Ref** 1 **Representor Name** Joyce Tanner
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives:

Negatives: This area is already designated for scott clinic

SITE B MN2.30

Positives:

Negatives:

SITE C MN2.31

Positives:

Negatives:

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1196 **Response Ref** 1 **Representor Name** J Nelson
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: None
Negatives: Concerns regarding security

SITE B MN2.30
Positives: None
Negatives: Increased traffic on waddicar lane, only part time G.P can school take more pupils, poor public transport.

SITE C MN2.31
Positives: None
Negatives: Same as above also possible drains problems.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1197 **Response Ref** 1 **Representor Name**
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Would not cause congestion, good public transport links, rail stations within walking.
Negatives: No negatives, easy access good motor way access.

SITE B MN2.30
Positives:
Negatives:

SITE C MN2.31
Positives: None
Negatives: Will block village waddicar lane already to busy, poor drains (never been updated)

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1198 **Response Ref** 1 **Representor Name** E Martin
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: More open space
Negatives:

SITE B MN2.30
Positives:
Negatives:

SITE C MN2.31
Positives:
Negatives:

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1199 **Response Ref** 1 **Representor Name** Sarah Aldwinckle
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Good infrastructure at new site proposed new railway station
Negatives:

SITE B MN2.30
Positives: None
Negatives: Por infrastructure, dangerous traffic levels/speed/bends already a problem.

SITE C MN2.31
Positives: None
Negatives: No parking on roadside, poor drainag minimal amenities, school + dr full. No public transport.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1200 **Response Ref** 1 **Representor Name** Louise Sneddon
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: More space, less impact to access roads

Negatives:

SITE B MN2.30

Positives:

Negatives: strain on drains, schools, doctors, shops, roads

SITE C MN2.31

Positives:

Negatives: Not enough doctos/schools/road-space. Only 1 major road in Melling which is already failing due to lack of space along with increased road usage.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1201 **Response Ref** 1 **Representor Name** Steven Gerard
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Space available, road infrastructure, amenities nearby

Negatives: Behind prison, proximity to high security mental hospital.

SITE B MN2.30

Positives: Would release locked in housing market lack of supply.

Negatives: Road infra, not big enough, not enough schools, local amenities too small, destroy greenbelt, environment issue

SITE C MN2.31

Positives: None

Negatives: Road infr not big enough, not enough schools, local amenities too small, destroy greenbelt.

Summary of Suggested Changes

Evidence Submitted

Policy MN Melling **Melling Response Sheet**

Respondent No 1202 **Response Ref** 1 **Representor Name**

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Bigger site to accommodate all Mellings quota, less traffic on waddicar lane.

Negatives:

SITE B MN2.30

Positives:

Negatives: Waddicar Lane heavily congested, poor infrastructure, over expansion of village feel, waddicar lane not wide enough for traffic.

SITE C MN2.31

Positives:

Negatives: Poor infrastructure, over expansion of village feel, waddicar lane not wide enough for traffic+ heavily congested

Summary of Suggested Changes

Evidence Submitted

Policy MN Melling **Melling Response Sheet**

Respondent No 1203 **Response Ref** 1 **Representor Name** Eddie Bucknall

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Better location for access to major town like Maghull + Kirkby

Negatives:

SITE B MN2.30

Positives: Green space park close by

Negatives: Local facilities ie school/doctors/shops already strained.

SITE C MN2.31

Positives:

Negatives: Not enough space, complicated road access, not enough green outdoor space, close to current residents, additional strains on drainage/roads.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1204 **Response Ref** 1 **Representor Name** Pauline Mac
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Close links to M58, better infrastructure.

Negatives:

SITE B MN2.30

Positives: Traffic going to + from new estate could miss Waddicar lane if they turned right out of estate.

Negatives: Impact on infrastructure + drains

SITE C MN2.31

Positives: Housing already established which would make access difficult + more cars on small road (chape lane) could be dangerous, these fields flood.

Negatives: These fields, houses at Rock view+ house at the village which enclose the field are all at different levels so how will this be solved.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1205 **Response Ref** 1 **Representor Name** Kevin Hermanson
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Closer to many amenities, has capacity to accommodate increase in population.

Negatives: None

SITE B MN2.30

Positives: None

Negatives: Local Amenities will have insufficient capacity to cope with increase in population

SITE C MN2.31

Positives: None

Negatives: Local amenities will have insufficient capacity to cope with any increase in population.

Summary of Suggested Changes

Evidence Submitted

Policy MN Melling **Melling Response Sheet**

Respondent No 1206 **Response Ref** 1 **Representor Name** Gary Reid

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Good infrastructure, new railway station, less likely to use Waddicar lane, closer to Maghull amenities.

Negatives:

SITE B MN2.30

Positives:

Negatives: No proposed new roads, No amenities, more traffic will use Waddicar Lane, no new schools prop

SITE C MN2.31

Positives:

Negatives: No new roads proposed, ie access to M57 OR M58. Drainage system cannot cope as it is now.

Summary of Suggested Changes

Evidence Submitted

Policy MN Melling **Melling Response Sheet**

Respondent No 1207 **Response Ref** 1 **Representor Name**

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Site is best for new houses, base infrastrucutre amenities more bountiful than sites B MN2.30 and C MN2.31 less traffic than Waddicar lane sites would generate.

Negatives:

SITE B MN2.30

Positives: There is no positive outcome from this proposed new housing estate for current residents. Current green belt land would be lost. Only profit seekers and Sefton Council would benefit.

Negatives: This would generate even more road traffic to an already large volume, onto a narrow, bendy, country lane. A reduction is the quality of lide, an increase in danger to the public. No gain whatsoever to residents, only a decrease in life quality.

SITE C MN2.31

Positives: As above site B

Negatives: This would have a similar dreadul effect as above but if the traffic is routed down Rainbow Drive then this raises danger levels In Rainbow Drive, which also feeds onto Wheeler Drive where the junior School is sited. A very bad arrangement.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1208 **Response Ref** 1 **Representor Name** Nicola Murphy
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Close to proposed new railway station, close to shops etc, better road network,
Negatives: Close to ashworth

SITE B MN2.30

Positives:

Negatives: Roads too narrow, drainage poor needs renewing, schools + doctors already full

SITE C MN2.31

Positives:

Negatives: Road is too narrow already, too many accidents, loss of village feel.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1209 **Response Ref** 1 **Representor Name** Robert Aldwinckle
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Access to motorway, more land, ease the congestion to waddicar lane.
Negatives:

SITE B MN2.30

Positives:

Negatives: waddicar lane is a lane not a motorway, already over loaded.

SITE C MN2.31

Positives:

Negatives: The landscape will be lost forever, poor drainage + congestion!

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1210 **Response Ref** 1 **Representor Name** Ann Gilpin
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: More amenities, more schools, better roads,

Negatives:

SITE B MN2.30

Positives:

Negatives: Schools too small in Melling, heavy congestion in Village, busy enough

SITE C MN2.31

Positives:

Negatives: Waddicar Lane could not take traffic, poor amenities in Melling, poor drainage.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1211 **Response Ref** 1 **Representor Name** Mark Gilpin
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Better amenities, schools, Drs, shops etc, better roads

Negatives:

SITE B MN2.30

Positives:

Negatives: traffic to village would be dangerous, high levels as it is, very poor amenities, schools too small

SITE C MN2.31

Positives:

Negatives: Poor drainage, poor as it is! Poor services ruin village feel.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1212 **Response Ref** 1 **Representor Name** Marilyn Connell
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Good infrastructure, new railway station and close motorway. Close to amenities, less traffic on narrow roads of Melling. Can accommodate Mellings Quota.

Negatives: Do we need these new houses or is this politics. Plenty of unused houses elsewhere.

SITE B MN2.30

Positives: None

Negatives: Poor infrastructure, Inadequate Drainage, congested waddicar Lane already dangerously busy, loss of precious agricultural land.

SITE C MN2.31

Positives: None

Negatives:As above

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1213 **Response Ref** 1 **Representor Name** Paul Milliken
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives:

Negatives:

SITE B MN2.30

Positives:

Negatives:Waddicar Lane heavily congested

SITE C MN2.31

Positives:

Negatives:Drainage needs updating

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1214 **Response Ref** 1 **Representor Name** Gillian Doherty
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Close to motorway, closer to new railway station, Maghull has better public transport, Maghull has better amenities.

Negatives:

SITE B MN2.30

Positives:

Negatives: Village cant cope with extra traffic, not enough public transport, schools full, doctors full.

SITE C MN2.31

Positives:

Negatives:Waddicar Lane cant cope with more traffic, constant problems with drains.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1215 **Response Ref** 1 **Representor Name** Herbert J Dowell
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: The proposed railway station would eliminate a lot of traffic, the amenities are already in place (schools etc.) This is a much bigger site than C.

Negatives:

SITE B MN2.30

Positives: No Positives

Negatives: Same as site C

SITE C MN2.31

Positives: No positives

Negatives:Services such as Drains, schools, Doctor, are already, stretched to the limit. Waddicar lane is already congested at peak times. Access to site will be on a blind bend.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1216 **Response Ref** 1 **Representor Name** Samantha Owens
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Proposed new railway station, closer to Maghull amenities, restaurants, shops etc

Negatives:

SITE B MN2.30

Positives:

Negatives: Traffic (blind bends) school doctors are full.

SITE C MN2.31

Positives:

Negatives:Over expansion, heavy congestion.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1217 **Response Ref** 1 **Representor Name** Mr&Mrs Scully
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: This site would be ideal for building all of the 313 houses, the other 2 Green Belt sites are earmarked for.

Negatives: None

SITE B MN2.30

Positives: No positives

Negatives: Its Green Belt, good farmland, has crops growing in it every year for the past 41 years.

SITE C MN2.31

Positives: No positives

Negatives: Green Belt with limited access

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1218 **Response Ref** 1 **Representor Name** Beryl Ireland
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Large enough for 313 houses- not green belt!
Negatives: None- brown field site.

SITE B MN2.30
Positives: No positives
Negatives: Green Belt- farmed every year for food for the past 40 years!

SITE C MN2.31
Positives: No positives
Negatives: Greenbelt farming land

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1219 **Response Ref** 1 **Representor Name** Lawrence Reeves
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Of the three, I would suggest that this area is better placed to support increased traffic.
Negatives: Why is this site protected but the others not, is Melling viewed as an easier target?

SITE B MN2.30
Positives: None, The area would become more congested than it already is.
Negatives: The road network in this area would not support the additional dwellings and there is virtually no public transport.

SITE C MN2.31
Positives: As above
Negatives: As above, in addition, it would spoil the local area to lose open green spaces.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1220 **Response Ref** 1 **Representor Name**
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: The infrastructure at this location lends itself to the placing of housing in this location.

Negatives:

SITE B MN2.30

Positives:

Negatives: Will encroach on an already heavily populated area with limited facilities for the population density.

SITE C MN2.31

Positives:

Negatives: Will encroach on an already heavily populated area with limited facilities for the population density. No suitable access from an already busy road.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1221 **Response Ref** 1 **Representor Name** Les Mooney
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: New station, gas available, power available, Motorway access

Negatives:

SITE B MN2.30

Positives: None

Negatives: Lack of doctors, few shops, traffic issues, loss of green belt , no leisure facilities

SITE C MN2.31

Positives: None

Negatives: No Gas, sewage issues, poor drainage, overhead electricity, traffic+ bottleneck issues, loss of green belt, grade 1 agricultural land, root crop

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1222 **Response Ref** 1 **Representor Name** Lynne Hughes
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Better public transport, easier to access to schools/doctors/shops
Negatives: Fragments Melling

SITE B MN2.30
Positives: Decent place to live
Negatives: Loss of green belt, increase in traffic, poor GP surgeries, no community infrastructure.

SITE C MN2.31
Positives: As above
Negatives: As above

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1223 **Response Ref** 1 **Representor Name** Louise Hughes
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Good transport network+ good public transport provision
Negatives: Loss of green belt land

SITE B MN2.30
Positives: None I can think of
Negatives: Lack of public transport, no local community, infrastructure, shops etc, poor GP services, school places limited, loss of greenbelt land, spoil community feel of tithebarn lane, volume + speed of traffic.

SITE C MN2.31
Positives: As above
Negatives: Lack of public transport, no local community, infrastructure, shops etc, poor GP services, school places limited, loss of greenbelt land, spoil community feel of tithebarn lane, volume + speed of traffic.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1224 **Response Ref** 1 **Representor Name** Marion Simmons
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Looks like a larger site than both of the others 2. (no mention of number of potential dwellings) little impact on existing residents/
Negatives: Any potential security issues for new residents?

SITE B MN2.30

Positives: Increased housing provision.

Negatives: 178 dwellings - how many residents anticipated? Adults+ children in excess of 500! We have v poor existing medical facilities, when will respond to the need of a growing population.

SITE C MN2.31

Positives:

Negatives:Development here has the greatest potential to disrupt the lives of mere residents than either A or B. Property prices will fall as a result of new build.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1225 **Response Ref** 1 **Representor Name** J Hargreaves-Brady
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Further away from Melling

Negatives:

SITE B MN2.30

Positives:

Negatives: Adding to already over populated area, too close to Melling village, Not enough schools/amenities, too much traffic. Loss of green space.

SITE C MN2.31

Positives:

Negatives:same

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1226 **Response Ref** 1 **Representor Name** Sid, Lil and Lucy Blakeman
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: No impact on the surroundings. Close to Bus + Rail connections, closer to shops, schools + motorway.

Negatives: None

SITE B MN2.30

Positives: None

Negatives: Increase in traffic within + through the village. Increased pressure on water utilities+ the environment.

SITE C MN2.31

Positives: None

Negatives:Overwhelming impact on the village with increased traffic. Over loading the waste water+ sewerage system, which is currently very problematic, floods etc.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1227 **Response Ref** 1 **Representor Name** Phil Quinn
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: No impact on infrastructure, area isolated

Negatives: None apparent

SITE B MN2.30

Positives: More revenue

Negatives: Traffic congestion, loss of green belt

SITE C MN2.31

Positives:

Negatives:Traffic congestion loss of landscape.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1228 **Response Ref** 1 **Representor Name** C Mason
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Less traffic through village, close to Maghull shops etc
Negatives:

SITE B MN2.30
Positives:
Negatives: Roads cannot cope, far too busy, no infrastructure

SITE C MN2.31
Positives:
Negatives:As above

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1229 **Response Ref** 1 **Representor Name** V Jarvis
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Far enough away to not effect Melling
Negatives:

SITE B MN2.30
Positives:
Negatives:Not suitable for, drains, roads, school,

SITE C MN2.31
Positives:
Negatives:Not suitable for drains, roads,

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1230 **Response Ref** 1 **Representor Name** S&D Lamb
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Bigger site to accommodate the buildings, less traffic at Waddicar Lane, good infrastructure in place.

Negatives: The people living in area wont like it.

SITE B MN2.30

Positives: None

Negatives: Traffic will be a nightmare, infrastructure is poor, not enough services for expansion, loss of our village.

SITE C MN2.31

Positives: None

Negatives:Traffic + speeding too much, doctors wont be able to cope, minimal services available.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1231 **Response Ref** 1 **Representor Name** A Perry
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Better access to Road/rail transport, buses, close to schools, shops, pre-school nursery.

Negatives:

SITE B MN2.30

Positives:

Negatives: Poor traffic access. Waddicar Lane already has too much traffic using it. Poor facilities for young people.

SITE C MN2.31

Positives:

Negatives:Waddicar Lane and its traffic problems. Access to the site, poor/no facilities for young people. Developing greenspaces.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1232 **Response Ref** 1 **Representor Name** Diane Oconnell
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Nearer Maghull facilities, M58 making bigger, less traffic for Melling.

Negatives:

SITE B MN2.30

Positives:

Negatives: Poor drainage, no facilities, poor traffic control.

SITE C MN2.31

Positives:

Negatives: As above

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1233 **Response Ref** 1 **Representor Name** Sarah Stott
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Better transport links, better local facilities, closer schools with higher intakes, not too close to Waddicar lane as this is already busy enough.

Negatives: None

SITE B MN2.30

Positives: None

Negatives: Not enough places for children(increase in anti social behaviour will occur) school can't cope, road is busy enough, nursery schools are not able to facilitate this for 3 year olds.

SITE C MN2.31

Positives: None

Negatives: Too close to nursery which is already quite full for 3 year olds.access is too close to houses. Doctors surgery is already full.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1234 **Response Ref** 1 **Representor Name** David Knowles
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Good links to motorway + services
Negatives:

SITE B MN2.30
Positives:
Negatives: narrow roads + increased throughout undesirabel

SITE C MN2.31
Positives:
Negatives: narrow roads + increased throughout undesirabe

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1235 **Response Ref** 1 **Representor Name** J Mcnab
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Roads much better + less likeley to affect the village. Only one site + less heavy machines travelling through village, proposed new rail station.
Negatives: None that we can see.

SITE B MN2.30
Positives: None!
Negatives: Traffic is already over the top, adding more will be awful. Already hard to get doctors app, all this is ruining the village.

SITE C MN2.31
Positives: None!
Negatives:All of the above.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1236 **Response Ref** 1 **Representor Name** R Kurs
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Dependent on size of site, this area maybe able to cope with additional traffic congestion.

Negatives:

SITE B MN2.30

Positives: None

Negatives: Road infrastructure, not fit for the additional traffic congestion this site would bring to the area.

SITE C MN2.31

Positives: None

Negatives:As above plus the invasion of privacy to current dwellings. Also, huge impact on wildlife in area.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1237 **Response Ref** 1 **Representor Name** Graeme Teague
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Good access, decent road structures already in place.

Negatives:

SITE B MN2.30

Positives: None

Negatives: Would cause major congestion on waddicar lane. Small school could not cope with influx of families.

SITE C MN2.31

Positives:None

Negatives:As above

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1238 **Response Ref** 1 **Representor Name** B Mullholland
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Near new proposed railway station, better access to surrounding areas, good access to Maghull shops and amenities.
Negatives: None

SITE B MN2.30

Positives: None

Negatives: More traffic, more emissions+ pollution on Waddicar Lane, loss of green belt land farming community added pressure on local services- doctor+ school. Due to shape of Waddicar restricted access could be dangerous.

SITE C MN2.31

Positives:

Negatives:

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1239 **Response Ref** 1 **Representor Name** Robert Warrilow
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Site would be a better link to the motorway.
Negatives:

SITE B MN2.30

Positives:

Negatives: I think development in these areas would have a negative impact on the school, and it would be too many houses for an already overcrowded village.

SITE C MN2.31

Positives:

Negatives: These areas are already overcrowded, it would impact on the traffic and environment.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1240 **Response Ref** 1 **Representor Name**
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: There are never any positives however we do need housing if this is what we have to give up then we need to plan for a community centre or similar this applies for all these sites. This is a good place for houses if you have too.

Negatives:

SITE B MN2.30

Positives: These 2 in the village could be worse it will only effect 16 houses.

Negatives: Traffic: but please no more widening roads.

SITE C MN2.31

Positives: These 2 in the village could be worse it will only effect 16 houses. Suit local business.

Negatives: Traffic the roads ill cope

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1241 **Response Ref** 1 **Representor Name**
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives:

Negatives: None

SITE B MN2.30

Positives: None

Negatives: Increase in traffic congestion, negative environmental changes.

SITE C MN2.31

Positives: None

Negatives: Overloading on ahead stretched sewerage system. Negative impact on village too much traffic + change.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Not on main road, new entrance to site exists as was to be prison. Better amenities close to Maghull.

Negatives:

SITE B MN2.30

Positives:

Negatives: Poor access straight onto waddicar lane, no amenities, poor public transport, excess traffic on Waddicar lane, problems for existing residents.

SITE C MN2.31

Positives:

Negatives: Poor access, no amenities, poor public transport, excess traffic on Waddicar Lane, problems for existing residents.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Good Access, no nearby residential properties, minimal disruption

Negatives: None

SITE B MN2.30

Positives: None

Negatives: Increases traffic through already busy Melling, Building work noise general disruption.

SITE C MN2.31

Positives: None

Negatives: As above

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1244 **Response Ref** 1 **Representor Name** G Lee
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Will not affect the already infrastructure problems of Waddicar Lane.

Negatives:

SITE B MN2.30

Positives:

Negatives: More traffic on Waddicar Lane, bad infrastructure already poor public transport, part time doctors, over subscribed school.

SITE C MN2.31

Positives:

Negatives:

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1245 **Response Ref** 1 **Representor Name**
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: More facilities for peopl in Maghull.

Negatives:

SITE B MN2.30

Positives: None

Negatives: Melling is now already over populated yet has no services or facilities whatsoever.

SITE C MN2.31

Positives: None

Negatives:We need a better bus service not more houses. Leisure centre, doctors, shops etc.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1246 **Response Ref** 1 **Representor Name** Stephen Baines
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Better transport links

Negatives:

SITE B MN2.30

Positives:

Negatives: Overlooked/loss of privacy, highway safety, traffic generation, noise + disturbance, loss of greenbelt land, nature conservation landscaping

SITE C MN2.31

Positives:

Negatives: Road access, loss of trees, smells, solar panels, layout + density of buildings.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1247 **Response Ref** 1 **Representor Name** Steve Shaw
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Seems to be less built up. Close to motorway.

Negatives:

SITE B MN2.30

Positives:

Negatives: Not enough facilities ie schools shopping, increased traffic, drainage system wont cope.

SITE C MN2.31

Positives:

Negatives: Same as site B

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Near to new train station, near to M58 reducing traffic on Prescott Rd assuming opening M58 up in switch island direction.

Negatives: Already plans to go ahead with large site, added traffic to prescot Rd.

SITE B MN2.30

Positives: Smaller sites, easy access to Kirby train station, ease congestion on Prescott Rd.

Negatives: Green Belt already heavily built up area, road links not as good, M58 will not be opened.

SITE C MN2.31

Positives: As above

Negatives:Green- But as above

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Greater transport links, nearer amenities, away from Green Belt, new train station for easy commuting.

Negatives: None

SITE B MN2.30

Positives: None

Negatives: spoil look and feel of village, ruins Greenbelt

SITE C MN2.31

Positives: None

Negatives:As above

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1250 **Response Ref** 1 **Representor Name** R&J Molloy
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Will not impact too much on Melling
Negatives:

SITE B MN2.30
Positives: None
Negatives: Increase in traffic on Waddicar Lane, we have no shops to speak of , no bus service.

SITE C MN2.31
Positives: None
Negatives: No facilities, no schools , no buses, traffic a nightmare, no shops.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1251 **Response Ref** 1 **Representor Name** Lynda Robinson
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Good access or easier opportunity to develop,bad networks/motorways.
Negatives:

SITE B MN2.30
Positives: None
Negatives: More houses to increase surface run off+ higher risk of flooding. Already overhoused area. Roads/ Infrastructure not in place.

SITE C MN2.31
Positives: None
Negatives: More houses to increase surface run off + higher risk of flooding in area already poor. Already overhoused area, roads/ infrastructure not in place.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1252 **Response Ref** 1 **Representor Name** H Carberry
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Infrastructure already there, facilities in place, lots of schools, to choose from, access to motorway.

Negatives: None

SITE B MN2.30

Positives: None

Negatives: Flood risk road, no shops, not adequate school to small, no facilities, noise building works,

SITE C MN2.31

Positives: None

Negatives: No shops, school to small to accommodate, no facilities, road inadequate for increased, noise, traffic.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1253 **Response Ref** 1 **Representor Name** Kevin Carberry
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Great Road network, roads generally quiet, close to major facilities in Maghull.

Negatives:

SITE B MN2.30

Positives: None

Negatives: Waddicar Lane inadequate for increased traffic, school inadequate in size. No leisure facilities, limited shopping, too many houses already, loss of open space, congestion on main road already, inconvenience to day to day life of residents.

SITE C MN2.31

Positives:

Negatives:

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1254 **Response Ref** 1 **Representor Name** Graham Cutts
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Better infrastructure, better amenities, better bus service,
Negatives: Green Belt land.

SITE B MN2.30
Positives:
Negatives: No amenities, no infrastructure, no bus service, too much traffic, Green belt land,

SITE C MN2.31
Positives:
Negatives: No amenities, no infrastructure, no bus service, too much traffic, Green belt land,

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1255 **Response Ref** 1 **Representor Name** M Raworth
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Its nearer m-ways + big roads that exist. Melling village is tiny + the amenities + roads which cant cope.
Negatives: None really but I still think Melling needs to stay as it is a little village!

SITE B MN2.30
Positives: Whilst there are less houses here it is less built up (prescot + glovers brow) I still want Melling to be a village but this is more outskirts.
Negatives: At rush hour waddicar lane + glovers brow is so over congested, it becomes unsafe and inconvenient.

SITE C MN2.31
Positives:
Negatives: This village cant take more cars + people. It doesnt have enough shops etc. Waddicar Lane cant handle it and I like having a small village.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1256 **Response Ref** 1 **Representor Name** Colin Sharrock
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Infrastructure already in place- closer to: local amenities, public transport+ local medical facilities.

Negatives:

SITE B MN2.30

Positives:

Negatives: Current infrastructure unable to support proposed plans. Lack of quite a number of local facilities.

SITE C MN2.31

Positives:

Negatives: Current infrastructure unable to support proposed plans. Lack of quite a number of local facilities.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1257 **Response Ref** 1 **Representor Name** Sandra Lackey
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Local shops, transport, easier access,

Negatives: None

SITE B MN2.30

Positives: None

Negatives: Too much traffic thru Melling, Insufficient doctors, shops, amenities, not enough schools.

SITE C MN2.31

Positives: None

Negatives: Drainage/flooding, too much traffic, insufficient amenities, loss of green belt.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1258 **Response Ref** 1 **Representor Name** D Beaumont
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: It will be close to new train station and business park. Good motorway links, close to good facilities in Maghull.
Negatives: None

SITE B MN2.30

Positives: None

Negatives: Destroying green space that is valued by the community, adding to an already congested village.

SITE C MN2.31

Positives: None

Negatives: Limited amenities already, roads already not able to cope with current traffic.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1259 **Response Ref** 1 **Representor Name** Eileen Pennington
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: An obvious infil that doesn't impact too much on other residents
Negatives: Proximity of Ashworth+ proposed scott clinic may put buyers off.

SITE B MN2.30

Positives: Looks like an obvious place to build to link present dwelling in Kirkby+ Melling.

Negatives: Has access been taken into consideration? Can drainage cope? What about school + doctor's surgery being able to take extra numbers.

SITE C MN2.31

Positives: Appears to link older dwellings with the newer village estate.

Negatives: Low lying, may add to current drainage problems, can schools, doctors etc cope? Proposed access not in a good place.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1260 **Response Ref** 1 **Representor Name** Rachel Tomlinson
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Ideal because of motorway and planned train station.
Negatives: No negatives

SITE B MN2.30
Positives: None
Negatives: This village is already full- and adding more houses would badly impact waddicar lane which is already too busy!

SITE C MN2.31
Positives: None
Negatives: Same as above- we do not have the facility or infrastructure for this- we are a village not a town.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1261 **Response Ref** 1 **Representor Name** Mike Rawling
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: My preference, land which is available and viable.
Negatives: None

SITE B MN2.30
Positives: None
Negatives: Will impact upon quality of life in Village.

SITE C MN2.31
Positives: None
Negatives: Will impact upon quality of life in Village.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1262 **Response Ref** 1 **Representor Name** Vicky Magill
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Bigger site
Negatives: None

SITE B MN2.30
Positives: None
Negatives: Lack of school, lack of surgery

SITE C MN2.31
Positives: None
Negatives: Lack of school, lack of surgery

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1263 **Response Ref** 1 **Representor Name** Carmen Nickless
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Better able to cope with increase in population, larger roads, more amenities.
Negatives: ?People would have to live so close to ashworth.

SITE B MN2.30
Positives: None
Negatives: Increase in population would put strain on Melling ie- increase in traffic, medical services, schools etc.

SITE C MN2.31
Positives: None
Negatives:As site B MN2.30

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Better access, more roads, nearer to shops, more local facilities and bus services.

Negatives:

SITE B MN2.30

Positives:

Negatives: Poor access for more traffic, already stretched local doctors etc, limited bus service, destruction of wildlife habitat.

SITE C MN2.31

Positives:

Negatives: Only one main road going through the village. Destruction of wildlife habitat, not enough local services ie doctors, dentists etc.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Motorway access for good transport links. Better shopping area. Nearer to the schools, especially to secondary schools.

Negatives:

SITE B MN2.30

Positives:

Negatives: Poor transport links. Few shops, less schools, fewer doctors surgeries.

SITE C MN2.31

Positives:

Negatives: Poor transport links, small country roads, less schools, fewer doctors surgeries, fewer shops.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1266 **Response Ref** 1 **Representor Name** P&L Clarke
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Excellent road infrastructure already in place that could handle increased traffic that a new housing development would generate.

Negatives:

SITE B MN2.30

Positives:

Negatives: Increased housing would add to an already overcrowded village road system.

SITE C MN2.31

Positives:

Negatives: See above reason.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1267 **Response Ref** 1 **Representor Name** Stacey Barrington
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Less houses in and around surrounding area. Less impact on current residents + resources.

Negatives: None

SITE B MN2.30

Positives: None

Negatives: The village isnt equipped for any increase in houses shops, public services etc.

SITE C MN2.31

Positives: None

Negatives:as Site B.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1268 **Response Ref** 1 **Representor Name** Lindsay Rea
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Near motorway, good transport links + public transport, less congestion.

Negatives: For all of them, loss of land, over population, lose village feel, more congestion, less available school places/doctors/shops, safety, extra traffic congestion. Less available school places, support structure eg doctors/ shops + traffic.

SITE B MN2.30

Positives: N/A

Negatives: For all of them, loss of land, over population, lose village feel, more congestion, less available school places/doctors/shops, safety, extra traffic congestion. Less available school places, support structure eg doctors/ shops + traffic.

SITE C MN2.31

Positives: N/A

Negatives:For all of them, loss of land, over population, lose village feel, more congestion, less available school places/doctors/shops, safety, extra traffic congestion. Less available school places, support structure eg doctors/ shops + traffic.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1269 **Response Ref** 1 **Representor Name** P Anderson
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Direct route to the motorway. Reduced impact on existing residential areas. Road infrastructure supports increased traffic volume.

Negatives:

SITE B MN2.30

Positives:

Negatives:Increased traffic in existing residential area.

SITE C MN2.31

Positives:

Negatives:Increased traffic in existing residential area.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1270 **Response Ref** 1 **Representor Name** Lyn Joyce
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Less houses in this area, therefore less impact on the community, area could accomodate sjhops and a new bigger school.

Negatives:

SITE B MN2.30

Positives:

Negatives: More road congestion, would need more shops to accommodate more hyouses- school already to the max. Where would all these new children of the area go to school?

SITE C MN2.31

Positives:

Negatives:More road congestion, would need more shops, school would not be big enough, where would new school be?

Pollution in the area, taking away green belt land (fields)

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1271 **Response Ref** 1 **Representor Name** Anthony Beyga
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Loads of land and space, plenty of schools in Maghull, money could be spent on improving present amenities in Melling.

Negatives:

SITE B MN2.30

Positives:

Negatives: More traffic, little enough countryside without taking more, no school available.

SITE C MN2.31

Positives:

Negatives:Melling school is only small, we want to stay as Melling village not town.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1272 **Response Ref** 1 **Representor Name** Peter McDermott
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: New homes, plenty of jobs, new railway station, closer to shops in Maghull.
Negatives: None

SITE B MN2.30
Positives: None
Negatives: Should use brown sites, Make better use of it, prime green belt land.

SITE C MN2.31
Positives: None
Negatives: Flooding drainage, too many cars on road in + out of Melling.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1273 **Response Ref** 1 **Representor Name** C Bartley
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: A lot less built up area. Proposed new railway, bigger site can accommodate all proposed housing.
Negatives:

SITE B MN2.30
Positives:
Negatives: poor drainage already in this area, waddicar lane already has heavy traffic, over expansion of village.

SITE C MN2.31
Positives:
Negatives: Doctor and schools cant accommodate. Adding more new build sot an area that has already had lots.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1274 **Response Ref** 1 **Representor Name** Sarah Powell
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Less traffic through melling.
Negatives:

SITE B MN2.30
Positives:
Negatives: Road too small, no infrastructure.

SITE C MN2.31
Positives:
Negatives: same as above.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1275 **Response Ref** 1 **Representor Name** Dawn McDermott
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Good infrastructure, proposed new railway, close to Maghull amenities, ie shops, Drs etc. Bigger site to match Mellings quota.
Negatives: None

SITE B MN2.30
Positives: None
Negatives: Drainage/flooding, congestion, waddicar lane not wide enough/blind bends for extra traffic, one main road, In/out village cant set agricultural land.

SITE C MN2.31
Positives: None
Negatives: Flooding + drainage issues. Infrastructure inadequate eg drs, schools, loss of green belt, agricultural, increased traffic on already congested roads. Main road not wide enough, was built for a small village.

Summary of Suggested Changes

Evidence Submitted

Policy MN Melling	Melling Response Sheet
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Respondent No 1276	Response Ref 1	Representor Name
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Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Proposed new railway station, closer to Maghull amenities, shops, doctors, etc) alleviate traffic congestion on waddicar lane, bigger site to accommodate all Melling quota.

Negatives:

SITE B MN2.30

Positives:

Negatives: Minimal services, bad drainage, not enough schools + doctors, waddicar lane would become heavily congested+ exits on dangerous bends.

SITE C MN2.31

Positives:

Negatives: Village made into town with minimal amenities, bad drainage, waddicar lane heavily congested, road dangerous as it is, not nearly enough services.

Summary of Suggested Changes

Evidence Submitted

Policy MN Melling	Melling Response Sheet
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Respondent No 1277	Response Ref 1	Representor Name
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Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: Established infrastructure, close to motorway links, no loss of green belt land.

Negatives: None

SITE B MN2.30

Positives: None

Negatives: Will bring extra traffic and loading on an already stretched area. Loss of farm/pasture land.

SITE C MN2.31

Positives: None

Negatives: As above, the area is already overloaded, no bus services or facilities for young family. In an over stretched area. Loss of green belt.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1278 **Response Ref** 1 **Representor Name** Philip Marsh
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Closer to Maghull amenities, new railway station, traffic shouldn't use waddicar lane as much.
Negatives:

SITE B MN2.30
Positives:
Negatives: School full, doctors full, poor infrastructure, minimal services, drainage needs updating.

SITE C MN2.31
Positives:
Negatives: School full, doctors full, poor infrastructure, minimal services, drainage needs updating.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1279 **Response Ref** 1 **Representor Name**
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2
Positives: Closer to Maghull amenities, will match new builds in Maghull,
Negatives: Poor infrastructure.

SITE B MN2.30
Positives: Traffic shouldn't use waddicar lane as much.
Negatives: Over expansion of village feel, waddicar lane heavily congested.

SITE C MN2.31
Positives: Bigger site to accommodate all Melling quota.
Negatives: Drainage needs updating, road not wide enough.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1280 **Response Ref** 1 **Representor Name** Len and Jo Maguire and Broughton
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives:

Negatives: Prescott road is not able to take additional traffic. No infrastructure damage to houses due to increased traffic . Noise.

SITE B MN2.30

Positives: Extension of existing housing with shops, public transport links.

Negatives: Village no longer classed as village, Incoming strangers. Increased traffic strain on existing facilities.

SITE C MN2.31

Positives: As site B MN2.30

Negatives:As Site B MN2.30

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1281 **Response Ref** 1 **Representor Name** Jennifer Leavitt
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives: A) access to Motorway,B) Easier access to site, C) Not a built up area.

Negatives:

SITE B MN2.30

Positives: Site not suitable

Negatives: A) Built up area. B) Limited shop amenities. C) Limited bus route. D) Limited child area

SITE C MN2.31

Positives: Site not suitable

Negatives: A) Built up area. B) Limited shop amenities. C) Limited bus route. D) Limited child play area

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** MN2 Aintree/Melling Sites **Other Documents**
Policy MN Melling **Melling Response Sheet**
Respondent No 1282 **Response Ref** 1 **Representor Name** Wendy Edward
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SITE A MN8.2

Positives:

Negatives:

SITE B MN2.30

Positives:

Negatives: More children, less school places, congestion.

SITE C MN2.31

Positives:

Negatives: Not enough room in surgery, bus/transport.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.30 **Other Documents**
Policy MN2.30 **Land east of Waddicar Lane, Melling**
Respondent No 14 **Response Ref** 1 **Representor Name** Anita Pruden
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

- 1) Pollution by more cars using the road that was never built for this heavy traffic.
- 2) Schools would be over subscribed with more families moving into area
- 3) Dr's Surgery for Melling only opened for three days so the impact of more patients would make people wait longer for a doctor's appointment.
- 4) Land gets water logged so where would the water go if concreted over?
- 5) Public transport only exists of one main bus to Liverpool when it comes.
- 6) This land is agriculture so needs to be preserved.
- 7) More cars mean more problems with speeding on the narrow road that runs through Melling.
- 8) We already have to put up with the noise and pollution from the M57 and M58 this would make it worse.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.30 **Other Documents**
Policy MN2.30 **Land east of Waddicar Lane, Melling**
Respondent No 56 **Response Ref** 2 **Representor Name** Marjorie Harvey
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Traffic from the Melling sites will proceed down Waddicar Lane, Spencers Lane and Bull Bridge Lane. Have you ever tried to cross Bull Bridge Lane? It is very difficult especially at peak times. You can wait 5-10 mins. I feel sorry for existing residents of Melling. They have a part time doctor and are expected to travel to Kirkby. No thought is given to schools, doctors and increased traffic.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.30 **Other Documents**
Policy MN2.30 **Land east of Waddicar Lane, Melling**
Respondent No 64 **Response Ref** 2 **Representor Name** KJ Trainer
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

This will lead to more cars in a place with small lanes. No local shops of buses. Most people in Melling use their cars.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.30 **Other Documents**
Policy MN2.30 **Land east of Waddicar Lane, Melling**
Respondent No 82 **Response Ref** 1 **Representor Name** Steve Graves
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I wish to raise my concerns why the full Melling parish has not been considered, just because it falls the wrong side of the motorway cannot be made as an excuse. Having previously visited your workshop at the scouts hut in Melling in September last year I voiced concerns re traffic management. Waddicar over the last ten years has had far more new build homes built than any other area of Sefton. Flooding is an issue. It's alright building properties and then leaving the problems for residents to find solutions after everybody has departed. The area cannot cope with any more vehicles as vehicles from Kirkby already use Waddicar as a cut through and putting slip road at M58 would not solve the problem. I'm totally against any new build housing in the area apart from any brown belt sites that could be redeveloped.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.30 **Other Documents**
Policy MN2.30 **Land east of Waddicar Lane, Melling**
Respondent No 235 **Response Ref** 1 **Representor Name** Ian Whiley
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

I am in favour of development at site S144 (off Waddicar Lane) as this provides adequate access and egress to the location and it is possible to have multiple access and egress to assist with the flow of traffic. This development location will slightly extend the village of Melling but I feel that this will become acceptable as it will be less damaging to the environment and has potential to extend, rather than have numerous sites, why not just extend this to take the volume of houses required for Melling and the local development plan? It is near to local schools and provides access to local amenities.

However I am extremely concerned that the current sewerage system and infrastructure will not be able to cope with the additional demand/traffic. However having this as the site and the only development within Melling will result in some of the volumes of traffic being diverted away from the village towards Kirkby and the M58 via Prescott Road for their daily commutes.

Summary of Suggested Changes

Evidence Submitted

Policy MN2.30

Land east of Waddicar Lane, Melling

Respondent No 381

Response Ref 1

Representor Name Benedict Cleary

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

In general I object to the overlooking of brownfield sites and redevelopment of existing traditional residential areas in favour of an over proportionate use of greenfield sites. In particular, as a resident of Melling I object to sites MN2.30 and MN2.31. There are many reasons why these sites are not appropriate, however I am basing this objection around three main points:

1) Road Access/Safety Melling effectively has one main through road (Waddicar Lane/Spencers Lane) with access to all of the housing branching off it. This was adequate for the size of development pre 1980, but with the extensive building that has gone in the area in the last 20 years this main through route has already become extremely busy for such a small road with blind bends in several places. The best example of this is at the Spencers Lane end. The result is that there is no longer a safe cycle route in and out of Melling. To add another 300+ households (likely to equate to another 500+ cars/vans) would be wholly inappropriate. Furthermore, the location of these sites would mean that the entrances to them would involve junctions at areas where the visibility along the road is quite restricted due to the curves in the road therefore increasing the prospect of accidents especially involving children.

2) Environment & Infrastructure The increased housing in the area in the last 20 years has resulted in major drainage issues in Melling. Concreting over significant areas and then increasing the load on the drainage system will undoubtedly lead to further issues therefore requiring significant investment in the infrastructure in the area and given that the area is low lying between the Melling Rock area to the West and the highpoint of Prescott Road to the East, will probably require pumping facilities to cope with the volumes.

3) Amenities Melling has only a handful of shops and one single form entry primary school which is already fully subscribed. Speaking as a governor of the primary school I am extremely concerned about the impact all of the additional households would have upon the school which only has a relatively small amount of grounds severely limiting the possibility to extend the premises. Being a community school, the school would naturally want to accommodate any members of the community wanting to attend but simply would not be able to do so. Extending the school into it's own grounds would have a severe negative effect on the school's environment and it's ability to make educational use of it's open space and nature trail. Even if a satisfactory way to extend the accommodation could be found, this would have to be completed before the housing otherwise families would be moving in to the area either with no school places available for their children or with their children having to attend an overcrowded school which would not be beneficial to any of the pupils. I sincerely hope that you will reconsider your adoption of this Local Plan and objectively reconsider the available use of existing brownfield sites.

Summary of Suggested Changes

The option of focusing primarily on brownfield sites would make the plan Justified.

Evidence Submitted

Chapter 6	Plan Order Site MN2.30	Other Documents
Policy MN2.30	Land east of Waddicar Lane, Melling	
Respondent No 382	Response Ref 1	Representor Name Elisabeth Cleary
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I object to using valuable agricultural land for building, while overlooking brownfield sites. It does not make sense to increase the population of an area while taking away its food production capacity. In particular, as a resident of Melling I object to sites MN2.30 and MN2.31. Melling is a rural area and must stay so. It is a farming area with fertile fields which must not be destroyed for

building houses – particularly while there are large areas of brownfield available and while there are plenty of existing residential areas in desperate need of redevelopment within Sefton. Destroying good agricultural land, while existing residential areas fall into disrepair (and become derelict) is a sign of irresponsible management of housing needs. It is a short sighted approach which appears to be driven by narrow-minded profiteering. I would have expected Sefton Council not to join into that sort of politics. I expect a good council to make good use of their resources: -

Preserve existing residential areas which have an existing infrastructure and bring them up-to-date with the 21st century -
Protect prime agricultural land from being permanently destroyed (in particular site MN2.30) - Preserve the character of its rural areas so people have recreational spaces to enjoy in their spare time (footpaths, views, etc.) - particularly site MN 2.31 is a very picturesque, irreplaceable part of Melling and must be protected!

Summary of Suggested Changes

Preserve existing residential areas which have an existing infrastructure and bring them up-to-date with the 21st Protect prime agricultural land from being permanently destroyed (in particular site MN2.30) Preserve the character of its rural areas so people have recreational spaces to enjoy in their spare time (footpaths, views, etc.) - particularly site MN 2.31 is a very picturesque irreplaceable part of Melling and must be protected! Concentrate work on brownfield sites, improve existing residential areas and please leave the Greenbelt alone!

Evidence Submitted

Policy MN2.30 Land east of Waddicar Lane, Melling

Respondent No 387 Response Ref 1 Representor Name JR & B Mulholland

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

It is nearly 2 years since we first received information of Sefton’s Local Plan. The points I made then were in response to an article in the Local Paper and are relevant today. I have based my comments after reading “a Local Plan for Sefton” in the Champion newspaper. I have read each section and thought about how in my opinion it affects Melling.

Environment – the protection of our heritage

Melling is an ancient village mentioned in the Domesday Book. The church is a landmark which at the moment can be seen across the fields from all areas and is a beautiful sight.

The footpath from Waddicar Lane to the church, pub and beyond is known as the PADS. There is always a feeling of tranquillity and a real feel-good factor walking up the pads. When I was teaching, I used these same fields and paths to introduce my inner city 4-6 year old pupils to rural life- showing them the various crops grown throughout the farming year. In my opinion this whole area should be a Conservation Area.

The Green Belt here is so important to all of us. Once concreted over it is lost forever. Waddicar has the largest concentration of houses in Melling. This area has a post office, a small grocers shop, chemist, chip shop, barber/hairdresser and beauty parlour. The doctors surgery now operates 2½ days per week but is full and the local school is fully subscribed. There is one bus every ½ hour to Liverpool and one Maghull circular to serve a population in the area of roughly estimated over 2,000.

It stands to reason that most people will have to use cars elsewhere for practically everything. A reasonable estimate of extra cars on the local roads would be at least 200.

The fact that Waddicar Lane has already become a major route for traffic of all sizes and speeds. IThe build-up begins between 4:30 and 5am Monday – Friday and is relentless until 9am. Evening peak begins around 4pm till 6:30. During the day there is a steady stream – we cannot just drive out of our path anymore.

More houses means many more cars on this already busy road increasing pollution and carbon emissions.

Another problem would be the exit onto Waddicar Lane from the new sites MN2.30 and M2.31. We find it unbelievable that anyone could even think about this but then again they have. Chapel Lane might seem an obvious choice but this is a dangerous bend for both cars and pedestrians. Woodland Road is another awkward road to exit.

Drainage – in the past rainwater had always drained off the fields and down the road drains but for several years now Waddicar becomes virtually impassable at times during the ever increasing rain storms. We have been in contact with the Council drainage dept. many times with worries over flooding from cars driving far too fast on the lane causing our garage and front drive to flood. We are always given the same reason “the drains can’t cope”. What will happen with more cars/houses serving them?

Infrastructure: The information sheet states “Council policies will require that new developments must not make existing conditions worse”.

How? An impossibility on Waddicar Lane I think.

Health and Safety: The information states it will restrict uses that have a negative impact upon health e.g. those that cause pollution and result in high traffic levels in sensitive areas such as residential areas and schools. We have both on or near Waddicar Lane.

New Jobs: Our concerns would be that not only would there be much more traffic from new houses but people travelling from all areas for whatever reason to a new business park in Maghull would create an even bigger problem on Waddicar Lane.

Since making these comments on our objection to Sefton Council in Sept 2013 we now find that Melling, historic village is under threat from industrial sprawl! Peel holdings is already marketing over 100 hectares of grade 1 agricultural land in and around our village for grand scale industrial sheds with a link road to the motorway across Melling land. If Sefton Council agrees their planning application (not submitted yet) the traffic problems would be enormous as Waddicar Lane is the entrance and exit to Melling and beyond.

Traffic: The amount of cars and lorries using this lane everyday makes it a dangerous place to be at times. The lane was never

designed for today's world. It is narrow in places and bendy in others, some parts of the pavement allow single file walking only. It can be unnerving walking along at times. Speeding is an everyday occurrence – the 30 mph sign has little or no effect and observing the zebra crossing cannot be taken for granted. I am worried that extra traffic coming off the motorway (which they already do) will be unsustainable in this rural area.

These worries are based on the experiences of living on Waddicar Lane for 37 years. Observations on Melling: Change to society and lifestyles have had a huge impact on Melling. Facilities are few and between with the closure of many shops and Melling c/e school over the years.

Public transport is much worse than it was in the '60s though many young people who used it then are the pensioners who need it today. Building more estates to exit on to Waddicar Lane will turn Melling into a commuter's corridor instead of a rural village.

With the worry about Peel Holdings plans too, I feel we are being attacked on all sides.

To sum up, our main objections are:-

- The loss of Green Belt land.
- The amount of traffic on Waddicar Lane. Every builder in the past said there would not be a problem but there have been.

But, being pragmatic, if it was an either/or situation we would say, the site identified by Melling parish Council MN8.2 is the lesser of all evils because it would preserve the history of Melling and hopefully some of the traffic along Waddicar Lane.

In Sept 2014 Sefton's planning committee rejected a proposal to build 100 houses on Green Belt land between Aintree and Melling. Bill Esterson MP who submitted his own formal rejection added "firstly the site for this proposed developed is green belt land. Sefton Council has a policy that states green belt land should not be built upon unless there are 'exceptional circumstances'. There were no such circumstances in this case.

I don't believe the roads here would be able to cope with such a large increase in traffic that 100 new homes would generate. That goes for sewage and flood management.

The impact on existing schools places and other local facilities would have been hugely detrimental to these communities". Maghull and Aintree Champion 24 Sept 2014. – I think this says it all.

Summary of Suggested Changes

Remove Sites MN2.30 and MN2.31 as allocations in the plan.

But, being pragmatic, if it was an either/or situation we would say, site MN8.2 is the lesser of all evils because it would preserve the history of Melling and hopefully some of the traffic along Waddicar Lane.

Evidence Submitted

Chapter 6	Plan Order Site MN2.30	Other Documents
Policy MN2.30	Land east of Waddicar Lane, Melling	
Respondent No 492	Response Ref 14	Representor Name
Organisation Name Craig Seddon SIPP		
Obj/Sup/Com Objection		

Summary of Main Issues

Land east of Waddicar Lane (Site MN2.30) is a 6ha site identified for 178 dwellings. The site is allocated in the UDP as falling within the Green Belt. The Site Assessment Form (reference SR4.28) identifies that there is existing congestion and speed issues on Waddicar Lane and that it would be necessary for any developer to address this. The Assessment Form states that the Council consider a single access off Waddicar Lane would be appropriate but continues that a Transport Assessment will be necessary, which will also need to assess the cumulative impacts of the scheme, given the proposed allocation at Wadacre Farm, Chapel Lane (MN2.31).

Without having already undertaken this assessment it is questioned whether a single access point to serve private vehicles associated with 178 new dwellings is appropriate and whether the surrounding road network has the capacity to accommodate both the Land east of Waddicar Lane site and the Wadacre Farm site. Given the Assessment Form has already identified existing road safety issues and the potential for the scheme to impact upon the wider highway capacity in terms of its cumulative impacts, until an assessment has been undertaken which proves otherwise, this must be considered a Tier 1 constraint.

In assessing sustainable transport, the Assessment Form contradicts itself. Under Accessibility Improvements it states that significant improvements to provide better connections to schools and local amenities would be required. But in the Conclusion it states, the site is accessible to public transport and services. 75% of the site comprises grade 3a 'best and most versatile agricultural land'. Were the site developed this would result in the loss of 4.5ha of grade 3a agricultural land.

Our client agrees with the Council's assessment that the proposed northern Green Belt boundary would be weak, given the clear, open views to the north. Given the potential for significant or severe access and network capacity constraints, it is questioned whether the site can be delivered as a Housing Allocation in the Local Plan.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.30	Other Documents
Policy MN2.30	Land east of Waddicar Lane, Melling	
Respondent No 563	Response Ref 1	Representor Name A Watson
Organisation Name		
Obj/Sup/Com Objection		

Summary of Main Issues

I'm writing in objection to the removal of greenbelt land, as set out in the local plan. With regard to site SR 4.28 [MN.2.30], in the draft local plan it was announced that sites would be developed in accordance with their net densities.

Less than 0.4 hectares = 100%
0.4 hectares -2 hectares = 90%
2 hectares-5 hectares =75%
Over 5 hectares = 50%

As site is 5.37 hectares then this site can only be developed up to 50% instead of the 75% as being shown. This site has poor access onto Waddicar Lane and Melling doesn't have the infrastructure to satisfy nearly three hundred houses being built in the village, especially on top quality agricultural land.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.30	Other Documents
Policy MN2.30	Land east of Waddicar Lane, Melling	
Respondent No 595	Response Ref 6	Representor Name Jonathan Clarke
Organisation Name	Knowsley Council	
Obj/Sup/Com	Comment	

Summary of Main Issues

There are three proposed allocations in the Melling / Waddicar area. We would welcome the opportunity to work with Sefton Council when considering the impact that these developments cumulatively would have on the highway network in and around Kirkby.

We anticipate that Knowsley Council and residents adjacent to the proposed allocations in the Kirkby Park area will be appropriately consulted on any future planning applications adjacent to Knowsley's boundary in line with statutory requirements.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.30	Other Documents
Policy MN2.30	Land east of Waddicar Lane, Melling	
Respondent No 643	Response Ref 2	Representor Name Chad Thompson
Organisation Name	Melling Parish Council	
Obj/Sup/Com	Objection	

Summary of Main Issues

Melling Parish Council objects with the proposed site MN2.30 for the following reasons:

- 1.Housing targets are too high which are not justified, deliverable or environmentally acceptable which is evidenced by the completed surveys submitted with this form
- 2.The loss of Green belt around Melling and creating urban sprawl which has already occurred in the Borough. The Green belt around Melling prevents coalescence to Maghull and Kirkby which further development would go against the purpose of the Green belt.
- 3.There would be a loss of best and most versatile agricultural land, farming communities and food production for the future
- 4.The sites are incompatible with advice in National Planning Policy Framework on promoting sustainable transport and supporting the move to a low carbon future. There is a new train station site (MN3, IN2) proposed which is within 500 metres away from the NM8.2 site. Developing on sites MN2.30 and MN2.31 would encourage driving to the station and other amenities to Maghull and Aintree. If development was built on MN8.2 there would be less traffic as there would be access to the train station.
- 5.The MN2.30 site would spread out unacceptably towards the adjacent to the Green Belt area which is Knowsley and would contribute towards coalescence.
- 6.The sites re in a natural flood plain. Any development on this land and the lack of drainage will cause flooding to existing properties. (See evidence letter from United Utilities Sewer Flooding Mitigation Team submitted with this form). Sites are unsuitable for development / housing as existing housing already suffers from flooding. Site MN2.31 is adjacent to Rock Lane which already has current issues which cannot be mitigated against.
- 7.Added pressure on services such as Doctors surgery and primary school which both are full to capacity and over stretched based on public participation and engagement with the School Head Teacher.
- 8.Further housing development would have a greater impact on current infrastructure issues and challenges such as: High levels of traffic flow especially on Waddicar Lane which is far from suited to frequent heavy vehicles, poor public transport with no service on a Sunday, inadequate retail or leisure facilities and incidences of overflowing drains - both rainfall and foul. The evidence was based on surveys admitted with this form and at Melling Parish Council meetings under public participation agenda item.
- 9.A previous petition of approximately 673 signatures was presented to Sefton MBC objecting to further development in Melling during the Local Plan consultation in September 2013 (evidence submitted with this form).
- 10.Concerns about robustness of the figures being used in the draft local plan for Seftons population in future years. Mellin'gs development has seen considerable growth over the past decade.
- 11.Loss of wildlife which has been raised at Melling Parish Council meetings under public participation agenda item and Neighbourhood planning consultation events.

The safeguarded site NM8.2 has a potential capacity of 350 and we would like to request that this site to be used as a preferred site and that sites MN2.30 and MN2.31 be taken out of the Local plan as preferred sites and not allocated for future development.

Summary of Suggested Changes

Evidence Submitted

Policy MN2.30

Land east of Waddicar Lane, Melling

Respondent No 661

Response Ref 7

Representor Name

Organisation Name PSA Developments

Obj/Sup/Com Objection

Summary of Main Issues

This 5.37 hectare site (Site MN2.30) is located to the north of Waddicar and is being considered for release to accommodate 141 dwellings.

Para 8.137 of the Local Plan [Preferred Option] describes Waddicar (Melling) as "a Residential village". That is clearly the case. It has practically no support infrastructure, and none is planned. The village has come to resemble something of a dormitory settlement, whose original village character has been severely eroded. It is the classic 'commuter village'. Is this therefore ideal settlement in which to promote two sizeable housing allocations when better sites are available elsewhere in more sustainable locations - such as PSA Developments Ltd's site off Bulls Bridge Lane, Aintree?

The site has been selected on the basis that any development would have a "minimal impact" on the openness of the green belt as it would be "rounding off" between the existing development on Waddicar Lane and Tower Hill.

PSA Developments Ltd maintain that it is more logical to release sites on the edge of the main built up area of sefton and liverpool (such as their site at Bulls Bridge Lane (ref AS19)), where infrastructure is in place to absorb the impact of an increased population. How can it possibly be suggested that housing development on this entirely open, flat, prominent agricultural site would have "minimal impact" on openness?

How would development of this site constitute "rounding off"? The site protrudes prominently to the north of the settlement. This is not rounding off working to obvious boundaries. Instead, it is clear and blatant protrusion into the open green belt with reference to little more than - we can only speculate - the land ownership boundary. The proposed allocation does not even appear to coincide with a clear field boundary.

We also note that to the immediate south of this site is a local play facility. It is difficult to understand how any development of this site would relate to the built up area to the south and assist in building and integrating with the established community. For all of the above reasons, this is not a good or sustainable site to release from the green belt or to develop for housing. We object accordingly and instead request the release / allocation of PSA Developments Ltd's site off Bulls Bridge Lane as an unconstrained and obvious and ideal housing site.

PSA Developments Ltd object to the inclusion of this site. It is not within easy walking distance of the nearest town, district or local centre, the local primary school is at or near capacity, and that the area suffers from a lack of shops and public transport. Additionally, it is suggested that "significant infrastructure" would be required.

Summary of Suggested Changes

Delete site MN2.30 from the housing allocations in policy MN2.

Evidence Submitted

Chapter 6	Plan Order Site MN2.30	Other Documents
Policy MN2.30	Land east of Waddicar Lane, Melling	
Respondent No 703	Response Ref 23	Representor Name Jackie Copley
Organisation Name CPRE Lancashire		
Obj/Sup/Com Objection		

Summary of Main Issues

We are opposed to the redesignation of this Green Belt site for residential development on the grounds that it would mean encroachment into the countryside. The site would narrow the gap between this part of Lydiate and Aughton Village by around 40% at its narrowest point. It is particularly impacting as it would diminish the space around the village of Melling, the landscape quality of which is complementary to Melling's ancient character (Melling is mentioned in the Domesday Book) and which is in stark contrast to the large township of Kirkby.

CPRE attributes considerable weight to the fact that a large proportion of the site is best and most versatile agricultural land. There are issues about the sustainability of the site and development would be conditional on a Transport Statement or Transport Assessment, as specified by NPPF paragraph 32. The site is constrained by surface water flooding.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.30	Other Documents
Policy MN2.30	Land east of Waddicar Lane, Melling	
Respondent No 716	Response Ref 34	Representor Name Robert Swift
Organisation Name Robert Swift and family		
Obj/Sup/Com Objection		

Summary of Main Issues

The development of the Site MN2.30 (Land east of Waddicar Lane, Melling) will result in the loss of Greenfield land and Grade 2A and 3B agricultural land. There are also a number of constraints associated with the site which include ecology/habitat concerns, accessibility and impact on the road network however the development of the site would round off the settlement edge. A density of 30 dph has been applied.

Summary of Suggested Changes

Reduce the indicative capacity of Site MN2.30 from 178 to 135

Evidence Submitted

Chapter 6	Plan Order Site MN2.30	Other Documents
Policy MN2.30	Land east of Waddicar Lane, Melling	
Respondent No 732	Response Ref 6	Representor Name
Organisation Name Bellway Homes Ltd		
Obj/Sup/Com Support		

Summary of Main Issues

Bellway support the allocation of site MN2.30 which lies to the east of Waddicar Lane, Melling and covers a gross area of approximately 6 hectares. It has an indicative net developable area of 4.90 hectares and can accommodate approximately 178 dwellings. The site is well located in relation to local services within the Waddicar area. Local facilities nearby include a doctor's surgery, pharmacy, ATM, post office, local convenience store, Melling County Primary School, open space/park, pub, take-away and youth group/scout group. Access can also be gained easily to further amenities, including train services, in Kirkby. As such, the proposed allocated site is within a sustainable location.

Directly informed by a comprehensive set of supporting technical studies, which submitted in support of this report, Bellway has prepared an indicative layout for new homes on the site in order to demonstrate that the development is deliverable. This layout proposes a sustainable mix of 1, 2, 3, and 4 bed properties, consistent with the objectives of Local Plan Policy HC2 – Housing Type, Mix and Choice in determining a suitable residential mix and choice of new homes. This layout is also inclusive of circa 0.6 hectares of public open space. The site also has the capacity to provide 30% affordable housing, complying with emerging Policy HC1. The illustrative layout has also been designed to exceed the proportion of new homes complying with Lifetime Home Standards.

It is an outward facing scheme, which ensures that the existing open space, countryside and movement routes/corridors are well over looked, and provides opportunities for future connections. It also provides the opportunity to make a visual and physical connection between the new housing development and Rainbow Park to reconnect the site with the existing community. Vehicular access to the site is proposed via a new priority junction to the east of site, off Waddicar Lane, south of the existing Presbytery. A suitable junction arrangement can be provided within the available site frontage.

The layout has been designed to integrate with the existing Public Right of Way (PRoW) running eastwest along the southern boundary of the site and allow for multiple pedestrian access ways to Waddicar Lane and Marc Avenue. Subject to agreement, a connection across the public footpath to the area of public open space (Rainbow Park) south of the site is also feasible. Existing bus stops are present on Waddicar Lane. To access the most frequent service provision residents would have to walk to the stops located 400m to the south of the site.

A Preliminary Ecological Appraisal has been carried out for the site. Non-breeding bird surveys are ongoing. There are limited roosting opportunities for bats within trees at the site. The site does however, provide foraging opportunities for bats, and trees on site may develop roosting habitat in the future. It is recommended that trees proposed to be lost be surveyed for bat roost potential prior to submission of the planning application. Enhancement features for bats can also be provided at this stage.

A series of mitigation measures are proposed to ensure that the retained trees are protected and that compensation is provided for the removal of the existing hedge. The planting of new trees, shrubs and linear hedges across the development will be delivered as part of a comprehensive landscape package.

A Flood Risk Assessment confirms that the site falls within Flood Zone 1. The assessment has also considered surface water runoff arising from the development proposals. Any increase in surface water runoff will be stored on site to limit the outflow rate to 13.2 litres per second, in accordance with DEFRA guidance (SC030219), thus reducing downstream flood risk. The Land Investigation Report confirms there is nothing relating to the land which would compromise its development for residential purposes.

A Landscape and Visual Impact Assessment has been prepared. It confirms that the release of the site from the Green Belt for residential use is acceptable in landscape planning terms. The extension to the built form would integrate well with the existing settlement pattern and would consolidate residential development to the north of Melling. The addition of further residential development in this location is not out of keeping with the character of this area. The flat topography of the site greatly reduces the visual impact of the development.

The agricultural land classification report concludes that the site comprises moderate to good quality agricultural land (Grade 3a and 3b), with a high proportion of the site falling into Grade 3b moderate quality. There are only three small pockets of Grade 3a land. The suite of technical site assessments that have been undertaken on Bellway's behalf clearly demonstrate that the site is not subject to any technical or environmental constraints that would prevent a high quality and sustainable housing development being brought forward immediately, demonstrating that the site is available now.

Summary of Suggested Changes

None required.

Evidence Submitted

General Highways Arrangement (Appendix 1); Preliminary Ecological Appraisal (Aeserta Consulting Limited); Arboricultural Impact Assessment (Aeserta Consulting Limited); Flood Risk Assessment (Michael Lambert Associates); Land Investigation Report (GroundSure Environmental Insight); Landscape and Visual Impact Assessment (Enzymgo Limited); Agricultural Land Study (Soil Environmental Services Ltd).

Chapter 6	Plan Order Site MN2.30	Other Documents
Policy MN2.30	Land east of Waddicar Lane, Melling	
Respondent No 740	Response Ref 35	Representor Name
Organisation Name Formby Residents Action Group		
Obj/Sup/Com Objection		

Summary of Main Issues

We wish to rely on the representation of Mr John Williams [Rep No. 1026] for flood risk issue on this site.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.30	Other Documents
Policy MN2.30	Land east of Waddicar Lane, Melling	
Respondent No 1026	Response Ref 17	Representor Name John Williams
Organisation Name		
Obj/Sup/Com Objection		

Summary of Main Issues

This site has several problems relating to development:-

- 1) The ground itself is frequently saturated to a very high level due to its very close proximity to the existing watercourses
- 2) There are already flooding problems on Waddicar Lane caused by the existing watercourses having difficulty in taking the current flow
- 3) There have previously been occurrences where this greenfield site has had so much water flowing off it that it was causing flooding to the public highway and entering properties. Even Sefton Council's own Highways Enforcement Officers had to speak to the farmer to get the site ploughed in order to allow the soil to absorb more water rather than for it to simply run off the surface (as happens on developed sites) in an attempt to reduce the flooding
- 4) There have already been attempts to restrict flow from new estates in this vicinity so as not to overload the watercourse near the southern boundary of this proposed site. Unfortunately the methodology included installing a throttle (or flow restrictor) on the surface water system in Archers Fold, as this was not correctly designed by the developer, this led to the surface water system overflowing and causing flooding. This should be noted as such methodology is normally proposed as ways of preventing further flooding.
- 5) In view of the existing problems that local residents already have, it would be advised not to develop this site until the cause of the existing flooding is successfully removed
- 6) The site is within 250m of a potential source of flooding, and a current real world flooding problems, so may have difficulty getting flood insurance.
- 7) It would therefore be deemed as logical that this site should be discounted on grounds of NPPF Ch10 Para.100

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.31 **Other Documents**
Policy MN2.31 **Wadacre Farm, Chapel Lane, Melling**
Respondent No 14 **Response Ref** 2 **Representor Name** Anita Pruden
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

- 1) Pollution by more cars using the road that was never built for this heavy traffic.
- 2) Schools would be over subscribed with more families moving into area
- 3) Dr's Surgery for Melling only opened for three days so the impact of more patients would make people wait longer for a doctor's appointment.
- 4) Land gets water logged so where would the water go if concreted over?
- 5) Public transport only exists of one main bus to Liverpool when it comes.
- 6) This land is agriculture so needs to be preserved.
- 7) More cars mean more problems with speeding on the narrow road that runs through Melling.
- 8) We already have to put up with the noise and pollution from the M57 and M58 this would make it worse.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.31 **Other Documents**
Policy MN2.31 **Wadacre Farm, Chapel Lane, Melling**
Respondent No 56 **Response Ref** 3 **Representor Name** Marjorie Harvey
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Traffic from the Melling sites will proceed down Waddicar Lane, Spencers Lane and Bull Bridge Lane. Have you ever tried to cross Bull Bridge Lane? It is very difficult especially at peak times. You can wait 5-10 mins. I feel sorry for existing residents of Melling. They have a part time doctor and are expected to travel to Kirkby. No thought is given to schools, doctors and increased traffic.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.31 **Other Documents**
Policy MN2.31 **Wadacre Farm, Chapel Lane, Melling**
Respondent No 64 **Response Ref** 3 **Representor Name** KJ Trainer
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

This will lead to more cars in a place with small lanes. No local shops of buses. Most people in Melling use their cars.

Summary of Suggested Changes

Evidence Submitted

Policy MN2.31 **Wadacre Farm, Chapel Lane, Melling**

Respondent No 82 **Response Ref** 2 **Representor Name** Steve Graves

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

I wish to raise my concerns why the full Melling parish has not been considered, just because it falls the wrong side of the motorway cannot be made as an excuse. Having previously visited your workshop at the scouts hut in Melling in September last year I voiced concerns re traffic management. Waddicar over the last ten years has had far more new build homes built than any other area of Sefton. Flooding is an issue. It's alright building properties and then leaving the problems for residents to find solutions after everybody has departed. The area cannot cope with any more vehicles as vehicles from Kirkby already use Waddicar as a cut through and putting slip road at M58 would not solve the problem. I'm totally against any new build housing in the area apart from any brown belt sites that could be redeveloped.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

There are a number of statements made in the Site Assessment Form that I wish to query.

Key Services - you state:

- a.100% Frequent Bus Stops - the bus services stop at 6.00 pm.
- b.100% Primary School – there is only one primary school
- c.100% District Local Centres – where are these located?
- d.100% Neighbourhood Park – are you referring to the playground area behind the local public house?
- e.100% GPs/Health Centres - there is one part time GP in Melling, no Health Centre, no dentists or other health professional services.

2.Wider Benefits Comments - in all but one question you have responded with 'No'. Can you explain to what benefit will these houses bring to Melling village and how have you identified the high need for houses in the Melling area? The area designated will see the demolition of the one and only nursery in Melling which you appear to have overlooked in your assessment form.

3.Constraints to Development –

a.Flooding : You have stated that the area is entirely in Flood Zone 1. Whilst this may be true in relation to river and sea flooding, there are problems with the local drainage which you mentioned in your conclusion. However in point 13 Utility Infrastructure you state that there are no known issues. I explained in my previous letter, my wife and I have experienced problems with flooding since we purchased our home in December 1989 and still experience problems to this day. It has been explained to me that it was due to the demand on the main drains, which are over 100 years old, the increase in new house building and the drains are hydraulicing causing them to backup and raw sewage overflows onto my property and my neighbours. All occasions of flooding are reported to United Utilities. The area earmarked for development overlooks the rear of our property and we can clearly see that flooding is a problem. As the problem is still yet to be resolved, if the current plan to build more homes (total 285) goes ahead, these flooding problems will be exacerbated even further

b.Site Access: You have recognised that there will be a greater volume of vehicular traffic and restricted visibility problems on Waddicar Lane and there will need to be a transport assessment, with a possible realignment of Waddicar Lane. How is this possible with the existing properties along Waddicar Lane and Chapel Lane?

c.Network Capacity: the current public transport operations are totally inadequate. The main bus service 345 terminates at Station Road and turns around via a primary school and Rainbow Drive back onto Waddicar Lane, a built up area subject to 20 mph. Waddicar Lane itself is a very narrow road with speed humps. As the bus service is limited, the use of private cars is the only way of travelling and if more properties are built, the traffic levels will undoubtedly increase. There is a general store on the corner of Rock View and there are existing problems with vehicles double parking making it impossible for access to service vehicles and to gain access to and from Rock View. With the additional use of cars in the area, these problems are going to be increased.

D. BMV Agricultural Lane: the area comprises grade 3a agricultural land. Once housing has been built on this land, it ceases to be green belt. When we purchased our home we were told that the fields at the rear of the property were green belt and therefore cannot be built on. It appears now that being classed green belt does not carry any significance. Why has the Council not considered using Brown Field sites or land that has remained fallow for many years which have direct access to Waddicar Lane around the area? Can you confirm that house builders potential developing a green field site have less restrictions than developing a brown field site?

e.Green Belt Purposes – you have stated that the impact is 'moderate' on three out of the four points. How can you justify moderate when the Green Belt site will disappear? You state that you are unable to assess impact on urban regeneration – why is this not possible?

Since 1990 there have been a large number (703) of new homes built in the village and it has now reached saturation point where further development will have a considerable environmental impact.

I am disappointed that you have not responded to my previous letter nor have you appeared to have taken into account any of the points that I have raised. Part of this consultation process is to take into consideration, the genuine points that the local homeowners have made in good faith. I feel that this process has been a tick box exercise to demonstrate that the Council have

followed national government guidelines.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.31	Other Documents
Policy MN2.31	Wadacre Farm, Chapel Lane, Melling	
Respondent No 122	Response Ref 1	Representor Name John Hart
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Since moving to Rock View I have experienced problems with the drains. The problems have got worse since 2 new housing estates were built in 2008 - The Village and Burchtree Drive Estate. When it rains we get sewage pumped back up through the rear of houses onto the garden. It has been checked by United Utilities [letters enclosed as proof].

About 8 years ago the Leeds and Liverpool Canal overflowed and Waddicar Lane and the Horse and Jockey pub was flooded.

The housing estate that has been proposed to be built at the rear of Rock View is being built on an inclined area and during the winter/summer when it rains the fields get flooded. They have to remove all the animals from the field. All it needs is for the canal to overflow and the housing estate would be flooded.

As the years have gone by the traffic through Melling has increased. Waddicar Lane seems to be a shortcut. As the proposed road to the new housing estate is to be Chapel Lane; which ever way you approach Chapel Lane there are bends, pulling in or out of Chapel Lane can be a danger and accidents are likley to occur. As you come out of Chapel Lane onto Waddicar Lane cars are parked adj to Chapel Lane as residents park them as there are no garages and this causes hold ups on the road.

I therefore oppose the proposed housing estate at Waddicar Farm, Melling. Melling is fast becoming a less rural viallge and more like a town. My family normally go for walks along the canal and are shocked to hear that houses may be built on open spaces which give people a lot of pleasure. Also to be considered is the wildlife of Melling which accumulates in the fields.

The drainage issue is ongoing from 2008 to the present day. The proposed housing estate would affect other houses in this area. I find it concerning to think a housing estate would be built in such a problem area.

Summary of Suggested Changes

Evidence Submitted

Correspondence to Mr Hart from United Utilities [2008 -2014]

Policy MN2.31

Wadacre Farm, Chapel Lane, Melling

Respondent No 235

Response Ref 3

Representor Name Ian Whiley

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

Site MN2.31 is not suitable due to the clear flood risk and to develop this site would be negligent by the local authority and dangerous to local residents. I am apposed to this development as are many residents in the village. I have lived in Rock View for 6 years and have flooded on numerous occasions, I am able to provide photographic evidence of this and documentary evidence. I have contacted Sefton council on numerous occasions because of flooding and requested assistance from Sefton Council environmental health on numerous occasions due to my garden being contaminated with not only sewerage but used sanitary towels and used condoms when it rains. If you visit Melling in winter or when it rains, you only have to look at the numbers of houses that have sandbags piled up in front of their houses to prevent internal flooding. With global warming future flooding will only get worse and you elude to this in your consultation paper and state you will not develop where there is risk of flooding.

United Utilities have provided me with compensation on 14 occasions as a result of my neighbours and I being flooded. When I first moved into Rock View I was trapped in my house for a number of days and could not use the rear garden the flooding was that bad, this came from the sewerage system which for Melling is completely inadequate and runs to the lowest point (Rock View) it then forces the manhole covers off and subsequently floods our gardens and roads. This is combined with the rain water that runs from the fields and hills behind and the result is catastrophic. If this site is developed the only location that the water can currently escape will be removed thus resulting in more severe frequent flooding in Melling village.

I understand that the farmer at the rear of Rock View for this site is keen to sell and obtain planning permission however she is not being truthful, for the fast majority of the winter she is not able to put live stock out as the fields are flooded and the animals would be in danger. The planning officer I spoke to stated the measures would be put in place to prevent flooding however Mr Rigby (risk manager for United Utilities) has stated that nothing can be done to prevent this. Although non return valves and hydraulic pumping stations were discussed they state that this is not possible as it will move the problem on else where in the village.

I have previously sought advice from my local MP due to the flooding and United Utilities and they have stated (after conducting surveys in 2010) that there is no way to stop the flooding unless millions are spent improving the drains.

To build here by Sefton council will be utter negligent and I believe will be contrary to the European convention of human rights, we as residents have the right to enjoy our possessions and the right to life. If development is agreed for this location other residents and I will seek a judicial review against Sefton council and any subsequent developers.

The only access is via Rock View which is too narrow and would mean a property being removed. Woodland walk likewise or Chapel Lane, which is already extremely busy with the local church and nursery. To develop this site would add to congestion and ultimately be dangerous.

The fields are overlooked by the footpath which runs to the Bootle Arms public house and the local country side, it is visited by ramblers and people participating in leisure activities. They will be prevented or put off by a flooded, sprawling development. Not to mention the vast numbers of birds such as herrings, buzzards and ducks that visit the fields.

Summary of Suggested Changes**Evidence Submitted**

Chapter 6	Plan Order Site MN2.31	Other Documents
Policy MN2.31	Wadacre Farm, Chapel Lane, Melling	
Respondent No 315	Response Ref 1	Representor Name Jeanette Griffiths
Organisation Name		
Obj/Sup/Com	Support	

Summary of Main Issues

My client wholeheartedly supports the removal of the above site from the Green Belt and its allocation for housing in the publication draft of the Sefton Local Plan. My client also supports the analysis by the Council of the need to release appropriate sites from the Green Belt in order to meet proven needs.

The submitted studies confirm that there are no planning objections to the developments of the sites for residential purposes.

The master plan indicates 162 dwellings ie 30pha. Land at the rear of the church which is only leased to my client would reduce this number to around 150 if negotiations with the church prove unsuccessful.

Studies have shown the amount of land available for housing within Sefton is inadequate to meet its future housing needs, such needs having been vigorously researched. The plan has been positively prepared over many years of consideration of a number of options. The plan achieves the correct balance between housing needs and the loss of the Green Belt.

Green Belt sites to be released have been identified following a rigorous assessment of their planning characteristics, ie flood risk, quality of agricultural land, highway safety and sustainability.

Summary of Suggested Changes

Evidence Submitted

- Agricultural Land Classification Assessment
- Proposed Masterplan
- Accessibility Review
- Flood Risk and Drainage Study

Chapter 6	Plan Order Site MN2.31	Other Documents
Policy MN2.31	Wadacre Farm, Chapel Lane, Melling	
Respondent No 381	Response Ref 2	Representor Name Benedict Cleary
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

In general I object to the overlooking of brownfield sites and redevelopment of existing traditional residential areas in favour of an over proportionate use of greenfield sites. In particular, as a resident of Melling I object to sites MN2.30 and MN2.31. There are many reasons why these sites are not appropriate, however I am basing this objection around three main points:

1) Road Access/Safety Melling effectively has one main through road (Waddicar Lane/Spencers Lane) with access to all of the housing branching off it. This was adequate for the size of development pre 1980, but with the extensive building that has gone in the area in the last 20 years this main through route has already become extremely busy for such a small road with blind bends in several places. The best example of this is at the Spencers Lane end. The result is that there is no longer a safe cycle route in and out of Melling. To add another 300+ households (likely to equate to another 500+ cars/vans) would be wholly inappropriate. Furthermore, the location of these sites would mean that the entrances to them would involve junctions at areas where the visibility along the road is quite restricted due to the curves in the road therefore increasing the prospect of accidents especially involving children.

2) Environment & Infrastructure The increased housing in the area in the last 20 years has resulted in major drainage issues in Melling. Concreting over significant areas and then increasing the load on the drainage system will undoubtedly lead to further issues therefore requiring significant investment in the infrastructure in the area and given that the area is low lying between the Melling Rock area to the West and the highpoint of Prescott Road to the East, will probably require pumping facilities to cope with the volumes.

3) Amenities Melling has only a handful of shops and one single form entry primary school which is already fully subscribed. Speaking as a governor of the primary school I am extremely concerned about the impact all of the additional households would have upon the school which only has a relatively small amount of grounds severely limiting the possibility to extend the premises. Being a community school, the school would naturally want to accommodate any members of the community wanting to attend but simply would not be able to do so. Extending the school into it's own grounds would have a severe negative effect on the school's environment and it's ability to make educational use of it's open space and nature trail. Even if a satisfactory way to extend the accommodation could be found, this would have to be completed before the housing otherwise families would be moving in to the area either with no school places available for their children or with their children having to attend an overcrowded school which would not be beneficial to any of the pupils. I sincerely hope that you will reconsider your adoption of this Local Plan and objectively reconsider the available use of existing brownfield sites.

Summary of Suggested Changes

The option of focusing primarily on brownfield sites would make the plan Justified.

Evidence Submitted

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

It is nearly 2 years since we first received information of Sefton’s Local Plan. The points I made then were in response to an article in the Local Paper and are relevant today. I have based my comments after reading “a Local Plan for Sefton” in the Champion newspaper. I have read each section and thought about how in my opinion it affects Melling.

Environment – the protection of our heritage

Melling is an ancient village mentioned in the Domesday Book. The church is a landmark which at the moment can be seen across the fields from all areas and is a beautiful sight.

The footpath from Waddicar Lane to the church, pub and beyond is known as the PADS. There is always a feeling of tranquillity and a real feel-good factor walking up the pads. When I was teaching, I used these same fields and paths to introduce my inner city 4-6 year old pupils to rural life- showing them the various crops grown throughout the farming year. In my opinion this whole area should be a Conservation Area.

The Green Belt here is so important to all of us. Once concreted over it is lost forever. Waddicar has the largest concentration of houses in Melling. This area has a post office, a small grocers shop, chemist, chip shop, barber/hairdresser and beauty parlour. The doctors surgery now operates 2½ days per week but is full and the local school is fully subscribed. There is one bus every ½ hour to Liverpool and one Maghull circular to serve a population in the area of roughly estimated over 2,000.

It stands to reason that most people will have to use cars elsewhere for practically everything. A reasonable estimate of extra cars on the local roads would be at least 200.

The fact that Waddicar Lane has already become a major route for traffic of all sizes and speeds. IThe build-up begins between 4:30 and 5am Monday – Friday and is relentless until 9am. Evening peak begins around 4pm till 6:30. During the day there is a steady stream – we cannot just drive out of our path anymore.

More houses means many more cars on this already busy road increasing pollution and carbon emissions.

Another problem would be the exit onto Waddicar Lane from the new sites MN2.30 and M2.31. We find it unbelievable that anyone could even think about this but then again they have. Chapel Lane might seem an obvious choice but this is a dangerous bend for both cars and pedestrians. Woodland Road is another awkward road to exit.

Drainage – in the past rainwater had always drained off the fields and down the road drains but for several years now Waddicar becomes virtually impassable at times during the ever increasing rain storms. We have been in contact with the Council drainage dept. many times with worries over flooding from cars driving far too fast on the lane causing our garage and front drive to flood. We are always given the same reason “the drains can’t cope”. What will happen with more cars/houses serving them?

Infrastructure: The information sheet states “Council policies will require that new developments must not make existing conditions worse”.

How? An impossibility on Waddicar Lane I think.

Health and Safety: The information states it will restrict uses that have a negative impact upon health e.g. those that cause pollution and result in high traffic levels in sensitive areas such as residential areas and schools. We have both on or near Waddicar Lane.

New Jobs: Our concerns would be that not only would there be much more traffic from new houses but people travelling from all areas for whatever reason to a new business park in Maghull would create an even bigger problem on Waddicar Lane.

Since making these comments on our objection to Sefton Council in Sept 2013 we now find that Melling, historic village is under threat from industrial sprawl! Peel holdings is already marketing over 100 hectares of grade 1 agricultural land in and around our village for grand scale industrial sheds with a link road to the motorway across Melling land. If Sefton Council agrees their planning application (not submitted yet) the traffic problems would be enormous as Waddicar Lane is the entrance and exit to Melling and beyond.

Traffic: The amount of cars and lorries using this lane everyday makes it a dangerous place to be at times. The lane was never

designed for today's world. It is narrow in places and bendy in others, some parts of the pavement allow single file walking only. It can be unnerving walking along at times. Speeding is an everyday occurrence – the 30 mph sign has little or no effect and observing the zebra crossing cannot be taken for granted. I am worried that extra traffic coming off the motorway (which they already do) will be unsustainable in this rural area.

These worries are based on the experiences of living on Waddicar Lane for 37 years. Observations on Melling: Change to society and lifestyles have had a huge impact on Melling. Facilities are few and between with the closure of many shops and Melling c/e school over the years.

Public transport is much worse than it was in the '60s though many young people who used it then are the pensioners who need it today. Building more estates to exit on to Waddicar Lane will turn Melling into a commuter's corridor instead of a rural village.

With the worry about Peel Holdings plans too, I feel we are being attacked on all sides.

To sum up, our main objections are:-

- The loss of Green Belt land.
- The amount of traffic on Waddicar Lane. Every builder in the past said there would not be a problem but there have been.

But, being pragmatic, if it was an either/or situation we would say, the site identified by Melling parish Council MN8.2 is the lesser of all evils because it would preserve the history of Melling and hopefully some of the traffic along Waddicar Lane.

In Sept 2014 Sefton's planning committee rejected a proposal to build 100 houses on Green Belt land between Aintree and Melling. Bill Esterson MP who submitted his own formal rejection added "firstly the site for this proposed developed is green belt land. Sefton Council has a policy that states green belt land should not be built upon unless there are 'exceptional circumstances'. There were no such circumstances in this case.

I don't believe the roads here would be able to cope with such a large increase in traffic that 100 new homes would generate. That goes for sewage and flood management.

The impact on existing schools places and other local facilities would have been hugely detrimental to these communities". Maghull and Aintree Champion 24 Sept 2014. – I think this says it all.

Summary of Suggested Changes

Remove the Aintree MN2.30 and MN2.31 as allocations in the plan.

But, being pragmatic, if it was an either/or situation we would say, the site identified by Melling parish Council MN8.2 is the lesser of all evils because it would preserve the history of Melling and hopefully some of the traffic along Waddicar Lane.

Evidence Submitted

Chapter 6	Plan Order Site MN2.31	Other Documents
Policy MN2.31	Wadacre Farm, Chapel Lane, Melling	
Respondent No 492	Response Ref 15	Representor Name
Organisation Name Craig Seddon SIPP		
Obj/Sup/Com Objection		

Summary of Main Issues

Wadacre Farm, Chapel Lane is a 5.5ha site identified as having provision for 135 dwellings. The site is allocated in the UDP as falling within the Green Belt.

The site is located within close proximity to Land east of Waddicar Lane (MN2.30) and therefore has the same highway capacity constraints upon it. The Site Assessment Form (reference SR4.29) identifies that there is existing congestion along Waddicar Lane and that there are known speeding issues. The Assessment Form goes on to identify that there are existing visibility issues off Chapel Lane and that a Transport Assessment would need to assess the cumulative impact of the site upon the highway network, when considered alongside the proposed housing allocation MN2.30. Given a lack of information regarding access and highways congestion, these have the potential to be Tier 1 constraints. It has not been demonstrated that safe access into the site can be achieved or that there is capacity on the surrounding highway network to accommodate the proposal.

The Council again provide contradictory statements regarding sustainable travel, stating at 'Accessibility Improvements' that significant improvements to provide better connections to schools and local amenities will be required, but conclude that the site is accessible to public transport and services. This generic response for both this site and Waddicar Lane (MN2.30) causes some concern.

60% of the site is identified as grade 3a 'best and most versatile agricultural land'. Were the site developed this would result in the loss of 3.3 ha of grade 3a agricultural land.

Our client agrees that the proposed site Green Belt boundary is weak. Whilst the site backs onto residential development along its southern and eastern boundaries, it is bounded by Green Belt land to the west and south. The site would not form a natural extension to the existing settlement. Our client does not agree with the Council's assessment that the site would be relatively contained because it clearly wouldn't be, given the clear, open views to the west and north.

Given the lack of information regarding safe access and the impact of the proposal on the wider highway network, these constraints must be considered to be significant or severe. The site is not seen to be a natural extension to the existing settlement and would form a weak boundary, by the Council's own definition, along its western and northern boundaries.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.31	Other Documents
Policy MN2.31	Wadacre Farm, Chapel Lane, Melling	
Respondent No 595	Response Ref 7	Representor Name Jonathan Clarke
Organisation Name Knowsley Council		
Obj/Sup/Com Comment		

Summary of Main Issues

There are three proposed allocations in the Melling / Waddicar area. We would welcome the opportunity to work with Sefton Council when considering the impact that these developments cumulatively would have on the highway network in and around Kirkby.

We anticipate that Knowsley Council and residents adjacent to the proposed allocations in the Kirkby Park area will be appropriately consulted on any future planning applications adjacent to Knowsley's boundary in line with statutory requirements.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.31	Other Documents
Policy MN2.31	Wadacre Farm, Chapel Lane, Melling	
Respondent No 643	Response Ref 3	Representor Name Chad Thompson
Organisation Name	Melling Parish Council	
Obj/Sup/Com	Objection	

Summary of Main Issues

Melling Parish Council objects with the proposed site MN2.31 for the following reasons:

- 1.Housing targets are too high which are not justified, deliverable or environmentally acceptable which is evidenced by the completed surveys submitted with this form
 - 2.The loss of Green belt around Melling and creating urban sprawl which has already occurred in the Borough. The Green belt around Melling prevents coalescence to Maghull and Kirkby which further development would go against the purpose of the Green belt.
 - 3.There would be a loss of best and most versatile agricultural land, farming communities and food production for the future
 - 4.The sites are incompatible with advice in National Planning Policy Framework on promoting sustainable transport and supporting the move to a low carbon future. There is a new train station site (MN3, IN2) proposed which is within 500 metres away from the NM8.2 site. Developing on sites MN2.30 and MN2.31 would encourage driving to the station and other amenities to Maghull and Aintree. If development was built on MN8.2 there would be less traffic as there would be access to the train station.
 - 5.The MN2.30 site would spread out unacceptably towards the adjacent to the Green Belt area which is Knowsley and would contribute towards coalescence.
 - 6.The sites are a natural flood plain. Any development on this land and the lack of drainage will cause flooding to existing properties. (See evidence letter from United Utilities Sewer Flooding Mitigation Team submitted with this form). Sites are unsuitable for development / housing as existing housing already suffers from flooding. Site MN2.31 is adjacent to Rock Lane which already has current issues which cannot be mitigated against.
 - 7.Added pressure on services such as Doctors surgery and primary school which both are full to capacity and over stretched based on public participation and engagement with the School Head Teacher.
 - 8.Further housing development would have a greater impact on current infrastructure issues and challenges such as: High levels of traffic flow especially on Waddicar Lane which is far from suited to frequent heavy vehicles, poor public transport with no service on a Sunday, Inadequate retail or leisure facilities and incidences of overflowing drains - both rainfall and foul. The evidence was based on surveys admitted with this form and at Melling Parish Council meetings under public participation agenda item.
 - 9.A previous petition of approximately 673 signatures was presented to Sefton MBC objecting to further development in Melling during the Local Plan consultation in September 2013 (evidence submitted with this form).
 - 10.Concerns about robustness of the figures being used in the draft local plan for Seftons population in future years. Mellin'gs development has seen considerable growth over the past decade.
 - 11.Loss of wildlife which has been raised at Melling Parish Council meetings under public participation agenda item and Neighbourhood planning consultation events.
- The safeguarded site NM8.2 has a potential capacity of 350 and would like to request that this site to be used as a preferred site and that sites MN2.30 and MN2.31 be taken out of the Local plan as preferred sites and not allocated for future development.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.31	Other Documents
Policy MN2.31	Wadacre Farm, Chapel Lane, Melling	
Respondent No 661	Response Ref 8	Representor Name
Organisation Name PSA Developments		
Obj/Sup/Com Objection		

Summary of Main Issues

This site (MN2.31) comprises 5.48 hectares to the north of Waddicar, and is being promoted by the LPA for release to accommodate 144 dwellings. The site has been selected primarily on the basis that it would help create a "round off" the existing village of Melling, and would therefore have "minimal impact on the openness of the green belt".

PSA Developments Ltd object to the inclusion of this site. It is not within easy walking distance of the nearest town, district or local centre, the local primary school is at or near capacity, and that the area suffers from a lack of shops and public transport. Additionally, it is suggested that "significant infrastructure" would be required.

This site cannot be considered to be the natural / logical rounding off of the settlement. It protrudes rudely from the edge of the settlement like a proverbial 'sore thumb'. The site does not extend to a strong, impervious boundary, and would represent obvious encroachment into the open green belt. That could (and will) in turn pave the way for pressure for future encroachment in years to come.

For all of the above reasons, this is not a good or sustainable site to release from the green belt or to develop for housing. We object accordingly and instead request the release / allocation of our client's site off Bulls Bridge Lane (AS19) as an unconstrained and (in many respects) obvious and ideal housing site.

Summary of Suggested Changes

Delete site MN2.31 from the housing allocations in policy MN2.

Evidence Submitted

Chapter 6	Plan Order Site MN2.31	Other Documents
Policy MN2.31	Wadacre Farm, Chapel Lane, Melling	
Respondent No 703	Response Ref 24	Representor Name Jackie Copley
Organisation Name CPRE Lancashire		
Obj/Sup/Com Objection		

Summary of Main Issues

We are opposed to the redesignation of this Green Belt site for residential development for all the same reasons which cause us to oppose the redesignation of MN2.30, viz, encroachment on the countryside to the detriment of the setting of the village of Melling, a weak boundary (to the west) and the loss of a substantial area of best and most versatile agricultural land. Development would be conditional on a Transport Statement or Transport Assessment, as specified by par. 32 of the NPPF. The existence of ground water flooding would make control of surface water flooding by SUDS problematic.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.31	Other Documents
Policy MN2.31	Wadacre Farm, Chapel Lane, Melling	
Respondent No 716	Response Ref 35	Representor Name Robert Swift
Organisation Name Robert Swift and family		
Obj/Sup/Com Objection		

Summary of Main Issues

The development of Site MN2.31 (Wadacre Farm, Chapel Lane, Melling) will result in the loss of Greenfield land and Grade 2A and 3B agricultural land. There are also a number of ecology and flooding issues associated with the site, due to surface water flooding, and only between 40 – 75% of the site is available for development. In addition, the Site is not contained, and therefore the development potential of the site has been limited to 50% at a density of 30 dph has been applied. The site also appears in part to be currently in use as a children's day nursery where access would be taken from.

Summary of Suggested Changes

Reduce the indicative capacity of Site MN2.31 from 135 dwellings to 83 dwellings.

Evidence Submitted

Chapter 6	Plan Order Site MN2.31	Other Documents
Policy MN2.31	Wadacre Farm, Chapel Lane, Melling	
Respondent No 740	Response Ref 36	Representor Name
Organisation Name Formby Residents Action Group		
Obj/Sup/Com Objection		

Summary of Main Issues

We wish to rely on the representation of Mr John Williams [Rep No. 1026] for flood risk issue on this site.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.31	Other Documents
Policy MN2.31	Wadacre Farm, Chapel Lane, Melling	
Respondent No 1026	Response Ref 18	Representor Name John Williams
Organisation Name		
Obj/Sup/Com Objection		

Summary of Main Issues

This site has several problems relating to development:-

- 1) The ground itself is frequently saturated to a very high level due to its very close proximity to the existing watercourses
- 2) There are already flooding problems on Waddicar Lane caused by the existing watercourses having difficulty in taking the current flow
- 3) There have been numerous flooding incidents in this area over many years, several of which have been linked to watercourses that run around and near this site.
- 4) In view of the existing problems that local residents already have, it would be advised not to develop this site until the cause of the existing flooding is successfully removed or corrected
- 5) The site is within 250m of a potential source of flooding, and a current real world flooding problems, so may have difficulty getting flood insurance.
- 6) It would therefore be deemed as logical that this site should be discounted on grounds of NPPF Ch10 Para.100

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.32 **Other Documents**
Policy MN2.32 **Land south of Spencers Lane, Melling**
Respondent No 14 **Response Ref** 3 **Representor Name** Anita Pruden
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

- 1) Pollution by more cars using the road that was never built for this heavy traffic.
- 2) Schools would be over subscribed with more families moving into area
- 3) Dr's Surgery for Melling only opened for three days so the impact of more patients would make people wait longer for a doctor's appointment.
- 4) Land gets water logged so where would the water go if concreted over?
- 5) Public transport only exists of one main bus to Liverpool when it comes.
- 6) This land is agriculture so needs to be preserved.
- 7) More cars mean more problems with speeding on the narrow road that runs through Melling.
- 8) We already have to put up with the noise and pollution from the M57 and M58 this would make it worse.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.32 **Other Documents**
Policy MN2.32 **Land south of Spencers Lane, Melling**
Respondent No 56 **Response Ref** 4 **Representor Name** Marjorie Harvey
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Traffic from the Melling sites will proceed down Waddicar Lane, Spencers Lane and Bull Bridge Lane. Have you ever tried to cross Bull Bridge Lane? It is very difficult especially at peak times. You can wait 5-10 mins. I feel sorry for existing residents of Melling. They have a part time doctor and are expected to travel to Kirkby. No thought is given to schools, doctors and increased traffic.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.32 **Other Documents**
Policy MN2.32 **Land south of Spencers Lane, Melling**
Respondent No 64 **Response Ref** 4 **Representor Name** KJ Trainer
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

This will lead to more cars in a place with small lanes. No local shops of buses. Most people in Melling use their cars.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.32	Other Documents
Policy MN2.32	Land south of Spencers Lane, Melling	
Respondent No 595	Response Ref 8	Representor Name Jonathan Clarke
Organisation Name	Knowsley Council	
Obj/Sup/Com	Comment	

Summary of Main Issues

There are three proposed allocations in the Melling / Waddicar area. We would welcome the opportunity to work with Sefton Council when considering the impact that these developments cumulatively would have on the highway network in and around Kirkby.

We anticipate that Knowsley Council and residents adjacent to the proposed allocations in the Kirkby Park area will be appropriately consulted on any future planning applications adjacent to Knowsley's boundary in line with statutory requirements.

Summary of Suggested Changes

Evidence Submitted

Policy MN2.32 Land south of Spencers Lane, Melling

Respondent No 704 Response Ref 2 Representor Name A Donnelly

Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

The site is located on the south western part of Melling. The majority of the site is located within the urban area with the most westerly part designated as Green Belt in the adopted UDP.

However due to the housing requirement identified in the emerging Local Plan there is a need for significant Green Belt releases within Sefton. Our client's site is identified (MN2.32) for 18 dwellings on 0.6 hectares of land. It is recognised in the Local Plan Site Selection Document that the site would contribute to the "high affordable housing need in Sefton East Parishes".

We support the removal of the site from the Green Belt and the extension of the settlement boundary as proposed. This reflects our submissions to the previous draft which sought the allocation of the site.

We support the indicative figure of 18 dwellings on the site although that will of course be determined through the application process.

Since we made our submissions in September 2013, our client wishes to put forward an additional area of land which is shown on the plan enclosed as Appendix 1. We deal with this specifically under Policy MN7 and we consider it is a logical extension to the proposed allocation. With that development there is potential for a development of some 29 dwellings (Appendix 2).

The Local Plan Site Selection Document sets out the assessment of the various planning considerations. For this site it concludes:

"Land partially in the Green Belt, although around 60% of the site is in the existing urban area. The site is well contained but is located in a narrow gap between Aintree and Melling. However by virtue of its size it would only have a marginal impact upon this gap. In isolation, the urban part of the site would be highly unlikely to accommodate more than 15 dwellings and therefore would provide no affordable housing. The release of the wider site from Green Belt would ensure that the site would deliver affordable housing to meet high local need. The site is appropriate for allocation in the Local Plan."

This conclusion follows a detailed assessment of constraints to development and an assessment against the 5 purposes of the Green Belt. The assessment against the 5 tests is clear that this site does not function as a Green Belt site and the only impact would be that Melling comes slightly closer to Aintree. We agree that the reduction is not material and the recognition that the site is previously developed and can deliver affordable homes is a clear benefit.

We agree with this conclusion in that there are strong planning reasons to allocate this site for development.

The proposed allocation is controlled by our client. Our client does intend to develop the site either themselves or with a developer. We would have submitted an application on site by now but clearly we need to await due to part of the site being Green Belt. Assuming an adopted plan on the 1st April 2016 we would expect an application to be submitted in May 2016. Due to the scale of the site this would be complete within 12 to 18 months.

Therefore the council and the Inspector who will examine the Plan can be assured that this is an allocation that will be delivered.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.32 **Other Documents**
Policy MN2.32 **Land south of Spencers Lane, Melling**
Respondent No 716 **Response Ref** 56 **Representor Name** Robert Swift
Organisation Name Robert Swift and family
Obj/Sup/Com Support

Summary of Main Issues

Land south of Spencers Lane, Melling (Site MN2.31) 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 MN2.33 **Other Documents**
Policy MN2.33 **Land at Wango Lane, Aintree**
Respondent No 56 **Response Ref** 1 **Representor Name** Marjorie Harvey
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I live in Aintree village and can't think of a more ridiculous site to build houses on. The site is bounded by houses, the canal and the River Alt. As far as I can see the only access is on Wango Lane just where Hancock's Bridge crosses the canal.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.33 **Other Documents**
Policy MN2.33 **Land at Wango Lane, Aintree**
Respondent No 68 **Response Ref** 1 **Representor Name** Stephen Leonard
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

As a local resident in Aintree village I think that the acceptance of these proposed plans would put an unacceptable strain on the local infrastructure with increase volumes of traffic on roads around these proposed sites. The mini roundabouts in the area of School Lane and Altway and Wango Lane are already an accident waiting to happen. With an increase in the population comes and increase in vehicles and this will only add to an already strained road network.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.33 **Other Documents**
Policy MN2.33 **Land at Wango Lane, Aintree**
Respondent No 78 **Response Ref** 1 **Representor Name** Michelle Bates
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I would like to object to all planning in the area of Aintree. I live on Wango Lane and feel there is already too much traffic coming over the bridge. It's like living on a motorway the noise keeps me awake most nights. I moved to the area to help my children who are both asthma sufferers aged 6 and 5, their symptoms have improved and I feel this would change due to higher pollution in the area. I also feel that any developments in the area would have a drastic effect on the local canal and all the species of animals/insects etc. We do not have need industry in the area as the area is mostly agricultural land which therefore would not benefit from such planning.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.33 **Other Documents**
Policy MN2.32 **Land south of Spencers Lane, Melling**
Respondent No 155 **Response Ref** 2 **Representor Name** Clive Dunn
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I object to the proposed local plan. In particular the proposed additional sites, not yet included, and the application to build on land adjacent to Wango Lane/Leeds Liverpool Canal. The building of houses at Wango Lane is not a viable proposition. The land is a sump for the Canal, regularly floods and is within the old river bed of the river Alt before it was straightened. The site is Green Belt and will lead to the loss of Agricultural land. There is no infrastructure in place to accommodate extra housing. There is no ready access to the proposed site. The pollution and vehicular traffic will be increased to unacceptable levels. There will be a loss of habitat for the European Shrew (protected species) which now populates the area. In November 1987 Sefton Council refused an application from the residents of Taunton Drive to convert additional site 22, which abuts the proposed development, into gardens citing the reasons as protecting the Green Belt. Circumstances have not changed, yet the Council now wishes to build on the Green Belt.

Summary of Suggested Changes

Evidence Submitted

Chapter General **Plan Order** Site MN2.33 **Other Documents**
Policy MN2.32 **Land south of Spencers Lane, Melling**
Respondent No 156 **Response Ref** 2 **Representor Name** Gwynneth Jean Dunn
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I object to the proposed local plan. In particular the proposed additional sites, not yet included, and the application to build on land adjacent to Wango Lane/Leeds Liverpool Canal. The building of houses at Wango Lane is not a viable proposition. The land is a sump for the Canal, regularly floods and is within the old river bed of the river Alt before it was straightened. The site is Green Belt and will lead to the loss of Agricultural land. There is no infrastructure in place to accommodate extra housing. There is no ready access to the proposed site. The pollution and vehicular traffic will be increased to unacceptable levels. There will be a loss of habitat for the European Shrew (protected species) which now populates the area. In November 1987 Sefton Council refused an application from the residents of Taunton Drive to convert additional site 22, which abuts the proposed development, into gardens citing the reasons as protecting the Green Belt. Circumstances have not changed, yet the Council now wishes to build on the Green Belt.

Summary of Suggested Changes

Remove the additional sites appended to the plan and refuse the application at Wango Lane

Evidence Submitted

Policy MN2.33

Land at Wango Lane, Aintree

Respondent No 285

Response Ref 2

Representor Name Stephen Gent

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

MN2.33 Land at Wango Lane, Aintree'

I am no engineer but as I see it any houses built on this site would require significant raising due to the ground level, this land is after all at risk of flooding especially given its proximity to the Leeds/Liverpool canal.

Houses developed on this site would be at risk of flooding from the following three perspectives:

- surface water flood risk;
- susceptibility to ground water flooding; and
- residual risk of canal failure.

It certainly begs the question how people will be able to insure their new properties, is this something which has been properly thought through I wonder?

According to one of the Council's own reports (Local Plan Site Assessment Form) I note that there is deemed to be a 'Significant Constraint' from a heritage perspective reference the above referenced site which is located within my home Village, the site being:

"adjacent to a Grade II listed building (Valley House). The site provides a contextual setting to the listed building. Part of the site may originally been within the curtilage of the listed farmhouse."

I'm therefore pleased to note that Appendix One (Site Specific Requirements) notes in respect of 'MN2.33 Land at Wango Lane, Aintree' that the development of this site must:

"be sited so that the connection between Grade II listed Valley House and its wider green / agricultural setting is maintained; and retain a buffer around the listed building".

I also object to the inclusion of 'MN2.33 Land at Wango Lane, Aintree' on the grounds of site access given its immediate proximity to Handcocks Bridge. I am also concerned that traffic will be an issue here. Sefton's report notes:

"The location of the access will need to be carefully assessed due to the proximity to traffic signal controlled shuttle working over the swing bridge, which leads to some queuing across the potential point of vehicular access. There are some concerns relating to sight lines."

Surely, the above is sufficient evidence that this site is inappropriate and should be removed from the scope of the Local Plan.

Summary of Suggested Changes**Evidence Submitted**

Chapter 6	Plan Order Site MN2.33	Other Documents
Policy MN2.33	Land at Wango Lane, Aintree	
Respondent No 309	Response Ref 1	Representor Name Leonard Stephen
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I would like to object to the local plan proposed by Sefton Council to build houses on sites within Aintree village on map location MN2.33 as per your planning map. The effect on the loss of Green Belt land speaks for itself. Our open land is being lost to developers. The infrastructure with regard to the local schools, and the only doctors surgery is at breaking point at the minute, so to increase the number of houses within the village will only add to already over subscribed facility.

I live in Downside Drive which borders the Leeds to Liverpool canal and my fear is that if houses are allowed to be built especially on locations MN2.33, AS23 and A522 there is a real danger of flooding to houses in the local area should there be a breach to the canal. These locations are flood areas which are supposed to protect the existing houses in the area. My house insurance premiums will be affected or I may not be able to insure my house at all.

Another objection is to the amount of increased traffic along with the pollution impact which would be a consequence of increasing the amount of housing in an already busy area. It is clear that the existing infrastructure already struggles to cope with the existing population and casual passing through traffic within the Aintree village area so to add to it would only bring more pressure on an already existing problem. Only five ways for cars, vans and lorries to enter and exit the village causing danger to children and adults alike. Trying to get into or get out of the village at normal times using Wango Lane, Aintree Lane, Altway, Bullsbridge Lane and Melling Road is bad enough but around peak times is an absolute disaster.

Summary of Suggested Changes

Remove MN2.33 from the plan.

Evidence Submitted

Chapter 6	Plan Order Site MN2.33	Other Documents
Policy MN2.33	Land at Wango Lane, Aintree	
Respondent No 310	Response Ref 1	Representor Name Margaret Stephen
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I would like to object to the local plan proposed by Sefton Council to build houses on sites within Aintree village on map location MN2.33 as per your planning map. The effect on the loss of Green Belt land speaks for itself. Our open land is being lost to developers. The infrastructure with regard to the local schools, and the only doctors surgery is at breaking point at the minute, so to increase the number of houses within the village will only add to already over subscribed facility.

I live in Downside Drive which borders the Leeds to Liverpool canal and my fear is that if houses are allowed to be built especially on locations MN2.33, AS23 and A522 there is a real danger of flooding to houses in the local area should there be a breach to the canal. These locations are flood areas which are supposed to protect the existing houses in the area. My house insurance premiums will be affected or I may not be able to insure my house at all.

Another objection is to the amount of increased traffic along with the pollution impact which would be a consequence of increasing the amount of housing in an already busy area. It is clear that the existing infrastructure already struggles to cope with the existing population and casual passing through traffic within the Aintree village area so to add to it would only bring more pressure on an already existing problem. Only five ways for cars, vans and lorries to enter and exit the village causing danger to children and adults alike. Trying to get into or get out of the village at normal times using Wango Lane, Aintree Lane, Altway, Bullsbridge Lane and Melling Road is bad enough but around peak times is an absolute disaster.

Summary of Suggested Changes

Remove MN2.33 from the plan.

Evidence Submitted

Chapter 6	Plan Order Site MN2.33	Other Documents
Policy MN2.33	Land at Wango Lane, Aintree	
Respondent No 355	Response Ref 1	Representor Name Brian Mann
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Very strong objection to the Sefton local plan and development of Aintree for the following reasons;

1. Destroying of wildlife and protected species.
2. Road network in the area has reached saturation and will have detrimental health and safety hazards for both pedestrian and vehicle user.
3. Building on land which has been designated by the environmental agency as flood plain, and now has been down graded by them. Where is the proof and reason for this down grade.
4. Building on green belt land.
5. Increase of vehicle traffic will have pollution effect on asthma sufferers, historical and factual evidence.
6. Aintree Parish has reached its limit on schooling intake and also reached capacity in local health care practice.
7. Modern development would be out of character with local housing stock. Along with listed building right next to site development.
8. The over population of a parish area will have a negative and detrimental effect on the community and cause unwanted anxiety.

Summary of Suggested Changes

Remove MN2.33 as an allocation from the plan.

Evidence Submitted

Chapter 6	Plan Order Site MN2.33	Other Documents
Policy MN2.33	Land at Wango Lane, Aintree	
Respondent No 356	Response Ref 1	Representor Name Patricia Mann
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

1. Destroying of wildlife and protected species.
2. Road network in the area has reached saturation and will have detrimental health and safety hazards for both pedestrian and vehicle user.
3. Building on land which has been designated by the environmental agency as flood plain, and now has been down graded by them. Where is the proof and reason for this down grade.
4. Building on green belt land.
5. Increase of vehicle traffic will have pollution effect on asthma sufferers, historical and factual evidence.
6. Aintree Parish has reached its limit on schooling intake and also reached capacity in local health care practice.
7. Modern development would be out of character with local housing stock. Along with listed building right next to site development.
8. The over population of a parish area will have a negative and detrimental effect on the community and cause unwanted anxiety.

Summary of Suggested Changes

Remove MN2.33 as an allocation from the plan.

Evidence Submitted

Organisation Name**Obj/Sup/Com** Objection**Summary of Main Issues**

I object to the proposed development of 25 new houses at site MN2.33 After considering your proposal to develop the land adjacent to Valley Close Aintree, I hereby registered my objections regarding ANY development of this land based on the following:

1. A Unitary Plan meeting was held in 2011 at Aintree Library organised by Sefton MBC. Members of Sefton and Aintree Parish Councillors were present, together with Officers and Members of your Planning Department also in attendance. It was made abundantly clear from plans displayed that the whole of the land between Wango Lane and Bullbridge Lane is subject to flooding and would not be used for development. I attended a meeting in Melling last year and spoke at length [to a planning officer] and found she had no knowledge of any flooding issues relating to this piece of land or to our adjacent Close which I found alarming. As I note that the area proposed (SR4.30) is a segment of the same field! We have had experienced flooding within our Close, (See enclosed picture). Which wasn't taken at the height of the flood, the water reached the bottom of car door sills and was at the point of entering the cars, this is sufficient enough reason to reject this land for any development.

2. The proposed development would be significantly lower than the Leeds and Liverpool Canal and would pose a serious and very real potential problem which cannot be overlooked. [The planning officer] claimed she has been advised this wouldn't be the case.

3. The Aintree Lane side of the Canal already floods on a regular basis, especially during periods of heavy rain and is frequently closed to through traffic, with diversions in place which includes our Bus Services (159, 236 and the school buses to the High Schools in Maghull). Many attempts have been made over the 16 years I have lived in Valley Close to address this issue, but the flooding continues to present a major problem.

4. United Utilities regularly need to access sewerage drains within Valley Close. It involves lifting manhole covers in the centre of the road as well as one located on the drive of house number 11. Surely any further development would exacerbate this problem and further increase the number of visits they have to make. When I mentioned this to [the planning officer] she advised that she is in contact with United Utilities and wasn't aware of this issue.

5. The proposed entry/exit road to this site was identified as being in Wango Lane. This needs serious consideration due to the incline and sharp bend, with speed bumps close by the entry to Valley Close. I have already been involved in a car crash whilst attempting to leave Valley Close. We experience daily delays whilst just trying to enter/exit our Close, and with the increased volume of barges on the canal the bridge is being closed on a regular basis which is adding to the traffic being backed up down Wango Lane. Only a couple of weeks ago we tried to leave our Close and found ourselves involved with irate drivers who wouldn't allow us to exit. I think cars will miss the entrance to this new development, especially if they are accessing the estate from Fazakerley as they will no sooner be coming down the bridge on the left hand side when the entrance will appear sharply on the right, if they miss this turn the next entrance is Valley Close to make a turn around.

As our Close is already used as a turnaround point for vehicles who think they can access Taunton Drive through Valley Close this additional development will create further chaos in vehicles thinking they can access this via our Close. Currently when traffic is backed up on Wango Lane they often pull in and turn around whilst the swing bridge is in use, disregarding the sign that Valley Close is not a through road. I worry for the safety of the children who are playing out in our close, and feel an accident is waiting to happen. I do not doubt vehicles will try and enter this development via our Close again adding to the turnaround situation we see on a daily basis. I arranged with the council a number of years ago to have the sign at the end of our close changed to display this was a 'dead end' due to the number of vehicles that keep turning around in our close, but as people do not pay attention to this sign they continue to turnaround sometimes at great speed in Valley Close. The traffic problem has increased further with the building of a new Aldi Store in Fazakerley which has significantly increased the daily flow of vehicles' along Wango Lane. At times we are grid locked when trying to leave Valley Close, weekend traffic is coming ridiculous, as we try to not venture out at weekends due to the queue of traffic on Wango Lane.

6. [The planning officer] advised that due to a shortage of houses within Aintree further development is required, I would like to point out that a number of affordable houses have been on the market in excess of 18 - 24 months and are not being sold; therefore I do not understand this point in question. We find ourselves in 'lock down' due to the congestion of traffic entering and leaving Aintree as a result of the heavily used Aintree Retail Park, shortcut traffic from Kirkby, a couple of small housing estates over the bridge in Fazakerley. One estate in question has less than 57 houses and on 15th September I counted 117 cars present on this estate. Also motorists are taking short cuts off the motorway through Aintree to reach the Retail Park by avoiding Switch Island.

7. The proposed development would aggravate further issues with schools and GP surgeries. As we currently struggle in obtaining GP appointments it is not unusual to wait 5 days for a doctor's appointment. I know of parents who are trying to obtain a place in the local schools with difficulty, [the planning officer] advised that as far as she was aware no issues around places with the local schools/GP Surgeries currently exist.

8. Whilst the land is quite a small area the wildlife is quite varied, owls, sparrow hawks, wood peckers, voles and kingfishers are present and any development would adversely affect this balance of nature and destroy this little bit of natural beauty that is left in Aintree.

9. We are also concerned as to the type of property that would be considered for this development, as [the planning officer] mentioned 'One Vision Housing Trust' we are concerned this will affect the value of our property but more importantly the tenants who could be placed in these 8 properties. Speaking from personal experience we purchased an ex council house in the Old Roan 33 years ago when we first married and found to our detriment that some of the tenants who were gradually being placed in the remaining council held properties changed the whole feel of the estate and after 18 years we basically gave the house away just to leave the estate. I can't believe that this 'unique piece of land' would be destroyed for the sake of 8 affordable houses.

10. Permanent increase in light & noise pollution with this development would be unbearable. The new development will spoil the peace and quiet of this 'close' and the lives of the residents forever, which greatly needs to be considered before you consider the benefits of a new development surely you must consider the impact this would have on our lives and consider our needs and rights as current residents of Aintree.

Please see enclosed picture how 'Valley Close' currently looks, as you can see it would dramatically change with the proposed development of 25 houses being built on this picturesque piece of land, all this for 8 affordable houses is not worth the loss to Aintree Village. How out of place will Valley House look which was built in 1625 surrounded a mini housing estate, this piece of history needs to stand out and be left in a tranquil and natural setting.

The current owner of Valley House also owns the land that has been offered for development, they have been open and honest in saying they plan to sell up and move on within the next 12 to 18 months to a more rural setting. In my view, good local knowledge is far preferential to anyone deciding the fate of this development from afar without being keenly aware of everything which is involved. I strongly appeal to all those responsible for making a decision do so only after conferring with Aintree Village Parish Councillors and local residents, alongside a site visit in order to ascertain, indeed confirm, that this particular piece of land is totally unsuitable for the proposed development.

Summary of Suggested Changes

Remove MN2.33 as an allocation in the plan.

Evidence Submitted

Policy MN2.33

Land at Wango Lane, Aintree

Respondent No 380

Response Ref

Representor Name Ian Gent

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

The houses built on this site would require raising to the ground level, as this land is at risk of flooding especially given its proximity to the Leeds/Liverpool canal. Houses developed on this site would be at risk of flooding from the following three perspectives:

- surface water flood risk;
- susceptibility to ground water flooding; and
- residual risk of canal failure.

How would people living in this situation be able to insure their new properties? Has this problem been thought through? According to one of the Council's own reports (Local Plan Site Assessment Form). There is deemed to be a 'Significant Constraint' from a heritage perspective reference the above referenced site which is located within my home Village, the site being: "adjacent to a Grade II listed building (Valley House). The site provides a contextual setting to the listed building. Part of the site may originally been within the curtilage of the listed farmhouse."

I'm therefore pleased to note that Appendix One (Site Specific Requirements) notes in respect of 'MN2.33 Land at Wang^o Lane, Aintree' that the development of this site must: "be sited so that the connection between Grade II listed Valley House and its wider green / agricultural setting is maintained; and retain a buffer around the listed building".

I also object to the inclusion of 'MN2.33 Land at Wango Lane, Aintree' on the grounds of site access given its immediate proximity to Handcocks Bridge. I am also concerned that traffic will be an issue here.

Sefton's report notes: "The location of the access will need to be carefully assessed due to the proximity to traffic signal controlled shuttle working over the swing bridge, which leads to some queuing across the potential point of vehicular access. There are some concerns relating to sight lines." Surely, the above is sufficient evidence that this site is inappropriate and should be removed from the scope of the Local Plan.

Summary of Suggested Changes**Evidence Submitted**

Policy MN2.33

Land at Wango Lane, Aintree

Respondent No 427

Response Ref 1

Representor Name Thomas Hancock

Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

The site is well served by existing infrastructure is unconstrained and would be readily available for development. The release of this site would consolidate the built up area providing a logical extension to the settlement following the existing hard edge along Taunton Drive to the north. A nice housing development would enhance the area. This site over the last 30 years has been subject to fly tipping, stolen cars, fires and general disturbances. The rubbish from it gets removed and within a couple of weeks it has built up again. Any open space on this site will cause the same problem, as people will continue to put rubble and rubbish on to it. This is something that should be taken into consideration when considering the density of housing on the site.

This site is free from all encumbrances and is available for development. The infrastructure for the site is modest and we have entered into a contract with Robinson New Homes of Blackburn (see representation 705). The builder is keen to start building as soon as the plan has been adopted and planning permission has been given. We have had an initial assessment of traffic implications and of visibility for site access which have both been positive. A comprehensive heritage report has been completed for the site regarding the protection of the listed building in Valley Close and its setting. The traffic assessment and water vole habitat assessment would be implemented at planning application.

It is appropriate to consider the site in its local context and proximity to the urban area. Homes are needed in locations which would afford easy and convenient access to the primary commercial and employment areas such as Liverpool Bootle and Kirkby. The site is also close to the M57 and the M58. Releasing the site would contribute to reducing the need to travel in accordance with central government guidance. It is close to local transport and amenities.

In conclusion, this site would have a minimum impact on green belt and would finish off the hard edge of Aintree Village. According to the Council's Agricultural Land Study the site would prove too difficult to maintain because of its isolated position. Development of this site would have a minimum impact on the local area and would indeed enhance the surroundings.

Summary of Suggested Changes

None.

Evidence Submitted

Heritage Assessment (CgMs), June 2014

Policy MN2.33 Land at Wango Lane, Aintree

Respondent No 492 Response Ref 16 Representor Name

Organisation Name Craig Seddon SIPP

Obj/Sup/Com Objection

Summary of Main Issues

Land at Wango Lane is 1.8ha site identified for 25 dwellings. The site is allocated in the UDP as Green Belt land and a Landscape Renewal Area. In justifying the site's inclusion, the Council state that the site will contribute to meeting a high affordable housing need. Proposed Local Plan Policy HC1 (Affordable And Special Needs Housing) advises that on new developments of 15 dwellings or more, 30% of the total scheme will be provided as affordable housing. Given the site's allocation is only for 25 dwellings, this would equate to eight affordable units. This is a weak argument for suggesting the site will contribute towards affordable housing need.

Given the size of the site and the small number of units it would bring forward, it is questioned why it has been identified as a strategic housing allocation.

The Site Assessment Form (SR4.30) identifies that there is the potential for water voles on part of the site linked to the River Alt. Given the number of existing mature trees and foliage on site, it is suggested that there is the potential for other protected habitats, species and trees to be present on site. Given there does not appear to be any further evidence of an ecological survey having been undertaken, it would suggest that this constitutes a Tier 1 constraint.

The site is adjacent to Valley House, which is a grade II listed building. The Assessment Form describes the site as providing a 'contextual setting' to the building, which may have originally been within its curtilage. The Council assess the impact of the site on this grade II listed building as being a significant constraint but justify this by stating only 50% of the site should come forward. The Assessment Form concludes that the site is not subject to any other significant constraints and is appropriate to allocate for housing. Without having undertaken a Heritage Impact Assessment it is questionable how the Council have come to this conclusion. Given the proximity of the site to the listed building, even if only 50% came forward it has the potential to significantly impact upon it. It is not considered that heritage has been adequately assessed.

The Assessment Form identifies that there are concerns regarding the limited capacity of the swing bridge to the east and identify this as a significant constraint. Given this fact it is questioned why the site has been allowed to progress to the Draft Publication stage, without this having been assessed. Concerns have also been raised regarding the location of the access point into the site and whether the necessary sight lines can be achieved. Given the site is located on a bend on Wango Lane it is questioned whether appropriate access can be achieved at all. Given the above, no evidence has been provided to demonstrate that safe access into the site can be achieved. This must therefore be regarded as a Tier 1 constraint.

Our client does not agree with the Council's concluding assessment that there are no significant constraints on the site. In fact, the Council specifically identify the network capacity as being a significant constraint. Without having undertaken a Transport Assessment it is difficult to understand how the Council have determined the site's small size will mitigate the significant network capacity constraints. There are significant ecological and highways constraints which need to be addressed to demonstrate that this site is suitable for residential development. Without these assessments, these issues must be regarded as Tier 1 constraints.

Summary of Suggested Changes

Evidence Submitted

Policy MN2.33

Land at Wango Lane, Aintree

Respondent No 515

Response Ref 1

Representor Name Lynn Woodward

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

My objections to the site at Wango Lane are as follows:

1. Access/Egress. I've been advised the access to the site would be from Wango Lane. This proposal could not have been thought through as it's almost impossible to enter the site between Hancocks Bridge and Valley Close. It's on an incline, a bend with traffic lights on the bridge. This cannot be safe. The bridge closes twice a day for barges to pass, causing traffic to back up past Valley Close in the so call quite time. The number of vehicles using Wango Lane as a rat run for the Retail Park, Netherton, Maghull and Melling, all trying to avoid traffic jams at Switch Island.

2. Flooding. The site has been designated as Flood Zone 1 and is considerably lower than land adjacent to it on one side that has already been developed for housing and even more so than the canal. To build on the site it would be necessary to raise the land level to a point where it is higher than all other properties in the area My garden is almost constantly flooded. Having asked the Council for advice I've been told they cannot do anything about it. What redress would residents have if the flooding situation worsened and the flooding of the area is exacerbated if the new development went ahead.

3. The site is designated Green Belt land and should not be developed in this way regardless of the flooding potential. It should remain protected. This type of development will add to urban sprawl and reduces the space between Aintree, Melling and Kirkby.

4. Local Facilities. Aintree is not an 'ageing' population. Both schools are oversubscribed. More houses will over burden the local facilities, along with the Local GP, who have taken on the Melling residents since their GP closed. The appointment system is now at breaking point with a long wait to see a doctor.

Therefore the site, although relatively small, the impact would be inordinate not only on the immediate existing properties, on the road network, on Green Belt land, potential increase in flooding, local amenities, schools, doctors. It would be catastrophic to the equilibrium of Aintree Village.

Summary of Suggested Changes**Evidence Submitted**

Policy MN2.33

Land at Wango Lane, Aintree

Respondent No 533

Response Ref 1

Representor Name G H Sands

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

This area of land was purchased by the current owner and, shortly afterwards was rented out to the owners of Aintree Racecourse for a Grand National Meeting. It became flooded because of heavy rain leading to a situation which became so problematic that the vehicles parked there needed to be towed off the field. Shortly afterwards Valley Close itself became flooded.

Very regularly, the area is closed to through traffic because of flooding in the area. With the canal so close this is quite likely to flood again when any leakage of water from the canal would aggravate an already serious situation. Information regarding buses which operate in this area will be available from the operators of the 159 and 236 bus routes, as well as regular users of Aintree Lane between the canal bridge and Longmoor Lane / Valley Road. Many attempts have been made over the years to address the issue, but the flooding continues to present a major problem.

An officer of Sefton Planning Department informed me that an area of that same field would not be developed because 'it was subject to flooding'. However the same field is now being considered by Sefton Council as a part of the Local Plan. This particular field which is being considered is also significantly lower than the Leeds and Liverpool Canal itself.

United Utilities regularly need to come into Valley Close to deal with sewerage problems. It necessitates lifting a manhole cover in the centre of the road as well as one located on the drive of the house numbered 9.

The entry/exit road to the proposed site is given as being in Wango Lane. The serious difficulty this will introduce needs to be considered since, for vehicular traffic, this is on an incline with a sharp bend and speed bumps close to the entry to Valley Close. In addition, traffic over the canal bridge is controlled by traffic signals as the bridge is limited to one-way traffic.

Aintree Village has a limited number of shops, the bus service is woefully inadequate and, Aintree is very congested both in and out, making it an area of significant problems for motor vehicles.

Including this area of land for development would place a burden on the infrastructure, irrespective of how many properties are developed, particularly as it concerns the local schools and the single GP Surgery located in Aintree. It also needs to be considered that children in Aintree are required to travel outside the area to obtain secondary education.

Summary of Suggested Changes**Evidence Submitted**

Policy MN2.33

Land at Wango Lane, Aintree

Respondent No 535

Response Ref 1

Representor Name J P Woodward

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

My reasons for objecting include:

Access/Egress.

I was told by a member of Sefton Council Planning Department at one of the Consultation meetings that access to and egress from this site would be from Wango Lane. This seems to be a totally unacceptable proposal given the distance between Valley Close and the traffic lights at Hancocks Bridge. Between the swing bridge and Valley Close there is a significant bend in the road and it is also on an incline up to the bridge over the canal and this must interfere with sight lines and create a dangerous situation. Current traffic levels are extremely high and this is exacerbated twice daily when the swing bridge is opened to allow barges to pass which results in traffic backing up, very frequently, beyond the entrance to Valley Close. The number of vehicles using Wango Lane has increased inordinately over recent years coinciding, amongst other things, with the continuing development of Aintree Retail Park. In reality Wango Lane has become a "rat run" for people avoiding the M57 motorway and over recent weeks I have conducted a survey of the number of vehicles using Wango Lane at various random times of day and evening — I have particularly included what could be considered quiet times such as 11.30 am and 13.30 to give a representative reflection of numbers involved.

The table below shows the number of vehicles using Wango Lane at various times:

Date; [Time] No of Vehicles

2 March 2015; [13.15 - 14.15] 631

3 March 2015; [17.45 - 18.15] 567

5 March 2015; [11.15 - 12.15] 619

9 March 2015; [17.10 - 18.10] 1,106

16 March 2015; [11.40 - 12.10] 426

I appreciate this is a relatively small sample but I can assure you it is indicative of the levels of traffic using Wango Lane on a consistent, continual and seemingly increasing basis.

Potential Flooding

This site is designated as being a Flood Zone land is considerably lower than land adjacent to it on one side that has already been developed for housing and is very considerably lower than the Leeds/Liverpool canal that borders it on the other side. I have discussed this issue with a Civil Engineer and he stated that in order to develop this plot of land it would be necessary to raise the level to a point where it is higher than the adjacent housing, therefore any excess water would drain off into the existing established property. It should be borne in mind that Wango Lane both sides of the canal are susceptible to regular flooding and that in the last 5 years Valley Close has been flooded completely to a depth of approximately 10 inches. Development of Site MN2.33 would unquestionably increase the risk of future flooding exponentially.

Use of Green Belt Land

The site SR4.30 is designated as Green Belt and should not be developed in this way regardless of the flooding potential and should continue to remain protected. This type of development also adds to urban sprawl and reduces the space between Aintree village and neighbouring Kirkby.

Inadequate Local Facilities

The local Primary and Junior schools are at capacity now and are expecting excessive demand in future years and any further development in the area can only add to this pressure. These schools currently have "Good" or "Outstanding" reports from Ofsted and to put additional pressure on these resources would be reckless.

The only GP practice in Aintree Village is on record, and they have written to Sefton Council, saying unequivocally that they do not have the capacity to register any new patients and I believe that these factors should be taken into account.

Conclusion

This site would be a relatively small development that would have an inordinate impact, not only on the immediate existing properties but on the road network, the green belt land, potential increase in flooding and local amenities such as Doctors and

schools.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.33	Other Documents
Policy MN2.33	Land at Wango Lane, Aintree	
Respondent No 661	Response Ref 9	Representor Name
Organisation Name PSA Developments		
Obj/Sup/Com Objection		

Summary of Main Issues

Land at Wango Lane, Aintree (MN2.33) is in the Green Belt. This 1.81 hectare site is being promoted for 57 homes. It has been selected on the basis that the area presents little problem to the surrounding green belt, largely in terms of the minimal visual impact due to the size of the development and the fact that the M57 acts as a well-contained edge to the north.

PSA Developments Ltd object to the allocation of this site.

Problems are apparent, such as the road network being near capacity, there being no existing access point into the site, with the only opportunity to do so via Wango Lane and /or the established housing area, with potential harmful impacts on road safety and efficiency on those residential streets. The grade II listed Valley House could possibly impact on development to the east.

Summary of Suggested Changes

Delete site MN2.33 from the housing allocations in policy MN2.

Evidence Submitted

Chapter 6	Plan Order Site MN2.33	Other Documents
Policy MN2.33	Land at Wango Lane, Aintree	
Respondent No 705	Response Ref 1	Representor Name Alistair Wilcock
Organisation Name Robinson New Homes		
Obj/Sup/Com Support		

Summary of Main Issues

This site is free from all encumbrances and is available for development. The infrastructure for the site is modest. Robinson New Homes of Blackburn have entered into a contract with the site owners to develop the site. They are keen to start building as soon as the plan has been adopted and planning permission has been given. A comprehensive heritage report has been completed for the site regarding the protection of the listed building in Valley Close and its setting. A traffic assessment and water vole habitat assessment would be implemented at planning application.

It is appropriate to consider the site in its local context and proximity to the urban area. Homes are needed in locations which would afford easy and convenient access to the primary commercial and employment areas such as Liverpool Bootle and Kirkby. The site is also close to the M57 and the M58. Releasing the site would contribute to reducing the need to travel in accordance with central government guidance. It is close to local transport and amenities.

In conclusion, this site would have a minimum impact on green belt and would finish off the hard edge of Aintree Village. According to the Council's Agricultural Land Study would prove too difficult to maintain because of the position of the site. Development of this site would have a minimum impact on the local area and would indeed enhance the surroundings.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.33 **Other Documents**
Policy MN2.33 **Land at Wango Lane, Aintree**
Respondent No 716 **Response Ref** 57 **Representor Name** Robert Swift
Organisation Name Robert Swift and family
Obj/Sup/Com Support

Summary of Main Issues

Land at Wango Lane, Aintree (Site MN2.33) 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 MN2.33 **Other Documents**
Policy MN2.33 **Land at Wango Lane, Aintree**
Respondent No 740 **Response Ref** 37 **Representor Name**
Organisation Name Formby Residents Action Group
Obj/Sup/Com Objection

Summary of Main Issues

We wish to rely on the representation of Mr John Williams [Rep No. 1026] for flood risk issue on this site.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.33 **Other Documents**
Policy MN2.33 **Land at Wango Lane, Aintree**
Respondent No 859 **Response Ref** **Representor Name** Oli Caffrey
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

The proposed site of Wango Lane is totally unsuitable for houses. There is no proper access. Any alternatives will only make things elsewhere.

Summary of Suggested Changes

Evidence Submitted

Policy MN2.33

Land at Wango Lane, Aintree

Respondent No 862

Response Ref 1

Representor Name S McClelland

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

There is no planned infrastructure to support the proposed developments. Many years ago in the Aintree area we had fewer houses and a lower population but in the immediate area there were:- 2 infant/primary schools, 2 doctors surgeries, 2 buses per hour, library, petrol station, youth club, police station, 3 public houses, 2 banks. Now we have:- 2 infant/primary schools, 1 doctors surgery, 1 bus per hour, 2 public houses.

Unless we have an increase in these facilities this area will become one big housing estate. Unless we have an increase in public transport we will have more traffic on our roads that is already slowed up by the speed bumps on the two main access roads in the area. Unless we have more doctors we will find it increasingly difficult to get an appointment without our own surgery as any drop in health centre is not on a direct bus route.

Having lost many of the facilities we previously had, people in this area have no choice but to get in their cars to go to banks, dentists, libraries, petrol stations or police stations, all of which causes unnecessary traffic and pollution.

We have four access/exit points in our area of Aintree BUT two of these only allow one vehicle at a time to pass (Melling road bridge and Wango Lane bridge) Of the other two points, the one at the A59 junction is extremely busy at peak times and especially bank holidays and Grand National Day. Any further increase in traffic could potentially cause gridlock in this area.

FLOODING

It is obvious that the more ground we concrete, tarmac or build on that we will reduce our natural drainage area and there will be an increase in flooding. Whilst this will be considered for new build properties it does nothing to protect existing property owners who may in the future find themselves unable to insure their properties or subsequently sell them. If these existing properties cannot be sold, this again will impact on the number of houses available for habitation.

PROPOSED DEVELOPMENT IN MELLING

Any development that is approved for Melling will have a direct impact on Aintree for all of the above reasons. Traffic from there has to pass through our area. They are also lacking in facilities so will put a further strain on our doctors/schools/transport.

I am not against future development but it has to be balanced and well planned together with the right facilities. It should not just be a case of meeting government targets.

Summary of Suggested Changes**Evidence Submitted**

Chapter 6	Plan Order Site MN2.33	Other Documents
Policy MN2.33	Land at Wango Lane, Aintree	
Respondent No 863	Response Ref 1	Representor Name Ann Eaves
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

1. Insufficient resources in the area of Aintree to cope with the demands placed on it by extra housing ie. Doctors, Schools, Dentists.
2. The general road infrastructure is already overwhelmed at weekends in particular due to the opening of the retail park on Ormskirk road. Already there is traffic congestion coming out of Aintree village onto Ormskirk road. Additional housing would only create more problems and create additional traffic pollution.
3. Where is the access for the new development off Wango Lane going to be? Will it be on Wango lane, Valley Close or off Taunton Drive any of these locations would cause considerable upheaval to the residents of these areas and possibly structural damage to existing residences as the roads possibly couldn't cope with the heavy goods vehicles which would be needed to supply the site.
4. The building of new properties could add to the risk of flooding for the existing dwellings and possibly the new ones due to the close proximity of both the canal and the river Alt.
5. The loss of the greenbelt which is heavily used for walking, cycling and other leisure activities would be a major blow to the current residents especially those without other means of transport who are unable to go further afield to enjoy these activities.
6. The farmland is invaluable for the production of food and is of very high quality and this vital use should not be lost.
7. There should be a priority given to building on brown field sites rather than adding to the urban sprawl by using up the precious commodity of the green belt to build on. Once the green belt has been lost it can never be restored. Future generations will be denied this facility.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.33	Other Documents
Policy MN2.33	Land at Wango Lane, Aintree	
Respondent No 864	Response Ref 1	Representor Name Thomas Eaves
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

1. Insufficient resources in the area of Aintree to cope with the demands placed on it by extra housing ie. Doctors, Schools, Dentists.
2. The general road infrastructure is already overwhelmed at weekends in particular due to the opening of the retail park on Ormskirk road. Already there is traffic congestion coming out of Aintree village onto Ormskirk road. Additional housing would only create more problems and create additional traffic pollution.
3. Where is the access for the new development off Wango Lane going to be? Will it be on Wango lane, Valley Close or off Taunton Drive any of these locations would cause considerable upheaval to the residents of these areas and possibly structural damage to existing residences as the roads possibly couldn't cope with the heavy goods vehicles which would be needed to supply the site.
4. The building of new properties could add to the risk of flooding for the existing dwellings and possibly the new ones due to the close proximity of both the canal and the river Alt.
5. The loss of the greenbelt which is heavily used for walking, cycling and other leisure activities would be a major blow to the current residents especially those without other means of transport who are unable to go further afield to enjoy these activities.
6. The farmland is invaluable for the production of food and is of very high quality and this vital use should not be lost.
7. There should be a priority given to building on brown field sites rather than adding to the urban sprawl by using up the precious commodity of the green belt to build on. Once the green belt has been lost it can never be restored. Future generations will be denied this facility.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.33 **Other Documents**
Policy MN2.30 **Land east of Waddicar Lane, Melling**
Respondent No 867 **Response Ref** 2 **Representor Name** Lynn Caffrey
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Access via Wango Lane is impossible due to Hancocks Bridge. Access would have to be elsewhere. Either Bullbridge Lane (Increasing traffic) or Taunton Drive (totally unsuitable with roads that are too narrow to take existing traffic and not fit for purpose).

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.33 **Other Documents**
Policy MN2.33 **Land at Wango Lane, Aintree**
Respondent No 877 **Response Ref** 1 **Representor Name** Eva Bradley
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I strongly object to the proposed development of the land off Wango Lane near to the River Alt and canal.

I have lived here for 60 yrs and have watched the area grow and grow and can not see how we can cope with more development. I can no longer walk to the shops as I am not able to cross due to the speed and volume of traffic which will only get worse with more development. The additional traffic will also affect health.

I have seen the effects of flooding and I am very worried about the real possibility of more damage being caused here due to flooding if building is carried out. What about sewer pipe that runs under that land? Put people before project.

We have no real facilities here since the library closed down.

Why not use browfield sites, e.g. Bridle Road.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.33 **Other Documents**
Policy MN2.33 **Land at Wango Lane, Aintree**
Respondent No 878 **Response Ref** 1 **Representor Name** Neil Cole
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I strongly object to the proposed development of the land off Wango Lane. Main reasons: There is a risk from flooding, the nearby homes and the new homes will be at high risk. The land is flood zone, where will the water go if the land is covered in concrete.

We already suffer from high level of traffic congestion, we simply cannot take anymore along with the additional pollution this will cause.

We have very few facilities here no library, bank, dentist, and over subscribed GPs and schools, a very infrequent bus service.

The one thing we have is valuable arable land which the country needs and should value. More thought needs given to brownfield sites.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.35	Other Documents
Policy MN2.35	Former Z Block Sites, Buckley Hill Lane, Netherton	
Respondent No 741	Response Ref 13	Representor Name
Organisation Name	Priory Asset Management LLP	
Obj/Sup/Com	Comment	

Summary of Main Issues

The former Z Block Sites, Buckley Hill lane, Netherton (MN2.36) is a brownfield site in Netherton, which was allocated in the previous Local Plan but was not developed. The site is 3.5ha in size and is expected to deliver 100 units at a density of 28.57 dwellings per hectare. The proposed site has been available for development for a considerable amount of time and has not come forward. The site is adjacent to one of the top 20% most deprived wards in the UK and property values are subsequently low in this area. The site should currently be considered 'stalled'. Though there are few constraints attached to the site, the location is currently not appealing to the market and without intervention this site may not be developed.

Summary of Suggested Changes

It is not suggested that this site is de-allocated. A buffer should be included within the housing target to allow for some sites, such as the Z Blocks Sites, to potentially remain stalled without risking the delivery of the Local Plan and the Local Authority's ability to defend speculative development in the Green Belt.

Evidence Submitted

Chapter 6	Plan Order Site MN2.36	Other Documents
Policy MN2.36	Former St Raymond's School playing field, Harrops Croft, Netherton	
Respondent No 716	Response Ref 38	Representor Name Robert Swift
Organisation Name	Robert Swift and family	
Obj/Sup/Com	Objection	

Summary of Main Issues

The former St Raymond's School playing field, Harrops Croft, Netherton (Site MN2.36) is a partly Council owned site, located within the urban area and is in a poor quality environment. The site has also been promoted in part in the SHLAA. A density of 35 dph has been applied.

Summary of Suggested Changes

The indicative capacity of Site MN2.36 should be reduced from 65 to 50 dwellings.

Evidence Submitted

Chapter 6	Plan Order Site MN2.36	Other Documents
Policy MN2.36	Former St Raymond's School playing field, Harrops Croft, Netherton	
Respondent No 725	Response Ref 10	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 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.

No evidence has been provided that this proposed allocation meets 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 MN2.37	Other Documents
Policy MN2.37	Land at Pendle Drive, Netherton	
Respondent No 716	Response Ref 39	Representor Name Robert Swift
Organisation Name Robert Swift and family		
Obj/Sup/Com Objection		

Summary of Main Issues

Land at Pendle Drive, Netherton (Site MN2.37) is a Council owned site, located within the urban area and is in a poor quality environment. There is highway capacity issues associated with the site. The site has also been promoted in the SHLAA. A density of 35 dph has been applied.

Summary of Suggested Changes

The indicative capacity of Site MN2.36 should be reduced from 52 to 39 dwellings.

Evidence Submitted

Chapter 6	Plan Order Site MN2.38	Other Documents
Policy MN2.38	Land at the former Bootle High School, Browns Lane, Netherton	
Respondent No 716	Response Ref 40	Representor Name Robert Swift
Organisation Name Robert Swift and family		
Obj/Sup/Com Objection		

Summary of Main Issues

Land at the former Bootle High School, Browns Lane, Netherton (Site MN2.38) is a Council owned site, located within the urban area and is in a poor quality environment. There is highway capacity issues associated with the site. The site has also been promoted in the SHLAA. A density of 35 dph has been applied.

Summary of Suggested Changes

Reduce the indicative capacity of Site MN2.38 from 63 to 45 dwellings.

Evidence Submitted

Chapter 6	Plan Order Site MN2.38	Other Documents
Policy MN2.38	Land at the former Bootle High School, Browns Lane, Netherton	
Respondent No 725	Response Ref 11	Representor Name Paul Daly
Organisation Name Sport England		
Obj/Sup/Com Objection		

Summary of Main Issues

On this site the allocation would be limited to broadly the footprint of the former school buildings and hardstandings. This could comply with one of the exceptions in Sport England's playing field policy, but it could also prejudice the use of the adjacent grass area of playing field. For example, there would be no parking area to serve the playing field, any ancillary accommodation would have to be built on the playing field etc. Indeed, the supporting 'site assessment information' states that the allocated area should be laid out so as to allow for potential future development of the school site that lies outside of the allocation.

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. 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 MN2.39	Other Documents
Policy MN2.39	Former Daleacre School, Daleacre Drive, Netherton	
Respondent No 716	Response Ref 58	Representor Name Robert Swift
Organisation Name Robert Swift and family		
Obj/Sup/Com Support		

Summary of Main Issues

Former Daleacre School, Daleacre Drive, Netherton (Site MN2.39) 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 MN2.39	Other Documents
Policy MN2.39	Former Daleacre School, Daleacre Drive, Netherton	
Respondent No 725	Response Ref 12	Representor Name Paul Daly
Organisation Name Sport England		
Obj/Sup/Com Objection		

Summary of Main Issues

This site comprises of the majority of a playing field located to the west of school buildings. It appears the playing field has been partitioned by a fence and this forms the eastern boundary of the proposed allocation site.

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. 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 MN2.40	Other Documents
Policy MN2.40	Former Rawson Road Primary School, Rawson Road, Bootle	
Respondent No 716	Response Ref 59	Representor Name Robert Swift
Organisation Name Robert Swift and family		
Obj/Sup/Com Support		

Summary of Main Issues

Former Rawson Primary School (Site MN2.40) 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 MN2.40	Other Documents
Policy MN2.40	Former Rawson Road Primary School, Rawson Road, Bootle	
Respondent No 725	Response Ref 13	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. 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 MN2.41 **Other Documents**
Policy MN2.41 **Former St Wilfrid's School, Orrell Road, Bootle**
Respondent No 24 **Response Ref** 1 **Representor Name** Lorraine Highton
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

St Wilfrd's site should not be classed as brownfield site. Litherland and the surrounding area is being stripped of any open spaces, community amenities and character. There are real brownfield sites available for building.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.41 **Other Documents**
Policy MN2.41 **Former St Wilfrid's School, Orrell Road, Bootle**
Respondent No 716 **Response Ref** 41 **Representor Name** Robert Swift
Organisation Name Robert Swift and family
Obj/Sup/Com Objection

Summary of Main Issues

Former St Wilfrid's School, Orrell Road, Bootle (Site MN2.41) is a relatively contained Council owned site and comprises former school playing fields, located within the urban area and is in a poor quality environment. A density of 35 dph has been applied.

Summary of Suggested Changes

Reduce the indicative capacity of Site MN2.41 from 160 to 148 dwellings.

Evidence Submitted

Chapter 6	Plan Order Site MN2.41	Other Documents
Policy MN2.41	Former St Wilfrid's School, Orrell Road, Bootle	
Respondent No 725	Response Ref 14	Representor Name Paul Daly
Organisation Name Sport England		
Obj/Sup/Com Objection		

Summary of Main Issues

Built facilities appear to have been cleared from site, but playing field land remains and would be lost to the allocated used.

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. 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 MN2.41	Other Documents
Policy MN2.41	Former St Wilfrid's School, Orrell Road, Bootle	
Respondent No 741	Response Ref 16	Representor Name
Organisation Name Priory Asset Management LLP		
Obj/Sup/Com Comment		

Summary of Main Issues

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.

Summary of Suggested Changes

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.

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.42 **Other Documents**
Policy MN2.42 **Klondyke Phases 2 and 3, Bootle**
Respondent No 716 **Response Ref** 22 **Representor Name** Robert Swift
Organisation Name Robert Swift and family
Obj/Sup/Com Objection

Summary of Main Issues

Klondyke Phases 2 and 3, Bootle (Site MN2-42) - The scheme is part of a regeneration scheme on Council owned land within Bootle, with Phase 1 comprising 86 dwellings which is currently being built out . This part of the scheme focuses on Phase 2 and Phase 3 of the development of the site, and has planning permission for 142 dwellings (Planning App Ref: DC/2014/00642). As the site has planning permission it should not be included as a proposed site allocation and is discounted.

Summary of Suggested Changes

Klondyke Phases 2 and 3, Bootle (Site MN2.42) should be deleted from policy MN2.

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.42 **Other Documents**
Policy MN2.42 **Klondyke Phases 2 and 3, Bootle**
Respondent No 741 **Response Ref** 14 **Representor Name**
Organisation Name Priory Asset Management LLP
Obj/Sup/Com Comment

Summary of Main Issues

Klondyke Phases 2 and 3 are retained allocations within the Local Plan (MN2.42). The land is a 4.3ha brownfield site in a predominantly residential area of Bootle currently surrounded by a substantial amount of dwellings. It is anticipated that this site will deliver approximately 140 dwellings equating to 33.3 dwellings per hectare.

This site is similar to the Z Blocks site, in that the site has not been developed in the historic plan period and so is assumed to be 'stalled'. The site also has several costs associated to its development, as substantial demolition and decontamination are required. This reduces the likelihood of the market developing this site.

The site is located close to existing areas of deprivation, which also reduces the land value further. Although the Local Authority anticipates a high density of development on the site, this may not generate the profit required for the market to develop in this location.

Summary of Suggested Changes

It is not suggested that this site is de-allocated. However, it is suggested that the council be mindful of the weaknesses and the potential inability of these sites to deliver the required level of development. It is advisable that this be considered and a buffer built in to the Local Plan housing supply to acknowledge the risks of certain sites not being developed.

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.43 **Other Documents**
Policy MN2.43 **Peoples site, Linacre Lane, Bootle**
Respondent No 203 **Response Ref** **Representor Name** Julian Austin
Organisation Name National Grid
Obj/Sup/Com Comment

Summary of Main Issues

Peoples site, Linacre Lane, Bootle is crossed by IP line Linacre to Maghull

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.43	Other Documents
Policy MN2.43	Peoples site, Linacre Lane, Bootle	
Respondent No 716	Response Ref 42	Representor Name Robert Swift
Organisation Name	Robert Swift and family	
Obj/Sup/Com	Objection	

Summary of Main Issues

Peoples site, Linacre Lane, Bootle (Site MN2.43) is a Council owned cleared vacant site. However due to the former use of the site, there may be contamination and remediation issues associated with the site. The site has also been promoted in the SHLAA, which has identified a Council depot and recycling centre to the south of the site, and a buffer and noise attenuation is required. A density of 35 dph has been applied.

Summary of Suggested Changes

Reduce the indicative capacity of Site MN2.43 from 110 to 76 dwellings.

Evidence Submitted

Chapter 6	Plan Order Site MN2.44	Other Documents
Policy MN2.44	Former St Joan of Arc School, Rimrose Road, Bootle	
Respondent No 716	Response Ref 60	Representor Name Robert Swift
Organisation Name	Robert Swift and family	
Obj/Sup/Com	Support	

Summary of Main Issues

Former St Joan of Arc School, Rimrose Road, Bootle (Site MN2.44) 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 MN2.44	Other Documents
Policy MN2.44	Former St Joan of Arc School, Rimrose Road, Bootle	
Respondent No 741	Response Ref 17	Representor Name
Organisation Name	Priory Asset Management LLP	
Obj/Sup/Com	Comment	

Summary of Main Issues

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.

Summary of Suggested Changes

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.

Evidence Submitted

Chapter 6	Plan Order Site MN2.45	Other Documents
Policy MN2.45	Former St Mary's Primary School playing fields, Waverley Street, Bootle	
Respondent No 716	Response Ref 43	Representor Name Robert Swift
Organisation Name Robert Swift and family		
Obj/Sup/Com Objection		

Summary of Main Issues

Former St Mary's Primary School playing fields, Waverley Street, Bootle is a partly Council owned site, located within the urban area and is in a poor quality environment. The site has also been promoted in part in the SHLAA. A density of 35 dph has been applied.

Summary of Suggested Changes

Reduce the indicative capacity of Site MN2.44 from 72 to 42 dwellings.

Evidence Submitted

Chapter 6	Plan Order Site MN2.45	Other Documents
Policy MN2.45	Former St Mary's Primary School playing fields, Waverley Street, Bootle	
Respondent No 725	Response Ref 15	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. 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 MN2.45	Other Documents
Policy MN2.45	Former St Mary's Primary School playing fields, Waverley Street, Bootle	
Respondent No 741	Response Ref 18	Representor Name
Organisation Name	Priory Asset Management LLP	
Obj/Sup/Com	Comment	

Summary of Main Issues

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 lack of a ready solution regarding playing pitches raises questions about the delivery timetable for the school sites. The site may not be delivered within the plan period if a reasonable solution cannot be found.

Summary of Suggested Changes

It is recommended that deliverability should be considered now and the capacity of the site reduced. Several former school sites anticipate a higher density than the market may wish to deliver. The Former St Mary's school in Bootle site allows for over 40dph, which is extremely dense and potentially unrealistic.

Evidence Submitted

Chapter 6	Plan Order Site MN2.47	Other Documents
Policy MN2.47	Dunnings Bridge Road Corridor, Netherton (Senate Business Park, Atlantic Business Park, and the F	
Respondent No 666	Response Ref	Representor Name
Organisation Name	Chancerygate	
Obj/Sup/Com	Support	

Summary of Main Issues

The recognition of the Former Peerless Refinery Site as a Strategic Employment Location (MN2.47) is welcomed.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.47	Other Documents
Policy MN2.47	Dunnings Bridge Road Corridor, Netherton (Senate Business Park, Atlantic Business Park, and the F	
Respondent No 895	Response Ref 4	Representor Name Yvonne Irving
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

The plan to create new industrial sites and employment areas numbered MN2 47 and 48 is not the choice of local people. Unemployment is not a huge issue nor do the vast majority of people want to see sprawling sites of warehouses and industrial units. Sefton itself provides thousands of jobs in the tourism business and local trade services, for example there is a shortage of plumbers. Plus the new Superport at Liverpool Docks is expected to produce the need for up to 10,000 workers during and after it is finished. There are already many industrial sites in Sefton and not all are doing well. Many in Southport are half empty and the large retail park at Kew has many empty stores.

There are excellent train services throughout Sefton plus a good bus service, so many people do not find it a problem to commute. But the transport system would not serve those working in the proposed two sites on the eastern side of the by-pass and it is too far from the station for people to walk to. They will only be accessed by car from across the borough and will not be sustainable. They will create huge traffic holdups on the by-pass caused by the access that this complex will need. Tesco, and the new 250 seated restaurant plus Homebase and the existing industrial estate are already on these proposed sites MN247 and 48 and they all access now onto the by-pass which causes huge tailbacks on both sides. It is impossible to see how the extra traffic from these two new estates could be catered for. The Local Plan accepts that access onto a major highway would not normally be allowed but has chosen to ignore this with regards to these two new sites. To build industrial parks on these two sites will be inappropriate, they will spoil the openness of the area. They will destroy an important wild nature area and they will be built on a flood plain near to Downholland Brook that is known to flood. It runs into the River Alt which will not be able to cope with the extra outflow. The amount of green belt land for industrial purposes in Formby is nearly 80 acres and a huge slice of the green belt. It will run either side of the by-pass which is presently open fields. It will not solve anything and will only serve to make people unsettled in an area that they once found attractive.

The Local Plan says that Employment Land and Premises Study Refresh have done the assessment. They have simply looked at the borough and saw that it had very little industry; they have then made a subjective decision that there is a lack of job opportunities in Sefton and this hypothetical need can be solved by building industrial parks in the green belt. The Local Plan admits there is no real problem in Sefton with regards to employment but because of the NPPF they have to agree to proposals that will improve the economy of the region. Hence the demise of more of the green belt which is probably more valuable to the future of the economy than more areas of concrete. These employment sites will have to contain some retail units which will be a death knell for the village of Formby. This unnecessary encroachment onto the green belt will be a blot on the landscape

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.48	Other Documents
Policy MN2.48	Land to the North of Formby Industrial Estate	
Respondent No 241	Response Ref 17	Representor Name Claire Jenkins
Organisation Name Formby Parish Council		
Obj/Sup/Com	Objection	

Summary of Main Issues

We are 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.

The adjoining residential areas to these proposed sites in the green belt already have regular problems with the infrastructure in respect of both drainage and sewage. New housing developments will increase the burden. This is well documented.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.48	Other Documents
Policy MN2.48	Land to the North of Formby Industrial Estate	
Respondent No 329	Response Ref 8	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 industrial use.

Extending north of the existing Formby Industrial Estate, Formby Moss is underlain by a shallow layer of blown sand over peat, the soil being acidic and poorly drained. Its citation as a Local Wildlife Site (July 2003) includes one priority BAP habitat (reed-beds) and a total of 58 higher plants, one being locally rare. However, a detailed ecological survey in August 2003 described a mosaic of acid grassland, tall-herb communities and reed-beds, supporting a much greater floral diversity of 103 vascular plants, four being regionally or locally significant. Subsequently, two of these (Marsh Cinquefoil and Marsh Ragwort) were upgraded to "Near Threatened" status in the 2014 Vascular Plant Red List for England. It also holds a population of Water Voles.

It is not clear what proportion of the Formby Moss Local Wildlife Site will be destroyed if this land is allocated, nor which of the features for which it is designated will be lost.

Paragraph 6.52 of the local plan states that "The development of this site will need to incorporate suitable mitigation and enhancement for the loss of part of a designated Local Wildlife Site, provide replacement habitat for water voles within the site, and create a safe access to the site from the Formby Bypass."

In the absence of an up-to-date ecological survey of the allocated site and the remainder of the Local Wildlife Site and its surrounds it is impossible to judge whether "suitable mitigation and enhancement" is possible, nor whether in addition the provision of compensatory habitat other than for Water Voles will be required.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.48	Other Documents
Policy MN2.48	Land to the North of Formby Industrial Estate	
Respondent No 359	Response Ref 4	Representor Name Catherine Fraser
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Development MN2.48 North of Formby Industrial Estate involves building on a Local Nature Site. The Viability Study (Section 6.179) suggests that speculative development is not viable. This means that there will have to be some form of retail cross-subsidy if it fails to attract a bespoke development for a readily identified client, which will threaten the economic viability of Formby as a retail centre. Retail Threshold should be included in the site requirement. There should be a proper Impact Assessment made on Formby Village's viability as a town centre in the face of out of town retail competition. Given the amount of mitigation required for environmental damage and flood risk this whole development could become just another retail shopping site.

Summary of Suggested Changes

Remove site as an allocation.

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.48 **Other Documents**
Policy MN2.48 **Land to the North of Formby Industrial Estate**
Respondent No 361 **Response Ref** 12 **Representor Name** A D Fraser
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Development MN2.48 North of Formby Industrial Estate involves building on a Local Nature Site. The Viability Study (Section 6.179) suggests that speculative development is not viable. This means that there will have to be some form of retail cross-subsidy if it fails to attract a bespoke development for a readily identified client, which will threaten the economic viability of Formby as a retail centre. Retail Threshold should be included in the site requirement. There should be a proper Impact Assessment made on Formby Village's viability as a town centre in the face of out of town retail competition. Given the amount of mitigation required for environmental damage and flood risk this whole development could become just another retail shopping site.

Summary of Suggested Changes

Remove Green Belt sites as allocations.

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.48 **Other Documents**
Policy MN2.48 **Land to the North of Formby Industrial Estate**
Respondent No 551 **Response Ref** **Representor Name** Stephen Sayce
Organisation Name Environment Agency
Obj/Sup/Com Objection

Summary of Main Issues

The council has not undertaken a Level 2 Strategic Flood Risk Assessment or site specific Flood Risk Assessment for the following site allocations - Land North of Formby Industrial Estate. 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

Chapter 6 **Plan Order** Site MN2.48 **Other Documents**
Policy MN2.48 **Land to the North of Formby Industrial Estate**
Respondent No 701 **Response Ref** 1 **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** Site MN2.48 **Other Documents**
Policy MN2.48 **Land to the North of Formby Industrial Estate**
Respondent No 703 **Response Ref** 8 **Representor Name** Jackie Copley
Organisation Name CPRE Lancashire
Obj/Sup/Com

Summary of Main Issues

We are object to this significant encroachment into the Green Belt which would be inconsistent with the openness which is a fundamental attribute of the Green Belt. Further, it would be contrary to the landscape character of the area and the fact that the site is a Local Wildlife Site.

There is a small amount of strip development along Moss Lane, but otherwise there is no development East of the bypass from North of the Formby Altcar Trading Estate all the way to Ainsdale and we believe that nothing should be done to breach the bypass as a Green Belt boundary. The Council to some degree accepts this view by rejecting land between Moss Side and the Altcar Trading Estate (site ref. S044) as unsuitable for development. Some (5%) of the site is Flood Zone 3 and most (80%) is Flood Zone 2 and is subject to both surface water flooding and ground water flooding, the latter making it unlikely that an effective SUDS could be implemented.

The many ditches in the site provide good habitat for voles and development would be conditional on an Ecological Assessment. A further fundamental difficulty is the formidable issue of safe access to the site; a Transport Statement or Transport Assessment would necessary (as specified by NPPF paragraph 32). In summary, it is our opinion that the proposal is totally misconceived.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.48 **Other Documents**
Policy MN2.48 **Land to the North of Formby Industrial Estate**
Respondent No 703 **Response Ref** 32 **Representor Name** Jackie Copley
Organisation Name CPRE Lancashire
Obj/Sup/Com Objection

Summary of Main Issues

MN4, Land north of Formby Industrial Estate and south of Moss Side (Formerly SR5.25 and SO44) and MN2.48 on the map. This site is identified in the Infrastructure Development Plan as a site for industrial development despite being listed in the Sites Not Chosen section of the Plan.

This proposal is an encroachment of the Green Belt boundary and as there are no natural boundaries immediately to the east and north of the site and it could therefore be easily expanded to cause further unrestricted sprawl.

A vehicular access to the Formby By- pass would need to be created.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.48 **Other Documents**
Policy MN2.48 **Land to the North of Formby Industrial Estate**
Respondent No 730 **Response Ref** 9 **Representor Name** Gerry O'Brien
Organisation Name Nextdom Ltd
Obj/Sup/Com Support

Summary of Main Issues

We support allocations MN2.48, as detailed in policies MN4 and MN5 of the Publication draft Local Plan. The development of the Nextdom Ltd site would complement and support this allocation.

Summary of Suggested Changes

Evidence Submitted

Chapter 7	Plan Order Site MN2.48	Other Documents
Policy MN2.48	Land to the North of Formby Industrial Estate	
Respondent No 740	Response Ref 27	Representor Name
Organisation Name	Formby Residents Action Group	
Obj/Sup/Com	Objection	

Summary of Main Issues

Assessment of flood risk issues on this site [pages 103-104 of the rep].

We also wish to rely on the representation of Mr John Williams [Rep No. 1026] for flood risk issue on this site.

Assessment of the site in meeting the Green Belt purposes and its assessibility and sustainability impact [pages 127-128 of the rep]

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.48	Other Documents
Policy MN2.48	Land to the North of Formby Industrial Estate	
Respondent No 895	Response Ref 5	Representor Name Yvonne Irving
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

The plan to create new industrial sites and employment areas numbered MN2 47 and 48 is not the choice of local people. Unemployment is not a huge issue nor do the vast majority of people want to see sprawling sites of warehouses and industrial units. Sefton itself provides thousands of jobs in the tourism business and local trade services, for example there is a shortage of plumbers. Plus the new Superport at Liverpool Docks is expected to produce the need for up to 10,000 workers during and after it is finished. There are already many industrial sites in Sefton and not all are doing well. Many in Southport are half empty and the large retail park at Kew has many empty stores.

There are excellent train services throughout Sefton plus a good bus service, so many people do not find it a problem to commute. But the transport system would not serve those working in the proposed two sites on the eastern side of the by-pass and it is too far from the station for people to walk to. They will only be accessed by car from across the borough and will not be sustainable. They will create huge traffic holdups on the by-pass caused by the access that this complex will need. Tesco, and the new 250 seated restaurant plus Homebase and the existing industrial estate are already on these proposed sites MN247 and 48 and they all access now onto the by-pass which causes huge tailbacks on both sides. It is impossible to see how the extra traffic from these two new estates could be catered for. The Local Plan accepts that access onto a major highway would not normally be allowed but has chosen to ignore this with regards to these two new sites. To build industrial parks on these two sites will be inappropriate, they will spoil the openness of the area. They will destroy an important wild nature area and they will be built on a flood plain near to Downholland Brook that is known to flood. It runs into the River Alt which will not be able to cope with the extra outflow. The amount of green belt land for industrial purposes in Formby is nearly 80 acres and a huge slice of the green belt. It will run either side of the by-pass which is presently open fields. It will not solve anything and will only serve to make people unsettled in an area that they once found attractive.

The Local Plan says that Employment Land and Premises Study Refresh have done the assessment. They have simply looked at the borough and saw that it had very little industry; they have then made a subjective decision that there is a lack of job opportunities in Sefton and this hypothetical need can be solved by building industrial parks in the green belt. The Local Plan admits there is no real problem in Sefton with regards to employment but because of the NPPF they have to agree to proposals that will improve the economy of the region. Hence the demise of more of the green belt which is probably more valuable to the future of the economy than more areas of concrete. These employment sites will have to contain some retail units which will be a death knell for the village of Formby. This unnecessary encroachment onto the green belt will be a blot on the landscape

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.49 **Other Documents**
Policy MN2.49 **Land to the South of Formby Industrial Estate**
Respondent No 28 **Response Ref** 1 **Representor Name** Craig Donaldson
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

This new development will improve the lives of the residents and children with the addition of the new sports facilities. We completed a similar sports dome development 3 years ago in Seaton Carew, Hartlepool, and I am still to this day thanked by parents for providing an invaluable facility. I believe this will be the case with this site too.

It will create a lot of jobs and turn a tired site into one which carries forward the Olympic Legacy without using Government money. Sefton Council should back this facility and help the developer to achieve his goal in creating a community facility that everyone will be proud of.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.49 **Other Documents**
Policy MN2.49 **Land to the South of Formby Industrial Estate**
Respondent No 37 **Response Ref** 1 **Representor Name** Ian Morris
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

I support this sensible project for the people of Formby.

It is high time that the Football club was reinstated after making way for the provision of the Swimming Pool which ultimately led to its demise.

Now with the exciting Retail and Business park that has been proposed providing the funding for first class football facilities we can look forward to a much improved sports provision for the area.

The retail and Business park is a facility that many towns much smaller than our own already enjoy and will greatly improve the standard of living for the Formby community as well as providing much needed employment opportunities.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.49 **Other Documents**
Policy MN2.49 **Land to the South of Formby Industrial Estate**
Respondent No 39 **Response Ref** 1 **Representor Name** Nick Parry
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

I support and encourage the new sports site, it's a great opportunity for the kids in the local community and to give them something to focus their energies into during the evening and weekends, rather than playing on their Xbox's etc.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.49 **Other Documents**
Policy MN2.49 **Land to the South of Formby Industrial Estate**
Respondent No 40 **Response Ref** 1 **Representor Name** Melanie Grice
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

I support the development at Formby FC which will benefit the local area greatly and create more jobs for the local people.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.49 **Other Documents**
Policy MN2.49 **Land to the South of Formby Industrial Estate**
Respondent No 41 **Response Ref** 1 **Representor Name** Corin Holness
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

I support plans for the development of Site MN2.49 into a sports complex, a new home to Formby Football Club and a business park.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.49 **Other Documents**
Policy MN2.49 **Land to the South of Formby Industrial Estate**
Respondent No 42 **Response Ref** 1 **Representor Name** Dan Gregory
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

I support turning the site into a sports complex and an essential new home for Formby Football Club and for the business park.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.49	Other Documents
Policy MN2.49	Land to the South of Formby Industrial Estate	
Respondent No 359	Response Ref 5	Representor Name Catherine Fraser
Organisation Name		
Obj/Sup/Com	Comment	

Summary of Main Issues

A number of problems exist with development MN2.49. The developers have proposed to finance the sports facility by selling land to Tesco. Given the devastation wrought by Tesco on town centres across the UK (e.g. Deptford and Knowsley) this is as a risky development. Furthermore, the development will require 11,802 sq. Metres of retail development as well as 735 sq. Metres for a Public House (see Keppie Massie p.161). This development will have a considerable effect on Formby's viability as a Town Centre. The Local Plan should at the very least produce a proper Impact Assessment for this development (see planning framework).

This development involves building on land that is already a flood risk and I have seen the pumping of excess water into Downholland Brook occurring on a daily basis during wet weather! Part of Boundary brook which plays a considerable role in draining surface water from much of Formby and is in places maintained by Tesco may well disappear under a car park and various buildings and hard surfaces. Since there is already a surface water problem with this and many other culverts. The plan should stipulate that main rivers and water courses should not be culverted as this practice would undermine any Surface Water Management Plan. More Land to the East of the By-pass ought to be used for flood mitigation and not built on as there is a limit to the amount of water Downholland Brook and the river Alt can take. The Local Plan should reflect this.

I also have reservations about access to the site as there is a danger it could become a "rat — run" as traffic coming from Gt. Altcar heading to Liverpool would cut off the junction posing a risk to children using the play areas.

Summary of Suggested Changes

Remove site as an allocation.

Evidence Submitted

Chapter 6	Plan Order Site MN2.49	Other Documents
Policy MN2.49	Land to the South of Formby Industrial Estate	
Respondent No 361	Response Ref 3	Representor Name A D Fraser
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

A number of problems exist with development MN2.49. The developers have proposed to finance the sports facility by selling land to Tesco. Given the devastation wrought by Tesco on town centres across the UK (e.g. Deptford and Knowsley) this is as a risky development. Furthermore, the development will require 11,802 sq. Metres of retail development as well as 735 sq. Metres for a Public House (see Keppie Massie p.161). This development will have a considerable effect on Formby's viability as a Town Centre. The Local Plan should at the very least produce a proper Impact Assessment for this development (see planning framework).

This development involves building on land that is already a flood risk and I have seen the pumping of excess water into Downholland Brook occurring on a daily basis during wet weather! Part of Boundary brook which plays a considerable role in draining surface water from much of Formby and is in places maintained by Tesco may well disappear under a car park and various buildings and hard surfaces. Since there is already a surface water problem with this and many other culverts. The plan should stipulate that main rivers and water courses should not be culverted as this practice would undermine any Surface Water Management Plan. More Land to the East of the By-pass ought to be used for flood mitigation and not built on as there is a limit to the amount of water Downholland Brook and the river Alt can take. The Local Plan should reflect this.

I also have reservations about access to the site as there is a danger it could become a "rat — run" as traffic coming from Gt. Altcar heading to Liverpool would cut off the junction posing a risk to children using the play areas. The developments proposed for Formby would add at least three new junctions to the bypass, which will lead to more congestion on already congested roads. This will be made worse by the fact that the local bus company has gone into liquidation. Ineed, public transport will come under increasing threat as a result of austerity making a nonsense of developer claims about transport links.

Summary of Suggested Changes

Remove Green Belt sites as allocations.

Evidence Submitted

Chapter 6	Plan Order Site MN2.49	Other Documents
Policy MN2.49	Land to the South of Formby Industrial Estate	
Respondent No 446	Response Ref	Representor Name Hugh McAuley
Organisation Name Formby Play Sports Ltd		
Obj/Sup/Com Support		

Summary of Main Issues

The representor supports this allocation as he controls the site and intends to bring it forward for development as soon as possible.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.49	Other Documents
Policy MN2.49	Land to the South of Formby Industrial Estate	
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 south of Altcar Lane, Formby, 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

Chapter 6	Plan Order Site MN2.49	Other Documents
Policy MN2.49	Land to the South of Formby Industrial Estate	
Respondent No 703	Response Ref 33	Representor Name Jackie Copley
Organisation Name CPRE Lancashire		
Obj/Sup/Com Objection		

Summary of Main Issues

Not accurate to say there would be 'no impact' on the Green Belt. There would be a significant impact to Green Belt. There is no natural boundary to the south of the site, and a possibility that development would encroach onto the whole of the available area and cause further unrestricted sprawl. Half of the site is Best and Most Versatile farmland of Grades 2 and 3a (Sefton Agricultural Land Study 2012) and should be protected by policy for future food production and jobs.

The council make it clear that they regard the need to live sustainably as key requirement therefore it is vital that new developments can be accessed by sustainable means, such as walking or cycling. Policy EQ3 refers to this specifically. Crossing the road by bicycle or on foot would need careful thought as this is not easily attainable at present. In addition vehicular access to and from the Formby By-pass would need to be created.

The site is partly a flood risk area, due to being adjacent to Downholland Brook and is reliant on the use of pumping stations to keep the area free from surface water flooding.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.49	Other Documents
Policy MN2.49	Land to the South of Formby Industrial Estate	
Respondent No 703	Response Ref 9	Representor Name Jackie Copley
Organisation Name CPRE Lancashire		
Obj/Sup/Com	Objection	

Summary of Main Issues

We are opposed to the significant encroachment into the Green Belt, inconsistent with the openness, which is a fundamental attribute of the Green Belt. Further, it would be contrary to the landscape character of the area.

Apart from the football ground, there is no development East of the bypass from South of the Formby Altcar Trading Estate all the way to Ince Blundell and we believe that nothing should be done to breach the bypass as a Green Belt boundary.

We attribute great importance to the fact that approximately 50% of the site is best and most versatile grade 2 agricultural land. 40% of the site is Flood Zone 3 and 23% is Flood Zone 2 and is subject to surface water flooding.

Much of the site provides good habitat for voles and development would be conditional on an Ecological Assessment.

A further fundamental difficulty is the formidable issue of safe access to the site; a Transport Statement or Transport Assessment would necessary (as specified by NPPF, par. 32).

In summary, we are firmly of the opinion that the site should remain Green Belt and that the anticipated development proposal by Formby Football Club should be determined by standard Green Belt policy (ref. NPPF, Section 9, Protecting Green Belt land).

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN2.49	Other Documents
Policy MN2.49	Land to the South of Formby Industrial Estate	
Respondent No 725	Response Ref 4	Representor Name Paul Daly
Organisation Name Sport England		
Obj/Sup/Com	Objection	

Summary of Main Issues

The proposed allocation includes an existing football ground and sports pitches. However, land within the site is allocated for new office and light industrial (B1), general industrial (B2), and storage and distribution uses (B8) which could result in the loss of playing field land and sports facilities. Policy MN5 however requires a new football ground as well as a minimum of 5 hectares of sports and recreation facilities located on the eastern half of the site. This would include replacement sports pitches and outdoor recreational facilities available for community use.

The broad approach of the policy would ensure that replacement facilities of at least equivalent quantity and quality were provided. The fact that policy MN5 makes the requirements explicit is supported. However, the effectiveness of the policy could be adversely affected by phasing. Bullet point three requires the phasing of the developments to be agreed in writing with the Council. There is no explicit requirement, though, for the new ground, pitches and other sports facilities to be provided before any existing ones are lost to development. If replacement / new facilities are not provided first, there would be a significant adverse impact on existing teams, clubs etc. that use the facilities currently.

Summary of Suggested Changes

The policy wording should be amended to make clear that existing playing field land and sports facilities cannot be lost to development until replacement facilities have been provided and made available for use.

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.49 **Other Documents**
Policy MN2.49 **Land to the South of Formby Industrial Estate**
Respondent No 730 **Response Ref** 8 **Representor Name** Gerry O'Brien
Organisation Name Nextdom Ltd
Obj/Sup/Com Support

Summary of Main Issues

We support allocation MN2.49, as detailed in policies MN4 and MN5 of the Publication draft Local Plan. The development of the Nextdom Ltd site would complement and support this allocation. Indeed, we believe that the allocation of the Nextdom Ltd site could enhance allocation MN2.49. This is because the Nextdom Ltd site will take its access from the Formby by-pass, potentially at the roundabout with Liverpool Road, to the south of the site. The extension of this access road to allocation MN2.49 would provide a logical and direct access from Formby by-pass, thus mitigating the potential for conflict associated with the proposed dual use of allocation MN2.49 and reducing the potential for highways issues along Lord Sefton Way (B5195). However, the delivery of the Nextdom Ltd site is not dependent on the allocation to the south of Formby Industrial Estate and the two are not linked in terms of achievability or delivery.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.49 **Other Documents**
Policy MN2.49 **Land to the South of Formby Industrial Estate**
Respondent No 737 **Response Ref** 5 **Representor Name**
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

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 7 **Plan Order** Site MN2.49 **Other Documents**
Policy MN2.49 **Land to the South of Formby Industrial Estate**
Respondent No 740 **Response Ref** 28 **Representor Name**
Organisation Name Formby Residents Action Group
Obj/Sup/Com Objection

Summary of Main Issues

Assessment of flood risk issues on this site [pages 105-106 of the rep].

We also wish to rely on the representation of Mr John Williams [Rep No. 1026] for flood risk issue on this site.

Assessment of the site in meeting the Green Belt purposes and its assessibility and sustainability impact [pages 125-126 of the rep]

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.49 **Other Documents** Consultation General
Policy MN2.49 **Land to the South of Formby Industrial Estate**
Respondent No 891 **Response Ref** 3 **Representor Name** H Lee
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I feel that we have also been kept in the dark by our Labour councilors, for example Formby traders were not advised of the plans to build large retail outlets on the Formby Industrial Estate which would encourage business away from the village thus ripping the soul out of our community. Furthermore, Formby Parish was not consulted by Sefton on the final draft and additional sites that were included in the the draft (nor were the other Parish Councils in Sefton) which contravenes the duty to consult and is in breach of the recently updated Parish Charter for Sefton. I also wonder who will foot the bill caused by flooding when our critical drainage areas are abolished.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.49 **Other Documents**
Policy MN2.49 **Land to the South of Formby Industrial Estate**
Respondent No 896 **Response Ref** 2 **Representor Name** Bernard Prescott
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I object to the proposed retail park. Formby Town centre has struggled for many years to remain viable. We are now the charity shop capital of the Northwest. This development, I fear, would be the final nail in the coffin.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

This site has several problems relating to development:-

- 1) The ground itself is frequently saturated to a very high level due to its very close proximity to Downholland Brook
- 2) There are already flooding problems upstream of this site caused by the existing watercourse having difficulty in discharging into Downholland Brook due to watercourse "locking".
- 3) The watercourse crossing this site takes a significant area of Formby including travelling through Phillips Lane (floods regularly, at least on an annual basis), Liverpool Rd, Lytles Close (several previous internal flooding of properties incidents), Ditchfield, Alt Rd, Cartmel Drive (internal flooding 1989) and under the by-pass and collecting the surface water drainage from Tesco and the associated car park.
- 4) Any development within this site will take away the natural storage that is within the ground and is therefore likely to cause additional land drainage (flooding) problems to existing adjacent/upstream properties.
- 5) The football ground and pitches already on this site already suffer from flooding as the water cannot drain away properly
- 6) The site is within 250m of a potential source of flooding, and current real world flooding problems, so may have difficulty getting flood insurance.
- 7) It would therefore be deemed as logical that this site should be discounted on grounds of NPPF Ch10 Para.100

This provided picture shows the site to the south of Tesco (left hand side of picture) with the watercourse unable to discharge to Downholland Brook as the water in Downholland Brook (right of the picture) is significantly higher than the proposed development site. It would be polite to say developing this land is "asking for it" in relation to flooding and WILL undoubtedly cause additional flooding problems to the catchment area of the watercourse on the left of this picture. It should be noted that both the site itself and the housing estate on the other side of the By-pass is not only below high tide but below the level of water in Downholland Brook shown in this picture.

Although it is against Environment Agency policy to have watercourses pumped into main rivers, the EA had to install the pump shown on the embankment on this picture as a "temporary measure," as over a week after only a 1 in 30 year storm the watercourse on the left of this picture was still physically unable to drain into Downholland Brook.

Anyone who develops this site, proposes or encourages development of this site by putting it in the Local Plan, should be held responsible for the potential effects it will have on adjacent existing properties. Developing this close to Downholland Brook is unwise to the extent of being seriously irresponsible with a complete lack of foresight for potential knock-on effects to other properties, never mind the likely effects of climate change on this site.

Immediately downstream of this site you will find the confluence of Downholland Brook and the River Alt. Shortly after this the River Alt passes under the Formby By-Pass. To give you an idea of the difference in height of the water within the River Alt, there are two photographs below. To give you an idea of scale, the photograph on the right is of Sefton Council's Structural Engineers carrying out an annual inspection of the bridge. As you can see, the water is some 3m deeper in the picture on the left. When the water is this high, none of the watercourses, highway drains or surface water sewers can discharge from Formby. When the water is this high, the ground in Formby is significantly saturated, so many gardens, fields and other land is flooded and due to the watercourses being "locked" they remain flooded until the water in the River Alt drops sufficiently to allow the watercourses to discharge. Water in the River Alt can remain high for several days at a time whilst the pumps at Altmouth pumping station "catch up" with the backlog. If it rains in the meantime, the river will rise again, before the land in Formby has had time to drain and recover.

The priority for Sefton Council should be to protect its existing residents, it is surely clear that developing land near Downholland Brook and the River Alt is taking away the "buffer zone" between the existing housing and the river. Development, even with SUDS installed will make existing problems worse. I would politely suggest that ensuring the existing drainage systems have a free discharge should take priority over any ideas of developing more land before this problem is solved.

Summary of Suggested Changes**Evidence Submitted**

Photograph of site south of Tesco, Altcar Lane Formby

Chapter 6 **Plan Order** Site MN2.49 **Other Documents**
Policy MN2.49 **Land to the South of Formby Industrial Estate**
Respondent No 1031 **Response Ref** 6 **Representor Name** Janet Roberts
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Sites MN2.48 & MN2.49 on both sides of the existing industrial estate also act as flood planes. Formby Industrial estate has had severe flooding problems in the past when roads & businesses had to close until the water level had dropped again.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN2.54 **Other Documents**
Policy MN2.54 **Land at Linacre Bridge, Linacre Lane, Bootle**
Respondent No 203 **Response Ref** **Representor Name** Julian Austin
Organisation Name National Grid
Obj/Sup/Com Comment

Summary of Main Issues

Land at Linacre Bridge, Linacre Lane, Bootle is crossed by IP line Linacre to Maghull

Summary of Suggested Changes

Evidence Submitted

Chapter General **Plan Order** Site MN NA **Other Documents**
Policy MN NA **Non allocated site**
Respondent No 488 **Response Ref** 14 **Representor Name** Ian Brodie Browne
Organisation Name Sefton Council Lib Dem Opposition Group
Obj/Sup/Com Objection

Summary of Main Issues

Some small Green Belt compromises are possible: We do realise that some land that technically falls within Green Belt can sensibly be developed because it is often not high quality agricultural land. [Other sites &] the Pontins site in Ainsdale are examples of sites where a reasonable compromise can be made. [Other sites &] Pontins are clear examples of sites which have previously been built upon to some extent and therefore lend themselves to being developed. This approach can take the pressure off building on high grade agricultural land. However, such reasonably developable sites within the Green Belt are few.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN NA	Other Documents
Policy MN NA	Non allocated site	
Respondent No 728	Response Ref 1	Representor Name Martyn Sayer
Organisation Name Churchtown Green Belt Action Group		
Obj/Sup/Com Objection		

Summary of Main Issues

Sites in West Lancashire - Land South of New Cut Lane

Following assessment of the sites West Lancashire only identified one as having potential for release and this is land located south of New Cut Lane and is referenced as site SEFB13A. This site is identified as six hectares in extent and therefore could potentially accommodate approximately 200 homes. West Lancashire Council's assessment of the site indicates that this site could be suitable for residential development. This site is on the Sefton border, will make use of Sefton services and facilities and could contribute towards housing need in the Borough. Sefton Council should be cooperating with West Lancashire Council to assess whether this is a more suitable site for release than Site SR4.03. This alternative site could be allocated as part of Sefton's housing supply in co-operation and agreement with West Lancashire Council.

Summary of Suggested Changes

Evidence Submitted

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

Chapter 6	Plan Order Site MN NA	Other Documents
Policy MN NA	Non allocated site	
Respondent No 728	Response Ref 2	Representor Name Martyn Sayer
Organisation Name Churchtown Green Belt Action Group		
Obj/Sup/Com Objection		

Summary of Main Issues

Land to the north of New Cut Lane, West Lancashire

Another site which may potentially be suitable for release is land to the north of New Cut Lane. This site benefits from a number of potential access points, it is contained by Fine Jane's Brook and could potentially accommodate up to 900 homes. West Lancashire Council's assessment suggested that the release of this site would not safeguard the countryside from encroachment. However, it is not clear from the West Lancashire Council's assessment how this judgement was made. The site is well contained by Fine Jane's Brook to the east, New Cut Lane to the south and Moss Road to the North and would not provide for further encroachment into the Green Belt. Sefton Council should be undertaking their own assessment of this site and, if considered suitable, discuss its potential release from the Green Belt to meet the needs of Sefton instead of releasing inappropriate and unsuitable Green Belt sites such as Site SR4.03. NPPF identifies in paragraph 52 that a supply of new homes can sometimes be best achieved through larger scale developments such as extensions. The release potential release of this site for a significant number of houses would be in line with this guidance.

Summary of Suggested Changes

Evidence Submitted

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

Summary of Main Issues

The Craig Seddon SIPP owns approximately 12 ha of land at Edge Lane, Thornton which is currently in the Green Belt. Access to the site exists off Runnells Lane, to the north of the Tanhouse Farm. The site lies within a sustainable location with bus services, a primary school, a local centre and a GP surgery all within walking distance. The nearest bus stops are located on Edge Lane, within a three minute walk from the site, with services to Thornton, Netherton, Fazakerly and Crosby.

The Council’s most recent assessment of the site was undertaken in November 2014. This was informed by the Sustainability Appraisal and Site Selection Methodology and a Site Assessment Form (reference AS10) was prepared for the site.

There is no denying that, were the site to come forward, it would narrow the gap between Thornton and Netherton. It is important to understand the purpose of the gap, the current position and the impact of any proposal. In this context, there are numerous locations within this gap, where the distance between the existing settlements are significantly less than that at our client’s site, between Thornton and Netherton. For example, the gap between Drummond Lane and the Bowland Drive residential estate measures approximately 360m, the gap between Rimrose Valley Road and the residential properties on Ford Lane measures approximately 400m and the gap between Sandy Road and Beach Road measures approximately 337m. All of the above are located in close proximity to our client’s site, to the south. Furthermore, within the Council’s justification for allocating Land south of Runnell’s Lane, the Assessment Form (reference SR4.25) states that the site’s projection into the Rimrose Valley ‘would not be at the narrowest point in the gap between the settlements’ and is therefore deemed to be acceptable. Our client agrees with this statement. However within the Assessment Form for our client’s site (AS10) the Council state that the site ‘would significantly narrow an already very narrow Green Belt gap.’

It is acknowledged that, were our client’s site to come forward in its entirety, it would significantly narrow the green Belt gap. However, this is not what is being proposed and is not what has previously been proposed. At its nearest point, Land south of Runnell’s Lane measures approximately 417m from Buckley Hill Lane, Netherton. Notwithstanding the fact that there are gaps along this Green Belt corridor which are narrower than 417m, by identifying this site for housing, the Council have stated that the 417m gap is deemed to be acceptable. Indeed this is confirmed within the Assessment Form. The Council have therefore set a definitive view on an appropriate level. With the above in mind a plan has been prepared which demonstrates a significant proportion of our client’s site can come forward for development, which would not encroach any further into the Green Belt than 417m.

This plan demonstrates that approximately 4ha of the site could come forward for development. Based on the same density as Land south of Runnell’s Lane (26 dwellings per ha), the site could accommodate 104 dwellings. The two sites would form a comprehensive approach to the strategic gap, delivering wider community benefits. It is proposed that the rest of our client’s site, which measures approximately 8ha, could come forward for recreational and/or renewable energy purposes. The site could also come forward as recreational open space to serve both developments and the local community. Our client is open to either option, which provide community and sustainability benefits. The site therefore has the potential to offer specific benefits to the wider community.

The Assessment Form sets out that no part of the site adjoins the existing built up area. Whilst our client does not dispute this, Land south of Runnell’s Lane has been identified as a Housing Allocation (MN2.26) in the Publication Draft Local Plan, which is supported. Were Land south of Runnell’s Lane allocated for residential development, this would adjoin our client’s site’s north-western boundary. Our site already adjoins Edge Lane to south. Given the shape of the proposed allocation, only the eastern boundary of the site would remain open. Given our client’s wider land ownership, there is an opportunity to create a strong physical buffer along this eastern boundary, whether it be through tree planting or other, to ensure a strong Green Belt boundary is created.

Land south of Runnell’s Lane and Land at Edge Lane are both located next to a site which contains a grade II listed building, Tanhouse Farm. Land south of Runnell’s Lane is located immediately north east of the listed building and Land at Edge Lane is located immediately south east. Within the Assessment Form for Land south of Runnell’s Lane (reference SR4.25), the Council assess the impact of the site on the listed building as being a ‘moderate constraint’, however, within the Assessment Form for Land at Edge Lane (reference AS10) the Council assesses the impact of the site on the listed building as a ‘significant constraint’. A Heritage Assessment accompanies these representations.

In summarising the setting of Tanhouse Farm, the Heritage Assessment considers that views of the listed building within its setting are generally distant and only glimpsed, hence they make only a limited contribution to its heritage interest. However, this impact is assessed as being moderate, rather than the Council’s assessment that it is significant, given that a substantial portion of the

green corridor will be retained and that views of the building are limited in the context of the setting of the listed building. By definition, a moderate constraint does not prevent development from taking place.

The Assessment Form (AS10) identifies that the proposal will also have some impact on the setting of Orchard Farmhouse, a grade II listed building on Buckley Hill Lane. Orchard House is identified in the Heritage Assessment as a building of high importance in the national context of its special architectural and historical interest. Looking out from our client's site, distant views of Orchard Farm can be obtained but these are of a relatively minor nature as only its rooftop chimneys can be glimpsed, owing to the trees around the building. These views therefore add little to any appreciation of the listed building.

The Assessment Form for our client's site assesses that there are significant access constraints. The Assessment Form identifies that a new four arm signalised junction would be required from Edge Lane and that vehicular and pedestrian links would need to be created to the adjacent sites. Whilst our client agrees that a new access point off Edge Lane will need to be created, this is not a significant constraint and it is questionable how the Council have come to this conclusion, particularly when a similar approach is suggested for Land south of Runnell's Lane, where a four-arm signalised junction to provide access from Lydiate Lane is suggested, but only assessed as being a moderate constraint. Access into our client's site currently exists off Runnell's Lane. Were the site to come forward, this existing access could be used alongside a new access off Edge Lane. There is also the opportunity to create vehicular and pedestrian links to Land south of Runnell's Lane, which would allow vehicles to flow through, from Lydiate Lane in the north to Edge Lane in the south. There are no significant constraints which would prevent access being created into our client's site, where this be from Edge Lane, Runnell's Lane or both.

Summary of Suggested Changes

Our client seeks the partial release of the site (reference AS10) from the Green Belt and its allocation for housing. The site was not carried forward into the Local Plan because the Council considered the site would significantly narrow an already very narrow Green Belt gap and there were considered to be significant access and heritage constraints.

Our representation has demonstrated that 4ha of the site could come forward for development without compromising the function and objectives of the Green Belt gap.

A Heritage Assessment has been undertaken, which assesses the impact of the proposal upon Tanhouse Farm as being a 'moderate' constraint, rather than the Council's assessment that it is a 'significant' constraint. This impact is assessed as being the same as that at Land south of Runnell's Lane (Site MN2.26), where the impact is deemed to be acceptable given the site's allocation in the Draft Local Plan.

Access into the site can be achieved from both Runnell's Lane or Edge Lane and links into Land south of Runnell's Lane are achievable and are not significantly constrained.

In summary, there are no significant or severe constraints upon our client's site, in terms of heritage, access or the Green Belt gap, which would prevent the site from coming forward for development.

Evidence Submitted

Site plan; Heritage Assessment

Chapter 6	Plan Order AS12 Land West of Maghull	Other Documents
Policy AS12	Land west of Maghull	
Respondent No 57	Response Ref 1	Representor Name Joyce Scott
Organisation Name		
Obj/Sup/Com	Comment	

Summary of Main Issues

I am glad that you have concluded that land to the West of Maghull [AS12] will not be built on and trust this cannot be reversed.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order AS12 Land West of Maghull	Other Documents
Policy AS12	Land west of Maghull	
Respondent No 70	Response Ref 1	Representor Name Stephen, Lisa & Alex Fry
Organisation Name		
Obj/Sup/Com	Support	

Summary of Main Issues

I am a resident on the Green Park Estate and I have lived in Maghull all my life attending school there and I now own and run a local business in Maghull. I would like once again to object to the proposed development of the land around the Green Park Estate.

I am opposing to the building on any green belt land in Sefton, and I will detail my reasons for this objection, however I am specifically objecting to building on the piece of land (AS12) around the Green Park estate in Maghull, as this directly affects the community I live in.

Sefton Council within the consultation process received a petition from all the residents in Green Park estate who opposed this development. I don't believe anyone supported the development who lives within the effected area. You must listen to us the people who live here and are passionate about keeping this beautiful countryside intact.

Just to reiterate to you some of the already well documented objections that have been presented to Sefton Council: No building on a1 agricultural land – this is a precious resource – all brownfield sites should be used first. The population in Sefton is not increasing therefore we do not need extra houses. Access routes for piece of land AS12 are not suitable. Development would have a damaging long-term effect on the existing community.

I have ran and walked down green lane for over 40 years onto the Cheshire lines as do hundreds of other locals, spending many hours down there and have been overjoyed that the landscape has never changed thus protecting the wildlife.

I have always felt privileged that this countryside has been on my doorstep. It was one of the main reasons I have stayed in this area. I am not interested in the wishes of landowners or developers. It is obviously in their interest to build on green belt land, as it is cheaper, and they will make more money out of the developments.

I am aware that other detailed opposition letters have been presented to you outlining specifics concerning the lack of economic benefits, historical mistakes in council decisions made on similar developments in Bootle , Netherton , Seaforth etc. I do not want to see the area I grew up in being ruined for future generations, increased anti social behavior, crime, boarded up houses etc

Summary of Suggested Changes

Evidence Submitted

Chapter	Plan Order AS12 Land West of Maghull	Other Documents
Policy AS12	Land west of Maghull	
Respondent No 247	Response Ref	Representor Name L Marten
Organisation Name		
Obj/Sup/Com	Support	

Summary of Main Issues

In the event that the proposers of the original development of additional site AS12 (The Landowning Trust) make leave to appeal the Council's decision to exclude this site from inclusion in the final version of the Local Plan then such appeal must be rejected by Government Planning Inspector. The site is totally unsuitable for development - even the Council's Planning Department has agreed this is the case and has set out its reasons in the Local Plan. Circumstances and conditions remain unchanged and are unlikely to change at any time in the future.

Summary of Suggested Changes

None needed

Evidence Submitted

Policy AS12 **Land west of Maghull**

Respondent No 697 **Response Ref** 4 **Representor Name**

Organisation Name Maghull Limited

Obj/Sup/Com Comment

Summary of Main Issues

THIS IS A SUMMARY

Planit-ie on behalf of Maghull Limited have assessed their site (AS12 - Land west of Maghull) using the Council's 'Sustainability Appraisal and Site Selection Methodology' (November 2014) which provides an appropriate method for determining the site suitability for allocation for development.

Summary of Suggested Changes

Evidence Submitted

Policy AS14 Land east of A59, north of Kenyons Lane

Respondent No 697 Response Ref 3 Representor Name

Organisation Name Maghull Limited

Obj/Sup/Com Objection

Summary of Main Issues

In the event that further sites are required in Maghull then West Maghull (Ref AS14) offers an excellent opportunity. We propose that the southern part of the site be allocated for housing and the northern part of the site be reserved for future development. The boundaries of the allocation and reservations are identified with Figure 10 of the written representation. The site is under the ownership of one company and can be delivered immediately. The site has been assessed in accordance with the Council's site selection methodology. This has identified that: The site lies in close proximity to a plethora of facilities, any future proposals would ensure that a high quality bus route is provided to connect the site with the Rail Station. The proposals would provide improved road infrastructure, cycle and pedestrian links. There are other substantial community benefits such as New/enhanced school provision, Community Facilities and Community Park. A safe and suitable access can be provided without any major infrastructure improvements. The surrounding highway network can be enhanced to ensure that there is sufficient capacity to accommodate the traffic movements associated with the level of development identified within the site. There are no significant ecology constraints. A robust landscape boundary could be provided which would overcome any impact on the purposes of the Green Belt.

When compared against the sites that have been allocated as safeguarded land within the Local Plan, we concluded that AS12 is the most sustainable location; it could provide the most wider benefits; it is on par with the other sites in terms of constraints; and has the least impact on the Green Belt.

Based on the findings of the report and the evidence presented, we request that the inspector considers the land edged in black within Figure 10 be allocated within the Local Plan. The area is approximately 20 Ha and would include around 12 ha of residential (providing around 400 housing units); a Local Centre; educational expansion; Community Park and the Link Road between South Meade and Green Lane/Green Link. Further, the land hatched should be reserved for future development. The site as the most suitable to meeting any increased housing requirement for Maghull, particularly as its allocation would allow for a more balanced approach to housing land allocation across the settlement (west as well as east), when taking account of potential delivery issues.

We believe the Council's scoring for accessibility to services and facilities for the site is broadly correct. Whilst it is recognized that the scoring criteria relates to the site in its existing state, it should be noted that a proposed development itself would ensure the delivery of a high quality bus route, as evidenced within the submitted access notes 2013 and 2014. On this basis, 100% of the site would be accessible to Frequent Bus Stops. Moreover, the connection of the bus service directly to the Train Station would also resolve the lack of accessibility to this key transport hub. It should also be noted that the site is located some 2,400 metres from the station which is measured along the high quality footpath connection along the canal, as opposed to an 'as the crow flies measurement'. Thus, such a route is conspicuous, convenient, convivial and avoids any significant barriers to pedestrian/cycle movement.

There are a number of benefits which have not been considered within the Council's Assessment and have been referenced within the evidence base that supports the site allocation, which include:

Improved Road Structure - it is proposed that first and second phases of any development of the site would be served by a new link road serving 500–600 dwellings. The final phase of the development is intended to be served by a new access onto Bell Lane. It is also proposed to improve the existing turn bridge to facilitate bus / HGV access and a segregated pedestrian facility. Once the Bell Lane bridge has been upgraded, the Green Lane canal bridge can then be closed to all vehicles, leaving this route available to become a really attractive footpath /cycleway link through the site.

The development would generate a number of wider community benefits including enhanced Primary School provision, a new local centre (0.4 Ha), and the open spaces would enhance and repair an existing landscape resource. These benefits should be considered as part of the Local Plan process.

The Access Strategy (P15) concludes that there will not be any major capacity issues or constraints which will prevent residential development of the site from being brought forward. The proposed access strategy as outlined in Section 4.0 of this report will not detrimentally impact on the network. A detailed transport assessment including a review of the existing and future predicted traffic flows will be provided with any formal planning application submission.

The level of severity that has been assigned to ecological issues is clearly disproportionate and it is arguable that neither of these issues are indeed a constraint to development of the site. Altcar Withins is an exceptionally large Biological Heritage Site (BHS) extending to 905ha, most of which is arable farmland. This is a nonstatutory designation, and is considered to be a third-tier designation after international and national designations.

The suggestion that increased usage of Public Rights of Way (PRoW) within the BHS represents a significant ecological constraint to development of the site seems disproportionate as very few PRoWs which go through the BHS. It is arguable whether there is any constraint at all, and at best a severity level of 'Minor Constraint' would seem a more proportionate assessment. To consider the presence of invasive plant species as representing a Significant Constraint is entirely disproportionate. Developments across the country routinely deal with the presence of invasive plants.

Whilst we agree with the Council's severity score as the landscape being of a moderate constraint, the presence of the existing urban settlement, the existence of large farmsteads within the landscape along with intensive farming practice results in the landscape being of a moderate quality and sensitivity.

The Council has incorrectly assessed the impact of the parcel on the green belt, specifically in relation to purpose 1: To check the unrestricted sprawl of large built-up areas. Firstly, the Council concluded that 30% of the site adjoins the existing built area. However, if we take the proposed developed area, as identified within Figure 4, the figure is 37% of the site area, which is contained by an existing built up area. Secondly, the Council also concluded that: 'The existing Green Belt boundary is weak (mainly residential gardens). The proposed boundary would be relatively weak, comprising minor roads and Maghull Brook'. We consider that the Brook itself is a moderately strong feature. The council's conclusions fail to recognize that a new strong boundary could be created, which could comprise a new, wide belt of woodland planting. Further, such a woodland belt would not be uncharacteristic within the receiving landscape.

The site is currently closer to Maghull station than the two safeguarded sites (MN8.1 'Lambshear Lane, Lydiate' and MN8.2 'Land at Ashworth Hospital, Maghull'), although the latter would be slightly closer to the proposed Maghull north station when that is built. The site is the least accessible to a high frequency bus route, although this could be addressed with the provision of a high quality bus loop through the site. Maghull Ltd question the proportion of the site that is within 800m of the district centre. They consider that their site performs better than either sites MN8.1 or MN8.2. The site is the least accessible to a neighbourhood park, but is the most accessible to a GP surgery or health centre. As Maghull Ltd's site is 40% larger than site MN8.1, the potential benefits in terms of non-residential land allocations eg donating land adjacent to the existing primary school within the site for its expansion, are more significant. This sites would also be able to give a larger area over to public open space than the other sites. In terms of the Council's Assessment of the Constraints to Development, the main constraint comparison relates to site access and network capacity. The Council's assessment indicates that AS12 has a significant constraint for both site access and network capacity; however, we have provided evidence to support the case that these constraints are in fact minor. In terms of ecology, only AS12 was identified as having a significant constraint. However sufficient evidence has been provided to identify that this is not the case.

In summary, we have presented evidence that AS12 is on par with MN8.1 in terms of the significance of the constraints. Whilst it is difficult to comment on MN8.2 in the absence of any detailed information, the Council have referenced deliverability issues with potential network capacity solutions.

In terms of comparing AS12 against the sites that have been allocated as safeguarded land within the Local Plan, MN8.1 and MN8.2, AS12 is the most sustainable location, it could provide the most wider benefits and is on par with the other sites in terms of constraints. Finally, it has the least impact on the Green Belt. Approximately 20 ha could be allocated to include 12ha residential (around 400 dwellings), a local centre, school expansion, community park and a new link road between South Meade and Green lane / Green Link. Further land could be reserved for future development. It is the most suitable site for meeting an increased housing requirement for Maghull as its allocation would allow a more balanced approach to housing allocations to both the west and east of the settlement.

Summary of Suggested Changes

Allocate the southern part of site AS12 (Land west of Maghull) for housing and safeguard the northern part of the site for future development.

Evidence Submitted

Site appraisal including indicative layout
Site Access Strategy March 2015

Chapter 6 **Plan Order** AS14 Land east A59, north of Kenyo **Other Documents**

Policy AS14 **Land east of A59, north of Kenyons Lane**

Respondent No 727 **Response Ref** 2 **Representor Name**

Organisation Name Harrison and Sons

Obj/Sup/Com Objection

Summary of Main Issues

THIS IS A SUMMARY

AS12 Land East of A59, South of Sudell Brook and West of Maghull Smallholdings Estate, Lydiate

Harrison and Sons note that the site in their ownership 'Land East of A59, South of Sudell Brook and West of Maghull Smallholdings Estate, Lydiate' (Additional Site AS14) has been dismissed, but has been referred to as a 'Parcel with constraints that should only be included in the Local Plan if insufficient land remains with fewer constraints'. In view of the concerns with the Council's ability to meet its housing requirements, the deliverability / viability of other strategic sites and the need to find more sites, Harrison and Sons believe that their site should now be considered as a housing allocation.

The landowner can confirm that they have been speaking with a number of developers, including Ascot UK Property Investments Ltd and Priory Assets Management LLP (PAM). The latter have identified this site as a preferable location for an Extra Care, Respite and Dementia and Assisted Care Facility to meet an identified need for this type of accommodation for elderly care in this locality. This type of facility is also deliverable with 30% affordable provision, compliant with policy HC1. This is without the need of HCA, DOH or other financial subsidy.

The need to provide housing for older people is critical given the projected increase in the number of households aged 65 and over accounts for over half of the new households, based on recent household projection figures. PAM have a strong track record of working with and delivering similar care facilities and accommodation in the Sefton region, working collaboratively with Sefton Council and housebuilders as part of mixed use proposals to meet an identified housing need for extra care for over 55's, which also provides affordable housing, in addition to open market housing. Evidence of PAM's commitment to deliver an Extra Care facility on this site, in parallel with housing on this site with a development partner can be provided on request. We trust that this will provide the necessary assurances that a mixed use proposal on the site is deliverable and viable and there is a realistic prospect that an Extra Care facility and housing and can begin to be delivered on the site within the first five years of the plan period over a period of nine years in total, but has the ability to move with the market demand. In addition to the extra care facility, a total of 479 homes could be built, of which 112 would be affordable and 38 shared equity. The site could deliver 53 dwellings per year over 9 years.

Summary of Suggested Changes

Allocate site AS14 as a housing allocation under policy MN2.

Evidence Submitted

Chapter 6 **Plan Order** AS15 The Crescent Maghull **Other Documents**

Policy AS15 **Land at the Crescent**

Respondent No 152 **Response Ref** 2 **Representor Name** Carmel Gresham

Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

Building on the green belt behind The Crescent in Maghull would practically link Maghull to Netherton creating one huge urban sprawl. In the time I have lived in Maghull, I can remember serious flooding to properties in The Crescent so why would you even want to build on areas at serious risk of flood damage? My garden backs on to the brook in Maghull, and from my house and garden I can see numerous species of wildlife. Further building will only serve to damage the delicate habitats of these beautiful creatures.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** AS15 The Crescent Maghull **Other Documents**
Policy AS15 **Land at the Crescent**
Respondent No 488 **Response Ref** 28 **Representor Name** Ian Brodie Browne
Organisation Name Sefton Council Lib Dem Opposition Group
Obj/Sup/Com Support

Summary of Main Issues

We urge great caution in approaching this site for development. It is prone to flooding as the flood events of September 2012 demonstrated with many homes in Fouracres, Maghull being under water. These flooded properties are adjacent to this site and they risk being flooded again if Dovers Brook 'overtops' due to it being unable to run into an at capacity River Alt. Our understanding is that this site is rich in wildlife and there have been previous proposals to turn it into a nature reserve, which seems a far more sensible use for the land. We oppose development here.

Summary of Suggested Changes

Evidence Submitted

Policy AS15 Land at the Crescent

Respondent No 741 Response Ref 2 Representor Name

Organisation Name Priory Asset Management LLP

Obj/Sup/Com Objection

Summary of Main Issues

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.

An alternative, sustainable and deliverable location that could accommodate major residential development is available in south-west Maghull (LPA reference AS15). This land was considered as part of the Council's Green Belt Study (2013), and the updated Site Assessment concludes the green belt could be realigned in this location with minimal impact on the underlying purposes. Despite not being allocated within the Local Plan, technical studies have demonstrated that the site's constraints can be overcome and present no obstacle to its development.

The site is 6.18ha in size and comprises open land to the southeast of Maghull. The dismantled railway to the west forms a strong boundary and acts as a screen preventing views into and out of the site. The land beyond the former railway land comprises the Jubilee Wood and is controlled by the Forestry Commission. The land is flat and due to the railway embankment is seen wholly within the context of the residential environment created by The Crescent and Fouracres to the east.

A Transport Assessment has been undertaken for a development containing about 100 dwellings. Suitable access arrangements for vehicles, pedestrians and cyclists, which are acceptable in transportation terms, could be provided at the development site as agreement has been reached to acquire a property on the Crescent. For most of the road network local to the development site its traffic impacts, even during the busiest times of the day, are expected to be small. At the junctions near to the development site, where traffic impacts are greater, it is anticipated highway works for capacity reasons should not be required. Although the site is 1.4 Miles from Maghull Town Centre and is well positioned in a sustainable location for most services. However, the proximity to doctors is low. There would be limited infrastructure required to service the development, and any services to be required would be in proportion to the development. This accords with the site assessment of this site.

Although the site within Flood Risk Zone 2, the site has now been re-classified by the EA as being in Flood Zone 1. It is at risk of surface water flooding and would require flood risk attenuation methods in order to develop the site. It would also have the potential to offer some flood risk improvements to help reduce the existing flooding problems further downstream. The site is considered to be moderately constrained by surface water flooding only.

The site is a designated Local Wildlife Site (SLBI). The updated Phase 1 Habitats survey indicates that since the previous Phase 1 Habitats survey was undertaken in 2008, scrub encroachment has taken place which has partially decreased the area of neutral unimproved grassland. In March 2015 89 species of plants were identified, notwithstanding that this is outside the ideal period for undertaking botanical surveys. The site contains water voles, a protected species. It may also contain reptile species such as common lizard, slow worm and grass snake. The site is also potentially important to bird species and mammals. The site also contains two invasive plant species which would need to be removed. Their ecologists indicate that there are opportunities for habitat relocation and mitigation, and as such, this constraint should no longer be considered to be 'significant'.

Priory Asset Management LLP conclude that none of the constraints should be identified as 'significant'. The site therefore represents a sustainable, available and deliverable solution to the Borough's development needs during the plan period.

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

Appendix 1 - Site Assessment matrix; Appendix 2 - Ecology report; Appendix 3 - Transport Assessment.

Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

I am writing about my objections to the above and to voice my concerns about the impact it will have on the surrounding district. As a resident of the Twenty One houses this will have a greater impact on not just mine, but the other residents of the Twenty One houses. My objections are: Environment pollution. We already have the noise and pollution from the M57 and 58. This will only add more with heavy lorries coming and going on the proposed site.

Noise. At the moment the Twenty One houses have the protection of the green belt, but the noise will be unbearable if the proposed site goes ahead. We will have the constant noise right on our doorstep with the site lit up twenty four hours a day. This area is a loss for the local residents who use it constantly for walking and bike riding and walking their pets. This is a free way of getting exercise for the local residents without having to go miles out of the district.

The wildlife will be disturbed and fauna and flora will be wiped out. The lanes around this area will not be able to sustain the heavy lorries and machinery that will be needed for this site. This proposed development should not be enclosed or included in the Local Plan because it wipes out fertile agricultural land that, once gone, cannot be brought back.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

I am writing to object about the building of the above Peel holding warehouses. My main reasons for objection are as follow - Traffic congestion is already a major issue, this would be totally uncontrollable and dangerous. This is a rural residential area, the introduction of warehousing would be a blot on one of the few pieces of green belt in this area. The pollution of diesel fuel. Noise and light pollution. The wildlife, including water voles and many species of birds that nest in the area. Versatile agricultural land much need for food production. One of the few areas around where you can walk, run or cycle.

I feel this building project is detriment to a beautiful landscape, amenities and farm growing area, and I am totally against this project,

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

Site AS17 Land at Switch Island, Maghull/Aintree

I am writing to object about the building of the above Peel holding warehouses. My main reasons for objection are as follow -

- Traffic congestion is already a major issue, this would be totally uncontrollable and dangerous.
- this is a rural residential area, the introduction of warehousing would be a blot on one of the few pieces of green belt in this area.
- the pollution of diesel fuel
- Noise and light pollution.
- The wildlife, including water voles and many species of birds that nest in the area.
- versatile agricultural land much need for food production.
- one of the few areas around where you can walk, run or cycle.

I feel this building project is detriment to a beautiful landscape, amenities and farm growing area, and I am totally against this project,

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

I strongly object to site number: AS17 Peel Switch Island, Melling, Maghull & Aintree. Concreting over acres of grade 1 farmland is wrong. There has got to be a better alternative to the site chosen by Peel. This would be vandalism on a grand scale!! Once this green belt is gone, it's gone for ever! Please don't let this happen. You must see sense and save our precious farmland!

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** AS17 Land at Switch Island [Peel Sit **Other Documents**
Policy AS17 **Land at Switch Island [Peel site]**
Respondent No 137 **Response Ref** 1 **Representor Name** Peter Neild
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

I wish to register my objections to this plan for the following reasons: The proposed development is a massive intrusion on the existing green belt surrounding the urban areas of Maghull. It is to be built on prime agricultural land. Such development should be on brownfield sites. The main building would be a huge industrial unit about 80 ft. high which would be a visual intrusion into the surrounding countryside. The proposed main access at Switch Island would cause traffic congestion at a point where there are already significant traffic problems. It is difficult to see how queuing vehicles could be accommodated between the access from the M58 and M57 motorways. Construction of the site and access roads would cause congestion, noise and pollution hazards. The access road involves crossing the railway, presumably by a bridge. Construction would cause disruption of rail services. The proposed diversion of the River Alt is likely to exacerbate flooding risk in the area. Once a large development is allowed there is always a tendency to increase the size. Such further development would further intrude into the countryside and threaten Wood Hall Farm (a listed building) and the surrounding area.

Summary of Suggested Changes

No change.

Evidence Submitted

Chapter 6 **Plan Order** AS17 Land at Switch Island [Peel Sit **Other Documents**
Policy AS17 **Land at Switch Island [Peel site]**
Respondent No 170 **Response Ref** 1 **Representor Name**
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

I wish to register my opposition to Peel Development AS17 redevelopment plans. This is either green belt or farm land which must not be used for industrial units.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** AS17 Land at Switch Island [Peel Sit **Other Documents**
Policy AS17 **Land at Switch Island [Peel site]**
Respondent No 178 **Response Ref** 1 **Representor Name** Malcolm Morton
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

I wish to state my objection against the Peel Plan to develop the part of land site AS17, southeast of the railway line, for industrial purposes. The site is currently mostly an open aspect across open fields with no other development except the motorway and railway nearby, and the proposed development will fundamentally change the character of this area of farmland.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** AS17 Land at Switch Island [Peel Sit **Other Documents**

Policy AS17 **Land at Switch Island [Peel site]**

Respondent No 187 **Response Ref** 1 **Representor Name** Neil Dawson

Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

We write to applaud the council in not putting Peels [AS17] ludicrous plan to decimate the green belt in Aintree in the the Local Plan

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** AS17 Land at Switch Island [Peel Sit **Other Documents**

Policy AS17 **Land at Switch Island [Peel site]**

Respondent No 196 **Response Ref** 1 **Representor Name**

Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

We would like to put on record our objection to the above commercial development proposal on the land adjoining the M57/58. The amount of traffic in this area is already at breaking point and this proposal would only exacerbate the situation, at this major junction. All the adjoining local Aintree residential roads are extremely busy and this development would attract more heavy vehicles onto them. Also, drivers will use them to take short cuts to this industrial site. This site is adjacent to green belt and in our opinion is totally unsuitable for this commercial development, which would be an eye-sore to the area.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** AS17 Land at Switch Island [Peel Sit **Other Documents**

Policy AS17 **Land at Switch Island [Peel site]**

Respondent No 204 **Response Ref** 1 **Representor Name** Gill Armstrong & others

Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

We strongly object to Peel Holdings Plan AS17 for the following reasons. Pollution and noise from the industrial site will affect where we live. Now morning and evening traffic along Brewery Lane is horrendous. If these plans go ahead the continuous use of the small stone bridge could become dangerous structurally. Light Pollution – lights will be on 24/7 and will affect our living. Erosion of our houses plus the true value of our homes will decrease. Area should remain a green belt area as local farming will be affected. We need good agricultural land for farming and this should not be taken away. We need to preserve green belt areas for future generations. Melling is a historical part of Merseyside and should remain a parish and part green belt, if the build was to go ahead we would merge into one area and lose our Identity. Amenity for walkers and cyclists would be lost. Wildlife would be affected as trees and open land areas would go to make way for Industrial units. We do agree with Melling Parish Council about leaving Peels Holdings out of the plans, but we are not saying we do not object to some new houses in the area but we feel it's not necessary to use all green belt land, this area must be saved for our future families and children.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** AS17 Land at Switch Island [Peel Sit **Other Documents**
Policy AS17 **Land at Switch Island [Peel site]**
Respondent No 211 **Response Ref** 1 **Representor Name** Malcolm Swann
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

I totally agree with you and give my support to the decision to leave this site out of the Local plan. Common sense has prevailed and Green Belt crop growing land must never be used,when other alternative sites are available. Peel's sole aim seems to be profit and destruction of the environment at any cost. The people who object have a voice, the future generations must be considered, environments are important. Transit sheds will only bring more pollution, noise, air pollution, and light pollution. The people of Melling, Aintree and Maghull have spoken. They believe in preservation of Green belt, which has got to be the priority of any Council. Brown field sites once attracted a subsidy to excavate contaminated land. I do hope that Peel will be the leaders in demanding the reinstatement of that subsidy from whatever Government takes office. They should have been doing so for the last 5 years, but obviously, having carried out some research, have not done so.

Summary of Suggested Changes

None.

Evidence Submitted

Chapter 6 **Plan Order** AS17 Land at Switch Island [Peel Sit **Other Documents**
Policy AS17 **Land at Switch Island [Peel site]**
Respondent No 219 **Response Ref** 1 **Representor Name** Pat Roberts
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

Local Plan put forward by Peel Holdings for proposed distribution sheds from Brooklands Farm to Switch Island. I write once again to advise you of my very strong objections to the above plan. This land is prime green belt which, once gone, can never be replaced. We already have two motorways on our doorsteps and the sheer volume of added traffic noise would be intolerable. Hundreds of houses have been built in the Waddicar area in the last 20 years meaning lots of extra traffic through Spencers Lane. The noise pollution caused by the comings and goings of huge container lorries would be horrendous. The disruption to our lives during the clearing the farmland and building these units would be totally unacceptable. The local infrastructure is totally inadequate for such a huge undertaking. Please take note of these objections if this proposed plan comes up again.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** AS17 Land at Switch Island [Peel Sit **Other Documents**
Policy AS17 **Land at Switch Island [Peel site]**
Respondent No 236 **Response Ref** 1 **Representor Name** Malcolm Robinson
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

This is a totally inappropriate site for such a vast industrial/logistics complex. The land in question is some of the best and most versatile agricultural greenbelt,which should be reserved for food production,brownfield sites should always be used first. This would destroy a beautiful piece of our countryside,while industrial sites elsewhere lie empty. Late afternoon and early evening see standing traffic on the M57 which would be compounded should the proposed development be allowed to proceed.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** AS17 Land at Switch Island [Peel Sit **Other Documents**
Policy AS17 **Land at Switch Island [Peel site]**
Respondent No 246 **Response Ref** 1 **Representor Name** Michael Broom
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

I strongly support Sefton MBC in their decision not to include The "Peel plan" in their Local Plan. This decision shows that common sense has prevailed. This land is worked farm land and must not be concreted over to provide container storage. I would suggest that Peel inspect the old land maps of the area as the land slopes down from Melling Village to the motorway. If this extensive area of fertile farmland is concreted over it could cause flooding. More of our "Green Belt" would be lost for future generations and it could never be returned to its original state. This must not be allowed to happen.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** AS17 Land at Switch Island [Peel Sit **Other Documents**
Policy AS17 **Land at Switch Island [Peel site]**
Respondent No 261 **Response Ref** 1 **Representor Name** Margorie Harvey
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

I have already written about the number of houses proposed in the local plan which affect Aintree and Melling. I am now objecting to the plans of the Peel Group. A large company like this with loads of money does not worry about the effect their plans have on the local communities-never mind the loss of arable land. Those concerned with the plans should visit these sites to observe the consequences, especially those near Brewery Lane.The traffic around Aintree Village and Melling is horrendous now. You have to rely on a courteous driver who will stop for you. The roads are narrow, not built to take heavy traffic. Please consider the effects of these plans.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** AS17 Land at Switch Island [Peel Sit **Other Documents**
Policy AS17 **Land at Switch Island [Peel site]**
Respondent No 262 **Response Ref** 1 **Representor Name** M Wagner
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

Regarding the plan by Peel Holdings, to use land for commercial use. I object to this plan. I live near the M57/M58 and the amount of heavy lorries already using this area is horrendous, and in a recent paper is one of the roads named as the road from hell. What about peoples health and more noise plus all the lighting that this plan has. This plan should be by the docks not near to people's homes.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** AS17 Land at Switch Island [Peel Sit **Other Documents**

Policy AS17 **Land at Switch Island [Peel site]**

Respondent No 270 **Response Ref** 1 **Representor Name** E Lee

Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

We are not happy they are hinking of putting a distribution warehouse near our housing estate. We get enough dirt and fumes from the busy traffic already, we live right by Switch Island so we don't want anyone building around the green belt.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** AS17 Land at Switch Island [Peel Sit **Other Documents**

Policy AS17 **Land at Switch Island [Peel site]**

Respondent No 318 **Response Ref** 1 **Representor Name** Marion Elson

Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

I am writing to oppose the plan put forward by Peel Holdings to develop a site near Switch Island. We are swamped by retail and leisure parks; a massive Asda and heavy traffic 24/7 along the A59 and the A5036 - we deserve some respite from development of this area. The air quality is not that good and the enormous amount of litter generated from the fast food outlets and Asda is beyond belief and a blight on the area. I do not want Peel Holdings - it belongs in the dock area and not a residential area.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** AS17 Land at Switch Island [Peel Sit **Other Documents**

Policy AS17 **Land at Switch Island [Peel site]**

Respondent No 360 **Response Ref** 6 **Representor Name** John Hill

Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

Finally I wish to applaud the decision not to include in the plan the Peel Holdings proposal for a logistics complex on land adjoining the motorway at Aintree, reference AS17. I hope that this proposal will not reappear.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** AS17 Land at Switch Island [Peel Sit **Other Documents**
Policy AS17 **Land at Switch Island [Peel site]**
Respondent No 366 **Response Ref** 1 **Representor Name** Margaret Anne Hill
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

I approve the exclusion of the Peel site AS 17 from the Sefton Local Plan. The suggestion that such an enormous development be placed within a tiny agricultural village is appalling. It would completely destroy the delightful village of Melling where I lived for many years and raised my children. There are many brownfield sites which can be used for such a development. Please do not allow that plan to return to the Sefton Plan.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** AS17 Land at Switch Island [Peel Sit **Other Documents**
Policy AS17 **Land at Switch Island [Peel site]**
Respondent No 403 **Response Ref** 1 **Representor Name** Denise France
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

I am writing to support the exclusion of Peel Holdings (Peel Logistics') exclusion from Sefton's draft plan. Peel's development proposals AS17, if re-introduced and approved, would mean traffic congestion on a huge scale, cause a flood risk by removal of the built environment's 'natural sponge', impose high-impact urbanisation on a semi rural residential area which has no industry in the area and was always designed as a dormitory population and promote pollution from diesel fumes, noise & light.

The area's ecology, (water voles, priority bird species) and its land – 'best and most versatile agricultural land - is much needed for food production if we are to look to the future with any confidence. The locality is of huge amenity benefit to walkers cyclists, with footpaths and the canal towpath and has been singled out as having heritage value. It also provides an essential gap preventing the blurring of communities. Part of the covenant for Green Belt is that if any is required to be built on, then it should be the least valued first. All of the supporting evidence points to this area of Melling being 'the most valuable'.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** AS17 Land at Switch Island [Peel Sit **Other Documents**
Policy AS17 **Land at Switch Island [Peel site]**
Respondent No 410 **Response Ref** 1 **Representor Name** Alan Stirrup
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

I wish to object in the strongest terms relating to the proposed development by Peel Holding to build on rural land adjacent to Switch Island and the M57 motorway. My reasons include increased traffic congestion; flood risk; semi rural residential area; no industry in this area; pollution from diesel fumes; noise & light pollution; Ecology; water voles; priority bird species; Best and most versatile agricultural land much needed for food production look to the future; Amenity value walkers cyclists, canal towpath; and Heritage value and an essential gap preventing the blurring of communities. I believe that the loss of any one or all of the above will have a detrimental effect to the this and the wider area as a whole and wish to register my determined resistance to this plan.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

I am writing to support the decision to exclude proposals by Peel Holdings (Peel Logistics) in Sefton's Local Plan. I will continue to object to this development and urge you to reject any proposals and subsequent amendments. This development would wipe out 120+ [acres] Green Belt and important agricultural land in the area specified.

This land provides a critical corridor for wildlife in a very built up area, and offers habitat for red-listed species, identified as threatened and needing urgent action such as water voles and otters, as well as those currently causing less concern such as various bird of prey, farmland birds and waterfowl, other mammals (including some sightings of roe deer) and a wide range of insects, plants and wildflowers offering food sources and acting as pollinators.

This Green Belt area provides an important buffer between communities, a food growing amenity and a 'breathing space' in a heavily congested and built up region. The additional traffic congestion that would come with this proposed development would also represent a hugely negative impact along with light and noise pollution, disrupting the ecology of the area and habitat of a wide range of wildlife.

I am pleased that Sefton to date have opposed the development of these protected areas and I would ask that you continue to reject the continual attempts to develop this area and other Green Belts.

There are other protections for this land. Prime agricultural land such as this can be used only in the very last resort for built infrastructure because it's so valuable. There are plenty of other sites (brownfield) around, and fully constructed ones that are without tenants. To lose this valuable and irreplaceable amenity to pure commercial profit would be untenable.

It is unacceptable to hear that Peel is already marketing the land for 1.5m sq ft of commercial units at its Peel Logistics website under 'Switch Island'. It doesn't own the land and there is no planning application as yet to support this.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

Having read the article in our local newspaper the 'Champion' regarding the proposals set out by Peel Holdings Ltd for the purchase of local farmland between Switch Island & Spencers Lane for the development of industrial units, I would comment as follows.

I was born in Spencers Lane, Melling and have lived in my current house here for 47 years. As you might well imagine over this period of time I have seen many changes in Melling, some good & some not so good, but in all my 67 years of living in this beautiful rural area, I have never come across such a hideous proposal of land destruction as has been set out by Peel Holdings.

The land around Melling is Grade 1 agricultural land, & still within the Green Belt zone. To sell off 120 acres of prime land & convert this into an industrial estate would totally destroy the community of Melling as we know it today. Peel Holdings are a multimillion pound consortium who are used to ramroading their way into achieving whatever they want without any scrupels, but the latest scheme of theirs is beyond belief.

Melling is a close knit community linking closely with Aintree & Maghull, & this comradery atmosphere would no longer exist. How could anyone consider turning prime agricultural land, into a concrete & tin shed industrial estate. This is just a money making scheme with one thing in mind 'Peel Holdings' profits. We in Melling would gain nothing apart from total annihilation of a prosperous community.

The property in Spencers Lane, commonly known as 'The 21 Houses', would be drastically reduced in value, so much so that it would be virtually impossible to sell the property.

Switch Island is already a congested area, & with the introduction of an industrial estate, bringing many more HGV vehicles, this would only make matters much worse.

The Council has considered which is more important, money or the welfare of its community, by omitting the development from the Local Plan, the government must do the same. There can only be one answer. This project must not be granted approval.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

I wholeheartedly agree with and support Sefton Council's decision to exclude Peel's site AS17 from the Local Plan. I am the neighbouring farmer and my land is immediately adjacent to this proposed site. I therefore have grave concerns that my land would be compromised if this industrial development were to go ahead. Peel's proposal is to divert the river Alt along my boundary. Water presently finds its way to the river via field drains and ditches. All precipitation is either lost as transpiration from the arable crops or absorbed by the land up to field capacity, with any excess finding its way into the field drainage system, i.e. Run off is negligible. If such a vast area were to be concreted over then run off would be a major issue with the knock on effect of increased flood risk to my farm and thus lower the productive capacity of my land. At present all this area is classed as best and most versatile. We are in fact talking of an important national asset, a limited resource and at a time when food production needs to increase, I feel a degree of foresight needs to be exercised here.

I believe that planning policy recommends that only small areas of agricultural greenbelt should be used, only if absolutely necessary and then not adjacent to other agricultural land which could be affected/compromised. Such an industrial development would therefore be inappropriate use of prime growing land. It would, I fear also be the thin end of the wedge as Peel would inevitably want to expand this site in the future.

Melling/Aintree residents at present enjoy the quality of life provided by this semi rural environment. People tell me that is why they choose to live here. The development of AS17 would destroy the Essential Gap between communities, changing the area to an urban environment. There are brownfield sites on already established industrial areas which would be more suitable for this proposal.

Finally I would like to say that my farm "Wood Hall", is a Grade 2 listed building and as such is of great importance to Sefton's heritage. The increased traffic of HGV vehicles on our country lanes would make field access by agricultural machines increasingly dangerous. I consider Sefton's decision to exclude Peel's site AS17 to be the right one.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

I am writing to support removal of Peel Holdings (Peel Logistics') plan from Sefton's Local plan. The area is a wildlife haven where species' communities thrive, despite being pressed at the boundaries. The ecology (we have a strong population of water voles and many priority bird species including woodpeckers and kingfishers) is doing well. There are mature hedgerows and plenty of wildflowers which support species living on the margins in the UK.

The land has been designated 'best and most versatile agricultural land; it is highly productive with year on year high crop yields. In terms of use by local people the area is used as a leisure amenity by walkers cyclists, with footpaths and the canal towpaths, and has been singled out as having heritage value (King James stayed at Woodhall Farm, a listed building). It also provides an essential gap preventing the blurring of suburban communities. Part of the rules for Green Belt is that if any is required to be built on, then it should be the least valued first. All of the supporting evidence points to this area of Melling being 'the most valuable'.

Peel's development proposals AS17, if re-introduced and approved, would mean congestion on the roads on a huge scale, cause a severe flood risk by removal of the built environment's 'natural sponge', impose high-impact urbanisation on a semi rural residential area which has no industry in the area and was always designed as a dormitory population and promote pollution from diesel fumes, noise & light.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** AS17 Land at Switch Island [Peel Sit **Other Documents**

Policy AS17 **Land at Switch Island [Peel site]**

Respondent No 459 **Response Ref** 1 **Representor Name** Jean Mullen

Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

I am writing to urge you to support the Council's decision to remove Peel Holdings (Peel Logistics') plan from Sefton's Local plan. The land has been designated 'best and most versatile' agricultural land. It is highly productive and, given the amount of news around Britain's dwindling agricultural resources and its ability to feed itself, this should ensure this land is protected. The country is in danger of becoming reliant on foreign imports for food. This is by no means a stable supply resource.

More, the Green Belt around Brewery Lane, Melling is rich in wildlife. I know that there is a large diversity of species in the area, with water voles and lots of different birds.

The land is a green lung and recreation area in addition to providing food. People use the area is used as a leisure amenity for cycling, walking, running etc. The village and some of its properties have been acknowledged as having heritage value, some of the buildings are listed. It also provides buffer preventing the blurring of suburban communities, one of the prime reasons for Green Belt being created. Part of the rules for Green Belt state that if any is required to be built on, then it should be the least valued first. Melling's Green Belt is in the ranks of 'the most valuable'

Peel's development proposals AS17, if re-introduced and approved, would mean road congestion, would cause a severe flood risk by removal of the built environment's natural sponge, produce high-impact urbanisation on a semi rural residential area which has no industry in the area and was always designed as a dormitory population and promote pollution from diesel fumes, noise & light.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** AS17 Land at Switch Island [Peel Sit **Other Documents**

Policy AS17 **Land at Switch Island [Peel site]**

Respondent No 460 **Response Ref** 1 **Representor Name** C E Farrell

Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

I wish to confirm my support for your decision not to include Peel site AS17 in your Local Plan. My reasons are as follows: There are many suitable business and industrial sites lying empty and unused in the local area which should be used first. Development on greenbelt land is unnecessary when other more suitable sites are readily available. The increased traffic generated by this development would place additional strain on this already congested major junction. We need to preserve greenbelt sites for our wildlife as natural habitats are being constantly eroded. There is already a shortage of arable land for the production of crops and other foodstuffs for both animal and human consumption, we need to preserve arable land not destroy it forever.

The land could be better used for rearing animals for food production which would also provide natural habitat for wildlife. There is a national housing shortage so if the land absolutely could not be saved from development It would be a more sensible option to use it to meet the housing need rather than another business development which is absolutely not needed.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

I am particularly glad to see that elsewhere on the whole Green Belt boundaries have been retained. I am also glad to see that the "Essential Gap" on either side of the M57 to the Borough boundary has been retained. This will ensure the retention of an almost unbroken green highway corridor from the south end of the Knowsley Expressway to Ince Blundell (with the completion of the Switch Island/Thornton link road). This attractive landscape feature could easily be significantly damaged by Peel Holdings proposals for the development of agricultural land south of Switch Island. Peel's outline studies produced as part of the "Additional Sites Consultation" in this area indicated a development of rural land which did little to comply with national or local policies for the Green Belt in checking sprawl, safeguarding the countryside from encroachment and assisting urban regeneration. Because of potential flooding issues, the development was not a part efficient use of land with large areas set aside for flood control, barrier landscaping and the diversion of the main local river. One also wonders what the effect on such a proposal would be on the local traffic network of narrow lanes in Melling and residential streets in Aintree and Old Roan with just employees arriving and departing by Spencers and Brewey Lanes. The huge bulk of the buildings in the flat landscape would have a dramatic adverse effect on the openness of the landscape and it would have a major negative effect on the setting of the listed farm buildings and house at Woodhall Farm. Finally, development of this productive, versatile agricultural landscape would probably reduce the incentive to develop less attractive sites financially nearer the Port on Dunningbridge Rd, Bootle, Seaforth and even in established "industrial" estates in Knowsley and elsewhere.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

I write to object to the Peel Group application to develop units under reference AS17 which means desecrating existing Green Belt Land and quality agricultural land. I am a pensioner living in the 21 houses in Melling which comes within the published plan. Apart from the Green Belt area these houses have an historic value.If this green belt land is built on it will not only destroy wildlife habitat but also cause pollution in the way of noise and extra traffic on roads that are already at capacity. The green belt will disappear and Melling and Aintree will be joined together, this is what the green belt is supposed to stop happening. There is also a river through this land and a railway. Are the proposals to move these things? We are constantly urged by the government and other institutions to save and plan for our retirement. Where I live is a beautiful place and is a tribute to Sefton and Merseyside. Surely you cannot consider giving the go ahead on this application which could well become yet another derelict area such as we see all over Merseyside. We are led to believe that Green Belt areas are sacred and meant to be safeguarded for the future. Hopefully you will continue this purpose.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

I am writing to object to the proposed plan by the Peel Group to develop land at Switch Island north of M57 between Aintree, Maghull and Melling. I find it unbelievable that the council would consider allowing development of Grade 1 agricultural land and the demolition of houses in the area. What will the country do for food in the future when all the agricultural land has been destroyed? We will have to import from abroad. At what cost. This is a historic area of the borough, and is an area of land enjoyed by walkers, joggers, birdwatchers and fishermen. The Peel Group want to build industrial units that they will then rent or sell off. They have done this in other boroughs in the county and those areas units now lay empty and derelict and a filthy disgrace because nobody wants them. You cannot let this happen here.

I ask you to reject Peels plans for the Brewery Lane/Spencers Lane area as the impact on the environment would be irreversible. The noise pollution, the extra traffic on already overcrowded roads in the area is totally unacceptable. There are other sites that are far more suitable to this kind of development that will not be as destructive to the community.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

Land at Switch Island north of M57 between Aintree, Maghull and Melling. Peel plan to obtain 100 plus acres of Grade 1 agricultural farming land. When we purchased our home for life we were advised our property was freehold and registered with title absolute. The property is Covenants which are set out in the Conveyance dated 21st August 1933. I am stunned to think that the present serving Council members would even consider allowing such an assault on what is presently a beautiful rural community with thriving nature and wildlife. If this plan goes ahead half of Melling will be gone forever. On a personal level I am disabled and have had my home adapted to enable me to live with some independence. I cannot see how this can be replaced. I rely and depend on the support of my neighbours which gives me a sense of safety. These things cannot be replaced.

How dare they just decide that our land and homes are not important, who gave them the right to destroy our homes, community and beautiful countryside. You cannot allow these plans to go ahead. Please reject Peel plan AS17.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** AS17 Land at Switch Island [Peel Sit **Other Documents**
Policy AS17 **Land at Switch Island [Peel site]**
Respondent No 488 **Response Ref** 23 **Representor Name** Ian Brodie Browne
Organisation Name Sefton Council Lib Dem Opposition Group
Obj/Sup/Com Support

Summary of Main Issues

The Peel Holdings proposals for a logistics park to the east of the M57 and adjacent to Switch Island and Brewery Lane in Melling are a huge concern to us. The land is presently being farmed because it is high grade agricultural land and there are, in our view, no sound reasons to agree to this development. The landscape of rural Melling would be lost forever as acre upon acre of high grade agricultural land would be lost to an industrial development. The traffic implications of this upon rural Melling would be huge indeed.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** AS17 Land at Switch Island [Peel Sit **Other Documents**
Policy AS17 **Land at Switch Island [Peel site]**
Respondent No 495 **Response Ref** 1 **Representor Name** Christine Glover
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

I totally agree with and support Sefton Councils decision to exclude the Peel Plan site AS17 from the Local Plan. I am strongly objecting to Peels proposal to build a huge industrial/logistics complex on best and most versatile agricultural greenbelt. The M57 motorway is the boundary which is protecting us from urban sprawl. It is an Essential Gap and is not contained. In Sefton's "Final Greenbelt Study", the parcels of land were discarded and excluded from the study, as they were considered so important to the openness of the greenbelt that they would not even be considered for development.

Peel are calling this site "Switch Island", which is very misleading for the public because Switch Island may be the main entrance, but in fact the vast majority of this site is the other side of the railway in Melling/Aintree on prime arable land which could lead to loss of the remaining farmland in the future. The site is a flood plain for the river Alt and if the river is to be re-aligned, as they plan to do, could cause worrying flood consequences for the remaining fields and houses adjacent to this site.

The staff entrance/emergency exit purports to be on Brewery/Spencers Lane and as such would cause untold traffic problems. Brewery Lane has an ancient stone bridge with single lane traffic only. This lane has always been a rat-run for commuting traffic and if the vast housing projects in Maghull were to go ahead would most definitely have an added load as people commute to work. To have this Logistics site on a country lane in addition to all this, would make it extremely congested both on the bridge and the exit from Spencers Lane onto Bullbridge Lane which already has queues of traffic at peak times. These lanes are used by farmers with agricultural vehicles to access their fields.

The open character of this part of the village is an important contribution to the greenbelt and as an amenity asset is irreplaceable, there being a network of footpaths including the Leeds/Liverpool towpath.

The historic village of Melling, along with its listed buildings and in particular Wood Hall Farm (James II coat of Arms over front door) which lies in close proximity to the proposed site. This development being 25 meters high would adversely impact on the setting of these buildings. The special character of this part of the village should be preserved along with the integrity of its listed buildings.

I am in full agreement with Sefton's pragmatic approach in excluding this inappropriate development.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

Whilst we applaud the fact that the development proposed by Peel Holdings to construct a distribution centre between Switch Island and Brewery Lane has not been included in the Local Plan, we understand that this will be considered as a separate matter at a later time and date, so feel that it is necessary that we register our objection to this development on the grounds that : 1. The proposed site is quality agricultural land and bearing in mind that it has been determined that within a relatively short period of time – namely some 40 years – Britain will not be able to produce sufficient food to feed itself it will be necessary to import a great proportion of our food because the agricultural land has been covered by concrete. 2. The land is identified as Green Belt and would erode the green space separating the townships of Aintree, Maghull and the village of Melling. 3. The proposed area is not suitable for industrial use and would have a detrimental impact on the village status of Melling. 4. There is the direct impact on the current residents of Brewery Lane, who will be surrounded by an industrial site and will be affected by the re-direction of the River Alt to directly behind their property, the site has a high water table with a high potential for flooding and a re-routed river would only exacerbate this. We would ask that the construction of this development at this site be refused.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

I would like to make my objection public and official to any amendments by the Peel Group in promoting their AS17 plan in the Aintree, Maghull and Melling area and for the following reasons.

It will cause increased traffic congestion and in turn a significant increase in air pollution from diesel fumes that affect the health of several schools and communities in the proposed area. There will be a greater increase to flood risk and water pollution which in turn will destroy the local ecology, rare freshwater species as well as water voles, and many bird varieties. This is also a vital piece of rural greenbelt landscape to the Aintree, Maghull and Melling, communities and there is thankfully no industry in this area. The noise, air and light pollution will also cause damage to both physical and psychological health to all the residence in the proposed area . In addition building on this agricultural land will mean its complete and permanent loss. Local agricultural land will be essential for food production in the very near future and will decrease fuel costs for food transport in the UK. This area is also highly valued by diverse community members such as runners, walkers, dog walkers, cyclists, canal boat users, children (who have a park directly opposite the proposed site "Ballswood"), and the elderly who currently enjoy it as an easily accessible and reachable rural area.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

I am writing again to appeal against the decision to turn Melling, Maghull and Aintree (Peel site plan AS17) into an unwanted industrial site. I would also like to confirm that I completely agree with Sefton council's decision to exclude Peel site AS17 from the Local Plan and truly appreciate efforts against so far.

My reasons outlined before in brief include:- There are many more suitable/half developed sites, nearer to the docks that would not have the significant impact on the nearby residents. Granted these aren't owned by Peel but there is no denying that they are more appropriate for this project. There has been much publicity of this in recent months since I first wrote to you in July 2014. This land is some of the best agricultural land in the country, once it is concreted over it is ruined forever. I think the importance of this is severely underestimated.

It's so important that future generations have a chance to enjoy what precious little is left of Britain's countryside especially when living within close proximity to an urban environment; how else are we to teach future generations about rural England if there's only remote countryside left. Many families have moved to the area to try and better their lives for themselves and their children, this proposal firmly snuffs out their dreams. There is a real sense of community here, people genuinely care about the areas in hand.

It has been suggested in recent impact studies of this Peel project Wood Hall Farm would be the most affected should it go ahead. Wood Hall Farm is a Listed Building steeped in history, something we should treasure and be proud of. Buildings like this cannot be replicated, they need to be protected as do their surroundings. I grew up in the village of Melling and still have a strong affiliation with this area as do my children. I sincerely hope that you will think carefully, considerately and compassionately before making any decisions. We won't be able to revert back should you choose the Peel route.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

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It's so important that future generations have a chance to enjoy what precious little is left of Britain's countryside especially when living within close proximity to an urban environment; how else are we to teach future generations about rural England if there's only remote countryside left. Many families have moved to the area to try and better their lives for themselves and their children, this proposal firmly snuffs out their dreams. There is a real sense of community here, people genuinely care about the areas in hand.

It has been suggested in recent impact studies of this Peel project Wood Hall Farm would be the most affected should it go ahead. Wood Hall Farm is a Listed Building steeped in history, something we should treasure and be proud of. Buildings like this cannot be replicated, they need to be protected as do their surroundings. I feel so sad this area of natural beauty and agricultural land could potentially be spoilt for my own children's summers.

Summary of Suggested Changes

Evidence Submitted

Policy AS17 Land at Switch Island [Peel site]

Respondent No 565 Response Ref 1 Representor Name Paula Maguire

Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

In Sefton's Final Green Belt Study, parcels S150/151 (the bulk of AS17) were discarded at Stage 2 - on the grounds they are so important to maintaining the integrity of the Green Belt and its openness, that they should be protected from any development and should remain in the Green Belt in perpetuity. The Green Belt is aimed at: checking the unrestricted sprawl of large built up areas. Assisting in safeguarding the countryside from encroachment. Assisting urban regeneration by encouraging the recycling of derelict and other urban land. Preventing neighbouring towns merging into each other.

The Peel proposals cut across all of those objectives. I am particularly concerned that allowing this plan to go ahead will make it much easier for future development around AS17 to succeed. The National Planning Policy Framework is clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances and advises that if Green Belt is needed for development then: non-agricultural land should be used first. If agricultural land has to be used then the lowest grades should be used first. Finally if "best and most versatile land" has to be used then only small areas isolated from other agricultural land are to be used to avoid further agricultural loss in the future. The Peel proposal AS17 would fall at all of those hurdles.

Peel seeks to develop "best and most versatile" land — this is amongst the UK's most productive prime agricultural land and it's being farmed to capacity. This is a rare national asset and if this proposal is allowed then, when concreted over, it will be gone forever. With a population of c60m to feed losing our best farmland is a risk we can't afford to take – UK food imports have increased by 47% in the last 20 years and Cambridge University's recent study finds that by 2030 the UK will need an extra two million hectares of agricultural land. The UK can't afford to give up any best and most versatile land.

AS17 is not a small area nor is it isolated from other agricultural land. It is a large parcel piece of land using both actual and contextual measures, comprising the southern section of a very extensive agricultural belt spreading across Melling and Maghull towards Bickerstaffe and Aughton. This land is part of the essential gap between Aintree and Maghull and is not contained. The scale of AS17 goes way beyond the commercial provision proposed by Sefton in the Local Plan and permitting AS17 would represent a significant shift away from the balance sought. And it would fly in the face of all of the Green Belt and planning guidance detailed above.

Important though it is, this is not just about loss of Green Belt. AS17 would have a massive environmental impact too. Aintree/Melling/Maghull are dormitory areas — largely non-commercial — and Sefton's Local Plan expressed the aim of maintaining that position. Peel's plan will undoubtedly increase traffic in an already pressured and congested bottleneck, increasing pollution, making the roads more dangerous for our children and making it harder to get around/

And there would be loss of amenity. Sefton people walk, cycle and ride horses on the lanes, footpaths and towpaths of the area Peel want to develop. They enjoy the open space, the wildlife and countryside environment. This land is part of the good balance Sefton identified is needed to meet our community's housing, commercial and leisure needs. Development on AS17 will inevitably spoil the leisure amenity in that area.

We're not persuaded that Peel will attract investment to Sefton that would increase the number of jobs on offer. They would not give us details of their plans and their media soundbites are vague and guarantee nothing. But even if there is the prospect of inward investment that would do more than siphon jobs from other parts of Sefton there is no evidence that can only be achieved on AS17. There are alternative brownfield sites nearby, for sale and with equally good motorway access. But Peel doesn't own them and would rather pursue the cheaper option of AS17 with cavalier disregard for the consequences. Little detail of Peel's proposal has any attraction to Sefton, we strongly urge you to test the evidence for what they offer. They don't have a strong track record on job creation locally and only want to develop AS17 because it would be relatively cheap for them to do so. They can make big profits by buying farm land cheaply and developing it while brownfield sites lie vacant and a potential drain on Sefton's stretched financial resources.

I also object to the proposal for the following reasons: Noise pollution as this development is close to residential area. There is obviously going to be a noise and light impact from the facilities. Light pollution as the development will be near to residential area and be clearly visible after dark. This will be a factor in winter months and all year round if the site has 24 hour operation. Traffic impact with increased HGV transport requiring access to and from the Seaforth/Dunningsbridge, the so called Atlantic Gateway. Flooding Implications. The land at present is subject to flooding problems and a development on this land will increase the risk of flooding to areas beyond current flooding boundaries. Employment. This development doesn't provide a boost to employment in the area as warehousing and distribution centres provide low density employment.

Summary of Suggested Changes

Evidence Submitted

Policy AS17 Land at Switch Island [Peel site]

Respondent No 566 Response Ref 1 Representor Name Craig Maguire

Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

In Sefton's Final Green Belt Study, parcels S150/151 (the bulk of AS17) were discarded at Stage 2 - on the grounds they are so important to maintaining the integrity of the Green Belt and its openness, that they should be protected from any development and should remain in the Green Belt in perpetuity. The Green Belt is aimed at: checking the unrestricted sprawl of large built up areas. Assisting in safeguarding the countryside from encroachment. Assisting urban regeneration by encouraging the recycling of derelict and other urban land. Preventing neighbouring towns merging into each other.

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Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

I was relieved to hear and fully agree with the fact that the proposal to develop the land north of the M57 between Aintree, Melling and Maghull, submitted by Peel Holdings, was not being included within the Local Plan. I now understand that, despite local opposition, Peel can ask for their proposal to be considered by the Planning Inspector. I have major concerns about the impact any such development will have on our local environment and therefore, as part of the consultation process, wish to express my opposition on the grounds outlined below:

This proposed development is scheduled to destroy acres of Grade one agricultural land. While some reports suggest a downgrade of the land, research by Cambridge University supports the fact that this is some of the most productive, high yield and versatile land in the county. At a time when the government figures are suggesting that by 2030 we will not have sufficient land to meet our own food production needs, it seems counter intuitive, even negligent, to destroy grade 1 agricultural land to house industrial sheds which will, no doubt overtime, be the storage and distribution site for high cost imported food; produce which could be grown and sourced locally. In the longer term the growing population within the Sefton area and wider areas will rely upon sustainable food sources. Removing irreplaceable Grade 1 agricultural land will have a huge impact on the future of the Maghull, Melling and surrounding areas. Surely it is more effective in the longer term for Peel Logistics to look for alternative locations of a lower grade or even existing brown sites to build upon?

While I understand the Council's need to meet government targets in terms of housing, jobs and environment it is unclear how Peel's proposals for a distribution centre will actually help Sefton deliver against these. Clearly Peel suggest that the development of industrial sheds will have a positive impact upon "their" port and the Atlantic Gateway but in terms of the local economy it seems unrealistic to expect it to bring huge, long term benefits. Certainly in the short term it may create a number of jobs in the construction of the site but in reality these individuals are likely to come from outside the Melling, Maghull and Aintree areas. In the medium to long term, it is likely to keep HGV drivers from across the country in employment but, in terms of local jobs, it seems a high price to pay for several security guards and a relative number of warehouse staff whilst losing the existing chain of employment which comes from growing agricultural produce.

Peel's proposal touches on the issue of water management and flood risk and how their plan will address this. Recent events nationally have seen huge problems caused by flooding. Experts blame the destruction of trees and the removal of land which acts as a natural soak away for the increased risk of floods. Clearly in an area of flood risk, keeping natural land is one of the best solutions to prevent widespread damage to homes, property and potentially life, whilst proving less costly to both the council and Peel logistics?

I am not against development and, having lived in the area all my life, I want the community to thrive but this seems a high a price to pay. Too much industry will take the heart out of the community and people will no longer want to live in an area which has lost its semi-rural attractions and gained industrial buildings. There do seem to be other sites which are currently under utilised or indeed have unoccupied units. If there is the demand which Peel seem to be suggesting, and currently actively marketing, then surely it makes both economic and environmental sense to redevelop existing areas rather than building new?

It seems incongruous and even laughable that a selling point of the plans are to "create a high quality environment and landscape structure" but to do so they are looking to destroy what is already a high quality environment and one of the best landscape structures in the form of grade 1 agricultural land.

I implore the council to reject Peel's plans for industrial development in the Brewery/Spencers Lane area of Melling and look for alternative, less destructive locations for economic growth.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

In Sefton's Final Green Belt Study, parcels S150/151 (the bulk of AS17) were discarded at Stage 2 - on the grounds they are so important to maintaining the integrity of the Green Belt and its openness, that they should be protected from any development and should remain in the Green Belt in perpetuity. The Green Belt is aimed at: checking the unrestricted sprawl of large built up areas. Assisting in safeguarding the countryside from encroachment. Assisting urban regeneration by encouraging the recycling of derelict and other urban land. Preventing neighbouring towns merging into each other.

The Peel proposals cut across all of those objectives. I am particularly concerned that allowing this plan to go ahead will make it much easier for future development around AS17 to succeed. The National Planning Policy Framework is clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances and advises that if Green Belt is needed for development then: non-agricultural land should be used first. If agricultural land has to be used then the lowest grades should be used first. Finally if "best and most versatile land" has to be used then only small areas isolated from other agricultural land are to be used to avoid further agricultural loss in the future. The Peel proposal AS17 would fall at all of those hurdles.

Peel seeks to develop "best and most versatile" land — this is amongst the UK's most productive prime agricultural land and it's being farmed to capacity. This is a rare national asset and if this proposal is allowed then, when concreted over, it will be gone forever. With a population of c60m to feed losing our best farmland is a risk we can't afford to take – UK food imports have increased by 47% in the last 20 years and Cambridge University's recent study finds that by 2030 the UK will need an extra two million hectares of agricultural land. The UK can't afford to give up any best and most versatile land.

AS17 is not a small area nor is it isolated from other agricultural land. It is a large parcel piece of land using both actual and contextual measures, comprising the southern section of a very extensive agricultural belt spreading across Melling and Maghull towards Bickerstaffe and Aughton. This land is part of the essential gap between Aintree and Maghull and is not contained. The scale of AS17 goes way beyond the commercial provision proposed by Sefton in the Local Plan and permitting AS17 would represent a significant shift away from the balance sought. And it would fly in the face of all of the Green Belt and planning guidance detailed above.

Important though it is, this is not just about loss of Green Belt. AS17 would have a massive environmental impact too. Aintree/Melling/Maghull are dormitory areas — largely non-commercial — and Sefton's Local Plan expressed the aim of maintaining that position. Peel's plan will undoubtedly increase traffic in an already pressured and congested bottleneck, increasing pollution, making the roads more dangerous for our children and making it harder to get around/

And there would be loss of amenity. Sefton people walk, cycle and ride horses on the lanes, footpaths and towpaths of the area Peel want to develop. They enjoy the open space, the wildlife and countryside environment. This land is part of the good balance Sefton identified is needed to meet our community's housing, commercial and leisure needs. Development on AS17 will inevitably spoil the leisure amenity in that area.

We're not persuaded that Peel will attract investment to Sefton that would increase the number of jobs on offer. They would not give us details of their plans and their media soundbites are vague and guarantee nothing. But even if there is the prospect of inward investment that would do more than siphon jobs from other parts of Sefton there is no evidence that can only be achieved on AS17. There are alternative brownfield sites nearby, for sale and with equally good motorway access. But Peel doesn't own them and would rather pursue the cheaper option of AS17 with cavalier disregard for the consequences. Little detail of Peel's proposal has any attraction to Sefton, we strongly urge you to test the evidence for what they offer. They don't have a strong track record on job creation locally and only want to develop AS17 because it would be relatively cheap for them to do so. They can make big profits by buying farm land cheaply and developing it while brownfield sites lie vacant and a potential drain on Sefton's stretched financial resources.

I also object to the proposal for the following reasons: Noise pollution as this development is close to residential area. There is obviously going to be a noise and light impact from the facilities. Light pollution as the development will be near to residential area and be clearly visible after dark. This will be a factor in winter months and all year round if the site has 24 hour operation. Traffic impact with increased HGV transport requiring access to and from the Seaforth/Dunningsbridge, the so called Atlantic Gateway. Flooding Implications. The land at present is subject to flooding problems and a development on this land will increase the risk of flooding to areas beyond current flooding boundaries. Employment. This development doesn't provide a boost to employment in the area as warehousing and distribution centres provide low density employment.

Policy AS17

Land at Switch Island [Peel site]

Respondent No 601 Response Ref 2 Representor Name John Hoggarth

Organisation Name Melling Maghull and Aintree Against Peel Proposal

Obj/Sup/Com Support

Summary of Main Issues

Peel wants to build on 69ha of land alongside the M57. In Sefton's Final Green Belt Study, parcels S150/151 (the bulk of AS17) were discarded at Stage 2 - on the grounds they are so important to maintaining the integrity of the Green Belt and its openness, that they should be protected from any development and should remain in the Green Belt in perpetuity. The Peel proposals cut across the first, third, fourth and fifth purposes of the Green Belt set out in para 80 of the National Planning Policy Framework (NPPF). Allowing this plan to go ahead will make it much easier for future development on the Green Belt around AS17 to succeed. The NPPF is clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances and advises that if Green Belt is needed for development then non-agricultural land should be used first, then the lowest grades of agricultural land should be used first and if "best and most versatile land" has to be used then only small areas isolated from other agricultural land are to be used to avoid further agricultural loss in the future. The Peel proposal AS17 would fall at all of those hurdles. Peel seeks to develop best and most versatile land used in recent years to grow vegetables, cereals and oilseed rape suggesting it is extremely fertile land. AS17 is not a small area nor is it isolated from other agricultural land. It is a large parcel of land using both actual and contextual measures - the southern section of a very extensive agricultural belt. This is a rare national asset and once concreted over the land will be gone forever. Population of c60m means cannot risk losing our best farmland. UK food imports have increased by 47% in the last 20 years, and a Cambridge University study (2014) finds that by 2030 the UK will need an extra two million hectares of agricultural land. The UK can't afford to give up any best and most versatile land. This land is part of the essential gap between Aintree and Maghull and is not contained. And we understand that where the terrain is flat, as in this case, planning best practice requires the gap to be wider than in hilly areas. The scale of AS17 goes way beyond the commercial provision proposed by Sefton in their Local Plan and permitting AS17 would represent a significant shift away from the balance sought by the MBC. And it would fly in the face of all of the Green Belt and planning guidance detailed above.

A good part of site AS17 is within Flood Zone 2/3 and the proposals would increase the risk of flooding in the area. At present a proportion of rainwater percolates downwards and into field drainage systems, is taken up by agricultural crops or lost in transpiration. Once concreted over, all rainfall becomes surface run-off and has to finish up in ditches, the river Alt and SUDS, hence the increased risk of flooding. As the river Alt is to be re-aligned to the periphery, the neighbouring farmlands will be compromised by the surface run-off. This is environmentally unsustainable and could reduce the quality of the land soils presenting the risk that they will revert to their pre-drained condition. In addressing the flooding risk, the Peel proposals become inefficient because large flood areas are required to manage the loss of natural sponge.

AS17 would have a massive environmental impact too. Aintree/Melling/Maghull are dormitory areas - largely non-commercial - and Sefton's Local Plan expressed the aim of maintaining that position. Peel's plan will increase traffic in an already pressured and congested area: increasing pollution, making the roads more dangerous, making it harder to get around. Current pressures on roads around Switch Island (convergence of A59, A5036, M57 & M58). A5036 to Switch Island is one of 20 main routes - where more than HALF of all journeys resulted in the driver being late. Only 46.8% of journeys on the A5036 were on time last year. Heavy goods traffic will significantly increase when Peel's Liverpool Two terminal opens, increasing congestion. Every vehicle using the Port and logistics site will use Switch Island twice on its journey, and will generate new traffic to collect goods processed at the centre. New housing proposed for Maghull and Lydiate will increase the number of light vehicles using Switch Island. It is neither appropriate nor essential to locate this logistics development on land that would be directly accessed from one of Merseyside's most congested junctions. Instead should increase use of barges/small ships to move goods from the port, and maximum use of the Port railhead.

AS17 would cause a loss of leisure amenity. Sefton people walk, cycle and ride horses on the lanes, footpaths and towpaths of the area Peel want to develop. They enjoy the open space, the wildlife and countryside environment. This land is part of the good balance that Sefton identified is needed to meet our community's housing, commercial and leisure needs.

The north east boundary of AS17 is immediately adjacent to Wood Hall Farm, a Grade 2 listed building. Sefton MBC identified this as a significant constraint on development of AS17. The Peel proposal would have a detrimental impact on the setting and special character of this part of the historic village of Melling, and on other listed buildings The Old Parsonage and the parish church of St Thomas.

MMAAPP recognises that Peel's Liverpool Two terminal, and other port related activity, present a great opportunity for economic growth in Sefton and the wider sub-region. We acknowledge, and support, the potential for new jobs but feel strongly that the appropriateness of any location for development must be rigorously assessed before it is allowed to go ahead. We're not persuaded that Peel will attract investment to Sefton that would increase the number of jobs on offer; their public comment on job numbers is vague and guarantees nothing. Even if there is the prospect of inward investment that and new (not relocated) jobs, we don't believe that can only be achieved at AS17. We don't think it's for us to suggest alternative sites but there are

possibilities, nearby but away from congested Switch Island. In Skelmersdale, 6 miles from AS17, Matalan's c. 500,000 sq ft of warehousing) will become available. In Knowsley, Peel are marketing (so presumably have no need for) the former Sonae site (45acres). At Gillmoss, just 2 miles along the M57 from Switch Island and adjacent to the motorway and A580, there is already a multi-occupant logistics park with room for expansion to the north and towards the boundary with the motorway

Summary of Suggested Changes

Evidence Submitted

Chapter	General	Plan Order	AS17 Land at Switch Island [Peel Sit	Other Documents
Policy	AS17	Land at Switch Island [Peel site]		
Respondent No	601	Response Ref	1	Representor Name John Hoggarth
Organisation Name	Melling Maghull and Aintree Against Peel Proposal			
Obj/Sup/Com	Support			

Summary of Main Issues

MMAAPP is a non-political group formed by Melling residents who share common concerns about the impact that a Peel Holdings (Land & Property) Ltd [Peel] proposal, AS17 in reference to the Local Plan, would have on their own and wider communities. Melling is not referenced in the text of Peel's AS17 proposal to Sefton MBC, despite a large part of AS17 falling within the parish boundary. We don't want the lack of recognition by Peel to desensitise the impact of their proposal on this rural community. We support Sefton MBC's approach to AS17, it doesn't feature in the Local Plan, but we expect Peel and/or the landowner will submit an objection to the Local Plan and the purpose of this submission is to respectfully ask the independent Planning Inspector to endorse the Sefton approach for reasons we detail here.

Since becoming aware of the Peel proposals in spring 2014 we have: set up a website www.mmaapp.co.uk. Set up a Facebook site www.facebook.com/pages/Melling-Maghull-and-Aintree-Against-Peel-Plan-mmaapp/256660907869130. Erected signage to publicise the Peel proposal and leafleted every household in Melling to explain the issue and how residents can respond. Canvassed opinion by speaking at public meetings in Melling, Aintree, Maghull and Lydiate. Spoken on BBC Radio Merseyside and received publicity in the Maghull Champion newspaper. Liaised with Sefton MBC councillors and our MP Bill Esterson and, particularly, Melling Parish Council who we are supporting on development of their Neighbourhood Plan. Submitted a formal objection to the Peel proposals together with online/hardcopy petitions bearing 2099 signatures and attended Sefton MBC S&D and planning committee meetings.

In all of this activity we have had nothing but support from residents of Melling and the neighbouring parishes/towns potentially affected by the Peel proposal and we are confident that MMAAPP is a barometer for the views of those communities.

This is not intended to be a compelling case for these sites but does show that there are alternatives. If the detail of Peel's proposal has any attraction to the independent Planning Inspector, we respectfully ask that the evidence for what they offer and say is stringently tested. Peel want to develop AS17 because they have options to buy the land and it would be relatively cheap for them to do so. They can make big profits by buying farm land cheaply and developing it – while brownfield sites lie vacant and a potential drain on Sefton's stretched financial resource. Other developers are available who will put forward plans for similar developments in more appropriate locations if there is the commercial demand that Peel suggest. We ask the independent Planning Inspector to agree that it would be inappropriate and unnecessary to support Peel's AS17 proposal thus endorsing Sefton MBC's approach on this item in the Local Plan.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** AS17 Land at Switch Island [Peel Sit **Other Documents**

Policy AS17 **Land at Switch Island [Peel site]**

Respondent No 633 **Response Ref** 1 **Representor Name** Rosalind Hoggarth

Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

This representation relates to AS17 - the Peel proposal. Sefton's Local Plan does not include the Peel proposal and I support that approach. I am making this representation because I expect Peel to seek to resurrect their proposal at the independent Planning Inspector stage. I believe it would be inappropriate to allow Peel to build any commercial development at AS17 for the following reasons: The land concerned is the "best and most valuable" agricultural land in the Green Belt and according to planning guidance should not be given up for other purposes except in exceptional circumstances. Because there are other brownfield sites in the sub region I don't believe there are exceptional circumstances in this case.

Access to AS17 for HGVs is from Switch Island - already very congested and inevitably more so when the Peel river terminal is operational. It is difficult to think of anywhere more inappropriate to develop. Access to AS17 for light vehicles, especially staff, is via Brewery Lane. This narrow country lane will carry a lot more traffic if the housing Maghull and Melling housing developments proposed in the Local Plan go ahead. It is not sensible to add to that traffic by developing AS17. Much of AS17 is in a flood zone and the proposals include diverting the River Alt. It is inevitable that, whatever measures Peel say they can put in place, the risk of flooding (especially to adjacent farmland) will increase. AS17 would impact on the Grade 2 listed Wood Hall farmhouse immediately adjacent to the site - and on other listed buildings in the wider area of the historic village of Melling. I expect Peel will submit a very well presented proposal that AS17 should be included in the Local Plan. I would ask the independent Planning Inspector to very carefully consider whether there is any exceptional case for a development there and whether it would be appropriate to allow it.

Summary of Suggested Changes

No changes considered necessary

Evidence Submitted

Chapter 6 **Plan Order** AS17 Land at Switch Island [Peel Sit **Other Documents**

Policy AS17 **Land at Switch Island [Peel site]**

Respondent No 634 **Response Ref** 1 **Representor Name** John Hoggarth

Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

This representation relates to AS17 - the Peel proposal. Sefton's Local Plan does not include the Peel proposal and I support that approach. I am making this representation because I expect Peel to seek to resurrect their proposal at the independent Planning Inspector stage. I believe it would be inappropriate to allow Peel to build any commercial development at AS17 for the following reasons: The land concerned is the "best and most valuable" agricultural land in the Green Belt and according to planning guidance should not be given up for other purposes except in exceptional circumstances. Because there are other brownfield sites in the sub region I don't believe there are exceptional circumstances in this case.

Access to AS17 for HGVs is from Switch Island - already very congested and inevitably more so when the Peel river terminal is operational. It is difficult to think of anywhere more inappropriate to develop. Access to AS17 for light vehicles, especially staff, is via Brewery Lane. This narrow country lane will carry a lot more traffic if the housing Maghull and Melling housing developments proposed in the Local Plan go ahead. It is not sensible to add to that traffic by developing AS17. Much of AS17 is in a flood zone and the proposals include diverting the River Alt. It is inevitable that, whatever measures Peel say they can put in place, the risk of flooding (especially to adjacent farmland) will increase. AS17 would impact on the Grade 2 listed Wood Hall farmhouse immediately adjacent to the site - and on other listed buildings in the wider area of the historic village of Melling. I expect Peel will submit a very well presented proposal that AS17 should be included in the Local Plan. I would ask the independent Planning Inspector to very carefully consider whether there is any exceptional case for a development there and whether it would be appropriate to allow it.

Summary of Suggested Changes

No changes considered necessary

Evidence Submitted

Chapter 6 **Plan Order** AS17 Land at Switch Island [Peel Sit **Other Documents**
Policy AS17 **Land at Switch Island [Peel site]**
Respondent No 641 **Response Ref** 1 **Representor Name** Colin Leatham
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I am writing this e-mail to file my objection of building on green belt between Melling and Maghull. I am a transport and logistics graduate, so I have an understanding of the operations, disruptions and environmental impacts that would occur. I find this proposal on building on this area of green belt ill founded and silly. There are many places near the location that are more suitable rather build on this location. An example of alternative areas are further up the M57 the where carcarft and DHL in knowsley.

Looking at the matter of congestion. It would cause major disruption on dunningsbridge rd leading up to the port. The increase in large load bearing vehicles would cause quicker erosion to the road. Apart from the increase in road damage the, road congestion caused by the increase in vehicles which has not been addressed in my own opinion and demand could outway demand on the route and would cause tail backs and lorries parking along side of the road either for rests, or waiting to deliver to either the warehouses or port. I do feel that the increase in lorries has not been taken into account for dunningsbridge rd. This nicely brings onto the matter of pollution. Many sources of pollution would increase, including air pollution, noise and light pollution. I understand that I may be contradicting myself when I mentioned that the alternative location in knowsley uses the M57, alternative routes can be used to get to the site. These negative externalities can not be increase, which would increase in council expenditure to help correct, without introducing local schemes.

Looking from a local view. The area that has been chosen for the proposal of peel ports, still has residential housing and businesses operating in the area and provides a sanctuary for wildlife. It also has historical value along the river alt of viking settlements and natural beauty.

Overall, I am against the expansion of Lydiate/Maghull/Melling for housing and storage depots, distruction of farmland/greenbelt and reject the notion of joining up with the rest of Liverpool.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** AS17 Land at Switch Island [Peel Sit **Other Documents**
Policy AS17 **Land at Switch Island [Peel site]**
Respondent No 643 **Response Ref** 1 **Representor Name** Chad Thompson
Organisation Name Melling Parish Council
Obj/Sup/Com Support

Summary of Main Issues

Melling Parish Council supports the Local Plan in relation to the following: No proposed business units to be developed in the parish boundary (including any development by Peel Holdings) Melling Parish Council has received extensive feedback at Council meetings under its public participation section. Melling Parish Council opposes to any business and commercial units to be developed on the Green Belt within Melling.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

I am writing to say how pleased I am to hear that Sefton Council took the decision to exclude proposals by Peel Holdings (Peel Logistics) in Sefton's Local Plan. I fully support this decision and will continue to object to this development and urge Sefton Council to reject any proposals and subsequent amendments from Peel Holdings and any other companies looking to develop this area for any other use than its current agricultural purpose. This development would wipe out 120+ [acres] Green Belt and important agricultural land in the area specified.

This land provides a critical corridor for wildlife in a very built up area, and offers habitat for red-listed species, identified as threatened and needing urgent action such as water voles and otters, as well as those currently causing less concern such as various bird of prey, farmland birds and waterfowl, other mammals (including some sightings of roe deer) and a wide range of insects, plants and wildflowers offering food sources and acting as pollinators.

This Green Belt area provides an important buffer between communities, a food growing amenity and a 'breathing space' in a heavily congested and built up region. The additional traffic congestion that would come with this proposed development would also represent a hugely negative impact along with light and noise pollution, disrupting the ecology of the area and habitat of a wide range of wildlife.

I am pleased that Sefton Council to date have opposed the development of these protected areas and I would ask that you continue to reject the continual attempts to develop this area and other Green Belts.

There are other protections for this land. Prime agricultural land such as this can be used only in the very last resort for built infrastructure because it's so valuable. There are plenty of other sites (brownfield) around, and fully constructed ones that are without tenants. To lose this valuable and irreplaceable amenity to pure commercial profit would be untenable.

It is unacceptable to hear that Peel is already marketing the land for 1.5m sq ft of commercial units at its Peel Logistics website under 'Switch Island'. It doesn't own the land and there is no planning application as yet to support this. Thank you for your continued support on this matter

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

I am writing to appeal against the decision to turn Melling, Maghull and Aintree (Peel site plan AS17) into an industrial site. I would also like to express my agreement with Sefton council's decision to exclude Peel site AS17 from the Local Plan and endorse the efforts made against it so far.

The reasons are as follows: There are many more suitable and partially developed sites nearer to the docks that would not have the significant impact on nearby residents. These may not be owned by Peel but they would be more appropriate for this project. There has been much publicity surrounding this in recent months. This is some of the best agricultural land in the country; once it is built upon it is degraded.

It is important that future generations have a chance to enjoy Britain's countryside especially when living within close proximity to an urban environment. Many families have moved to the area to try to improve their lives for themselves and their children; this proposal negates that ambition. There is a real sense of community here; people genuinely care about the areas in question. It has been suggested in recent impact studies of this Peel project that Wood Hall Farm would be the most affected should it go ahead. Wood Hall Farm is a Listed Building and should be protected.

Summary of Suggested Changes

Evidence Submitted

Summary of Main Issues

The Liverpool 2 and SuperPort initiatives are supported by all key local, sub-regional and national partners. A major shortage of land has been identified and is accepted. It is for the Sefton Local Plan to address this challenge in terms of land requirements and supporting planning policy. Without this, there will be a shortage of land to accommodate logistics and port-centric requirements, and public and private investment in the region will be substantially undermined. As drafted, the Publication Draft falls well short on the specific response that is necessary to meet the opportunity created by SuperPort and Liverpool2 to boost Sefton's economy significantly and is therefore not 'sound'.

In order to address this need, Peel is promoting a number of major logistics and supply chain sites across the Liverpool-Manchester corridor. One of these is a key site at Switch Island (site reference AS17) in Sefton. The Switch Island site has an area of approximately 48 hectares. It lies in a sustainable location and is unique in its positioning at the end of the Dunnings Bridge Road (A5036) corridor which links the motorway network at Switch Island with the Port of Liverpool at Seaforth. The size of the site and its location means it will be able to provide around 1,000 jobs to the Sefton area and immediately surrounding economy. To ensure that jobs are directed at Sefton residents, an initiative to target local employment recruitment would be put in place.

The site is within the Green Belt. Maghull lies approximately 200m to the north of the site, beyond the M58 slip roads. Aintree lies approximately 200m to the south, adjacent the M57 corridor on the southern boundary. The Waddicar edge of Kirkby lies approximately 1km east of the site. None of the settlements form a distinctive part of the landscape viewed from the site, although the rooftops of Aintree and the racecourse stadium are a visible urbanising influence on the ridge line to the south.

Technical studies and design work has been undertaken to demonstrate that the development of the site is feasible and that key issues relating to transport, hydrology, ecology and agriculture can be addressed. The proposed design mitigation strategy would minimise visual and landscape impact, whilst creating a high quality gateway investment.

The M57 forms the southern site boundary, the M58 the north eastern boundary. The Railway and rail embankment divides the two parts of the site: the Switch Island contained site within the motorway junction and the larger expanse of land north of the M57 corridor. The site is generally flat, rising from approximately 8m AOD at the junction of the M57/railway crossing to 15m AOD by the Leeds Liverpool Canal.

There is no public access to the site, with several farm access points onto the agricultural land. A public footpath runs along the southern fringe of Maghull, approximately 100m north of the site and links with the Leeds Liverpool Trans Pennine Trail. The Switch Island part of the site (north east of the railway line) is a fragmented field pattern, with artificial boundaries created by the motorway junction and scrub vegetation lining the Brook which divides the fields into smaller units. The larger part of the site south-east of the railway line has a field pattern fragmented by the twisting route of the River Alt which runs through the centre of the site.

The site has scrub vegetation which lines the riverside, the drainage ditch and the Brook. The larger parcel of land has some small remnant trees hedges on the field boundaries, predominantly on the boundaries of farms and residential properties. There are no major treed areas or hedgerows within the immediate site. There is a dual line of electricity pylons which runs along the southern site boundary, dividing to create a single line which heads north east through the centre of the site to Carr Cottage. The pylons are a prominent feature of the skyline along the M57 corridor.

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. Peel have demonstrated that the needs arising from SuperPort must be addressed now with the stark reality of Liverpool2 being operational this year. Hence, it is essential that a clear policy must be included within the Plan so that proposals that respond to the SuperPort policy can be properly considered.

In the first instance, the representations put forward by Peel to the Plan propose a specific land allocation at Switch Island to assist in delivering the effects of the SuperPort investment and specifically the impacts of Liverpool2. The detailed analysis of the site has been provided to the Council to show that it is deliverable. A clear criteria-based policy is considered necessary so that proposals arising from the impact of the SuperPort can be appropriately judged. This allows for decisions to be taken on such large scale

proposals at any time rather than through a later review of the Plan as currently proposed.

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 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.

To address the shortcomings, Peel considers that SuperPort employment land should be positively addressed in the Local Plan. The Local Plan is deficient without this matter being positively addressed. The definition of 'objectively assessed' employment need should be expanded to include the wider implications of SuperPort. Owing to the scale of 400-500 hectare deficit across the SuperPort area, it is reasonable to conclude that Sefton should accommodate at least some of this shortfall, given the stated priorities of the Council, and the location of the Port within Sefton (and not least that other neighbouring authorities are progressing Green Belt releases to meet strategic employment needs, outside of a sub-regional approach).

In this situation, there would be no immediate need to reconcile any overall remaining shortfall by LPA area. The issue of a shortfall across the area could be a matter for a future study once proper agreement and arrangements are in place at a sub-regional level.

Given the shortage is for strategic sites, it could be concluded that it is necessary for Sefton to identify at least one such site, to ensure it has at least a short-medium supply of suitable sites. The Switch Island site is the only site in Sefton of suitable scale and location that has been considered and promoted for such use.

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.

Summary of Suggested Changes

The land at Switch Island (site ref AS17) should be allocated as a strategic site to meet identified need - Identification of Switch Island as a Strategic Employment Location: 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. Justification text – to be inserted after Paragraph 6.30 "The proposed Switch Island site at land East of the Switch Island (M57/M58 Junction) is subject to a separate policy (see policy MN9) and is to come forward for port-related uses."

Criteria Policy – to be inserted after Policy MN 8 or ED1 The Port and Maritime Zone:

"Proposals for major employment development (outside of specific employment allocations) in the Green Belt will only be supported in very special circumstances where all of the following criteria are met:

It can be fully demonstrated that the proposals are necessary to support the growth of SuperPort, in the logistic, supply chain and/or manufacturing/assembly sectors, as indigenous business growth and/or inward investment, including 'port-centric' users, and which are of a scale which cannot be met in full elsewhere in Sefton to meet demonstrable needs.

The scale of the proposals would lead to significant demonstrable economic benefits to Sefton and the wider economy of the Liverpool City Region, with a clear programme put in place to seek to secure local jobs wherever possible.

The proposals would not lead to a severe impact on the surrounding road network, and a strategic travel plan will be put in place to ensure that multiple means of access to the site are secured for local people.

The visual impact of the development is minimised as far as possible on the wider surrounding landscape through clear mitigation measures and long-term landscape improvements.

The design of any buildings will require a very high standard to integrate them into the surrounding landscape as far as practicable. In all circumstances the potential harm caused by proposals, including harm to the Green Belt, must be demonstrably clearly outweighed by the benefits of the case."

Reasoning:

The Port of Liverpool is a nationally significant gateway to the UK for port activities and freight arriving into the country. The port itself is subject to expansion through the Liverpool 2 improvements and other proposals to expand the operational estate.

The expansion of the port is one of the key elements of the Liverpool City Region Local Enterprise Partnership's vision for SuperPort, a global freight and logistics hub across the City Region and is a corporate priority for Sefton Council. These proposals are addressed by policy ED1 Port and Maritime Zone. (NOTE: SAME AS JUSTIFICATION FOR POLICY ED1).

There is expected to be significant market demand for SuperPort related activities, in the wider logistics sector and supply chains, including certain manufacturing and assembly uses, which cannot be located within the Port. This demand has been highlighted by the Liverpool LEP and is recognised by the Council. It is due to be addressed by an Early Review (see Policy). In the event that the Early Review is delayed or does not proceed, or a proposal emerges prior to that Early Review, and given the limited amount of available land within Sefton which is not Green Belt, there needs to be a specific controlled policy to allow such development to occur whereby meeting all of the above criteria would constitute a very special circumstances position arising in the Green Belt. It is also known that there is a clear opportunity to match specific labour force skills with the employment requirements likely to emerge from development for the above uses. Hence, a clear strategy is needed for any specific scheme to match the local labour

Chapter 6	Plan Order AS18 Land at Oriel Drive Aintree	Other Documents
Policy AS18	Land Oriel Drive	
Respondent No 488	Response Ref 29	Representor Name Ian Brodie Browne
Organisation Name Sefton Council Lib Dem Opposition Group		
Obj/Sup/Com Support		

Summary of Main Issues

Should this site be considered for development it will mean that Aintree Village will see a vast increase in its size and it will be developed right up to the M57 Motorway. Bearing in mind that AS17 will potentially develop land on the other side of the same Motorway this will have the effect of considerable urban sprawl with Aintree Village losing the semi-rural surroundings that it presently benefits from.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order AS18 Land at Oriel Drive Aintree	Other Documents
Policy AS18	Land Oriel Drive	
Respondent No 639	Response Ref 1	Representor Name
Organisation Name C P & S Limited		
Obj/Sup/Com Objection		

Summary of Main Issues

Site AS18 (Land at Oriel Drive, Aintree) should be brought out of the Green Belt. Two alternate proposals have been put forward, one for residential development(350 dwellings) and one for a mixed development scheme comprising 194 houses and a 30,000m² warehouse.

Scheme 1 (shown on drawing 1247/sk01) would: Contribute towards the demand for affordable housing. Addressing the issues previously raised with regard to access and network capacity by using 4 points of access: Bradfield Avenue — Serving 65 Houses, New tunnel linking site to Access Road to supermarket — Serving 175 Houses, Sedbergh Avenue — Serving 90 Houses, Windsor Park Road — Serving 20 Houses. The site is effectively split into 4 defined areas, each with its own point of access. The provision of a link to the supermarket access road will reduce the effect of any impact on The Old Roan junction of Copy Lane and Ormskirk Road. The proposal includes the provision of Green Space for the benefit of the development and the local community. The site is bounded to by the M57 motorway, as such concerns regarding the erosion of the Green Belt would be limited to this established boundary.

The alternative proposal for a mixed development compromising warehousing (Class B8) and housing, as shown on the accompanying drawing 1247/sk02. It would: Contribute towards the demand for affordable housing with the provision of 102 houses. Addressing the issues previously raised with regard to access and network capacity the proposal will be served by a number of access routes: Bradfield Avenue — access to 92 houses, Sedbergh Avenue — access routes to 92 houses, Windsor Park Road — Serving 10 Houses. It is proposed that the B8 element will be accessed directly from the M57, with access from the site to the highway network via site ref AS17. The proposal includes for the provision of Green Space areas for the benefit of the Development and the local community. The proposal will offer significant employment opportunities to the area.

Summary of Suggested Changes

Site AS18 (Land at Oriel Drive, Aintree) should be brought out of the Green Belt and allocated entirely for residential development (350 dwellings) or for a mixed development scheme comprising 194 houses and a 30,000m² warehousing.

Evidence Submitted

Site plans 1247/sk01 and 1247/sk02.

Chapter 6	Plan Order AS18 Land at Oriel Drive Aintree	Other Documents
Policy AS18	Land Oriel Drive	
Respondent No 738	Response Ref 9	Representor Name Charles Smith
Organisation Name CP&S Ltd		
Obj/Sup/Com	Objection	

Summary of Main Issues

The Council's Sustainability Appraisal and Site Selection Methodology (2014) has been incorrectly applied to the Oriel Drive site (LPA reference AS18), which has resulted in the site not being allocated. We consider that the methodology which informs the chosen sites is generally robust and based on sound principles and is in line with national guidance. However, we question why, unlike the original Sustainability Appraisal and Green Belt Study, the revised Sustainability Appraisal (2014) does not provide a clear scoring system or group sites to demonstrate how they compare with other sites. Without a means of scoring the sites it is unclear how the Council has objectively compared the sites and thus how it can be determined that the most appropriate and sustainable sites have been chosen.

Furthermore, the methodology document does not adequately explain the weighting applied to the different sections of the assessment.

The Site Assessment form states that 100% of the site is in a 'low accessibility' area for a GP. However, the Aintree Park Group Practice, Oriel Drive is located on the southern boundary of the Oriel Drive site. Therefore 100% of the site should be identified as being within a 'high accessibility' area of a GP/Health Centre.

Development of the Oriel Drive site could specifically improve the watercourse on site, including deculverting where possible and improving the ecological and aesthetic value of the watercourse, as well as provide other benefits in terms of jobs during the construction period, an increase in the number of working aged people in employment in Sefton, and financial benefits to the Council.

Ecology is identified as a 'minor constraint'. The reason provided for this is that the site includes wet woodland. We consider that this is inaccurate and in fact ecology should be recorded as being 'no constraint' to future development. The Ecological Appraisal confirms that the site mostly comprises species poor semi-improved grassland, with dense areas of willow and bramble scrub. The site is not identified as being of a woodland character. The Arboricultural study reports that the majority of the tree stock on site is young and of low value. There is no evidence for the 'wet woodland' identified in the Council's assessment and therefore no justification for the 'minor constraint' recorded.

Flood Risk has been identified by the Council as a 'significant constraint' as approximately 30% of the site is in Flood Risk Zone 2. The Council also record that half of the site is at risk of surface water flooding and the site is susceptible to ground water flooding. As such, the site is considered to fail the sequential test. This is despite the Environment Agency has downgraded the flood risk for the site and now only land to the west of the access track is within Flood Risk Zone 2, with the remainder falling within Flood Risk Zone 1. We believe that although part of the site is in Flood Risk Zone 2, this risk can be mitigated at the design stage of the proposed development. As such, the flood risk should be recognised as being a 'moderate constraint'. Our Flood Risk Assessment (FRA) (available on request) states that the site is generally at low risk from groundwater flooding and medium risk from surface water flooding, prior to the implementation of mitigation measures.

The Site Assessment acknowledges that there are watercourses within and adjacent to the site. The watercourse on site has not been identified in the FRA as posing a flood risk. The watercourse adjacent to the site is the River Alt, which is separated from the site by the M57. The FRA considers that as the M57 is located on a raised embankment it provides an adequate boundary to prevent overland flow from entering the site. Therefore, these watercourses do not pose as a constraint to development.

The FRA identifies potential mitigation measures to address the flood risk. These measures include raising land to the east of the access track; raising the height of dwellings to have finished floor levels at 150mm above proposed ground levels; using Sustainable Drainage Systems methods (SuDS) where appropriate; and locating lower risk uses (e.g. car parking and public open space) in the areas of the site which are at higher risk of flooding.

The 2014 Site Assessment states that heritage is a 'minor constraint' due to the perceived impact of development upon the setting of Wood Hall Farm (Grade II listed), which is located to the north of the M57. We believe that there is no justification for this being identified as a minor constraint. In light of the distance and lack of visual link between the site and the listed building we consider that development of the site at Oriel Drive would have no impact upon the setting of Wood Hall Farm. Therefore, this should be acknowledged as having 'no constraint' on development.

Pollution has been identified as a 'moderate constraint' to development. This is linked to the reported presence of invasive species on site. The Ecological Appraisal and Arboricultural Report have not reported the presence of any invasive species on site presently. A subsequent reason for this conclusion, as provided in the Council's assessment, is that the site is adjacent to the M57. An air

quality feasibility study has been conducted in relation to the Oriel Drive site. This concluded that the site is not within an Air Quality Management Area. Furthermore, beyond 10m from the northern site boundary it is considered unlikely that the concentrations of pollutants will exceed the thresholds established in legislation and guidance. The masterplan in the Development Statement proposes a minimum offset from the northern site boundary of 12m, with a 4m high bund between the motorway and dwellings. This will ensure that a suitable residential environment is created, in terms of air quality.

As the potential for pollution has been considered and suitable mitigation has been proposed, where required, it is felt that the identified constraint severity in the Council's Site Assessment should be downgraded from 'moderate' to 'no constraint'. Site access is identified as being a 'significant constraint' in the Council's Site Assessment. We feel that this should be a 'minor constraint'. The Transport work undertaken to date has concluded that site access is feasible and that three site accesses can be developed, which reduces the impact on the main site access proposed (Sedbergh Avenue). Other access points include limited access or cycle/pedestrian access via Windsor Park Road and a secondary access point at Bradfield Avenue.

There is potential that Sedbergh Avenue will require widening, however this is considered to be a minor constraint only as it is not required expansion into existing residents' land.

We believe that network capacity is a 'moderate constraint', as opposed to the 'significant constraint' identified in the Council's Site Assessment. Although a full Transport Assessment has not been conducted, initial research has indicated that the development of approximately 350 dwellings at Oriel Drive would have a minor impact upon existing flows and queue lengths. Junction Modelling (available on request) proposes mitigation measures for the A59 Ormskirk Road/Copy Lane/Aintree Lane/Altway junction. This includes signalling Altway to improve capacity at the junction and use more of the theoretical 'green time' to allow the junction to operate more efficiently.

The site is in a highly sustainable location. It is in close proximity to alternative means of transport, including train and bus links to neighbouring areas, Liverpool city centre and employment areas. The availability of these services will encourage the use of non-car modes of transport, thus reducing the potential adverse impact upon the highway network.

Landscape is identified by the Council as a 'minor constraint' as planting will be required along the outer boundary of the site. The masterplan indicates how landscaping could be incorporated into the development. As such, we do not perceive landscaping to be a site constraint. Therefore it should be assessed as having 'no constraint' upon development.

The allocation and subsequent delivery of c. 350 dwellings at Oriel Drive will respond to the needs of the borough's ageing population. The site is sustainably located in walking distance of a number of key services, including a GP surgery, local shops and a supermarket. Public transport links (bus and train) are also within walking distance of the site. The required dwelling sizes, as outlined in Policy HC2, can be delivered at Oriel Drive, ensuring that family housing and housing suitable for older people is available in the borough.

Summary of Suggested Changes

CP&S Ltd believe that this site should be allocated in Policy MN2, with an identified capacity for the development of 350 dwellings.

Evidence Submitted

Chapter 6	Plan Order AS19 Land west of Bull Bridge Lane	Other Documents
Policy AS19	Land west of Bull Bridge Lane	
Respondent No 488	Response Ref 30	Representor Name Ian Brodie Browne
Organisation Name	Sefton Council Lib Dem Opposition Group	
Obj/Sup/Com	Support	

Summary of Main Issues

Should this site be considered for development it will mean that Aintree Village will see a vast increase in its size and it will be developed right up to the M57 Motorway. Bearing in mind that AS17 will potentially develop land on the other side of the same Motorway this will have the effect of considerable urban sprawl with Aintree Village losing the semi-rural surroundings that it presently benefits from.

Summary of Suggested Changes

Evidence Submitted

Summary of Main Issues

PSA Developments Ltd owns land to the west of Spencers Lane, Aintree, which was allocated the site reference number AS19 under the Local Plan Site Assessment. The LPA have used the incorrect boundary for this site by including the triangle of land to the north east. The correct boundary as promoted for Green Belt release by our client is marked in red on Figure 1 of our representation.

The site is located to the immediate west of Spencers Lane and lies within the Green Belt.

The Local Plan Site Assessment states that development would lead to a reduction in the gap that exists between Aintree and Melling of around 30%. In that regard, it is highly notable that the Council is proposing the release of Green Belt sites elsewhere that would result in a more pronounced narrowing of the Green Belt between settlements. For example, the Plan designates areas MN2.26 and MN2.35 as new areas for housing. This would lead to the Green Belt gap between Thornton and Buckley Hill being reduced to 417 metres. This compares to a gap of 489 metres between our client's site (if developed) in the event housing site MN2.32 was also to

be developed. The Council is therefore being inconsistent, as the Council is actively promoting the narrowing of what we consider to

be a materially more important and visually open Green Belt gap elsewhere, and yet resisting lesser narrowing in respect of our client's land.

Furthermore, PSA Developments Ltd's land at Spencers Lane is overwhelmingly constrained by substantial manmade infrastructure - the M57 motorway that is banked and lined with trees, creating a strong and impenetrable barrier, and Spencers Lane itself. This is unlike the proposed allocations MN2.26 and MN2.35, which are separated by an open playing field that is open, flat and 'reads' very much as Green Belt intended to prevent coalescence of the built up area. These comments should not be taken as objections to the release of sites MN2.26 and MN2.35, to highlight the Council's flawed and inconsistent approach.

PSA Developments Ltd's land at Spencers Lane (Bull's Bridge Lane) was discounted for release from the Green Belt as a result of the Council's 'Red Amber Green Assessment'. The site scored AMBER in just two categories - its agricultural value and ecological value.

We have previously pointed out to the LPA that the eastern part of the site is on quite steeply sloping land, forming the embankment to the M57 motorway. That part of the site is therefore difficult to farm efficiently. It also comprises a considerable amount of fill material that was deposited at the time the motorway was constructed. PSA Developments Ltd's recent planning application promoting up to 100 houses on this site was not refused on the basis of loss of agricultural land. On that basis, this category should score 'green' and not 'amber'.

In terms of the second AMBER score (ecology), any development on the site will of course need to incorporate an easement alongside the River Alt for maintenance purposes. This zone could readily be used to create an attractive riverside walk, together with ecological protection and enhancement measures in the guise of a linear ecology park.

The River Alt is an attractive river, which represents a largely untapped asset and resource for the local area. The redevelopment of our client's land would create an excellent opportunity to create an attractive, well managed informal recreation and ecological resource. Our view, therefore, is that this ecological 'constraint' ought to be viewed as a positive opportunity.

To inform PSA Developments Ltd's recent planning application for up to 100 houses, we presented a surfeit of material relating to ecology, including otter surveys, water voles surveys and an Extended Phase 1 Habitat survey.

We turn to what was the only RED score - relating to traffic and access. The traffic light assessment suggested that "The roads are near capacity and that significant infrastructure is required". We are not convinced that this is correct. Our traffic consultants have undertaken traffic counts and detailed analysis, and conclude that the site is highly accessible to public transport, walking and cycling, and that : There are no local highway capacity or safety issues along the road frontage and the route operates at the posted speed limit. The ghost island right turn can be accommodated within the existing adopted highway and the access route into the site can be delivered with no third party land requirements. Across the network in 2018 with and without the development there are no capacity issues that would be deemed severe in nature for an extreme worst case i.e. assuming 135 houses (which realistically cannot be delivered), no discount for affordable, no discount for the accessibility of the site, all flows assigned to each junction with no wider distribution affects. Even in this robust view the network can accommodate the development with little or no increase in queues or delay.

The conclusion is that there are no transport or highway reasons that would prevent the site from being taken forward for

residential development.

PSA Developments Ltd are frankly confused at how this site has been assessed by the Council. On the one hand, the traffic light assessment suggests that the only reason why it has been discounted is due to traffic issues. And yet the 'Detailed Assessment by Local Area' suggested that, while there may be transport capacity issues in Aintree, the conclusion drawn is that "the roads in Aintree are approaching capacity, so not all the identified sites could be developed." That statement does not rule out development of this site for traffic reasons in absolute terms, and as such there appear to be inconsistent messages emanating from the different documents.

Having dealt with the limited and questionable constraints identified in the assessment of our client's site, PSA Developments Ltd wish to reinforce certain points that we consider ought to elevate the release of this site for short term release from the Green Belt: The site forms a natural extension to the built up area of Aintree, and highlights the strong, impervious boundaries (the River Alt, Spencers Lane and M57). These boundaries render this an obvious site for early Green Belt release, unlike a number of other sites considered in the local area (such as those around Waddicar), whose definition is far less clear cut. If developed, there would be no possibility of any further outward extension in any direction. We suggest that a good deal of weight should be attached to this

factor. The site is already served by a vehicular access point off Bull Bridge Lane, with plenty of scope to improve or relocate that without detriment to any party or to highway safety / efficiency. Many of the other sites considered in the area do not benefit from an existing vehicular access, and in most cases will rely upon access through established residential areas (with associated disturbance and traffic safety / efficiency implications for existing residents). The site forms part of Aintree, which is in turn part and parcel of the main built up area of Sefton / Liverpool. The creation of new homes on this site will add logically to what is already a sizable urban zone, whereas other sites promoted by the Council (such as those clustered around Waddicar) are bolted on to what is a relatively small "residential village" (the Council's own terminology) that has already seen significant housing growth over the past few years, and in turn we suggest is not best placed to continue to absorb a significant proportion of the Borough's future housing needs.

To reinforce all of the above, we return to the outcome of our client's recent refusal of an outline planning application for up to 100 homes on this site (LPA Ref: DC/2014/01216). This was refused on two grounds (i) the site is in the Green Belt, and (ii) the development by virtue of its location will give rise to poor levels of accessibility for all modes of transport and is therefore contrary to Policy AD2 of the Sefton UDP. This application was re-submitted in February 2015.

We request the Inspector to question the extent to which the site at Spencers Lane fulfils the purposes of the Green Belt when it is considered in its own right.

Our landscape assessment demonstrates that public views towards the site from the wider Green Belt are very limited / glimpsed, such that the site does not read as part of the wider open landscape or countryside. It is essentially a self contained mini-parcel that does not fulfil a wider Green Belt role, and - unlike some of the other sites that are being suggested by the Council for release - it is not readily visible from wider vantage points.

We acknowledge — certainly in two dimensional (plan) form - that the wider parcel of Green Belt (of which the site forms a small part) plays an important role in preventing the mergence of built up areas (Green Belt purpose 2), but the specific role the site plays in that is negligible, and certainly when the site and context is considered in three dimensions. The erection of up to 100 houses on the site (having regard to its limited visibility and substantial boundary features) will be barely perceptible when considering both the actual and perceived gap between those settlements.

Having regard to all of the above factors, we contend that Site AS19 ought to be released from the Green Belt and allocated for housing in the short term. Our client objects to the draft Local Plan on that basis, and considers it to be unsound for the following reasons : The decision not to allocate Site 154 is not justified or founded on a robust and credible evidence base. Research / fact finding — the decision not to allocate this Site is not backed up by facts and the documentation appears to be inconsistent, with mixed messages about different assessment criteria. For instance, one of the (or the only?) key constraint relates to highways / access issues, but the report by DTTPC refutes that in the strongest terms and the recent planning application was not refused on those grounds. The Council's chosen strategy — which discounts the release / allocation of Site AS19 — is incorrect when considered against the reasonable and justified alternative to release the site for housing development. Our client's recent outline application was refused on the grounds of Green Belt (which we anticipated at that stage). The only other reason for refusal was added at Committee (relating to the site's accessibility). That jars with the Council's own assessment of the site. A resubmission application is currently before the Council seeking the removal of that reason, backed up by analysis that demonstrates that the accessibility of this particular site is as good as, or better than, that of other sites that the Council is promoting for Green Belt release.

Summary of Suggested Changes

The Plan should allocate the land off Spencers Lane in Aintree (LPA reference AS 19) for housing release, as that site is largely unconstrained and ideally suited for short term release, or — failing that — as safeguarded land for release in the event that housing provision lags.

Evidence Submitted

Chapter 6 **Plan Order** AS19 Land west of Bull Bridge Lane **Other Documents**
Policy AS19 **Land west of Bull Bridge Lane**
Respondent No 661 **Response Ref** 4 **Representor Name**
Organisation Name PSA Developments
Obj/Sup/Com Objection

Summary of Main Issues

The Plan should allocate the land off Spencers Lane in Aintree (LPA reference AS 19) for housing release, as that site is largely unconstrained and ideally suited for short term release, or — failing that — as safeguarded land for release in the event that housing provision lags

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** AS21 Land east of Bull Bridge Lane **Other Documents**
Policy AS21 **Lane east of Bull Bridge Lane**
Respondent No 488 **Response Ref** 31 **Representor Name** Ian Brodie Browne
Organisation Name Sefton Council Lib Dem Opposition Group
Obj/Sup/Com Support

Summary of Main Issues

Should this site be considered for development it will mean that Aintree Village will see a vast increase in its size and it will be developed right up to the M57 Motorway. Bearing in mind that AS17 will potentially develop land on the other side of the same Motorway this will have the effect of considerable urban sprawl with Aintree Village losing the semi-rural surroundings that it presently benefits from.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** AS21 Land east of Bull Bridge Lane **Other Documents**
Policy AS21 **Lane east of Bull Bridge Lane**
Respondent No 542 **Response Ref** 4 **Representor Name** Jennifer Hadland
Organisation Name Liverpool and Chester Property Company
Obj/Sup/Com Objection

Summary of Main Issues

In order to meet the suppressed number of houses needed especially during the early part of the plan period (see comments in relation to policy MN1), site AS21 (Land at Carr House Farm, Melling) should be added to policy MN2. It is a suitable, sustainable, logical site which is available in the short term. It has an area of 22.65 has which could accommodate 475 - 540 dwellings at an average density of 30 dph on 70% - 80% of the site. It is well contained and strategically located close to the existing urban area and is within close proximity to the highways network. It has no severe physical or technical constraints. It could also be removed from the Green Belt without detriment to the overall function on the Green Belt. It is well contained. It would not lead to urban sprawl or to settlements merging into each other as the Liverpool Municipal Golf Club and a landscaped buffer / open space would maintain the existing gap between Aintree and Melling / Waddicar. Turley's, on behalf of Barratt Ltd, have previously supported the future allocation of this site for housing.

Summary of Suggested Changes

Site AS21 (Land at Carr House Farm, Melling) should be added to policy MN2.

Evidence Submitted

Chapter 6 **Plan Order** AS21 Land east of Bull Bridge Lane **Other Documents**

Policy AS21 **Lane east of Bull Bridge Lane**

Respondent No 884 **Response Ref** 1 **Representor Name** Jean Bradley

Organisation Name

Obj/Sup/Com Support

Summary of Main Issues

The following non allocated sites - AS21 Land East of Bulls Bridge Lane, Aintree, AS22 Mill Farm, Aintree and AS23 Land East of Aintree Racecourse - should not be built on for the following reasons: They suffer from flooding and surface water. They are havens for wildlife. Aintree villages does not have sufficient range of facilities, no library, dentist or bank. The bus service is only occasional. Schools and gps over subscribed. Traffic in the area is already at bursting point. People will be disturbed by the building work

Summary of Suggested Changes

Evidence Submitted

Chapter General **Plan Order** AS22 Land at Mill Farm **Other Documents**

Policy AS22 **Land at Mill Farm, Aintree**

Respondent No 488 **Response Ref** 32 **Representor Name** Ian Brodie Browne

Organisation Name Sefton Council Lib Dem Opposition Group

Obj/Sup/Com Support

Summary of Main Issues

Should this site be considered for development it will mean that Aintree Village will see a vast increase in its size and it will be developed right up to the M57 Motorway. Bearing in mind that AS17 will potentially develop land on the other side of the same Motorway this will have the effect of considerable urban sprawl with Aintree Village losing the semi-rural surroundings that it presently benefits from.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order AS22 Land at Mill Farm	Other Documents
Policy AS22	Land at Mill Farm, Aintree	
Respondent No 712	Response Ref 1	Representor Name Andrew Pepper
Organisation Name Persimmon Homes		
Obj/Sup/Com Objection		

Summary of Main Issues

Land at Mill Farm, Aintree (Council reference AS22) is within single ownership, is free from constraints and is a well-contained parcel of Green Belt land within the Eastern Parishes where more housing and particularly affordable housing is sorely needed. The site is available and deliverable within a 5 year period.

Persimmon considers that the site should be allocated for residential development because it is free from constraints, in single ownership and available for development now. Persimmon considers that the Site is well contained by existing built form and a strong defensible boundary is created by the River Alt to the north.

If the Inspector agrees that the housing requirement is now too low, it must follow that the Council must allocate additional Green Belt for residential development for the plan to be found sound. The Council has already confirmed that it cannot meet its housing requirement (at that time) through brownfield land or other open space within the urban area. The Council's November 2014 Site Assessment Form of the Site at Mill Farm, Aintree concluded that the development of the Site would result in the unacceptable narrowing of the gap between Aintree and Melling by 10%. Because of this and highway capacity concerns on the A59, the Site was not proposed to be allocated in the Local Plan.

The Site is still under option by Persimmon and that it is available for residential development;- That the Site is deliverable and free from constraints for residential development. That the development of the Site would not lead to any significant impact on any Green Belt purpose and that any impact on the openness of the Green Belt can be mitigated. A Landscape Assessment (Little Altcar) has been prepared in support of the site in this regard; and that the Site should be allocated for residential development because the Council's housing requirement is too low.

Persimmon considers that the allocation of their site at Mill Farm, Aintree will help the Council provide a wider selection of both quality and affordable homes. The Council's assessment is that the Site is either high/medium accessibility when assessed against the proximity to key services. It only scores low accessibility because of poor access to a train station. Persimmon has not yet carried out an Ecological Phase 1 Assessment of the Site. However, the Site does not include any ponds, nor does it contain any significant hedgerows or mature trees that are likely to provide habitat for protected species. The Council's assessment is that Water Voles are present along the River Alt but it assesses this as a minor constraint to development. The Site is located entirely within Flood Zone 1.

It is considered that any impact on the setting of Valley House can be satisfactorily addressed at the planning application stage and through a condition. The Council assess this as a minor constraint which Persimmon agrees with. It is agreed that there is no constraint to the development of the Site in relation to pollution. Persimmon has assessed the impacts on the highway of residential development on this Site. Based on a capacity of 120 dwellings, a signalised junction on to the A59 [sic; should be Bull Bridge Lane] will provide an adequate solution to allow safe access and egress into the Site. Persimmon does not have any issue with contributing to or enhancing the accessibility of the site as suggested by the Council.

The land is classed as non-agricultural according to the Council's Agricultural Land Study 2012. This does not represent any constraint to the development of the Site. The Council's assessment is that landscape represents a moderate constraint but that the site can be integrated with hedgerow and woodland blocks of an appropriate scale. A Landscape Assessment has been submitted. This assesses the ability of the site to accommodate residential development without harming the purposes of including land within the Green Belt. In terms of the fourth purpose, to safeguard the countryside from encroachment, the Council assesses this as a moderate impact. In response, Persimmon considers that the Council has already made the decision to accept encroachment into the countryside in proposing to allocate Green Belt sites for residential development. The question is not whether this is acceptable in principle, but whether the Site is well contained, which the Council confirms in the conclusion that it is. Persimmon therefore considers that the impact cannot be categorised as a moderate and it must be categorised as minor or 'none'.

In terms of the fifth purpose, to prevent towns from merging into one-another, the Council states that the development of the Site will have a significant impact. In Persimmon's view, if the site is allocated for residential development, there is no prospect that the two settlements of Melling and Aintree, will merge together. In accordance with paragraph 85 of the National Planning Policy Framework, there is a permanent boundary to the north, the River Alt. The development will form a natural extension to Aintree that cannot be extended owing to this permanent boundary. Ground conditions are noted as being a minor constraint due to the clay sub-strata.

Summary of Suggested Changes

Chapter General **Plan Order** AS23 Land east of Aintree Racecour **Other Documents**
Policy AS23 **Land east of Aintree Racecourse**
Respondent No 488 **Response Ref** 33 **Representor Name** Ian Brodie Browne
Organisation Name Sefton Council Lib Dem Opposition Group
Obj/Sup/Com Support

Summary of Main Issues

This will, if it is developed for housing, have the effect of joining Aintree Village to Liverpool as it is very close to the Sefton/Liverpool boundary. This will lead to a position whereby presently separate communities merge into each other and as a consequence lose identity. This site needs to retain its open aspect.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** AS23 Land east of Aintree Racecour **Other Documents**
Policy AS23 **Land east of Aintree Racecourse**
Respondent No 695 **Response Ref** 1 **Representor Name** P Booth
Organisation Name Hourwatch
Obj/Sup/Com Objection

Summary of Main Issues

The site owner (Hourwatch) objects to the Council's non-allocation of land to the east of Aintree racecourse (AS23) for housing. The site is currently in the Green Belt and comprises former railway sidings. It has an area of approximately 8 hectares. Part could be developed for residential purposes. A ground investigation, ecological assessment and transport appraisal were carried out in 2009 / 2010 in preparation of the proposed development of the site for a marina. These revealed that there was no major contamination; there was limited ecological value; and the site would be able to accommodate the proposed marina from a highway assessment view. However the scheme was not pursued for viability reasons. Whilst ecology is a matter to be addressed, it would not restrict development. Although there is a risk of surface water and the risk of canal failure, as the site is at a higher level than the canal, this constraint would be very minor. The ground conditions would also present a minor constraint subject to appropriate measures being taken. The site's access and impact on the road network requires further investigation but there is no reason why this could not be resolved. The public footpath which crosses the site is not well used and could be diverted if required. Hourwatch do not agree that the development of the site would have a severe impact on the Green Belt purposes. It would not lead to unrestricted sprawl as it is closely associated with the urban area and was previously railway sidings. Not all of the site would be developed, as a buffer would be maintained to the racecourse and to connect to the small area of Green Belt in Liverpool adjacent to the site. This will help to prevent both areas from being isolated from the rest of the Green Belt. The site is available for development which would help meet Sefton's needs for housing.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** AS25 Land at the Stables, Netherton **Other Documents**
Policy AS25 **Land at the Stables, Netherton**
Respondent No 374 **Response Ref** 1 **Representor Name** John & Angela Radford
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Site AS25 'Land at The Stables', Chapel Lane, Netherton is promoted by the site owner for housing. The site, which has an area of approximately 0.8 hectares, is part of a larger area that was assessed as part of the Green Belt Study. However this did not consider the impact of the A5758 Brooms Cross Road which is under construction. It has not been considered as an infill site. It is well-contained by physical features. As the site is not situated at the narrowest point in the gap between Netherton and Maghull it would not lead to these settlements coalescing. The land between the A5758 and Netherton is not likely to remain open beyond 2030. Therefore it is not necessary to keep this area permanently open. The site represents limited infill which is permitted by the NPPF. Any impact on heritage in relation to The Manor House and The Lodge should be considered as a matter of detailed design and not to inform a strategic plan. The site can provide housing choice by providing a niche development.

Summary of Suggested Changes

The site should be allocated in the Local Plan and removed from the Green Belt.

Evidence Submitted

None

Chapter 6 **Plan Order** AS26 Land between Southport Old **Other Documents**
Policy AS26 **Land between Southport Old Road and Formby bypass**
Respondent No 630 **Response Ref** 1 **Representor Name** Gary Clarke
Organisation Name GPC Rail Ltd
Obj/Sup/Com Objection

Summary of Main Issues

We would like to build on land within the "green belt" between Southport Old Road and Eight Acre Lane and the A585 (Formby by-pass). There are a number of reasons we feel that the construction of new homes in this area would be beneficial and would help with Sefton's housing needs. For example Chapter 6 of the Local Plan shows that there is a focus on 2012's population projections and the need for more dwellings in Sefton. The area is around 20 yards into the green belt. The distance away from the border of the Green Belt and the site is around the same width as the Formby by-pass. Development of this site would have no impact on reducing the gap resulting in any nearby settlements merging. In essence this is a stand alone development, with no impact on its immediate surroundings. The dwellings will comply with the requirements set out by NLP and set out in policy MN1 and will also help provide affordable homes (for both market housing and private rental housing in the area of Formby). According to the SHMA, the need for 3 bedroom houses is most pressing in areas such as Formby. The dwellings which we will construct will be homes of this size. This will help to attract young families of a working back group into the Sefton area. The land is currently not being used for anything. Which makes it an idea area for accommodating the vast growing population in Sefton. There is no historical evidence of the land ever having a purpose or being used to build on, which indicates that the land will not have been contaminated. A copy of the land registry document (MS390018) has been submitted.

Summary of Suggested Changes

Evidence Submitted

Site plan.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order AS27	Land n of Liverpool Rd e of by	Other Documents Green Belt Study
Policy AS27	Land between Formby bypass, Downholland Brook and north of Liverpool Rd		
Respondent No 730	Response Ref 6	Representor Name Gerry O'Brien	
Organisation Name Nextdom Ltd			
Obj/Sup/Com Objection			

Summary of Main Issues

The Nextdom Ltd site was assessed in the Council's Green Belt Study (2013) as it formed part of Parcel S047 'Land south of Formby Industrial Estate'. The northern half of this site has since been allocated under proposed Policy MN2, Housing, employment and mixed use allocations and proposed Policy MN5 Land south of Formby Industrial Estate.

The following section demonstrates the suitability of the remainder of Parcel S047 for release from the Green Belt and allocation for employment uses. This is evident from the lack of site constraints and the current inability of the site to fulfil the purposes of the Green Belt, especially in light of surrounding proposed allocations.

Green Belt purposes. Check unrestricted sprawl of large built up areas. As identified in the Council's Green Belt Study (2013), the site is well contained by strong, defensible boundaries. The site is bounded to the north by the proposed allocation MN2.49 Land to the south of Formby Industrial Estate. Downholland Brook and New Causeway form the eastern site boundary and the Formby by-pass (A656) bounds the site to the west. The southern site boundary is Liverpool Road (B5424). The release of the Nextdom Ltd site from the Green Belt would represent a logical extension to the existing urban area, particularly in light of proposed allocations which adjoin the site to the north and west: employment allocation MN2.49 to the north and the proposed housing allocation to the west of the site (MN2.16 – Land at Liverpool Road, Formby). These proposed allocations will extend the urban area of Formby. The Nextdom Ltd site will round off this area, revising the urban boundary to ensure that it is a logical extension to the existing town. Without the allocation of the Nextdom Ltd site, proposed allocation MN2.49 lacks a strong Green Belt boundary and is not well contained. This is because the southern boundary of this allocation is formed by a drain line. The inclusion of the Nextdom Ltd site as an employment allocation would round off the urban area and ensure that the resulting Green Belt boundaries are defensible, thus preventing further urban expansion.

As stated in the Council's Green Belt Study (2013), the site is located in a wide gap between settlements. As such, the release of this parcel from the Green Belt would not result in the merger of towns. Travelling eastwards, the nearest settlement to Formby is Downholland, situated approximately 5.6km to the north-east of the Nextdom Ltd site (straight-line distance). Ormskirk is approximately 8.5km to the east of Formby (straight-line distance). Due to the wide gap between Formby and towns to the east, it is considered that the release of the Nextdom Ltd site will not have an impact upon the ability of the Green Belt to prevent towns from merging.

The site is acknowledged within the Council's Green Belt Study (2013) as being in countryside use. However, there are no Public Rights of Way across the site, which is in private ownership. As such, the site does not provide any countryside benefit in terms of access. Furthermore, the boundary of the site to the east, the Downholland Brook, prevents movement from the Nextdom Ltd site to the countryside beyond the brook. The Council's Green Belt Study (2013) acknowledges that the site is not fulfilling this purpose as there is no historic setting which requires preservation.

As demonstrated above, the Nextdom Ltd site is not currently fulfilling the purposes of its Green Belt designation. Therefore release of the Nextdom Ltd site from the Green Belt and subsequent development will not adversely affect the ability of the borough's Green Belt to achieve its aims for the remainder of the plan period, and beyond.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** AS30 Damfield Lane, Maghull **Other Documents**
Policy AS30 **Damfield Lane, Maghull**
Respondent No 108 **Response Ref** 3 **Representor Name**
Organisation Name The Cowell Family
Obj/Sup/Com Objection

Summary of Main Issues

Land at Damfield Lane, Maghull is capable of being developed without detriment to the character of the settlement as a whole or the Conservation Area within which it is located, and can be delivered in the next 3 years. A heritage assessment has been commissioned which demonstrates the land can be developed without harm to the character of either the Conservation Area or the nearby Listed Buildings. Given the Council's SHLAA comments that the main reason for the not considering the suitable for housing is based on a flawed conclusion, there can be no planning reasons to prevent that sites coming forward for housing.

Summary of Suggested Changes

The site edged in red on submitted plan be allocated for housing in the Sefton Local Plan

Evidence Submitted

Map of site
[Heritage Assessment - asked if they are submitting one]

Chapter 6 **Plan Order** SR4.49 Land at Melling Lane, Magh **Other Documents**
Policy SR4.49 **Land at Melling Lane, Maghull**
Respondent No 716 **Response Ref** 5 **Representor Name** Robert Swift
Organisation Name Robert Swift and family
Obj/Sup/Com Objection

Summary of Main Issues

The Melling Lane site is complementary to the proposed Maghull East strategic allocation and contributes to providing a wider selection of both quality and affordable homes. The Council agrees that this site is free from constraint (apart from the flood risk issue) and that their site (Land south of Melling Lane, Maghull Preferred Option reference SR4.49) is well contained in Green Belt terms.

Summary of Suggested Changes

Evidence Submitted

Policy SR4.49 Land at Melling Lane, Maghull

Respondent No 716 Response Ref 1 Representor Name Robert Swift

Organisation Name Robert Swift and family

Obj/Sup/Com Objection

Summary of Main Issues

We own land to the south-east of Maghull identified by the Council at the Preferred Option stage as site SR4.49 'Land south of Melling Lane, Maghull', with a site area of 4.2 hectares as a 'reserve site'. The Publication Local Plan (PLP) does not allocate the Site for residential development nor does it safeguard it for future development beyond the plan period. The reason why the site was not allocated was solely due to the inclusion of 37% of the Site being included within Flood Zone (FZ) 2. On that basis, the Council confirmed it fails the sequential test and was therefore not allocated.

The previous identification of the site as a Reserve Site at the Preferred Option stage of the preparation of the Local Plan is confirmation that the Council does not take issue with the development of this site for residential use in principle. Its assessment, both at the Preferred Option and Publication Draft Local Plan stage is that the site is a well-contained site with clear and well-defined boundaries to the north, south, east and west. Robert Swift and family agrees and that the development of the site would not conflict with the purposes of including land within the Green Belt.

As a result, we are in agreement that the site is, in principle, appropriate for development. We do not agree that there any constraints to the development of this site which cannot be overcome through appropriate mitigation and/or planning conditions attached to the grant of a planning permission.

Approximately 37% of the Site is within FZ2. The Technical Note accompanying the NPPF on Flood Risk confirms that residential development is a more vulnerable use but this is an appropriate use within Flood Zone 2. As a result, there is no reason, in principle, why the whole Site cannot be developed for residential use, subject to consultation with the Environment Agency and subject to finished floor levels being at the appropriate level. This could be secured by way of a Condition attached to the grant of any planning permission. We consider that this does not represent a significant constraint to development of the Site either in part, or as a whole.

However, the Council's position is that there are reasonable alternative sites within FZ1 and as such, the Site fails the sequential test.

Our position as set out in these representations is that the Council's housing land requirement is too low and that there are doubts as to the deliverability of all of the identified housing allocations to such an extent that there is a pressing need for additional sites within the Green Belt to be allocated for residential development.

WYG have been commissioned to provide advice on flood risk matters for this site. They will have a clear position before the examination that can be reported to the Council and the Inspector at the pre-hearing meeting.

The Environment Agency's (EA) existing modelling confirms that the site is at a risk of flooding from Whinney Brook because there appears to be no obvious outfall to an existing watercourse. Because of this, the modelling assumes that the flood water could collect at the lowest part of the Site. However, this modelling takes no account of an existing drain and culvert beneath the Leeds and Liverpool Canal which provides an outfall for flood water. Therefore, in order to improve the flood risk, it is proposed to open up a section of the existing pipe within the site to allow any flood water to drain out via an existing culvert to an existing watercourse. This is a drainage strategy recommended by WYG.

In addition, SuDS ponds will be included within the western part of the site which will also be lowered slightly to allow any residual flood water to collect in these ponds and store any flood water.

As a result and subject to confirmation by the Council and the EA, there is solution that would result in the whole site being included in FZ1. It is anticipated that the EA will provide a letter before the examination to confirm that the whole site is now included within

FZ1. If this is not possible, and the Inspector agrees more land is needed, then the remaining two-thirds of the Site could make a valuable contribution to the identified housing land supply. There is scope to include the area within FZ2 as Public Open Space to serve the residential development which can be kept open and left as Green Belt.

Robert Swift and family consider that the Site is deliverable within a five year timeframe and could contribute to the Council's five year housing land supply and its affordable housing requirement. A Development Strategy has been submitted to show how the site could be developed and how this would contribute to the Council's housing land supply and affordable housing supply. The site is deliverable within a five year timeframe.

Summary of Suggested Changes

Allocate the land at Melling Lane, Maghull as a housing allocation under policy MN2. If the whole of the site cannot be included in FZ1, there is no reason why the 63% of the Site in FZ1 currently should not be allocated for residential development. There is scope to include the area within FZ2 as Public Open Space to serve the residential development which can be kept open and left as Green Belt.

Evidence Submitted

Melling Lane Master Plan

Chapter 6	Plan Order Policy MN3	Other Documents
Policy MN3	Strategic Mixed Use Allocation – Land east of Maghull	
Respondent No 288	Response Ref 1	Representor Name Tim and Jennie Seller
Organisation Name		
Obj/Sup/Com	Support	

Summary of Main Issues

This submission is made on behalf of owners of land adjacent to the restricted access Junction 1 of the M58. It is one of support for the Draft Local Plan in general and for the proposed allocation of a comprehensive mixed use development SRM1 (and related policies SR4 and SR5) on land enclosed by School Road/Maghull Lane (north), the Liverpool-Ormskirk railway line (west), the M58 (east) and Poverty Lane (south). Support is given to the opportunity to provide residential and employment development, supported by relevant infrastructure provision (School, retail, health, facilities) in a comprehensive and co-ordinated manner.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN3	Other Documents
Policy MN3	Strategic Mixed Use Allocation – Land east of Maghull	
Respondent No 595	Response Ref 5	Representor Name Jonathan Clarke
Organisation Name Knowsley Council		
Obj/Sup/Com	Comment	

Summary of Main Issues

We are also aware of further transport modelling being undertaken to assess the impacts of this site on the highway network. We would welcome the opportunity to engage with Sefton Council and the Highways Agency on this important piece of work. This modelling should consider the effect that an all movements junction at Junction 1 of the M58 will have on levels of traffic using the A506 Bank Lane. Any development that is required to upgrade that motorway junction should also seek to justify and mitigate the impact of traffic on Bank Lane, Kirkby.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN3	Other Documents
Policy MN3	Strategic Mixed Use Allocation – Land east of Maghull	
Respondent No 595	Response Ref 4	Representor Name Jonathan Clarke
Organisation Name Knowsley Council		
Obj/Sup/Com	Support	

Summary of Main Issues

Knowsley Council is satisfied that the identification of these sites is sound and based on robust evidence. The scale of the largest proposed site (comprising 1400 homes and 20 hectares of employment development) is however likely to place additional pressure on the surrounding highway network. It is noted that Policy MN3 'Strategic Mixed Use Allocation – Land East of Maghull' makes provision for the delivery of infrastructure and off site mitigation measures. These elements of Policy MN3 are clearly justified given the scale of the site and supported by Knowsley Council.

Summary of Suggested Changes

Evidence Submitted

Policy MN3 **Strategic Mixed Use Allocation – Land east of Maghull**

Respondent No 715 **Response Ref** 7 **Representor Name**

Organisation Name Countryside Properties (UK) Ltd and Persimmon Homes Lancashire

Obj/Sup/Com Support

Summary of Main Issues

These representations on this policy as part of a joint representation with all other landowners and developers with an interest in the Site [rep #1021]

For the avoidance of doubt, they support the proposed allocation and are committed, alongside the other landowners and developers to working with the Council on the proposed SPD to guide development across the Site.

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]

Summary of Main Issues

The principal landowners in respect of site MN2.46 'Land east of Maghull' support the development of this strategic site but consider that an amendment to Policy MN3 is required to reflect the manner in which it is envisaged the site will be delivered through the development management process. The amendment relates to parts (3) – (5) of the policy that currently require: The development of the site to be subject to a single outline application covering the whole site. The justification for a single outline application is that it would set out details of the infrastructure contributions and locations of development, access and open space. The phasing of the development and infrastructure works. The details of the benefits that the development of the site will secure by contributions and planning conditions.

Any application should come forward in accordance with a Supplementary Planning Document ('SPD') to be adopted prior to the submission of any application pursuant to Policy MN3. The requirement for the preparation of a SPD for this site is already introduced at Paragraph 6.38 of the emerging Local Plan. The second sub-paragraph at Paragraph 28 of the section titled 'Local plans – Adoption, monitoring and supplementary planning documents' in the national planning guidance states "They should build upon and provide more detailed advice or guidance on the policies in the Local Plan. They should not add unnecessarily to the financial burdens on development." Given the significant scale of the proposed allocation site, the parties consider that the adoption of a SPD to support Policy MN3 is the appropriate mechanism to provide the detail and guidance required to deliver the development of the site in accordance with the requirements of the Local Plan. It will guide development and enable the Local Planning Authority to maintain full control of development proposals as they are submitted.

It will achieve this by: Building upon and providing more detailed advice and guidance for the delivery of the Land East of Maghull, including setting out: The locations of development, types of uses and open space, including any constraints to development. The locations of access arrangements including access into the site from School Lane and Poverty Lane. The design code for development. Setting out the phasing for the delivery of development and infrastructure at the site in line with the expectations of the emerging policy, namely: The provision of homes, including affordable and/or special requirement homes. The proposed Maghull North train station. The M58 Junction 1 south-facing slip roads. Bus service provision. Park and recreation provision. Local shopping provision on the site. Serviced plots for business development.

Providing details of the financial contributions required to deliver development and infrastructure at the site, including contributions to: Maghull North station and the associated park and ride facility. The M58 Junction 1 slip roads. The subsidisation of a bus service for three years. Affordable and/or special requirement homes. Health care and education facilities. The parties are committed to the formulation of the SPD.

Summary of Suggested Changes

The parties request that parts (4) and (5) of Policy MN3 are removed as detailed advice of this level would be included in a SPD and replaced with: Prior to the submission of any planning application at the site a Supplementary Planning Document (SPD) for the whole site must be agreed between all landowners and the Local Planning Authority. The Local Planning Authority will adopt the agreed SPD prior to the submission of any application. Proposals for the development of the site will only be granted planning permission where they accord with the adopted SPD."

The parties propose that the following is added to the end of the explanation to the policy at Paragraph 6.38: The SPD will set out: The locations of development and open space, including any constraints to development. The locations of access arrangements including access into the site from School Lane and Poverty Lane. The design code for development. The phasing for the delivery of development and infrastructure at the site in line with the expectations of Policy MN3, namely: The provision of homes, including affordable and/or special requirement homes. The proposed Maghull North train station. The M58 Junction 1 south-facing slip roads. Bus service provision. Park and recreation provision. Local shopping provision on the site. Serviced plots for business development

Details of the financial contributions required to deliver development and infrastructure at the site, including contributions to: Maghull North station and the associated park and ride facility. The M58 Junction 1 slip roads. The subsidisation of a bus service for three years. Affordable and/or special requirement homes. Health care and education facilities.

Evidence Submitted

Chapter 6	Plan Order Policy MN4	Other Documents
Policy MN4	Land north of Formby Industrial Estate	
Respondent No 446	Response Ref 5	Representor Name Hugh McAuley
Organisation Name	Formby Play Sports Ltd	
Obj/Sup/Com	Support	

Summary of Main Issues

Reflecting the fact that the representor is of the view that this proposed allocation is different but nonetheless complementary to his site, (i.e. Policy MN5 - Land South of Formby Industrial Estate), and taking into account their view that Formby is a highly sustainable location, this proposed allocation/policy is broadly supported.

Summary of Suggested Changes

None required/proposed.

Evidence Submitted

None

Chapter 6	Plan Order Policy MN4	Other Documents
Policy MN4	Land north of Formby Industrial Estate	
Respondent No 701	Response Ref 4	Representor Name Brian Rostron
Organisation Name	S Rostron Ltd	
Obj/Sup/Com	Support	

Summary of Main Issues

S Rostron Ltd support policy MN4 and the allocation of strategic site MN2.48 (land north of Formby Industrial Estate). They are the freehold owners of the site and developed the existing industrial estate to its south. The site is of low grade agricultural land and is currently tenanted. It is flat and well-drained by manmade ditches, and, with the exception of the area immediately adjacent to Downholland Brook on its eastern boundary, is not subject to significant or high risk of flooding. It contains part of the Formby Moss Site of Biological Interest (SBI). Reed bed and ditches (also containing reeds) from the biological interest, Water voles, which are a protected species, occur within the site.

The allocation of the site for employment use meets the NPPF's objectives. The NPPF makes it clear that significant weight should be placed on the need to support economic growth through the planning system. The site can help to meet identified needs in the north of Sefton (which includes Formby) and provide considerable benefits for local residents and the local economy. Policy MN4 has been developed in conjunction with the site owner and is aimed at promoting sustainable development which balances economic, social and environmental considerations. There are no constraints which cannot be mitigated which would impede development. Downholland Brook and Mittens Lane will form a new defensible boundary to the Green Belt.

The business park can be delivered during the plan period, as demonstrated by the Council's Viability Study. Paragraph 6.182 of its study indicates that purpose built units for owner occupation would be viable and likely to come forward. The site could be made available for development within one year of the adoption of the Local Plan. Development would commence approximately 2 years later and continue throughout the plan period. This would enable it to meet medium to long term employment needs, particularly once the Southport Business Park has been fully developed in the early 2020's as envisaged by paragraph 6.50 of the Local Plan.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN4	Other Documents
Policy MN4	Land north of Formby Industrial Estate	
Respondent No 703	Response Ref 29	Representor Name Jackie Copley
Organisation Name CPRE Lancashire		
Obj/Sup/Com	Objection	

Summary of Main Issues

We are opposed to the redesignation of this Green Belt site as a Strategic Employment Location on the grounds that it would be a significant encroachment into the Green Belt and would be inconsistent with the openness which is a fundamental attribute of the Green Belt. Further, it would be contrary to the landscape character of the area and the fact that the site is a Local Wildlife Site. There is a small amount of strip development along Moss Lane, but otherwise there is no development East of the bypass from North of the Formby Altcar Trading Estate all the way to Ainsdale and we believe that nothing should be done to breach the bypass as a Green Belt boundary. The Council to some degree accepts this view by rejecting land between Moss Side and the Altcar Trading Estate (site ref. S044) as unsuitable for development; however, the present site extends only from Mittens Lane ditch to the Trading Estate.

Some (5%) of the site is Flood Zone 3 and most (80%) is Flood Zone 2 and is subject to both surface water flooding and ground water flooding, the latter making it unlikely that an effective SUDS could be implemented.

The many ditches in the site provide good habitat for voles and development would be conditional on an Ecological Assessment. A further fundamental difficulty is the formidable issue of safe access to the site; a Transport Statement or Transport Assessment would necessary (as specified by NPPF paragraph 32).

In summary, it is our opinion that the proposal is totally misconceived.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN4	Other Documents
Policy MN4	Land north of Formby Industrial Estate	
Respondent No 703	Response Ref 27	Representor Name Jackie Copley
Organisation Name CPRE Lancashire		
Obj/Sup/Com	Objection	

Summary of Main Issues

MN4, Land north of Formby Industrial Estate and south of Moss Side (Formerly SR5.25 and SO44) and MN2.48 on the map.

This site is identified in the Infrastructure Development Plan as a site for industrial development despite being listed in the Sites Not Chosen section of the Plan.

This proposal is an encroachment of the Green Belt boundary and as there are no natural boundaries immediately to the east and north of the site and it could therefore be easily expanded to cause further unrestricted sprawl.

A vehicular access to the Formby By- pass would need to be created.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN5 **Other Documents**
Policy MN5 **Land south of Formby Industrial Estate**
Respondent No 446 **Response Ref** 6 **Representor Name** Hugh McAuley
Organisation Name Formby Play Sports Ltd
Obj/Sup/Com

Summary of Main Issues

Reflecting the fact that the representor controls the land which Policy MN5 proposes to allocate as a strategic employment location, and has pushed for this status, he fully supports the allocation and the broad objectives of Policy MN5. Although his representations are of support the representor proposes some minor changes to the scope and key requirements of Policy MN5. They are designed to create clarity and assist in the future implementation of the desired developments at the site. The proposed changes relate to the grade of ground the new facility for Formby FC should be developed to; flexibility as to where the proposed uses are to be developed; the need and circumstances for enabling/cross subsidising uses; and the benefits associated with requiring a masterplan for the proposed uses.

Summary of Suggested Changes

Proposed change to Policy MN5 (page 35), which for ease are reflected through a full redrafting of the policy, are as follows: 'Policy MN5 Land South of Formby Industrial Estate. Land south of Formby Industrial Estate is allocated as a 'strategic employment location' (as shown on the policy map). Development of this site must: provide a new ground and related facilities capable of accommodating a reformed Formby Football Club which should be developed to an appropriate standard in the context of the Football Association's Ground Grading Standards and which has to be agreed with the Council. Provide a minimum of 5 hectares of sport and recreation facilities to replace existing sports pitches and outdoor recreational facilities for community use and which can include the above facility for Formby Football Club. Provide a minimum of 7 hectares (net) of land for the employment uses specified in Policy MN2. The development of other uses on residual land may be acceptable where they are necessary to enable/cross subsidise the delivery of the other uses as set out above. Provide new access onto the Formby bypass and Altcar Road. Improve connections to the wider highway network including provision for walking, cycling and public transport. Ensure that development of the site does not increase flood risk elsewhere and that flood risk is managed effectively and appropriately within the site including sustainable drainage systems and provide a landscaping framework with appropriate tree planting and a buffer alongside Downholland Brook.

Any uses required to enable/cross subsidise the delivery of the employment and sports and recreation uses must be phased so that they are delivered after or in tandem with those uses. At planning application stage a masterplan and phasing plan/strategy will be required to demonstrate how, where and through what phases the desired uses will be delivered. This will be controlled through planning conditions, a section 106 agreement and other legal agreements as appropriate.

Evidence Submitted

None

Chapter 6 **Plan Order** Policy MN5 **Other Documents**
Policy MN5 **Land south of Formby Industrial Estate**
Respondent No 703 **Response Ref** 28 **Representor Name** Jackie Copley
Organisation Name CPRE Lancashire
Obj/Sup/Com Objection

Summary of Main Issues

CPRE does not believe the concluding statement to be accurate as it says there would be 'no impact' on the Green Belt. There would be a significant impact to Green Belt. There is no natural boundary to the south of the site, there is a possibility of the development encroaching onto the whole of the available area and causing further unrestricted sprawl. Half of the site is Best and Most Versatile farmland of Grades 2 and 3a (Sefton Agricultural Land Study 2012) and should be protected by policy for future food production and jobs. In terms of accessibility, the criteria states 'N/A' and this is worrying. In the local plan, the council make it clear that they regard the need to live sustainably as key requirement therefore it is vital that new developments can be accessed by sustainable means, such as walking or cycling. Policy EQ3 refers to this specifically. Crossing the road by bicycle or on foot would need careful thought as this is not easily attainable at present. In addition vehicular access to and from the Formby Bypass would need to be created. The site is partly a flood risk area, due to being adjacent to Downholland Brook and is reliant on the use of pumping stations to keep the area free from surface water flooding.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN5	Other Documents
Policy MN5	Land south of Formby Industrial Estate	
Respondent No 703	Response Ref 30	Representor Name Jackie Copley
Organisation Name CPRE Lancashire		
Obj/Sup/Com	Objection	

Summary of Main Issues

We are opposed to the redesignation of this green belt site as a Strategic Employment Location on the grounds that it would be a significant encroachment into the Green Belt and would be inconsistent with the openness which is a fundamental attribute of the Green Belt. Further, it would be contrary to the landscape character of the area. Apart from the football ground, there is no development East of the bypass from South of the Formby Altcar Trading Estate all the way to Ince Blundell and we believe that nothing should be done to breach the bypass as a Green Belt boundary. We attribute great importance to the fact that approximately 50% of the site is best and most versatile grade 2 agricultural land. 40% of the site is Flood Zone 3 and 23% is Flood Zone 2 and is subject to surface water flooding. Much of the site provides good habitat for voles and development would be conditional on an Ecological Assessment. A further fundamental difficulty is the formidable issue of safe access to the site; a Transport Statement or Transport Assessment would necessary (as specified by NPPF, par. 32). In summary, we are firmly of the opinion that the site should remain Green Belt and that the anticipated development proposal by Formby Football Club should be determined by standard Green Belt policy (ref. NPPF, Section 9, Protecting Green Belt land).

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN5	Other Documents
Policy MN5	Land south of Formby Industrial Estate	
Respondent No 725	Response Ref 3	Representor Name Paul Daly
Organisation Name Sport England		
Obj/Sup/Com	Objection	

Summary of Main Issues

This policy allocates a specific site as a 'Strategic Employment Location'. The site is also identified by policy MN2 (MN2.49 Land South of Altcar Road, Formby). The proposed allocation includes an existing football ground and sports pitches. However, land within the site is allocated for new office and light industrial (B1), general industrial (B2), and storage and distribution uses (B8). Such development could result in the loss of playing field land and sports facilities. Policy MN5 however requires a new football ground as well as a minimum of 5 hectares of sports and recreation facilities located on the eastern half of the site. This would include replacement sports pitches and outdoor recreational facilities available for community use.

In this respect, the broad approach of the policy would ensure that replacement facilities of at least equivalent quantity and quality were provided. The fact that policy MN5 makes the requirements explicit is supported. However, the effectiveness of the policy could be adversely affected by phasing. Bullet point three requires the phasing of the developments to be agreed in writing with the Council. There is no explicit requirement, though, for the new ground, pitches and other sports facilities to be provided before any existing ones are lost to development. If replacement / new facilities are not provided first, there would be a significant adverse impact on existing teams, clubs etc. that use the facilities currently.

Summary of Suggested Changes

The policy wording should be amended to make clear that existing playing field land and sports facilities cannot be lost to development until replacement facilities have been provided and made available for use.

Evidence Submitted

Chapter 6	Plan Order Policy MN6	Other Documents
Policy MN6	Land North of Brackenway, Formby	
Respondent No 685	Response Ref 5	Representor Name
Organisation Name Taylor Wimpey		
Obj/Sup/Com Support		

Summary of Main Issues

THIS IS A SUMMARY

TWUK strongly supports the Council's allocation of the site for housing and considers that the site specific requirements will enable a high quality residential development to come forward. However, TWUK has proposed amendments to the policy wording to make clear that the 7.9 ha of grassland and wetland habitats is outside the residential allocation.

Summary of Suggested Changes

Retain and manage up to 7.9 ha of grassland and wetland habitats [outside of the residential allocation] as a buffer zone to the adjacent nature reserve, including additional species enhancement measures. In addition, main water courses within the site (including Wham Dyke) must be maintained and enhanced with watercourse buffer habitats.

(The words in [] are proposed to be added to criterion 1(b) of the policy)

Evidence Submitted

Chapter 6	Plan Order Policy MN6	Other Documents
Policy MN6	Land North of Brackenway, Formby	
Respondent No 703	Response Ref 31	Representor Name Jackie Copley
Organisation Name CPRE Lancashire		
Obj/Sup/Com Objection		

Summary of Main Issues

We prefer to see SR4.11 serve its Green Belt purpose, and continue to afford ecological value as a Local Wildlife Site, but should the Council redesignate the site we recommend an enforceable planning condition relating to adequate mitigation. The proximity of the larger Local Wildlife Site nearby could support this biodiversity off-setting. The site has a known flood risk and suffers noise due to the proximity of the Formby By-pass. There are known highways and accessibility constraints. CPRE supports the officer view that the bridleway along the south side of the site would need to be improved to include provision for cyclists. Site ref. AS06: We are strongly opposed to the redesignation of this larger green belt site for residential development. We do not believe that the significant reduction in this Local Wildlife Site could be adequately mitigated. Were the site to be developed, and ecological survey would be required. A significant proportion of the site is in Flood Zones 2 and 3; we believe that residential development of the eastern part of the site so affected would be contrary to paragraph 100 of the NPPF, especially taking into account the need to consider the long-term impact of climate change. Access to the site would be very problematic. We regard the officer recommendation of a new signal controlled junction onto the Formby Bypass at less than 400 m from the Freshfield Roundabout would be an unacceptable impediment to the flow of traffic on the bypass. In our opinion, access would have to be via Deansgate Lane North, exacerbating the already existing difficulties at its junction with Southport Road (B5424).

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

Sefton residents have been consistent throughout consultation – that development on the Borough's green belt should not be countenanced. The National Planning Policy Framework 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. 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. I do not believe the NLP report or the SHMA provide the necessary justification. 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.

I consider that 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 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 ageing 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.

By applying a higher figure, to more accurately align with the SHLAA policy on net developable area, and a more realistic housing density to meet the requirements of the ageing population, Sefton MBC could significantly reduce the total area of land required to meet the projected need and could therefore, reduce the number of new sites that need to be allocated. In addition to potentially relaxing some of the perceived infrastructure constraints, such an approach would signal the intention of Sefton Council to minimize the impact to the green belt and to the best and most versatile agricultural land. Instead, the Council's approach suggests it has little regard for the valuable and irreplaceable agricultural land that surrounds many parts of the borough.

Summary of Suggested Changes**Evidence Submitted**

Chapter 6	Plan Order Policy MN7	Other Documents
Policy MN7	Sefton's Green Belt	
Respondent No 542	Response Ref 5	Representor Name Jennifer Hadland
Organisation Name Liverpool and Chester Property Company		
Obj/Sup/Com Objection		

Summary of Main Issues

The Council will not be looking to review the Green Belt boundary until a future Local Plan review; however, it is vital that enough land is allocated for this plan period and beyond. It is good practice and a requirement of The Framework and Planning Policy Guidance to add in a buffer for housing development in case some allocated sites do not come forward during the plan period. We question whether enough sites have been allocated / safeguarded for development.

Summary of Suggested Changes

The site should be removed from the Green Belt and allocated under Policy MN2

Evidence Submitted

Chapter 6	Plan Order Policy MN7	Other Documents
Policy MN7	Sefton's Green Belt	
Respondent No 548	Response Ref 3	Representor Name Michael and Julie Corbitt
Organisation Name		
Obj/Sup/Com Objection		

Summary of Main Issues

building upon Green Belt land should only be undertaken in 'Exceptional Circumstances'. To date, despite asking, we have not yet seen a definition for 'Exceptional Circumstances'. We would anticipate this to be following a significant man-made event (such as extreme fire or aircrash) or natural disaster (such as flood or landslide). It is acknowledged other areas of the country are suffering from a shortage of affordable housing. We certainly believe that this is not applicable within Sefton, and at best any shortfall in housing would be due to poor planning or management, and does not constitute 'Exceptional Circumstances'. We believe that this is not legally compliant, positively prepared or justified.

Brownfield Sites are targeted first in preference over Green Belt sites, Within South Sefton, there are many disused and derelict old industrial sites that are now unsightly and unsafe. Are adequate efforts being made to contact and target the landowners as this would be the right thing to do if housing needs verified? We believe that this is not positively prepared.

Green Belt land is a premium resource that we should strive to maintain. The concept of this is well founded, and is still valid. Within Thornton, it prevents further urban sprawl out of Liverpool. This is the first green space encountered when travelling northwards out of Liverpool. This is not justified.

Within Thornton, preserving high quality arable farmland and providing green spaces for residents is a national resource that can never be replaced. This is not justified.

Summary of Suggested Changes

Confirm the definition of 'Exceptional Circumstances' related to the requirement to build upon Green Belt land
Confirm that all potential Brownfield Sites are evaluated and targeted in preference to Green Belt land. This has to be the 'right thing' to do.

Evidence Submitted

Chapter 6 **Plan Order** Policy MN7 **Other Documents**
Policy MN7 **Sefton's Green Belt**
Respondent No 567 **Response Ref** 2 **Representor Name** Janette Miller
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I wish to object to the Sefton Local Plan on the following grounds: Housing figures do not give "special circumstances" for building on the Green Belt. Sefton is unique in that it has limited land to build on due to the various constraints. On one side its 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

Evidence Submitted

Chapter 6 **Plan Order** Policy MN7 **Other Documents**
Policy MN7 **Sefton's Green Belt**
Respondent No 661 **Response Ref** 2 **Representor Name**
Organisation Name PSA Developments
Obj/Sup/Com

Summary of Main Issues

The Plan proposes the release of some Green Belt land, but nowhere near enough to accommodate future needs. It is a flawed strategy to minimise Green Belt release and in doing so fail to respond to the inevitable needs of the Borough. It is out of kilter with one of the two 'essential characteristics' of Green Belts — namely their permanence.

Summary of Suggested Changes

The Plan should allocate more land, which will inevitable require more Green Belt releases.

Evidence Submitted

Chapter 6 **Plan Order** Policy MN7 **Other Documents**
Policy MN7 **Sefton's Green Belt**
Respondent No 699 **Response Ref** 3 **Representor Name** P O'Hanlon
Organisation Name Maghull and Lydiate Action Group
Obj/Sup/Com Objection

Summary of Main Issues

Maghull is small town and Lydiate a village, situated approximately 10 miles from Liverpool City Centre and surrounded by green belt which protects the openness of the countryside. Encroachment on to the Green Belt will result in an urban sprawl stretching from Liverpool City Centre through to the borders with West Lancashire, eroding the whole character of this area.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN7 **Other Documents**
Policy MN7 **Sefton's Green Belt**
Respondent No 704 **Response Ref** 4 **Representor Name** A Donnelly
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

We support the allocation of the site (MN2.32) and the revised Green Belt boundary. However there is an additional parcel of land (red hatched land in Appendix 1) which if excluded from the Green Belt could form a logical extension to MN2.32. The Council has rightly accepted that MN2.32 would have no impact on the 5 objectives in the Green Belt. We consider that those same reasons would apply to this field which is only 0.38 hectares in size.

When reviewing Green Belt boundaries, the sixth bullet of paragraph 85 of the Framework advises: "define boundaries clearly, using physical features that are readily recognisable and likely to be permanent". Therefore we propose that the new Green Belt boundary follows the drain and hedge as shown on the OS Base in Appendix 1 (red hatched area). Should the Inspector agree with the revised Green Belt boundary the Policy NH3 (Development in the Nature Improvement Area) would not apply to this parcel of land.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN7 **Other Documents**
Policy MN7 **Sefton's Green Belt**
Respondent No 706 **Response Ref** 3 **Representor Name** Mike McComb
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

The southern extent of the settlement boundary of Formby as drawn in the adopted UDP is drawn north of Hoggs Hill Lane. Land South of Hoggs Hill Land is designated as Green Belt. Our client's site MN2.18 is allocated in the emerging plan as housing land and development has already commenced on the neighbouring Powerhouse site. Accordingly the emerging plan amends the settlement policy line to follow the more natural boundary of the River Alt thereby encompassing the Powerhouse (Phase 1), site MN2.18 and the land to the south of it between it and the river within the settlement boundary. We support the removal of this land from the Green Belt and the extension of the settlement boundary as proposed.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN7	Other Documents
Policy MN7	Sefton's Green Belt	
Respondent No 708	Response Ref 2	Representor Name Terry Riley
Organisation Name	Ascot Property Group	
Obj/Sup/Com	Objection	

Summary of Main Issues

The site referred to as Shorrocks Hill has an area of 3.2 hectares. It is part brownfield, with substantial areas of hard standing for car parking and other developed structures including tennis courts, stables, swimming pool and a range of outdoor recreational pursuits. The existing built form comprises some 44%, or 1.4 hectares of the site. The decision for this site to remain in the Green Belt has not been justified.

Paragraph 85 of NPPF states that when defining Green Belt boundaries, local planning authorities should: "not include land which it is unnecessary to keep permanently open." This land is not open as 44% of the site is developed. Paragraph 85 further states that local planning authorities should 'define boundaries clearly, using physical features which are likely to remain permanent.' The site is clearly defined and is bound by strong boundaries comprising Lifeboat Road to the north, St Luke Church Road to the east and Alexandra Road to the south. To the western boundary, the site is defined by existing built structures.

The site that would be suitable for housing allocation and for removal from the Green Belt. The site would be ideally suited to a low density residential development, possibly a securely gated private estate. Such a scheme could provide approximately 30 dwellings. This would be aimed at the upper echelons of the housing market. The Local Plan should provide housing choice for all groups across the market, particular those who can contribute positively to wealth creation in the Borough. This site would provide genuine housing choice with a niche development. For all the above reasons, and to satisfy the tests of soundness, this site should be excluded from the Green Belt and allocated for housing.

Summary of Suggested Changes

The site, referred to as Shorrocks Hill, comprising 3.2 hectares should be included in the Local Plan as a housing allocation, under Policy MN2 and removed from the Green Belt, MN7.

Evidence Submitted

Chapter 6	Plan Order Policy MN7	Other Documents
Policy MN7	Sefton's Green Belt	
Respondent No 723	Response Ref 16	Representor Name Laurence Rankin
Organisation Name	Sefton Green Party	
Obj/Sup/Com	Objection	

Summary of Main Issues

This simple policy wording is misleading when in fact the Plan proposes release of Green Belt to development. Existing Green Belt must be maintained.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN7	Other Documents
Policy MN7	Sefton's Green Belt	
Respondent No 730	Response Ref 5	Representor Name Gerry O'Brien
Organisation Name Nextdom Ltd		
Obj/Sup/Com Objection		

Summary of Main Issues

We agree with the principle of releasing Green Belt sites to establish Strategic Employment Sites, as proposed in the Publication draft Local Plan. The employment requirement, whilst in our view is understated, as demonstrated in the earlier section, necessitates Green Belt release in light of the insufficient supply of land within the existing urban area.

We agree within the statement made in Chapter 3 of the Publication draft Local Plan, which establishes that there is limited available land within the existing settlement boundaries to meet employment needs over the next 15 years.

We agree with Sefton Council that exceptional circumstances are apparent and that the release of land from the Green Belt is required to meet employment and housing needs over the plan period.

The NPPF states that when establishing a new Local Plan which revises Green Belt boundaries, authorities should prepare for the long-term permanence of the revised boundary, which extends beyond the lifetime of the plan (para. 83). When revising Green Belt boundaries, Local Authorities must be satisfied that the boundaries will not need to be altered beyond the plan period (para. 85). As stated in Section 2, we feel that a greater employment land supply is required over the plan period in light of forecast sub-regional growth, including activities linked to the expansion of the Port of Liverpool. Subsequently, the Council should allocate more Green Belt land to meet potential future employment land needs. In doing this, the Council would be confident that ample, suitable land is available both during the plan period, and beyond, without the need to revise Green Belt boundaries again in this time.

Choosing not to release Green Belt land at this time would surmount to a 'do nothing' scenario and, as stated in Chapter 4 of the Publication draft Local Plan, could result in the loss of opportunities to attract new businesses and inward investment; loss of existing local businesses; lack of economic growth and, ultimately, failure to meet the Government's requirement to promote sustainable economic development.

Summary of Suggested Changes

The Nextdom Ltd site should be included within Policy MN2 as a strategic employment location

Evidence Submitted

Chapter 6	Plan Order Policy MN7	Other Documents
Policy MN7	Sefton's Green Belt	
Respondent No 738	Response Ref 7	Representor Name Charles Smith
Organisation Name CP&S Ltd		
Obj/Sup/Com Objection		

Summary of Main Issues

The Publication draft Local Plan proposes the release of 4.4% of the authority's Green Belt land for employment and housing development. In light of CP&S Ltd's objection to the quantum of housing development proposed, we believe that insufficient Green Belt land has been allocated for housing development in the plan period.

CP&S Ltd feel that the requirement for 615 d.p.a. is insufficient and subsequently the Council should allocate additional Green Belt land to meet housing needs in the future. In doing this, the Council would be confident that ample, suitable land is available both during the plan period, and beyond, without the need to revise Green Belt boundaries in this time.

The release of the Oriel Drive site (LPA reference AS18) from the Green Belt will provide a further 350 dwellings, adjoining the existing urban area, which will contribute towards meeting housing needs in Sefton. The release of this site will result in a strong, defensible Green Belt boundary (M57) which will ensure that the boundary can remain unchanged without encroachment for the remainder of the plan period and beyond.

Summary of Suggested Changes

Release the Oriel Drive site from the Green Belt to provide a further 350 dwellings.

Evidence Submitted

Chapter 6 **Plan Order** Policy MN7 **Other Documents**
Policy MN7 **Sefton's Green Belt**
Respondent No 741 **Response Ref** 9 **Representor Name**
Organisation Name Priory Asset Management LLP
Obj/Sup/Com Objection

Summary of Main Issues

The Council's approach to amending Green Belt is generally supported. We agree that the requirement to allocate sufficient land for market housing, affordable housing, and employment development to meet identified needs constitutes the 'exceptional circumstances' that justify the alteration of Green Belt boundaries through the preparation of the Local Plan. Neighbouring authorities have indicated they would be unable to assist Sefton in meeting any of its unmet needs, which would comprise the only other option.

Further to our comments made on the Objectively Assessed Housing Need figure (policy MN2) Priory Asset Management LLP have concerns with regards to the quantum of Green Belt land to be released and the lack of safeguarded land provided within the plan. The current approach will only put severe pressure on the release of green belt at the end of the plan period.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN7 **Other Documents**
Policy MN7 **Sefton's Green Belt**
Respondent No 1037 **Response Ref** 1 **Representor Name** Marilyn Griffiths
Organisation Name
Obj/Sup/Com Comment

Summary of Main Issues

Green Belt
National Policy 6.69 paras 80,90 Local Plan p47 chapter MN7
Building on Green belt "only in exceptional circumstances" "percentages of proposed site are adjacent to existing built up areas"
There is no guarantee that this sentence could not be used once a precedent has been set.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN8 general	Other Documents
Policy MN8	Safeguarded Land	
Respondent No 542	Response Ref 6	Representor Name Jennifer Hadland
Organisation Name Liverpool and Chester Property Company		
Obj/Sup/Com Objection		

Summary of Main Issues

The third bullet point of paragraph 85 of The Framework states that where necessary, Councils should identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period. The fifth bullet point states that they should also satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period. The Council, therefore, should ensure that they have enough land identified for future development as part of this Green Belt assessment, rather than commissioning another review in the short term which is directly contrary to paragraphs 14 and 85 of NPPF.

As a 'last resort', whilst we consider Site AS21 suitable for allocation now, subject to deletion from the Green Belt, our client would also support Site AS21 being safeguarded for development post plan period. Furthermore, the two sites which have been identified as safeguarded land (Sites MN8.1 and MN8.2) are both within areas identified as a licence area for onshore hydrocarbon extraction. It is considered that safeguarded land should be identified on land which is outside the licence area to ensure deliverability in the longer term. The Council has not identified enough safeguarded land to accommodate future housing requirements, particularly based on the historic under delivery. The Council should be looking to identified post plan period with regard to deleting land from the Green Belt.

Summary of Suggested Changes

If site AS21 is not allocated as a housing site in the Local Plan, it should be allocated as sfaeguarded land under policy MN8.

Evidence Submitted

None

Chapter 6	Plan Order Policy MN8 general	Other Documents
Policy MN8	Safeguarded Land	
Respondent No 637	Response Ref 7	Representor Name Ken Hopkins
Organisation Name Mactaggart & Mickel Homes Ltd		
Obj/Sup/Com Objection		

Summary of Main Issues

Mactaggart & Mickel are of the view that there has to be an appropriate 'trigger' for the release of safeguarded land which is aligned to the Local Plan strategy and its deliverability. This should include a measure of inherent flexibility, for example, if allocated sites are not coming forward in the manner anticipated. There should not be 'artificial barriers' to safeguarded land coming forward purely on the basis that it is designated in the Local Plan to meet longer term need.

Summary of Suggested Changes

Mactaggart & Mickel suggest the following wording as a new section to policy MN8: "Development of safeguarded land can be considered in the following circumstances: There has been a record of persistent under delivery of housing by failing to provide a five year housing supply as detailed in paragraph 47 of the NPPF. If a 20% buffer is required to provide a realistic prospect of achieving the planned housing supply and realise the stated strategy, then safeguarded land will no longer be in the statutory Green Belt and to ensure that the Local Plan meets its housing needs in full by 2030."

Evidence Submitted

Chapter 6	Plan Order Policy MN8 general	Other Documents
Policy MN8	Safeguarded Land	
Respondent No 707	Response Ref 6	Representor Name Matthew Good
Organisation Name	Home Builders Federation	
Obj/Sup/Com	Objection	

Summary of Main Issues

The policy is considered unsound as it is not in conformity with national policy.

The HBF supports the provision of safeguarded land but the quantity proposed is insufficient to meet the long-term development needs of the area. Paragraph 85 of the NPPF indicates that Council's should, where necessary; 'identify safeguarded land within their plans between the urban area and Green Belt in order to meet longer-term development needs stretching well beyond the plan period'.

The plan provides sufficient safeguarded land for 1,000 dwellings (plan paragraph 6.78) which is less than two years supply, based upon the proposed housing requirement. The plan also notes that the development period of two sites are likely to extend beyond the plan period adding a further 500 units to the long-term supply (plan paragraph 6.78). This still only provides a maximum 1,500 unit capacity post plan period, or less than 3 years of the proposed housing requirement. This does not provide for the development needs stretching well beyond the plan period as required by the NPPF. The inevitable outcome will be further review of the Green Belt at plan review.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Policy MN8 general	Other Documents
Policy MN8	Safeguarded Land	
Respondent No 717	Response Ref 5	Representor Name
Organisation Name	TR Silcock Ltd, DWH & Barratt Homes	
Obj/Sup/Com	Objection	

Summary of Main Issues

TR Silcock Ltd, David Wilson Homes and Barratt Homes support the principle of allocated Safeguarded Land in Sefton to meet the longer term development needs of the borough. However, my clients consider that the quantity of safeguarded land proposed within the emerging plan is insufficient to meet these needs.

The emerging plan provides safeguarded land capable of accommodating 1,000 dwellings which equates to less than two years housing supply, based upon the proposed housing requirement. The plan also notes that the development period of two sites is likely to extend beyond the emerging plan period potentially adding a further 500 units to the long-term supply (plan paragraph 6.78). However, this still only equates to a maximum 1,500 unit capacity (which is less than three years supply) after the emerging plan period. This does not provide for the borough's development needs beyond the plan period as required by the NPPF and the inevitable outcome will be further review of the Green Belt at plan review.

Summary of Suggested Changes

Additional land should be identified as Safeguarded Land between the urban area and the Green Belt boundary to meet the longer term development needs of the borough, including that located to the south of Liverpool Road, Formby (Agricultural land between Altcar Lane and the River Alt, Formby, including Lovelady's Farm).

Evidence Submitted

Chapter 6	Plan Order Policy MN8 general	Other Documents
Policy MN8	Safeguarded Land	
Respondent No 727	Response Ref 3	Representor Name
Organisation Name Harrison and Sons		
Obj/Sup/Com Objection		

Summary of Main Issues

If the Council do not deem it necessary to allocate this site for housing, it should be identified as a safeguarded land site under Policy MN8, so this site can meet the longer term development needs stretching beyond the plan period. The emerging Draft Local Plan only provides sufficient land for 1000 dwellings which is less than two years supply based on the Council's housing requirement. Harrison and Sons do not consider that 1000 dwellings will meet the longer term development needs stretching beyond the plan period was stated in the National Planning Policy Framework.

Summary of Suggested Changes

Allocate site AS14 as safeguarded land under Policy MN8, so this site can meet the longer term development needs stretching beyond the plan period.

Evidence Submitted

Chapter 6	Plan Order Policy MN8 general	Other Documents
Policy MN8	Safeguarded Land	
Respondent No 738	Response Ref 8	Representor Name Charles Smith
Organisation Name CP&S Ltd		
Obj/Sup/Com Objection		

Summary of Main Issues

Policy MN8, Safeguarded Land, states that the Council has identified two sites which will be safeguarded for development beyond the plan period. These sites, equating to 51.5ha have an identified capacity of 1,000 dwellings. In light of our concerns regarding the need for a higher housing requirement, and in particular with reference to the proposed early plan review to take account of sub-regional changes linked to the Port of Liverpool expansion, we feel that more safeguarded land should be allocated at this stage. This strategy would prevent the need for a full Green Belt review before the next plan period and ensure the permanence of the Green Belt boundaries beyond 2030.

Summary of Suggested Changes

More safeguarded land should be allocated in the Local Plan.

Evidence Submitted

Chapter 6	Plan Order Policy MN8 general	Other Documents
Policy MN8	Safeguarded Land	
Respondent No 741	Response Ref 10	Representor Name
Organisation Name Priory Asset Management LLP		
Obj/Sup/Com Objection		

Summary of Main Issues

Further to our comments made on the Objectively Assessed Housing Need figure (policy MN2) Priory Asset Management LLP have concerns with regards to the quantum of Green Belt land to be released and the lack of safeguarded land provided within the plan. The current approach will only put severe pressure on the release of green belt at the end of the plan period

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy MN8 general **Other Documents**
Policy MN8 **Safeguarded Land**
Respondent No 882 **Response Ref** 6 **Representor Name** Leslie James Baxter
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

The supposed supply of houses in Sefton is given as 11070 + 5% by 2030 and parts of the Green Belt will be removed as "Safeguarded Land" to be used as required; this defeats the purpose of Green Belt "safeguarded" land is banked for possible future development.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN8.1 **Other Documents**
Policy MN8.1 **Land at Lamshear Lane**
Respondent No 30 **Response Ref** 1 **Representor Name** E Billington
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I was assured by a officer that development of land within Liverpool Rd./ Moss Lane/Lamshear Lane and Sandy Lane would only take place on completion of all other approved developments. Please confirm that this is still the position. I am much concerned by the statement "if the adjacent site were developed first."

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN8.1 **Other Documents**
Policy MN8.1 **Land at Lamshear Lane**
Respondent No 90 **Response Ref** 1 **Representor Name** Helen Bromfield
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Having seen the plans for development in Maghull and Lydiate I would like to register my objections to any planned development at this location. This area is part of the countryside that local people have enjoyed for many years and would like to continue to do so. It is prime greenbelt land.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN8.1 **Other Documents**
Policy MN8.1 **Land at Lamshear Lane**
Respondent No 114 **Response Ref** 4 **Representor Name** Barbara Keenan
Organisation Name Lydiate Parish Council
Obj/Sup/Com Objection

Summary of Main Issues

This covers a vast area of high grade agricultural land.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN8.1 **Other Documents**
Policy MN8.1 **Land at Lamshear Lane**
Respondent No 136 **Response Ref** 3 **Representor Name** Derek McStea
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

From an environmental point of view to remove green belt protection and apply a 'safeguarded land' status to the area shown on the map Ref: MN 8.1, will be detrimental to for a number of reasons. If in the future planning permission were given to build on this 'safeguarded land' it will inevitably lead to local flooding. As I reside in this area, I know from many years of experience that there are flooding incidents most winters. If hundreds of houses were built on this land, it would be an environmental disaster as it is a natural floodplain which has a high water table and sits at the bottom of Aughton Hill. Some other key environmental considerations should be:

- The land off Lamshear Lane is land is grade 1 agricultural land which is a precious resource to the country and the community in terms of self provision.
- The area needs green and open spaces in our community, and the decline of these will affect our health.

Summary of Suggested Changes

The proposals to remove the greenbelt status from areas and apply a status of safeguarded land are to be removed. It is not acceptable from a legal, environmental or sustainable perspective to remove greenbelt protection to the areas identified in the plan.

Evidence Submitted

Chapter 6 **Plan Order** Site MN8.1 **Other Documents**
Policy MN8.1 **Land at Lamshear Lane**
Respondent No 183 **Response Ref** **Representor Name** William Supple
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I oppose the reserve area in Lydiate (Harrisons Farm) - excellent Grade I agricultural land - in such short supply in the UK.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN8.1	Other Documents
Policy MN8.1	Land at Lambshear Lane	
Respondent No 406	Response Ref 3	Representor Name Peter Richards
Organisation Name West Lancashire Borough Council		
Obj/Sup/Com Objection		

Summary of Main Issues

West Lancashire Borough Council have concerns over the soundness of policy MN8 and the allocation of land to the north of Maghull / Lydiate at sites MN8.1 and MN2.28, in that the policy on safeguarded land and the allocations do not appear justified in the context of a Local Plan that is committed to an early review when the two allocations in question have such a harmful impact on the Green Belt. Sites MN8.1 and MN2.28, if removed from the Green Belt and allocated, would, by Sefton Council's own admission (see relevant site assessment forms), close the strategic Green Belt gap between Maghull and Aughton Village in West Lancashire by around 40%, reducing the gap to approximately 1 km. In addition, coupled with the Ashworth Hospital site further east (which, while previously developed, is also earmarked to be removed from the Green Belt), the release of this land from the Green Belt would create an area of Green Belt land between the A59 and the Ormskirk-Liverpool rail line that would ultimately become enclosed on three sides by the Maghull built-up area. As such, the new Green Belt boundary to the north of Maghull would not be a strong one, and, for the area of Green Belt remaining, would leave it very vulnerable to any proposals in the future to amend the Green Belt boundary. As such, by allocating sites MN2.28 and MN8.1, the Local Plan would effectively be facilitating the long-term (post-2030) expansion of Maghull northwards, significantly closing a strategic gap to settlements in West Lancashire.

The Council recognise that Green Belt boundaries are not sacrosanct and that, if exceptional circumstances exist, there can be justification for a Green Belt release such as that described above. However, the Council do not consider that such justification exists at this time given the fact that the Sefton Local Plan commits to an early review. Given this context, it is not necessary to include safeguarded land in this Local Plan, as the early review (carried out in the context of a wider Liverpool City Region evidence base and strategy on development needs) would be the better time to consider what land might be required after 2030 for development in Sefton.

Therefore, were policy MN8 to be deleted, site MN8.1 would immediately be removed from the Local Plan (allowing it to remain in the Green Belt), and site MN8.2 could be re-allocated as a housing allocation to replace site MN2.28, allowing MN2.28 to be removed from the Local Plan (and so remain in the Green Belt). This would be a far more satisfactory solution to the Council, given the limited harm to the Green Belt that site MN8.2 has, compared to MN2.28. The Council notes Sefton's concerns regarding market saturation were MN8.2 brought forward for development in the Plan period (see site assessment for MN8.2) but it is the Council's view that MN8.2 would create no greater competition than MN2.28 given that both are in the Maghull / Lydiate housing sub-market. Were Sefton Council or the Inspector appointed to examine the Local Plan not to agree with the Council's suggestion to delete Policy MN8 entirely, the Council would, at least, respectfully suggest that site MN2.28 could be swapped with site MN8.2 so that both the sites that the Council consider cause most harm to the Green Belt are only allocated as safeguarded land (while MN8.2 would become a full housing allocation), meaning that their status for development could still be reconsidered at the Early Review stage.

Summary of Suggested Changes

Policy MN8 should be deleted from the Local Plan, together with site allocations MN8.1 and MN2.28. Site allocation MN8.2 should instead be re-allocated as a housing allocation under Policy MN2 to replace MN2.28. Alternatively, if Policy MN8 is to remain in the Local Plan, MN2.28 should become a safeguarded site and MN8.2 should instead be re-allocated as a housing allocation under Policy MN2 to replace MN2.28.

Evidence Submitted

Chapter 6 **Plan Order** Site MN8.1 **Other Documents**
Policy MN8.1 **Land at Lambshear Lane**
Respondent No 488 **Response Ref** 25 **Representor Name** Ian Brodie Browne
Organisation Name Sefton Council Lib Dem Opposition Group
Obj/Sup/Com Objection

Summary of Main Issues

Sites AS12/AS14 - These two huge sites to the west and east of Lydiate/Maghull fall within a similar category to AS17 in that they are both high grade agricultural land that is presently being farmed. To turn them over to housing is unthinkable in environmental sustainability terms. AS14 is right next to SR4.48 (Tyson's Triangle) which Sefton Council has already designated as a 'reserve' site for development in its own draft Local Plan. Bearing in mind that a further and much larger 'reserve' site (SR4.47) is the other side of SR4.48 this would have the effect of vastly increasing the size of Lydiate's population. Just developing the two reserve sites will increase Lydiate's size by 35%! What's more AS14 will develop Lydiate right up to the West Lancashire (Aughton) boundary and we are aware that West Lancs Council already have concerns about the two 'reserve' sites for this very reason. Taking the 3 sites together Lydiate would be subject to an urban extension of considerable proportions.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Site MN8.1 **Other Documents**
Policy MN8.1 **Land at Lambshear Lane**
Respondent No 637 **Response Ref** 6 **Representor Name** Ken Hopkins
Organisation Name Mactaggart & Mickel Homes Ltd
Obj/Sup/Com Objection

Summary of Main Issues

THIS IS A SUMMARY. Mactaggart & Mickel are of the view that their site, located between Moss Lane and Sandy Lane, Lydiate (Site MN8.1 in the Local Plan), should be allocated under policy MN2. It is deliverable now, is available, and is in a suitable location for development. There is a realistic prospect that the site could be delivered within 5 years and development is viable. There are no significant infrastructure requirements.

The reason this site should be allocated is that more sites will be required to meet the additional houses required as a result of the 2012 household projections being published in February 2015.

In addition, Sefton has struggled to meet its 5 year housing land requirement (paragraph 6.20 of the Local Plan). This site will help to address that shortage. Furthermore, because there has been a persistent under delivery, a buffer of 20% is required. The 2014 SHMA (paragraph 2.1) states the backlog was 1,245 units. This provides an overall requirement of 13,245 dwellings or 736 a year from 2012 - 2030. Reflecting the existing phasing of 500 units from 2012 - 2017, the figure will rise to 827 units a year from 2017 - 2030. This deficit should be addressed by the Inspector.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN8.1	Other Documents
Policy MN8.1	Land at Lamshear Lane	
Respondent No 697	Response Ref 1	Representor Name
Organisation Name Maghull Limited		
Obj/Sup/Com Objection		

Summary of Main Issues

Site SR4.47 (Local Plan ref MN8.1) clearly performs the best in relation to high frequency bus routes, and is well-located in relation to a Neighbourhood Park, but is the least accessible to a train station (3.2kms using linear footpath routes). We do not agree that 70.2 % of its area within 800m of the District Local Centre; rather we consider that around 90% of the site would be over 1,200 metres and therefore of low accessibility. Around 50% of the site is within 1,200 metres of a GP's Surgery or Health Centre.

In Green Belt terms, In relation to the other comparable sites, SR4.47 is well enclosed by existing built form and the existing Green Belt boundary varies from moderately strong to strong; on this basis the impacts are minor in relation to this Green Belt purpose. However, In terms of purpose 2: to prevent towns merging, SR4.47 is significant, as the site would narrow the gap between this part of Lydiate and Aughton Village by about 40% at its narrowest point - albeit this impact is lessened by the presence of ribbon development along Liverpool Road.

To conclude, this site is not as sustainable as the Land West Of Maghull and would have a greater impact on the purposes of including land within the Green Belt than site AS12 which Maghull Limited are promoting for development..

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN8.1	Other Documents
Policy MN8.1	Land at Lamshear Lane	
Respondent No 740	Response Ref 38	Representor Name
Organisation Name Formby Residents Action Group		
Obj/Sup/Com Objection		

Summary of Main Issues

We wish to rely on the representation of Mr John Williams [Rep No. 1026] for flood risk issue on this site.

Summary of Suggested Changes

Evidence Submitted

Policy MN8.1

Land at Lambshear Lane

Respondent No 741 Response Ref 12 Representor Name

Organisation Name Priory Asset Management LLP

Obj/Sup/Com Objection

Summary of Main Issues

Land north of Lambshear Lane, Lydiate has been safeguarded for housing development within the Local Plan. The site comprises 33ha of agricultural land in the 'narrow gap' between Lydiate and Aughton. The likely development parameters for this site have not been estimated. However a development of this size could accommodate approximately 660 dwellings at a density of 20 dwellings per hectare. This would allow for the requirement for a substantial landscape buffer as well as facilitating an on-site bus route.

The site contains some of the best and most fertile agricultural land in Sefton, consisting of a mix of grade 1, 2 and 3a farming land and the site is currently in agricultural use. Local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.

The Landscape Assessment undertaken by Ryder Landscape consultants in 2014 identified this site as being generally flat in topography and predominantly open, arable farmland with a few hedgerows to delineate the field boundaries. These characteristics are similar to the surrounding area.

The Site Assessment identifies that extending the urban boundary in this location as being a weakness. Any development in this location would weaken the character of the area and therefore development would need to be designed very sensitively. If landscaping were to be implemented to screen the development; it would have to be substantial including large areas of open space and any screening would take a number of years to become mature. This in itself would change the character of this area from being agricultural and open in nature.

The site could be accessed from several different locations. However, each would require some substantial road widening on Kenyon's Lane which may require third party land and potentially limit the level of development on site. Sefton's site selection analysis also indicates that there may be some need for additional improvements to Robbin's Island roundabout or provision of a four way light controlled junction on Liverpool Road, which also provides access to the allocated site at Kenyon's Lane (Site Ref. MN2.28). The development of this site in addition to other sites within the local area would lead to a significant impact on the surrounding network. As this site would be the last to be developed, any remaining capacity within the network may have been used by other developments. This could lead to significant improvements required on roads such as Kenyon's Lane/A59 junction. The land required to allow the improvements is currently in third party ownership.

A ransom situation could lead to the development capacity of the site being limited. The Council would require significant infrastructure as well as a public transport being supplied through the site. These improvements are significant, costly and could reduce the development parameters on site.

The site is within a 'narrow gap' between Lydiate and Aughton village. Development of the site would reduce the size of the gap by 40% at its narrowest point and significantly alter the character of Lydiate and the entrance to Lydiate off Northpoint. This would subsequently have a significant impact on the green belt within this location. The Site Assessment states that the impact would be reduced if the Kenyon's Lane site was developed first. The allocation should not need to be reliant on another site in order for its delivery to be considered acceptable.

The number of large and more complicated sites coming forward within Maghull and Lydiate later in the plan period suggests that the housing market demand in this location will not be met until well after the plan period. There is a clear argument that further housing in this location should be allocated for earlier in the plan period.

Summary of Suggested Changes

Green Belt release in other locations would be a more secure option for safeguarded land.

If the allocation is retained, it is recommended that extensive landscaping be undertaken.

Evidence Submitted

Organisation Name**Obj/Sup/Com** Objection**Summary of Main Issues**

This site has several problems relating to development:- The ground itself is frequently saturated to a very high level due to the existing watercourses not being able to take the flow from this frequently ploughed farmland. There are already flooding problems on Moss Lane caused by the existing watercourses having difficulty in taking the current flow. This flooding has been so serious on several occasions that properties on the northern boundary of this site have flooded several times since 2000. Unless the surface water system that serves this site and properties is seriously upgraded and given a free discharge point, developing this site can only make matters worse for the properties that already flood. Bear in mind that this site is higher than the properties that flood, and the properties are lower than the road in front of them, therefore water will always accumulate around those properties after this site is developed. There have previously been occurrences where this greenfield site has had so much water flowing off it that it was causing flooding to the public highway to the extent of closing the road. In view of the existing problems that local residents already have, it would be advised not to develop this site until the cause of the existing flooding is successfully removed. The site is within 250m of a potential source of flooding, and a current real world flooding problems, so may have difficulty getting flood insurance. It would therefore be deemed as logical that this site should be discounted on grounds of NPPF Ch10 Para.100

Summary of Suggested Changes**Evidence Submitted**

Chapter 6	Plan Order Site MN8.2	Other Documents
Policy MN8.2	Land adj to Ashworth Hospital	
Respondent No 406	Response Ref 4	Representor Name Peter Richards
Organisation Name	West Lancashire Borough Council	
Obj/Sup/Com	Comment	

Summary of Main Issues

West Lancashire Borough Council have concerns over the soundness of policy MN8 and the allocation of land to the north of Maghull / Lydiate at sites MN8.1 and MN2.28, in that the policy on safeguarded land and the allocations do not appear justified in the context of a Local Plan that is committed to an early review when the two allocations in question have such a harmful impact on the Green Belt. Sites MN8.1 and MN2.28, if removed from the Green Belt and allocated, would, by Sefton Council's own admission (see relevant site assessment forms), close the strategic Green Belt gap between Maghull and Aughton Village in West Lancashire by around 40%, reducing the gap to approximately 1 km. In addition, coupled with the Ashworth Hospital site further east (which, while previously developed, is also earmarked to be removed from the Green Belt), the release of this land from the Green Belt would create an area of Green Belt land between the A59 and the Ormskirk-Liverpool rail line that would ultimately become enclosed on three sides by the Maghull built-up area. As such, the new Green Belt boundary to the north of Maghull would not be a strong one, and, for the area of Green Belt remaining, would leave it very vulnerable to any proposals in the future to amend the Green Belt boundary. As such, by allocating sites MN2.28 and MN8.1, the Local Plan would effectively be facilitating the long-term (post-2030) expansion of Maghull northwards, significantly closing a strategic gap to settlements in West Lancashire.

The Council recognise that Green Belt boundaries are not sacrosanct and that, if exceptional circumstances exist, there can be justification for a Green Belt release such as that described above. However, the Council do not consider that such justification exists at this time given the fact that the Sefton Local Plan commits to an early review. Given this context, it is not necessary to include safeguarded land in this Local Plan, as the early review (carried out in the context of a wider Liverpool City Region evidence base and strategy on development needs) would be the better time to consider what land might be required after 2030 for development in Sefton.

Therefore, were policy MN8 to be deleted, site MN8.1 would immediately be removed from the Local Plan (allowing it to remain in the Green Belt), and site MN8.2 could be re-allocated as a housing allocation to replace site MN2.28, allowing MN2.28 to be removed from the Local Plan (and so remain in the Green Belt). This would be a far more satisfactory solution to the Council, given the limited harm to the Green Belt that site MN8.2 has, compared to MN2.28. The Council notes Sefton's concerns regarding market saturation were MN8.2 brought forward for development in the Plan period (see site assessment for MN8.2) but it is the Council's view that MN8.2 would create no greater competition than MN2.28 given that both are in the Maghull / Lydiate housing sub-market. Were Sefton Council or the Inspector appointed to examine the Local Plan not to agree with the Council's suggestion to delete Policy MN8 entirely, the Council would, at least, respectfully suggest that site MN2.28 could be swapped with site MN8.2 so that both the sites that the Council consider cause most harm to the Green Belt are only allocated as safeguarded land (while MN8.2 would become a full housing allocation), meaning that their status for development could still be reconsidered at the Early Review stage.

Summary of Suggested Changes

Policy MN8 should be deleted from the Local Plan, together with site allocations MN8.1 and MN2.28. Site allocation MN8.2 should instead be re-allocated as a housing allocation under Policy MN2 to replace MN2.28. Alternatively, if Policy MN8 is to remain in the Local Plan, MN2.28 should become a safeguarded site and MN8.2 should instead be re-allocated as a housing allocation under Policy MN2 to replace MN2.28.

Evidence Submitted

Chapter 6	Plan Order Site MN8.2	Other Documents
Policy MN8.2	Land adj to Ashworth Hospital	
Respondent No 643	Response Ref 4	Representor Name Chad Thompson
Organisation Name	Melling Parish Council	
Obj/Sup/Com	Objection	

Summary of Main Issues

The safeguarded site MN8.2 has a potential capacity of 350 and we would like to request that this site to be used as a preferred site and that sites MN2.30 and MN2.31 be taken out of the Local plan as preferred sites and not allocated for future development.

Melling Parish Council is currently creating a Neighbourhood Development Plan which has just received 'Designated Area' status from its Local Authority. The key objectives of the plan are to influence design, type and location of development within its parish boundary. Sefton MBC has advised that only the Local Plan can influence development on the Green Belt. Any available land in Melling is within the Green Belt but Melling Parish Council would like to exercise its right to use the powers of the Localism Act to determine where future development should be.

Following an extensive community & stakeholder engagement exercise which has been supported and funded through Locality and the Community Development Foundation a Local Plan Survey was carried out with 211 completed with 90 residents attending a consultation event at Mellings Primary School.

The consultation provided an opportunity to provide positive and negative comments on sites MN2.30, MN2.31 and safeguarded site MN8.2. There were 181 responses (see breakdown submitted with this form) that stated that if there was ever any development in the Green Belt in Melling that the safeguarded site MN8.2 was the preferred option to develop; Melling Parish Council supports this outcome. MN2.30 site has been designated 178 dwellings for development and MN2.31 has 135 dwellings allocated. Please find below for the following reasons to change the preferred site to MN8.2 rather than MN2.30 and MN2.31:

Maghull has a site (MN2.46) identified for 1400 dwellings allocated for future development and will be making improvements to infrastructure which site MN8.2 will be able to access and benefit from which will reduce the environmental harm and traffic impact compared to sites MN2.30 and MN2.31. There are plans to build a new train station in the Maghull East area which would provide public transport and infrastructure to dwellings on site MN8.2 which would reduce the traffic impact through Waddicar Lane and the Village. MN8.2 would have access to the M58 Motorway which would reduce and help mitigate the impact on the already overstretched busy country lanes.

MN8.2 site would have access to Maghulls shops, schools, retail, doctors and health care amenities will be development as part of site xxx. This will help reduce the impact on Mellings only primary school which is full to capacity and it's overstretched and limited service doctor's surgery. Developing on sites MN2.30 and MN2.31 would harm and overstretched services which would have an impact on the quality of life for those who live and work in the Village. MerseyCare NHS is applying for planning permission for a medium security mental health called the 'Scott Clinic'. The development of this site is adjacent to the safeguarded site MN8.2. Therefore any development on MN8.2 would benefit from any improvements to infrastructure and that all disruption from development sites would be in one concentrated area rather than two or three different sites which would create major traffic impact, safety issues and environmental and social harm to the village and its residents and stakeholders.

United utilities [UU] Sewer Flooding Mitigation Team have written to residents on Rock View near site MN2.31 and confirmed that they have exhausted every avenue to minimise the impact of flooding in the area. UU state they regret to inform residents that it is not possible to carry out any flood minimisation work. UU state that there are occasions where mitigation work could cause the flooding situation to worsen or move to another location causing environmental issues as a result mitigation is not an option [see attached letter for evidence]. Therefore strongly advise any development on site MN2.31 as further development would cause serious flooding harm. MerseyCare NHS own the land on site MN8.2 which they have engaged with Melling Parish Council and gone out to public consultation stating that they wish to propose this site for future residential development which support the evidence Melling Parish Council has provided in this form to change the preferred site to MN8.2 instead of MN2.30 and MN2.31 which is what the public, Melling Parish Council and MerseyCare all support.

Summary of Suggested Changes

Evidence Submitted

Chapter 6	Plan Order Site MN8.2	Other Documents
Policy MN8.2	Land adj to Ashworth Hospital	
Respondent No 697	Response Ref 2	Representor Name
Organisation Name Maghull Limited		
Obj/Sup/Com Objection		

Summary of Main Issues

The east Maghull site (MN8.2) has not demonstrated through submission of a viability report that it can provide the full range of infrastructure needed to implement the site in a sustainable way. This site is not as sustainable as the west Maghull site.

Summary of Suggested Changes

Evidence Submitted

Access Strategy, Create Consulting Engineers (March 2015)

Chapter 6	Plan Order Site MN8.2	Other Documents
Policy MN8.2	Land adj to Ashworth Hospital	
Respondent No 729	Response Ref 3	Representor Name Alison Jordan
Organisation Name Mersey Care NHS Trust		
Obj/Sup/Com Objection		

Summary of Main Issues

Generally supports the principle of allocated Safeguarded Land in Sefton to meet the longer term development needs of the borough. While welcoming the clear recognition that policy MN8 provides that its land should be released from Green Belt and agrees that such action would not cause any significant harm to the purposes of Green Belt, the Trust considers that the site should be allocated for housing in recognition of the shortfall against the Full Objectively Assessed Needs. The site is suitable for housing development, will result in significant public benefit to mental healthcare in Merseyside resulting from its disposal and there is an absence of constraints. The site is deliverable and is capable of making a notable contribution to the housing supply within the next five years and across the plan period.

Summary of Suggested Changes

Object 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. Further land should be Safeguarded to meet the longer term development needs of the borough and ensure that Green Belt boundaries will not need to be re-visited at the end of the plan period.

Evidence Submitted

Chapter 6	Plan Order Site MN8.2	Other Documents
Policy MN8.2	Land adj to Ashworth Hospital	
Respondent No 729	Response Ref 7	Representor Name Alison Jordan
Organisation Name Mersey Care NHS Trust		
Obj/Sup/Com Objection		

Summary of Main Issues

Site MN8.2 is wholly owned by the Mersey Care NHS Trust. It comprises 15.38 ha of land located to the east of Villas Road, the main staff and visitor vehicular access to the Ashworth complex from School Lane. The subject site lies between HMP Kennet and the M58 motorway. It is a swathe of open land comprising a number of fields, some of which are used informally by a local farmer; there is no agricultural tenancy in place. The topography of the land itself is generally flat. There is also substantial tree planting to the boundaries, particularly the south-eastern boundary. Adjacent to this boundary, the M58 motorway and the elevated motorway junction provide a strong physical boundary to the site and a very effective visual screen which limits views into and across the land. Some residential development lies immediately to the east of the open parcel of land, effectively containing the site.

The area of land to the south of School Lane is currently in agricultural use but is allocated in the emerging local plan as a strategic site (MN2.48) and is expected to be developed as a mixed residential and employment development. It is likely to contain a local centre amongst other facilities, further improving the range of facilities in the local area. A report is submitted that sets out the Mersey Care NHS Trust's needs for investment in its facilities. This includes the relocation of the Scott Clinic from St Helens to within the Ashworth Hospital site. Site (MN8.2) comprises surplus land to the south of HMP Kennet is capable of accommodating up to 310 new dwellings to assist in the cross-funding of the Estate programme. The site will meet a number of key housing objectives set out in the National Planning Policy Framework, specifically those set out in paragraphs 14, 21, 30, 47 and 50. The supply of new homes through large scale development, such as sustainable extensions, is also encouraged. The site will also meet the transport objectives contained in paragraphs 29, 30 and 34.

The Council has undertaken an assessment of the housing sites and safeguarded land included within the Local Plan, including the Trust's land at Maghull. It considers suitability of the site for redevelopment in terms of its accessibility, site specific or wider benefits that would be secured by redevelopment, constraints that would limit redevelopment, Green Belt purposes. It concludes that the subject site is well contained and is not subject to any significant constraints that would affect development. The report suggests that there are deliverability issues with bringing the site forward; limited benefits delivered by the development of the land and concludes that the site would be less accessible than adjacent sites. As a consequence, it concluded that it is most appropriate to allocate the site as Safeguarded Land. The Trust does not agree with these conclusions. Development of the site is capable of delivering a number of important social, environmental and economic benefits which contribute to the delivery of sustainable development: Development will allow up to 300 high quality residential dwellings and a new secure in-patient facility to be delivered on the Trust's land in Maghull. The site is deliverable, being owned solely by the Trust, and capable of making an important contribution to Sefton's housing requirements across the plan period. The disposal of the site to a housebuilder offers the potential to generate a substantial capital receipt. As the Trust is not a commercial organisation, this sum will then be reinvested back into mental health care facilities and provision by the Trust and will be used to deliver the Trust's Estate Strategy, including new and improved high quality health facilities across Merseyside. This includes the relocation of the Scott Clinic onto the Parkbourn site, with the associated employment and economic benefits to Sefton of doing so. While disposal and redevelopment of the site in Maghull is not essential to delivering the strategy it will contribute significantly to improve the economy, efficiency and effectiveness of the Mersey Care NHS Trust Estate.

The construction sector plays an important role as a provider of local employment within the Sefton economy, with almost 8% of all economically active residents in employment working within the construction industry. The construction of 274 new homes and the new secure inpatient facility (Scott Clinic) would equate to an average of 74 direct full-time equivalent (FTE) temporary construction jobs on-site annually during the estimated construction period of 5 years. Where required, contributions towards transport infrastructure will be made. This could include financial support towards the proposed Maghull North railway station and associated park and ride facility, and accessibility upgrades to the 'missing' slip roads at Junction 1 of the M58 motorway. It is estimated that circa 18% of the 900 staff currently working at Ashworth reside in Maghull, with over 80% commuting into the area. By enhancing local housing choice it is anticipated that the site will encourage a greater proportion of staff to both work and live in Maghull. The site will provide new landscaped public open spaces, recreation areas, wildlife habitats and ecological areas. This will offer considerable amenity benefit to both existing and new residents of Maghull as well as supporting nature conservation and enhancement and to address existing groundwater flooding issues identified by the SFRA. A bespoke Climate Change Mitigation and Adaptation strategy will be developed (subject to allocation) to ensure that sustainability is identified and integrated at the very outset of the development process.

It is recognised that the total number of dwellings capable of being delivered across the site and the proposed strategic allocation to the south would result in a significant expansion of Maghull. However, it should be noted that there was previously an outline planning permission for residential development (300 dwellings) on part of the land. The Council has proposed the strategic allocation of the East of Maghull (Site ref. MN2.46) whilst that permission was extant thereby recognising that the area is capable

of delivering a higher quantum of housing development overall. The current masterplan for the Ashworth land shows c.300 dwellings ; there is no net increase in dwellings compared to earlier iterations of the plan. In identifying the site as Safeguarded Land, the Council has clearly accepted that it will be developed for housing at some point. Allocating both the Trust's site and the strategic site is potentially beneficial and would provide a number of opportunities that would not otherwise be realised. Together the sites offer the potential to achieve a well-planned and sustainable, mixed-use urban extension with permanent and defensible boundaries (such as the M58) forming the western boundary of the town. The combined sites will be capable of providing sufficient land to maintain a deliverable housing supply in Maghull, and make a significant contribution to that of the Borough, over the plan period and beyond. By making sufficient housing land available, through allocation of the Trust's site in conjunction with the strategic site, the need for a future early review of the Green Belt boundaries in Maghull can be avoided.

The amount of development proposed within this part of Maghull will also create a critical mass of development with financial contributions of a scale to deliver important strategic infrastructure improvements and a population capable of supporting a range of local services, further adding to the sustainability of the location. The Council's Site Assessment confirms the site is not subject to any constraints preventing development, with no significant constraints identified. The draft development framework for the site has taken account of the extent of the area affected by groundwater drainage issues and proposes to locate uses which are less vulnerable to flooding, such as greenspace, within these areas. DEFRA's Magic mapping service does not show the subject site as agricultural land and the Council's own Agricultural Land Classification Report only covers sites which were proposed to be allocated for future development. The Council's Site Assessment confirms that the site comprises 'best and most versatile' agricultural land (i.e. Grade 1 – 3a) but that this classification may not be accurate at the site specific level classification. In any event , it is viewed as a minor constraint. There is a significant amount of high quality agricultural land available within the borough and the loss of a relatively small amount will not have a significant effect on its own. Furthermore, whilst the site is farmed on an informal basis, it does not form part of an agricultural holding and its loss will not affect the viability of any agricultural holding. If a loss of best and most versatile land will result it is also important to balance that against the urgent requirement to identify and deliver sites to accommodate housing, a Government priority.

Whilst it is possible that there may be some ecological interests within the site there are no statutory designations and those interests can be identified and appropriate mitigation measures incorporated through the normal development process. The illustrative masterplan demonstrates how the site can be developed to contribute to biodiversity with the existing trees, hedgerows and watercourses / pond retained within a generous green network maintaining linkages with the wider greenspace network and providing opportunities for maintaining an ecological corridor adjacent to the route of the M58. There are opportunities to enhance the biodiversity of the site through provision of suitable habitat areas. The development framework proposes a substantial buffer between the nearest noise source, the M58, and the nearest dwellings. This will minimise the impact on those dwellings, with additional mitigation in the form of acoustic fencing and glazing provided if necessary. Any localised impact from the motorway in relation to air quality is capable of being addressed through the site layout, by incorporating appropriate buffers if necessary. The Council's Site Assessment suggests this is a moderate constraint and certainly not an issue that would prevent development.

The site also potentially offers a unique opportunity to deliver a renewable energy solution as part of the urban expansion of the town. The site is 'deliverable' sites are defined by the National Planning Policy Framework. There are no legal or ownership problems, such as multiple ownerships, ransom strips, tenancies or operational requirements of landowners. The land is not affected by any engineering, environmental or other technical constraints that cannot be addressed through the planning and design process, and appropriate mitigation measures will be employed where necessary in respect of ground conditions, flood risk, drainage and ecology. It is expected that the site would be of particular interest to a major house builder(s) with a proven track record in developing large, high quality housing schemes. Allocation of the site within the Local Plan would provide certainty to the Trust and enable it to engage with potential housebuilders. Informal discussions with housebuilders suggest a strong interest in the site. A significant proportion of the site could therefore come forward in the first 5 years of the plan period, with between 100 – 125 dwellings being considered a realistic estimate of delivery rates over that time. The remaining dwellings would be delivered over the course of the subsequent 5 years.

Summary of Suggested Changes

Evidence Submitted

Site Advocacy Document

Chapter 6	Plan Order Site MN8.2	Other Documents
Policy MN8.2	Land adj to Ashworth Hospital	
Respondent No 741	Response Ref 8	Representor Name
Organisation Name Priory Asset Management LLP		
Obj/Sup/Com Objection		

Summary of Main Issues

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.

Summary of Suggested Changes

Delete Site Ref MN8.2.

Evidence Submitted

Chapter 7	Plan Order Chapter 7	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 553	Response Ref 18	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 7	Plan Order Chapter 7	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 553	Response Ref 14	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. It may be worth referencing the Superport Liverpool website.

Summary of Suggested Changes

Evidence Submitted

Chapter 7	Plan Order Chapter 7	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 553	Response Ref 12	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. 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 and container feeder services to Dublin, Belfast and Glasgow and from English Channel Ports 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/dbimngs/FINAL%20Offshore%20wind%20energy%20hub%20\(2\).pdf](http://visitliverpool.nmdemo.net/dbimngs/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 7	Plan Order Chapter 7	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 723	Response Ref 10	Representor Name Laurence Rankin
Organisation Name Sefton Green Party		
Obj/Sup/Com Comment		

Summary of Main Issues

It can be unrealistic to expect long term worklessness to be resolved by moving people straight into orthodox full time employment. This is where the intermediate labour market and the third sector can play a key role in the transition from long term unemployment to work. The Green economy offers many opportunities for this such as community regeneration projects, and environmental projects, through organisations such as Groundwork and the Wildlife Trusts. Sefton could work with others such as Business Link to provide business start up clubs and facilities and finance, and ensure that Sefton leads the way in supporting new enterprise through purchase and promotion of products and services.

Summary of Suggested Changes

Evidence Submitted

Chapter 7	Plan Order Chapter 7	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 723	Response Ref 11	Representor Name Laurence Rankin
Organisation Name Sefton Green Party		
Obj/Sup/Com	Comment	

Summary of Main Issues

To some extent the definition of employment land is misleading in that it tends to ignore or undervalue the close mixing of employment and residential areas. There is a need for some segregation to protect the public, but equally there are opportunities to share facilities and services where suitable employment and homes are side by side. Segregation can also lead to degradation of employment land, which is isolated from the community, by poor work practices leading to environmental pollution and health and safety risks. Employment land needs to be identified as a community asset and subject to high standards of visual and structural amenity, rather than “out of sight, out of mind”.

Summary of Suggested Changes

Evidence Submitted

Chapter 7	Plan Order Chapter 7	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 740	Response Ref 8	Representor Name
Organisation Name Formby Residents Action Group		
Obj/Sup/Com	Objection	

Summary of Main Issues

Overview of the current economic performance of Sefton, with comparison with other Merseyside authorities. A critique of the Local Plan’s [and the Sefton Economic Strategy’s] approach to these challenges. Consideration if conditions for economic growth, the structure of Sefton’s economy and the knowledge economy. This section sets out a number of recommendations/conclusions.

Set out in Chapter 9 [pages 20-28] of the representation.

Summary of Suggested Changes

Evidence Submitted

Chapter 7 **Plan Order** Policy ED1 **Other Documents**
Policy ED1 **The Port and Maritime Zone**
Respondent No 329 **Response Ref** 1 **Representor Name** Michael Collier
Organisation Name Wildlife Trust for Lancashire, Manchester & North Merseyside
Obj/Sup/Com Objection

Summary of Main Issues

Seaforth Nature is part of the Mersey Narrows and North Wirral Foreshore Special Protection Area, which is designated for the wintering and migratory birds it supports and for breeding Common Terns. It is the requirements of these species- the SPA 'features' - that need to be compensated for by the provision of alternative habitats of sufficient extent and quality and in a appropriate location.

Summary of Suggested Changes

Policy ED1 (2c) – Amend the wording of 2c along the following lines:

c) Incorporates suitable compensatory habitat, which demonstrates the same functions as Seaforth Nature for those species which are 'features' of, or part of the non-breeding 'assemblage', of the Mersey Narrows and North Wirral Foreshore SPA . Compensatory habitat must be of sufficient extent and quality and be provided in a suitable location to ensure that the requirements of the species displaced by any development are met in full.

Note: Without this amendment it is considered that the policy would not make clear the precise requirements of the Habitats Regulations.

Evidence Submitted

List of Supporting Information:

- Changing plant life of Hightown meadow on the Sefton Coast, Merseyside
- Ainsdale Hope School playing fields – further ecological studies
- Ainsdale Hope School playing-field – an ecological survey
- Sand Lizard records, Upton Dunes 2014
- Locations of Sand Lizards, Upton Dunes 2014

Chapter 7 **Plan Order** Policy ED1 **Other Documents**
Policy ED1 **The Port and Maritime Zone**
Respondent No 550 **Response Ref** 12 **Representor Name** Peter Brown
Organisation Name Merseyside Civic Society
Obj/Sup/Com Objection

Summary of Main Issues

The Plan does not get to grips with the possible need for land and premises, beyond the immediate port area, which might be needed to support substantial port expansion and the expansion of its capacity by the use of larger vessels. Although there are proposals to grow the port west of the A565, the Plan hints that further accommodation might be necessary, but does not explain how this can be achieved, and the potential areas which might be safeguarded.

Summary of Suggested Changes

Evidence Submitted

Chapter 7 **Plan Order** Policy ED1 **Other Documents**
Policy ED1 **The Port and Maritime Zone**
Respondent No 550 **Response Ref** 10 **Representor Name** Peter Brown
Organisation Name Merseyside Civic Society
Obj/Sup/Com Comment

Summary of Main Issues

The Society is supportive of the role of the Port of Liverpool in underpinning the regional economy.

Summary of Suggested Changes

Evidence Submitted

Chapter 7 **Plan Order** Policy ED1 **Other Documents**
Policy ED1 **The Port and Maritime Zone**
Respondent No 568 **Response Ref** 3 **Representor Name** Peter Greener
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

The Peel Ports claims of local and regional employment associated with Post Panamax traffic appears at variance and seems to ignore the multipliers associated with B2 and B8 jobs.

The hi-tech container handling equipment to be used at the port (Liverpool 2) calls for highly qualified operators and control room staff. The need for low skilled workers will not be met by the addition of two large berths.

The fact that the Irish Sea is outside any ECA and numbers of ship movements (which in some years pass the criteria) for monitoring for air pollution within 1 kilometre of the docks, the council seem only to agree to measure up to 250 metres.

Switch Island must be on course to become one of the 'hottest' roundabouts in the country!

One wonders at the benefits that the residents of Bootle will get from the SuperPort, so loved by certain councillors! I hope the only thing in it for residents will not be a lungful of exhaust emissions from passing HGVs as operators move their boxes to their factories.

The Access to Port of Liverpool Report dated Nov 2011 points to the large number of HGVs using Dunnings Bridge Road. The Entry to the Port report shows an average of about 350 HGVs enter or leave the port every hour. And this is predicted to rise to 800 by 2030 or 750 if investment in freight infrastructure happens. I understand that the majority of HGVs use Dunnings Bridge Road. Given the recent criticism of diesel vehicles and pollution one can only wonder of the effects on a Ward (Linacre) . With very high levels of early death rates.

Summary of Suggested Changes

Evidence Submitted

Chapter 7 **Plan Order** Policy ED1 **Other Documents**
Policy ED1 **The Port and Maritime Zone**
Respondent No 586 **Response Ref** 1 **Representor Name** S Wright
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

The Old Road, which includes Switch Island, Copy Lane and Dunnings Bridge Lane, is a residential area and is not suitable for any dock traffic, especially lorries carrying dubious materials which will be mixing with ordinary cars. Apart from the noise and pollution this is a recipe for disaster and an enormous accident waiting to happen.

More heavy traffic on Dunnings Bridge Road will mean more wear and tear, leading to more expensive roadworks. Businesses on Dunnings Bridge Road could also suffer as people will find it very difficult to cross over to Aldi, Matalan, Dunelm Mill and the Odeon Cinema and most will not bother taking their life in their hands.

Vehicles coming out of Copy Lane will not be able to gain access onto Dunnings Bridge Road easily due to the continual stream of container traffic plus cars etc. This will lead to hold ups and longer lines of traffic along Copy Lane.

Some parents on this estate walk their children to school over Dunnings Bridge which is already dangerous to cross and will now be almost impossible.

The area around here has latered drastically from what it once was - countryside into a Dock road, no matter what fancy name you give it such as Atlantic Park. As the area area has changed so much from what it once was I think we should have a reduction in our Council Tax bills.

Summary of Suggested Changes

Evidence Submitted

Chapter 7 **Plan Order** Policy ED1 **Other Documents**
Policy ED1 **The Port and Maritime Zone**
Respondent No 594 **Response Ref** 3 **Representor Name** Peter Cushion
Organisation Name Wirral Council
Obj/Sup/Com Comment

Summary of Main Issues

Wirral Council seeks further clarification that policies for the port and maritime zone, for minerals and for pollution and hazards will also apply to cross river communities in Wirral (a principle that has been accepted in some of the supporting documentation), which could be achieved by amending Point 1.e of Policy ED1 The Port and Maritime Zone.

Summary of Suggested Changes

Amending Point 1.e of Policy ED1 The Port and Maritime Zone to read:

“Appropriate mitigation is included that ensures that impacts from noise, dust, smells or other forms of pollution on the amenity of other occupiers within the area and on adjacent communities, including those outside the Borough, are mitigated and minimised, and”

Evidence Submitted

Chapter 7 **Plan Order** Policy ED1 **Other Documents**
Policy ED1 **The Port and Maritime Zone**
Respondent No 594 **Response Ref** 10 **Representor Name** Peter Cushion
Organisation Name Wirral Council
Obj/Sup/Com Comment

Summary of Main Issues

Seaforth Nature Reserve

The suggestion that the port and maritime policy should consider the potential impact on designated European sites has only been applied to Seaforth Nature Reserve.

It is therefore suggested that Policy ED1 - The Port and Maritime Zone, is further amended to require all port-related proposals to demonstrate no likely significant effects on internationally important nature sites, which could be achieved by amending Point 1.f of Policy ED1 The Port and Maritime Zone.

Summary of Suggested Changes

Amending Point 1.f of Policy ED1 The Port and Maritime Zone to consider the impact on Internationally important nature sites generally, for example by deleting the words “Seaforth Nature Reserve” from the end of point 1.f, (as Seaforth is already fully addressed under Point 4) or by amending Point 1.f of Policy ED1 to read:

“It can be demonstrated that there is no likely significant effects on internationally important nature sites”

Evidence Submitted

Chapter 7 **Plan Order** Policy ED1 **Other Documents**
Policy ED1 **The Port and Maritime Zone**
Respondent No 680 **Response Ref** 4 **Representor Name** J Edgar and MJ Joyce
Organisation Name Reclaim Community
Obj/Sup/Com Objection

Summary of Main Issues

Summary of Suggested Changes

Evidence Submitted

Summary of Main Issues

Objection to policies ED1 & IN2 part2

Our references include LocalPlan references: -

- para 3.18 / 3.19 / 3.35 / 3.51
- paras 4.10 / 4.21 / part C para 6
- paras 5.7 / 5.17 / 5.18 / 5.42
- paras 7.1 / 7.6 / 7.7 / 7.9 / 7.10 / 7.11
- paras 9.17 / 9.21 /
- paras 9.23 (add in A5058 to correct the current Strategic Freight Priority Route)
- related paras in Infrastructure Delivery Plan 2014

Our view is that these policies should be suspended until there is full, open, transparent consultation with all local Sefton communities affected by any further port development prior to the stated 'early review of the Local Plan' as in paras 5.42 & 7.11.

We do so for the following reasons: -

We find access to comprehensive information has been very difficult and fragmented and what there has been made available is lacking in detail.

Public Monies

We have found so far that public money devoted to the Port expansion scheme includes:

- £35m dredging the estuary – RGF
- £230m support for economic growth – LCR/LEP/LGF
- £300m increase access to Port of Liverpool – Autumn December 2014
- £565m Total Public Money, so far known!

Land Assembly

We have calculated from 'LCR Superport Centric Logistics' (undated marketing brochure) a total of 9,585,000 square feet of logistics space.

In Sefton of that space at Port of Liverpool (POL) 100,000 square feet

Planned operation port expansion to Derby Road 370,000 square feet A5036 Dunningsbridge Road Corridor 190,000 square feet

So far Sefton Total 660,000 square feet

In addition Peel Ports recently submitted an application for a further 48 ha site in Green Belt Land at junction M57 and M58 at Switch Island in Netherton. We understand this has been subsequently withdrawn as premature.

We note the Land Assembly Strategy is essentially Employment Land from Super Port Action Plan 2011-2020 we calculate a projected jobs total of some 18,350 across the six local authorities in the LCR: this excludes the Manchester Ship Canal Sites.

Logistics is a euphemism for warehousing and distribution. Jobs are sorters, pickers, packers, and movers associated with endemic, low skill, low pay, insecure work. That to us means labour agency recruitment, zero hour contracts, part time or shift work, with minimum pay, punitive T & c of employment, if not 'self employment' sub contractors.

Access to Port

The Access to Port Study none technical study- November 2011 presents packages of interventions including widening of the Dunningsbridge Road/ Church Road / Princess Way corridor A5036.

Local Plan policy ED 1 part 3 further indicates the possibility of an additional new road. We believe this anonymous new road to be the unpublished plan to construct a new road from the Switch Island to Thornton By Pass, newly constructed, Brooms Cross Road A5758 through the Rimrose Valley Country Part to Seaforth Centre at A5036 Princess Way.

The overriding impelling drive is apparently to focus on road /highway development for most traffic to the Port.

Yet another finding in this summary report was the spare capacity on the rail network that can meet Peel Ports needs. The main constraint to further development of inter modal rail freight services is the limited current terminal capacity within the Port itself!

But that terminal capacity will directly affect the balance between road versus rail haulage, (More rail less Road). It is therefore absolutely essential for our local communities that rail freight is maximized and prioritized over all highway improvements. To reduce as far as possible over reliance on our roads.

Area of Pressure

The access study summary further identifies the effect of Port expansion for the 'local transport network' complaining amongst other matters: -

- current highway congestion
- local network serving local communities
- commuter driving to Liverpool City Centre,

This together with the drive for regeneration and the need to use national routes (TERN) creates an area of pressure, illustrated by a square on a map: -

- o From M58 to North of the Dunningsbridge / Church / Princess Way corridor
- o North to South A565 Derby Road
- o South of A5058 Millers Bridge / Balliol Road / Queens Drive / M57 Junction

This encompasses communities of Bootle / Seaforth / Waterloo / Litherland & Netherton living in the area of pressure.

Port operation land incorporates the former Dock Road / Regent Road to Derby Road A565 frontage. Opposite that Port frontage is demarked in the DLP map as primarily industrial area – undeveloped, under developed old industrial sites. Small pockets of former council housing faces the A565 and is left to intolerable conditions.

Thousands of residents will be affected by this economic growth. The only opportunity we have had to voice our concern was to attend the Peel Ports Consultation Day in 2011 a show of pretty pictures and dense impenetrable reports and nothing since, despite Peel Ports and Atlantic Gateways acknowledged multiple conferences and meetings with businesses and investors, there so-called stakeholders. Of course we residents are not seen as stakeholders. LCR/LEP regional deal with Government 5th July 2012 estimated impact 'improving sustainable access to POL and associated development sites in South Sefton is an essential part of the master plan.'

The governments growth deal for LCR/ LEP 7/7/2014 commits the LEP and its partners to take a more proactive role in consultation on

- long term rail planning
- long term strategic road network planning
- and a co-ordinating role between the 6 constituent local authorities

There has been no consultation with the people most affected. Given our evidence above we believe this justifies suspension of policies ED 1 / 2/ 3 allow a full programme of public meetings of full open and transparent information, to include all of the studies affecting these matters and prior to the early review of the local plan.

Summary of Suggested Changes

Evidence Submitted

Chapter	7	Plan Order	Policy ED1	Other Documents
Policy	ED1	The Port and Maritime Zone		
Respondent No	694	Response Ref	1	Representor Name Warren Marshall
Organisation Name	The Mersey Docks and Harbour Company			
Obj/Sup/Com	Support			

Summary of Main Issues

We support the Policy in terms of the acknowledgement it provides that development and restructuring will be permitted within the Port and Maritime Zone and we can confirm the accuracy of the land use designation upon the Proposals Map. We are pleased that the Policy properly reflects the aspirations within the Mersey Ports Master Plan relating to the expansion of the operational port to the A565 subject to a number of criteria being met. Likewise, the Policy acknowledges the circumstances relating to the expansion of the operational port onto all or part of the Seaforth Nature Reserve (subject to consideration under the Habitats Directive); this also forms a key land use expansion element of our Port Master Plan.

Summary of Suggested Changes

Evidence Submitted

Chapter 7	Plan Order Policy ED1	Other Documents
Policy ED1	The Port and Maritime Zone	
Respondent No 700	Response Ref 2	Representor Name Kate Wheeler
Organisation Name	Natural England	
Obj/Sup/Com	Support	

Summary of Main Issues

Natural England has no further comment to make other than to welcome the amendments that have been made to Policy ED1: The Port and Maritime Zone in chapter 7 of the Economic development and regeneration with regard to the protection of Seaforth Nature Reserve, particularly the fact that reference to Seaforth has been removed from Part 1 of the policy.

Natural England suggests that explanation of this change should be outlined in the Habitats Regulations Assessment.

Summary of Suggested Changes

Evidence Submitted

Chapter 7	Plan Order Policy ED1	Other Documents
Policy ED1	The Port and Maritime Zone	
Respondent No 736	Response Ref 1	Representor Name Mark Basnett
Organisation Name	Liverpool City Region LEP	
Obj/Sup/Com	Support	

Summary of Main Issues

Liverpool City Region LEP has been consulted by Sefton Council in the development of the Sefton Local Plan.

The LEP has set out through its work on SUPERPORT the opportunity to attract investment in logistics facilities to the City Region due to the City Region's attractive port and population centric location coupled with investment in deep water container facilities at the port.

We fully agree with the assertion in 7.10 of the Local Plan that the Port expansion will create significant job opportunities for both Sefton residents and for communities across the Liverpool City Region, both directly at the Port and through a wide range of other businesses which depend on goods brought in and out of the Port.

We also agree that a consequence of this growth is that there will be a significant increase in the demand for high quality employment land across the Liverpool City Region. There is ample evidence of demand for large logistics sites with good access both locally and regionally and we anticipate this demand will be further stimulated by the expansion of the port. This is supported by research conducted by NAI Global in 2014 in their Superport Market Study on the Demand and Supply of Land.

Summary of Suggested Changes

Evidence Submitted

Chapter 7 **Plan Order** Policy ED1 **Other Documents**
Policy ED1 **The Port and Maritime Zone**
Respondent No 736 **Response Ref** 2 **Representor Name** Mark Basnett
Organisation Name Liverpool City Region LEP
Obj/Sup/Com Support

Summary of Main Issues

We welcome the proposal at 7.11 that the scope for meeting this need will be assessed at the sub-regional level and the timetable for reviewing sub-regional employment needs set out at paragraph 4.42. Given the economic importance of this issue to the economy of both the Borough and the City Region, we welcome the Council commitment to an early selective review of this part of the plan to react to the consequences of such a decision.

Liverpool City Region LEP is committed to working in close collaboration with Sefton Council to help inform this review and welcomes the opportunity to do so.

Summary of Suggested Changes

Evidence Submitted

Chapter 7 **Plan Order** Policy ED1 **Other Documents**
Policy ED1 **The Port and Maritime Zone**
Respondent No 740 **Response Ref** 11 **Representor Name**
Organisation Name Formby Residents Action Group
Obj/Sup/Com Objection

Summary of Main Issues

Assessment of the Liverpool2 development at Seaforth, the impacts on local employment opportunities, GVA in Sefton, access and traffic, pollution, the Seaforth Nature Reserve and regeneration.

Set out in Chapter 9 [pages 50-61] of the representation.

Summary of Suggested Changes

Evidence Submitted

Chapter 7 **Plan Order** Policy ED1 **Other Documents**
Policy ED1 **The Port and Maritime Zone**
Respondent No 882 **Response Ref** 9 **Representor Name** Leslie James Baxter
Organisation Name
Obj/Sup/Com Comment

Summary of Main Issues

The Local Nature Reserve at the Royal Seaforth dock has the highest number of cormorants on the coast and this nature reserve could be lost as the Port is developed. Every attempt must be made to preserve this reserve as it does not take much land off the Port.

Summary of Suggested Changes

Evidence Submitted

Policy ED1	The Port and Maritime Zone
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Respondent No 937	Response Ref 1	Representor Name S Wright
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Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

Old Roan, which includes Switch Island, copy lane and Dunnings- bridge road, is a residential area not suitable for dock traffic (mostly large container lorries carrying dubious materials) which will be mixing with ordinary cars etc. Apart from the pollution this is a recipe for disaster and an enormous accident waiting to happen. More heavy traffic on Dunnings bridge road will mean more wear and tear, so more roadworks (expensive) businesses on Dunningsbridge could suffer as people will not find it easy to cross over to Aldi, Matalan, Dunelm Mill and the Odeon etc and most will not bother taking their life in their hands.

Vehicles from copy lane will not be able to gain access onto Dunningsbridge road easily due to the continual stream of containers and ordinary traffic.

Some parents on this estate walk their children to St Benedicts School and Ambrose Barlow school on copy lane over on the other side of Dunningsbridge road, which is already dangerous to cross and will now be almost impassible.

The area round here has altered drastically from what it once was- countryside into a dock road, no matter what fancy name you give it (Atlantic Way!) How about a cut in Council Tax as the area has changed so much from what it was. (This was suggested folk could do this a few years back in one of the little booklets given out with the Council Tax bills)

Summary of Suggested Changes

Evidence Submitted

Policy ED2	Development in town, district and local centres, local shopping parades and outside defined centre
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Respondent No 361	Response Ref 3	Representor Name A D Fraser
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Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

Formby Village has always been the centre of the local community. Formby Village plays an important part in defining the character of the town and creating a Healthy Community. However, like many town centres new technology and changing shopping patterns has affected footfall. The framework document says "where town centres are in decline, local planning authorities should plan positively for their future to encourage economic activity." Unfortunately the Local Plan will have detrimental effect on Formby Village.

Currently the Village has only approximately 700 parking spaces. The council are desperate to convert the remaining 'free' parking place to fee paying spaces. Currently there are times when it is impossible to shop in the village because of a lack of parking. The building of an extra 1000 houses will put further pressure on the village in terms of parking and traffic congestion. Site MN2.141 could have offered some extra parking since a site access is planned adjacent to the Furness Rd. Car Park.. The Local Plan should address this problem. The failure of the council to actively promote a Neighbourhood Plan means that local input into the development of the Village has been limited as far as the planning process is concerned.

The local plan seeks to promote substantial out of town retail development without ever considering the impact on Formby Village. It seems that site (MN2.48, North of the Industrial Estate) is not viable without a retail component (as yet unspecified). The viability Study by Keppie Massie — Local Plan Community Viability Study p. 161, suggests site (MN2.49, South of the Industrial Estate) will only be viable with 11,802 sq. Metres of retail and a public house of 735 sq. Metres. This is more than the 2,500 sq. Metres required to trigger an Impact Assessment under the policy framework. Sefton have carried out no research into how such out of town retail development would affect the village. This plan is in excess of the plans threshold figure. These developments require considerable mitigation as does and so the retail component is likely to increase. The Local Plan will have serious implications for the long-run survival of Formby Village as a retail centre. Therefore the Plan fails to ensure the Vitality of the Town Centre.

Summary of Suggested Changes

Evidence Submitted

Chapter 7	Plan Order Policy ED2	Other Documents
Policy ED2	Development in town, district and local centres, local shopping parades and outside defined centre	
Respondent No 490	Response Ref 3	Representor Name
Organisation Name Aintree Retail Park Limited		
Obj/Sup/Com Objection		

Summary of Main Issues

Aintree Retail Park Limited object to the proposed floorspace thresholds and catchment areas for requiring an impact assessment from retail, leisure and other town centre uses in Policy ED2 part 3.

No evidence has been provided that sets out the rationale for the proposed impact assessment thresholds of 200 sqm, 300 sqm and 500 sqm, which are substantially lower than the default national floorspace threshold of 2,500 sqm (NPPF paragraph 26). Equally, no evidence has been provided for the proposed 800m catchment area around district and local centres where the lower thresholds will apply. In the absence of this information, it is not possible to determine whether these locally set floorspace thresholds are “proportionate”, in line with NPPF paragraph 26.

Such justification would normally be found in the supporting text, a Supplementary Planning Document or in an evidence base study. However, no such explanation has been provided in the Local Plan, whilst the Sefton Retail Strategy Review Update 2012 does not suggest any impact assessment thresholds.

The only evidence available is in Section 8 of the Sefton District Centres, Local Centres and Shopping Parades Study May 2012. This suggests that an acceptable walk time distance around district and local centres and shopping parades should ideally be 500m. 500m is the distance that has been used in the walk time analysis of centres and parades. However, it is not clear why the Council then has arrived at a higher distance of 800m for the proposed catchment areas around district and local centres in Policy ED2 part 3. In addition, the District Centres, Local Centres and Shopping Parades Study makes no reference to any suggest impact assessment thresholds.

The Council should therefore clarify the reasoning behind this approach.

Summary of Suggested Changes

Aintree Retail Park Limited request that the evidence and/or justification behind the proposed impact assessment thresholds and catchment areas in Policy ED2 part 3 be produced and made available for public consultation.

Evidence Submitted

Chapter 7	Plan Order Policy ED2	Other Documents
Policy ED2	Development in town, district and local centres, local shopping parades and outside defined centre	
Respondent No 490	Response Ref 1	Representor Name
Organisation Name Aintree Retail Park Limited		
Obj/Sup/Com Objection		

Summary of Main Issues

Aintree Retail Park Limited object to the proposed lack of a policy relating to Aintree Racecourse Retail Park, which is shown as undesignated “white land” on the proposed Policies Map.

Currently, UDP Policy R9 part 3 (Edge-of-centre & out-of-centre retail development and key town centre uses) designates Aintree Racecourse Retail Park as a “Retail Park” on the Proposals Map and states that: For out-of-centre retail developments which meet the above requirements [parts 1 and 2 of Policy R9], sites within the following Retail Parks should be considered before any other out-of-centre location: Aintree Racecourse Retail Park, Aintree; Grand National Retail Park, Ormskirk Road, Aintree; Switch Island Leisure Park, Dunnings Bridge Road, Netherton; and Meols Cop and Kew Retail Parks, Southport.

No evidence or reasoning has been provided by the Council to justify why this policy is proposed to be deleted and not replaced.

The absence of an equivalent policy in the Local Plan effectively means that Aintree Racecourse Retail Park will no longer be given any degree of priority over other edge of/out of centre sites. Given the significant level of investment that Aintree Retail Park Limited have made, together with the number and range of retailers that are located there and the scale of employment that is generated for Sefton’s residents, it is disappointing that this will weaken the existing position and potentially put the retail park at risk of competition with arguably less appropriate development proposals. Aintree Retail Park Limited would contend that Aintree Racecourse Retail Park has actually strengthened its offer since the UDP was adopted.

Aintree Retail Park Limited would be concerned if an alternative out-of-centre retail development not listed above were to jeopardise the future strength of Aintree Racecourse Retail Park as a result of this policy being omitted from the Local Plan. It is therefore requested that UDP Policy R9 part 3 be re-instated and the ‘status quo’ be maintained.

Summary of Suggested Changes

Aintree Retail Park Limited request that UDP Policy R9 part 3 and its designation of Aintree Racecourse Retail Park as a “Retail Park” on the Proposals Map be carried forward into the Local Plan and its Policies Map.

It is suggested that the new policy (which itself could be incorporated into proposed Policy ED2 between parts 3 and 4) should read:

For out-of-centre retail development which meets the requirements of Policy ED2, sites within the following Retail Parks should be considered before any other out-of-centre location: Aintree Racecourse Retail Park, Aintree; Grand National Retail Park, Ormskirk Road, Aintree; Switch Island Leisure Park, Dunnings Bridge Road, Netherton; and Meols Cop and Kew Retail Parks, Southport.

Evidence Submitted

Chapter 7	Plan Order Policy ED2	Other Documents
Policy ED2	Development in town, district and local centres, local shopping parades and outside defined centre	
Respondent No 490	Response Ref 2	Representor Name
Organisation Name Aintree Retail Park Limited		
Obj/Sup/Com Objection		

Summary of Main Issues

Aintree Retail Park Limited object to the proposed approach of Policy ED2 part 2 in relation to retail, leisure and other town centre uses.

Whilst it is acknowledged that Policy ED2 part 2 deals with the sequential approach, which is set by National Planning Policy Framework (NPPF) paragraph 24, the policy goes further than this and introduces elements that closely resemble an Impact Assessment required by NPPF paragraph 26 (if not in name).

In addition to the sequential test set out by Policy ED2 part 2, the two bullet points that follow require that all proposed retail, leisure and other town centre uses should demonstrate:

- "that they would not prejudice the delivery of planned investment within any existing defined centre, and
- that no significant adverse impact on the vitality and viability of any existing centre will arise from the proposed development."

However, this effectively renders Policy ED2 part 3 superfluous, which sets out the local thresholds (of 200 sqm, 300 sqm and 500 sqm) for undertaking an Impact Assessment. Therefore, it would appear that such applications below these thresholds will also need to undertake an Impact Assessment, as they will be captured by part 2.

This is at odds with NPPF paragraph 193, which states "Local planning authorities should publish a list of their information requirements for applications, which should be proportionate to the nature and scale of development proposals and reviewed on a frequent basis. Local Planning Authorities should only request supporting information that is relevant, necessary and material to the application in question" (our emphasis).

In the absence of any justification or explanation about how this policy will operate in practice, it is not clear whether this is unintentional or whether there is a deliberate distinction to be drawn between the "pseudo" Impact Assessment required in Policy ED2 part 2 and what appears to be a "full" Impact Assessment required in part 3.

The policy as set out is therefore unclear and should be amended for clarity.

Summary of Suggested Changes

Aintree Retail Park Limited request that Policy ED2 part 2 be scaled back to only deal with the sequential approach. Any references to elements of the Impact Assessment required by NPPF paragraph 26 should be more appropriately dealt with by Policy ED2 part 3.

Therefore, the last sentence of Policy ED2 part 2 starting "In addition, all proposed retail, leisure and other town centre uses should demonstrate:" and the two bullets that follow should be removed.

Evidence Submitted

Chapter 7	Plan Order Policy ED2	Other Documents
Policy ED2	Development in town, district and local centres, local shopping parades and outside defined centre	
Respondent No 599	Response Ref 6	Representor Name Ross Anthony
Organisation Name The Theatres Trust		
Obj/Sup/Com Comment		

Summary of Main Issues

We also note that Policy ED2 also encourages the provision of new social, leisure and cultural infrastructure.

Summary of Suggested Changes

Evidence Submitted

Chapter 7	Plan Order Policy ED2	Other Documents
Policy ED2	Development in town, district and local centres, local shopping parades and outside defined centre	
Respondent No 638	Response Ref 14	Representor Name
Organisation Name Crosby Investment Strategy Steering Group		
Obj/Sup/Com Objection		

Summary of Main Issues

Given the need to consider the future role and functions of centres post the Portas Review and work by organisations such as the Association of Town and City Management and Centre for Cities, we would suggest that the opening text/ para in 4.6.1 of the Infrastructure Delivery Plan be used to explicitly support policies in the main body of the Local Plan, specifically Policies ED2.... This would have the benefit of recognising centres' role in providing a focus for 'other important services and facilities' and as economic drivers and community hubs and, therefore, strengthen the 'soundness' of the Plan.

Summary of Suggested Changes

Evidence Submitted

Chapter 7	Plan Order Policy ED2	Other Documents
Policy ED2	Development in town, district and local centres, local shopping parades and outside defined centre	
Respondent No 638	Response Ref 13	Representor Name
Organisation Name Crosby Investment Strategy Steering Group		
Obj/Sup/Com Support		

Summary of Main Issues

The role of Town, District and Local Centres:

We support in principle Policy ED2 and in particular ED2 (7) as it applies to Crosby Centre. In that connection we support the definition of 'Primary Retail Frontages' as they are defined under ED2 in Figure 7.2

Summary of Suggested Changes

Evidence Submitted

Chapter 7	Plan Order Policy ED2	Other Documents
Policy ED2	Development in town, district and local centres, local shopping parades and outside defined centre	
Respondent No 662	Response Ref 2	Representor Name
Organisation Name Birkdale Trading Estate		
Obj/Sup/Com Objection		

Summary of Main Issues

Birkdale Trading Estate is allocated by the Plan as a Primarily Industrial Area. Primarily Industrial Areas are covered by Policy ED3 of the Plan. Policy ED3 seeks to limit uses within these areas to B1, B2 and B8 Uses with others only acceptable where they are small scale or ancillary to the above uses or maximise job outputs and are compatible with the character and function of the area and with adjacent uses. The policy also requires that development within the Primarily Industrial Areas must not significantly harm the amenity of nearby residents or significantly harm the general environment.

There are five primarily industrial areas in the Southport area of the Borough with Birkdale Trading Estate being the smallest of these at 0.75 hectares, the one that provides the least employment floorspace and the one that is most constrained by nearby residential properties. We support the principle of the protection of the Borough's employment land although it is fundamental for the Council to consider whether these areas are appropriately allocated. The Local Plan is intended to cover a 15 year period which following adoption means it will be in force to beyond 2030. Any site specific allocations should therefore be made not just on the basis of whether the present use is acceptable but whether the allocated use will remain acceptable for the majority of the plan period or at least beyond the immediate term.

The appended report prepared by Fitton Estates covers in detail the site's suitability for employment use over the long term. This is discussed in detail further below.

It is a requirement of the National Planning Policy Framework (NPPF) (Paragraph 182) that for a Local Plan to be considered sound it should enable the delivery of sustainable development in accordance with the policies of the NPPF and be justified – based upon proportionate evidence and adopting the most appropriate strategy.

The most relevant policy of the NPPF relating to employment land is Paragraph 22. Paragraph 22 is worded as follows: "Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities."

The NPPF is clear in stating that planning policy should avoid the long term protection of sites where there is no reasonable prospect of the site being used for that purpose. Allocation of a site for a 15 year period within a Local Plan constitutes such a long term protection. Whether the allocation of the Birkdale Trading Estate as a Primarily Industrial Area in the Local Plan is sound is therefore based upon whether there is a reasonable prospect of a site being used as a Primarily Industrial Area over this period. The starting point for consideration of whether there is a reasonable prospect of a site being used for the purpose for which it is protected is whether or not it is currently being used for that purpose. Birkdale Trading Estate is protected as a Primarily Industrial Area and that suitable uses will be B1, B2 and B8. The appended schedule of current occupiers at Birkdale Trading Estate identifies that only 39% of the occupied floorspace at the estate is currently being used for B1, B2 and B8 Uses. In contrast 52% of the floorspace is currently occupied by what are identified in the NPPF as 'Main Town Centre Uses'.

Birkdale Trading Estate is therefore not currently a Primarily Industrial Area.

Notwithstanding that the trading estate is not currently a Primarily Industrial Area, it is appropriate to consider if there is a reasonable prospect of the site being used as a Primarily Industrial Area in the foreseeable future. This matter is considered in detail in the appended report by Fitton Estates who have detailed knowledge of the industrial and office markets in north Sefton. The key findings of the report are summarised below:

The premises appear to have been constructed in the 1970s, are a poor quality industrial estate, the buildings are of a poor specification and are approaching the end of their economic lives. The property has deteriorated further in recent years and the consideration that the estate is reaching the end of its economic life is reflected in the transient nature of its occupiers. The estate is not sustainable in the medium or long term. Many of the occupiers are paying significantly reduced rents or are in significant rental arrears. The estate has been the subject of anti-social and illegal activities in the past. The majority of existing occupiers would be able to relocate to secondary or tertiary retail premises of which there is adequate availability at appropriate prices and which would be more suitable for the majority of users on the site. Of the existing industrial and employment uses, there is also currently sufficient immediate availability for these uses to relocate; and, redevelopment of the site to create modern industrial or employment premises would result in a negative value even if there were a 0% developer's profit.

The appended plan identifies a redevelopment of the Birkdale Trading Estate to accommodate more suitable modern accommodation. Notwithstanding any amenity issues this scheme would result in for nearby residents, it has been demonstrated by the development appraisal undertaken by Fitton Estates that redevelopment of the site along these lines would produce a negative value even with 0% developer profit.

The allocation of Birkdale Trading Estate as a Primarily Industrial Area in the emerging Sefton Local Plan is therefore unsound as the site is not currently in use as a Primarily Industrial Area and there is no reasonable prospect of the site being used for such a purpose in the short, medium or long term. If the site is protected for employment purposes it is destined to become vacant and derelict over time as the economic life of the currently dilapidated buildings comes to an end.

As set out above, if the Primary Industrial Area allocation at Birkdale Trading Estate is retained, it is likely that the already poor condition of the facilities on site will deteriorate further as there is no benefit in further investment. This will result in the quality of the site as an employment generating location declining.

Policy ED2 of the Plan identifies that provision will be made for up to 84.5 hectares of employment land in strategic employment locations, employment allocations, primarily industrial areas, sites with planning permission for employment development and other suitable sites over the plan period. As set out in Table 1 below, Policy MN2 identifies sites for 82.1 hectares of this land.

Table 1: Sefton Employment Sites <table one in rep>

The BE Group Sefton Employment Land and Premises Study Refresh identifies four potential scenarios for employment land need forecasts in the Borough. These are set out in Table 2 below.

Table 2: Sefton Employment Land Need <table two in rep>

As can be seen, even under the requirement for the greatest level of employment land, the current amount proposed to be allocated in the Local Plan is significantly in excess of this figure, even if the Birkdale Trading Estate site is no longer allocated as a Primarily Industrial Area. The 'loss' of Birkdale Trading Estate despite not being in primarily industrial use would result in a reduction in the Borough's employment land of less than 1%.

Furthermore, as the Fitton Estates report identifies, there are ample opportunities for existing occupiers on the trading estate to relocate to nearby, more suitable premises given that the majority of uses on the site are not classified as employment uses. The site owners would work with existing occupiers to help them identify alternative and more suitable premises that they can relocate to within a reasonable time frame. Redevelopment of the site for retail purposes therefore would result in a net increase in job creation in the local area. Development of the site for a discount foodstore for example would also improve access to fresh produce in the local area and provide greater consumer choice.

The removal of the Primarily Industrial Area allocation will therefore not result in a shortage of employment land within Sefton, would result in a net increase in employment in the locality and if a discount retail use came forward, would also result in the physical regeneration of a deteriorating site and improve local consumer choice in Birkdale.

Suitability of Birkdale Trading Estate for Redevelopment for Alternative Purposes

Policy ED3 of the Local Plan identifies that Primarily Industrial Areas are suitable for B1, B2 and B8 development. It is identified that other uses will only be permitted where they are small scale or ancillary to the above uses; or maximise job outputs and are compatible with the character and function of the area and with adjacent uses. The policy also identifies that development within the Primarily Industrial Areas must not significantly harm the amenity of nearby residents and must not significantly harm the general environment.

As outlined above, the redevelopment of Birkdale Trading Estate for a discount foodstore will maximise job outputs in the area. Further to this, a retail use in such close proximity to nearby residential properties will have a significantly lower impact upon residential amenity than the employment uses for which the site is allocated but not primarily currently being used for. Any redevelopment of the site for employment purposes would be likely to result in significant delivery, operational, noise or air quality/odour constraints that would render new units on the site unsuitable for actual employment occupiers. It is therefore evident that the redevelopment of the trading estate for non-employment uses complies with the exceptions identified in Policy ED3 itself.

We trust you will take the above and attached information into account in progressing the Sefton Local Plan to the next stage and that the Birkdale Trading Estate site is de-allocated as a Primarily Industrial Area in the next iteration of the plan.

Summary of Suggested Changes

Identify the site for a discount foodstore and not as part of a Primarily Industrial Area.

Evidence Submitted

Report prepared by Fitton Estates outlining the potential for redevelopment of the site for employment purposes; Birkdale Trading Estate Schedule of Floorspace and Occupiers; and,

Plan showing a redeveloped site for employment purposes.

Chapter	7	Plan Order	Policy ED2	Other Documents
Policy	ED2	Development in town, district and local centres, local shopping parades and outside defined centre		
Respondent No	710	Response Ref	1	Representor Name
Organisation Name	GL Europe Bootle Sarl (Ellandi LLP)			
Obj/Sup/Com	Objection			

Summary of Main Issues

Our comments relate to Chapter 7 of the Sefton Local Plan Publication Draft and in particular Draft Policy ED2 which sets out the Council's requirements for development in town centres and for proposals for main town centre uses. These comments are made following Ellandi LLP's recent acquisition of The Strand Shopping Centre in Bootle Town Centre and are made alongside our recent comments in connection with the emerging Investment Strategy for Bootle Town Centre.

We support the thrust of the policy which seeks to direct main town centre uses towards the Borough's existing centres in accordance with the following hierarchy: Town Centres: Bootle and Southport. District Centres: Crosby, Formby, Maghull and Waterloo. Local Centres: Ainsdale, Birkdale, Churchtown, Netherton and Old Roan.

We are also supportive of the Council's decision to retain the Bootle Primary Shopping Area as set out in Saved Policy R4 of the UDP, but at the same time recognising the need for flexibility of uses within this area to include complementary non-retail uses with a view to maintaining the Centre's vitality and viability.

Greater clarity is however required as to what is meant by 'Primary Shopping Area' as presently the Local Policy Map for Bootle and Crosby refers to a 'Primary Shopping Frontage', whereas Draft Policy ED2 refers to a Primary Shopping Area. There is general confusion as a result which should be rectified. In doing so, regard should be had to NPPF Paragraph 23 which states that in drawing up Local Plans, local planning authorities "should define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations".

We also have a number of observations regarding the wording of Draft Policy ED2, which in our view could be refined in order to strengthen the Authority's stance in connection with harmful out of centre proposals for retail development. This is bearing in mind the 2012 Retail Study for Sefton which identifies the increasing dominance of out of centre facilities (particularly in South Sefton). These comments should be read in the context of our observations regarding the need to provide a clearer definition of the Town Centre's Primary Shopping Area / Frontage.

Include wording which specifies that existing retail parks and warehouse units do not comprise designated centres for the purpose of this policy and that proposals for town centre uses in these locations will need to be assessed in accordance with the policy criteria set out at Draft Policy ED2.3. The current wording of part 2 of the policy does not accord with the requirements of the sequential test as set out in the National Planning Policy Framework. The definitions of edge and out of centre locations set out at Page 52 of the NPPF should be noted. The correct wording of how the sequential test is applied is set out at Paragraphs 24 and 27 of the NPPF.

In the interests of clarity and in order to properly assess the cumulative impacts of small scale increases in retail floorspace in non-town centre locations across the Borough, simplify the criteria for requiring an impact assessment at Draft Policy ED2.3 to read: "outside of the Primary Shopping Frontages of Bootle and Southport and the boundaries of district and local centres, an impact assessment will be required for development which proposes more than 200 sqm gross floorspace".

Again, in the interests of clarity, Policy ED2 should specify what an impact assessment will be required to include. In our view, and in accordance with the NPPF, impact assessments should demonstrate that a proposal will not have a significant adverse impact on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal. Moreover, that the impact of the proposal on the vitality and viability of existing centres is tested in the catchment area of a proposal, including local consumer choice and trade up to five years from when an application is made (for major schemes, up to ten years from when the application is made). Impact assessments should also be required to have regard to existing, committed and planned investment and regeneration schemes in these centres, as well as having regard to the proposal's cumulative impact with other out of centre developments.

Referring to the supporting text to Draft Policy ED2, we would also welcome clarification of the Council's findings in connection with comparison goods retail in South Sefton. We note that that the 2012 Retail Study is very clear that a need for comparison goods retail in South Sefton does not arise until post-2026 and that in developing a strategy for the established centres throughout Sefton, careful consideration will need to be given to the expansion of centres whilst recognising that any expansion opportunities will be very much a long term vision or aspiration, rather than seeking to address an urgent need which clearly does not exist at present.

Summary of Suggested Changes

Evidence Submitted

Chapter 7	Plan Order Policy ED2	Other Documents
Policy ED2	Development in town, district and local centres, local shopping parades and outside defined centre	
Respondent No 740	Response Ref 12	Representor Name
Organisation Name Formby Residents Action Group		
Obj/Sup/Com Objection		

Summary of Main Issues

An overview of the challenges faced by retailers and consideration how the Local Plan should meet these challenges.

Set out in Chapter 9 [pages 62-65] of the representation.

Summary of Suggested Changes

Evidence Submitted

Chapter 7	Plan Order Policy ED3	Other Documents
Policy ED3	Primarily Industrial Areas	
Respondent No 491	Response Ref 1	Representor Name
Organisation Name Orbit Investments (Properties) Limited		
Obj/Sup/Com Objection		

Summary of Main Issues

Orbit support the proposed continued allocation of Aintree Racecourse Business Park as a “Primarily Industrial Area” under Policy ED3. However, given that this is a designation where B1, B2 and B8 uses are considered appropriate, which includes uses wider than merely industry (i.e. offices and storage and distribution), it would be more appropriate to rename the designation as a “Primarily Commercial Area”.

Summary of Suggested Changes

Orbit request that Policy ED3 be renamed as “Primarily Commercial Areas”.

Evidence Submitted

Policy ED3

Primarily Industrial Areas

Respondent No 662 Response Ref 1 Representor Name

Organisation Name Birkdale Trading Estate

Obj/Sup/Com Objection

Summary of Main Issues

Birkdale Trading Estate is allocated by the Plan as a Primarily Industrial Area. Primarily Industrial Areas are covered by Policy ED3 of the Plan. Policy ED3 seeks to limit uses within these areas to B1, B2 and B8 Uses with others only acceptable where they are small scale or ancillary to the above uses or maximise job outputs and are compatible with the character and function of the area and with adjacent uses. The policy also requires that development within the Primarily Industrial Areas must not significantly harm the amenity of nearby residents or significantly harm the general environment.

There are five primarily industrial areas in the Southport area of the Borough with Birkdale Trading Estate being the smallest of these at 0.75 hectares, the one that provides the least employment floorspace and the one that is most constrained by nearby residential properties. We support the principle of the protection of the Borough's employment land although it is fundamental for the Council to consider whether these areas are appropriately allocated. The Local Plan is intended to cover a 15 year period which following adoption means it will be in force to beyond 2030. Any site specific allocations should therefore be made not just on the basis of whether the present use is acceptable but whether the allocated use will remain acceptable for the majority of the plan period or at least beyond the immediate term.

The appended report prepared by Fitton Estates covers in detail the site's suitability for employment use over the long term. This is discussed in detail further below.

It is a requirement of the National Planning Policy Framework (NPPF) (Paragraph 182) that for a Local Plan to be considered sound it should enable the delivery of sustainable development in accordance with the policies of the NPPF and be justified – based upon proportionate evidence and adopting the most appropriate strategy.

The most relevant policy of the NPPF relating to employment land is Paragraph 22. Paragraph 22 is worded as follows: "Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities."

The NPPF is clear in stating that planning policy should avoid the long term protection of sites where there is no reasonable prospect of the site being used for that purpose. Allocation of a site for a 15 year period within a Local Plan constitutes such a long term protection. Whether the allocation of the Birkdale Trading Estate as a Primarily Industrial Area in the Local Plan is sound is therefore based upon whether there is a reasonable prospect of a site being used as a Primarily Industrial Area over this period. The starting point for consideration of whether there is a reasonable prospect of a site being used for the purpose for which it is protected is whether or not it is currently being used for that purpose. Birkdale Trading Estate is protected as a Primarily Industrial Area and that suitable uses will be B1, B2 and B8. The appended schedule of current occupiers at Birkdale Trading Estate identifies that only 39% of the occupied floorspace at the estate is currently being used for B1, B2 and B8 Uses. In contrast 52% of the floorspace is currently occupied by what are identified in the NPPF as 'Main Town Centre Uses'.

Birkdale Trading Estate is therefore not currently a Primarily Industrial Area.

Notwithstanding that the trading estate is not currently a Primarily Industrial Area, it is appropriate to consider if there is a reasonable prospect of the site being used as a Primarily Industrial Area in the foreseeable future. This matter is considered in detail in the appended report by Fitton Estates who have detailed knowledge of the industrial and office markets in north Sefton. The key findings of the report are summarised below:

The premises appear to have been constructed in the 1970s, are a poor quality industrial estate, the buildings are of a poor specification and are approaching the end of their economic lives. The property has deteriorated further in recent years and the consideration that the estate is reaching the end of its economic life is reflected in the transient nature of its occupiers. The estate is not sustainable in the medium or long term. Many of the occupiers are paying significantly reduced rents or are in significant rental arrears. The estate has been the subject of anti-social and illegal activities in the past. The majority of existing occupiers would be able to relocate to secondary or tertiary retail premises of which there is adequate availability at appropriate prices and which would be more suitable for the majority of users on the site. Of the existing industrial and employment uses, there is also currently sufficient immediate availability for these uses to relocate; and, redevelopment of the site to create modern industrial or employment premises would result in a negative value even if there were a 0% developer's profit.

The appended plan identifies a redevelopment of the Birkdale Trading Estate to accommodate more suitable modern accommodation. Notwithstanding any amenity issues this scheme would result in for nearby residents, it has been demonstrated by the development appraisal undertaken by Fitton Estates that redevelopment of the site along these lines would produce a negative value even with 0% developer profit.

The allocation of Birkdale Trading Estate as a Primarily Industrial Area in the emerging Sefton Local Plan is therefore unsound as the site is not currently in use as a Primarily Industrial Area and there is no reasonable prospect of the site being used for such a purpose in the short, medium or long term. If the site is protected for employment purposes it is destined to become vacant and derelict over time as the economic life of the currently dilapidated buildings comes to an end.

As set out above, if the Primary Industrial Area allocation at Birkdale Trading Estate is retained, it is likely that the already poor condition of the facilities on site will deteriorate further as there is no benefit in further investment. This will result in the quality of the site as an employment generating location declining.

Policy ED2 of the Plan identifies that provision will be made for up to 84.5 hectares of employment land in strategic employment locations, employment allocations, primarily industrial areas, sites with planning permission for employment development and other suitable sites over the plan period. As set out in Table 1 below, Policy MN2 identifies sites for 82.1 hectares of this land.

Table 1: Sefton Employment Sites <table one in rep>

The BE Group Sefton Employment Land and Premises Study Refresh identifies four potential scenarios for employment land need forecasts in the Borough. These are set out in Table 2 below.

Table 2: Sefton Employment Land Need <table two in rep>

As can be seen, even under the requirement for the greatest level of employment land, the current amount proposed to be allocated in the Local Plan is significantly in excess of this figure, even if the Birkdale Trading Estate site is no longer allocated as a Primarily Industrial Area. The 'loss' of Birkdale Trading Estate despite not being in primarily industrial use would result in a reduction in the Borough's employment land of less than 1%.

Furthermore, as the Fitton Estates report identifies, there are ample opportunities for existing occupiers on the trading estate to relocate to nearby, more suitable premises given that the majority of uses on the site are not classified as employment uses. The site owners would work with existing occupiers to help them identify alternative and more suitable premises that they can relocate to within a reasonable time frame. Redevelopment of the site for retail purposes therefore would result in a net increase in job creation in the local area. Development of the site for a discount foodstore for example would also improve access to fresh produce in the local area and provide greater consumer choice.

The removal of the Primarily Industrial Area allocation will therefore not result in a shortage of employment land within Sefton, would result in a net increase in employment in the locality and if a discount retail use came forward, would also result in the physical regeneration of a deteriorating site and improve local consumer choice in Birkdale.

Suitability of Birkdale Trading Estate for Redevelopment for Alternative Purposes

Policy ED3 of the Local Plan identifies that Primarily Industrial Areas are suitable for B1, B2 and B8 development. It is identified that other uses will only be permitted where they are small scale or ancillary to the above uses; or maximise job outputs and are compatible with the character and function of the area and with adjacent uses. The policy also identifies that development within the Primarily Industrial Areas must not significantly harm the amenity of nearby residents and must not significantly harm the general environment.

As outlined above, the redevelopment of Birkdale Trading Estate for a discount foodstore will maximise job outputs in the area. Further to this, a retail use in such close proximity to nearby residential properties will have a significantly lower impact upon residential amenity than the employment uses for which the site is allocated but not primarily currently being used for. Any redevelopment of the site for employment purposes would be likely to result in significant delivery, operational, noise or air quality/odour constraints that would render new units on the site unsuitable for actual employment occupiers. It is therefore evident that the redevelopment of the trading estate for non-employment uses complies with the exceptions identified in Policy ED3 itself.

We trust you will take the above and attached information into account in progressing the Sefton Local Plan to the next stage and that the Birkdale Trading Estate site is de-allocated as a Primarily Industrial Area in the next iteration of the plan.

Summary of Suggested Changes

Identify the site for a discount foodstore and not as part of a Primarily Industrial Area.

Evidence Submitted

Report prepared by Fitton Estates outlining the potential for redevelopment of the site for employment purposes; Birkdale Trading Estate Schedule of Floorspace and Occupiers; and,

Plan showing a redeveloped site for employment purposes.

Chapter 7	Plan Order Policy ED4	Other Documents	
Policy ED4	Mixed Use Areas		
Respondent No 710	Response Ref 2	Representor Name	
Organisation Name GL Europe Bootle Sarl (Ellandi LLP)			
Obj/Sup/Com Comment			

Summary of Main Issues

Draft Policy ED4 Mixed Use Areas – this policy identifies a number of areas that would be suitable for mixed use development. We support this policy, particularly in connection with the Bootle Central Area. However, greater clarification is required as to the likely uses that would be subject to greater scrutiny in order to be acceptable in these locations (i.e. ‘other uses that might complement the character of the area’). For example, retail development in these locations, other than that which is genuinely ancillary to the main use, should not be permitted in these locations, unless the criteria outlined at Policy ED2.3 is met. This is in the interests of achieving the overarching Plan objective to help Sefton’s town and local centres to diversify and thrive.

Summary of Suggested Changes

Evidence Submitted

Chapter 7	Plan Order Policy ED4	Other Documents	
Policy ED4	Mixed Use Areas		
Respondent No 723	Response Ref 19	Representor Name Laurence Rankin	
Organisation Name Sefton Green Party			
Obj/Sup/Com Objection			

Summary of Main Issues

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

Summary of Suggested Changes

Evidence Submitted

Chapter 7	Plan Order Policy ED5	Other Documents	
Policy ED5	Tourism		
Respondent No 663	Response Ref 9	Representor Name Alan Hubbard	
Organisation Name National Trust			
Obj/Sup/Com Objection			

Summary of Main Issues

As far we can ascertain this is a new Policy that has not previously been put forward for comment. Whilst in principle National Trust supports the decision to include a specific Tourism Policy in the Plan it does have concerns about the wording proposed. In particular the approach is quite partial and as written suggests that tourism development is only appropriate within the 4 locations identified. This approach ignores the benefits of other tourism resources within Sefton and the wider contributions and benefits that they make to the local economy. As an example, para 11.45 (see separate response to this paragraph) identifies the large number of visitors to the Trust’s property at Formby and specifically the importance of this to the local economy...yet there is no reference to this either as a specific tourism location in Policy ED5, or in a more general approach relating to other existing/valued tourism resources.

Summary of Suggested Changes

Amend the wording of Policy ED5 to include an additional bullet point as follows: National Trust site at Formby Point

Evidence Submitted

Policy ED5	Tourism
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Respondent No 711	Response Ref 1	Representor Name
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Organisation Name	Jockey Club
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Obj/Sup/Com	Objection
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Summary of Main Issues

As you are aware, and as stated in your Local Plan Publication Draft document, Aintree Racecourse is a nationally significant asset, major visitor attraction and amongst the most important areas for tourism within Sefton Council's administrative area. As such, changes to local planning policy in the locality are of significant interest to our client, particularly those that may affect Racecourse operations.

Having reviewed the policies as currently worded in the Publication Draft document, we are instructed to make specific representations to Policy ED5, which deals with Tourism.

As drafted, Policy ED5 states that 'Tourism development will be supported in the following locations, subject to there being no adverse effects on the integrity of sites of international nature conservation importance and to other Local Plan policies'.

Aintree Racecourse is stated within this policy as one of the locations at which tourism development is supported.

Our client is supportive of the recognition of the Racecourse as a key tourist facility within Sefton, and is broadly supportive of Policy ED5.

Notwithstanding the Council's support for 'Tourism Development' at Aintree Racecourse, we note that Policy ED5 does not stipulate what types of 'Tourism Development' would be permitted in these locations.

On this basis, our client requests that clarification is provided within the Policy text in terms of the tourism uses which would be considered acceptable, in principle, within identified tourist locations. Our client in particular seeks for the permissible uses on the site to include specific reference to 'hotel development' or 'visitor accommodation'.

This will ensure that the Policy effectively optimises the achievement of the key Government objective of building a strong, competitive economy and allocating a range of sites to meet requirements for new tourism development, as well as providing the appropriate supportive policy context for the evolution and enhancement of the Racecourse over the Plan period.

It is clear that visitor accommodation is key, not only in enhancing and strengthening tourism, but also representing a clear positive addition to the growth and regeneration for Sefton and the City Region (as stated in the aims for tourism within the Chapter 7 of the Draft Local Plan in respect of Economic Development and Regeneration).

It is also noted in National Planning Policy Framework (NPPF) paragraph 23 that needs for retail, leisure and other main town centre uses, of which hotel development is one, are met in full and are not comprised by limited site availability.

Summary of Suggested Changes

Evidence Submitted

Policy ED5	Tourism
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Respondent No 740	Response Ref 13	Representor Name
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Organisation Name	Formby Residents Action Group
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Obj/Sup/Com	Objection
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Summary of Main Issues

An overview of the importance and opportunities of tourism in Sefton.

Set out in Chapter 9 [page 66] of the representation.

Summary of Suggested Changes

Evidence Submitted

Chapter 7 **Plan Order** Policy ED6 **Other Documents**
Policy ED6 **Regeneration Areas**
Respondent No 333 **Response Ref** 1 **Representor Name** Tim Harrison
Organisation Name Capita
Obj/Sup/Com Support

Summary of Main Issues

National Grid have a nationwide programme to demolish their holders, this site falls into the second half of the programme which means that it will not be demolished until after 2021. It is currently listed for 2023 although this may change. The disposal will follow the demolition works.

The site is not going to be available until around 2024/25 and we therefore agree with your proposed allocation of the site as a regeneration opportunity site. A regeneration scheme can then be developed around the demand at this time, we do think that the site is suitable for low cost / affordable housing.

Summary of Suggested Changes

Evidence Submitted

Chapter 7 **Plan Order** Policy ED6 **Other Documents**
Policy ED6 **Regeneration Areas**
Respondent No 627 **Response Ref** 6 **Representor Name** C&S Belsham
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Matching housing development to employment locations

In S.7.44 SC identifies that Central Southport is a designated regeneration area.

Whilst there is identified regeneration for Central Southport, there is no mention of any generation of employment opportunities in Ainsdale, which has very limited employment opportunities at present.

SC have not explained and justified how they intend to match housing development to job opportunities, noting that lack of employment and low income are the prime causes of deprivation (Objection 9).

Summary of Suggested Changes

Evidence Submitted

Chapter 7 **Plan Order** Policy ED6 **Other Documents**
Policy ED6 **Regeneration Areas**
Respondent No 627 **Response Ref** 7 **Representor Name** C&S Belsham
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

SC have not explained the basis for determining the areas of deprivation in Central Southport. In particular the deprivation index is built up from 7 contributing factors ; Income (22.5%), Employment (22.5%), Health and Disability (13.5%), Education, Skills and Training (13.5%), Barriers to Housing and Services (9.3%), Crime (9.3%), Living Environment (9.3%). This indicates that housing contributes only a very small fraction to the classification of deprivation and it is thus unclear how SC have used this data.

SC should explain and justify how they have arrived at parts of Central Southport being within 20% of the most deprived areas in the country and why it is relevant to housing needs.

Summary of Suggested Changes

Evidence Submitted

Chapter 7 **Plan Order** Policy ED6 **Other Documents**
Policy ED6 **Regeneration Areas**
Respondent No 638 **Response Ref** 11 **Representor Name**
Organisation Name Crosby Investment Strategy Steering Group
Obj/Sup/Com Support

Summary of Main Issues

We welcome and support the general principle that Crosby Centre is identified as a priority for regeneration (para 7.42).

Summary of Suggested Changes

Evidence Submitted

Chapter 7 **Plan Order** Policy ED6 **Other Documents**
Policy ED6 **Regeneration Areas**
Respondent No 638 **Response Ref** 9 **Representor Name**
Organisation Name Crosby Investment Strategy Steering Group
Obj/Sup/Com Objection

Summary of Main Issues

Regarding transport, we would express a high degree of concern that the supporting 'Infrastructure Delivery Plan' (IDP) (Para 9.5 refers) is disappointingly vague about what is proposed, all the more so since the emerging Crosby Investment Strategy is likely to include ideas and proposals about public transport and parking facilities. In the Delivery Schedule to the IDP, in both cases, no costs are identified, nor is any funding secured, nor any source of funding identified, and crucially, no timetable for delivery identified. Resolution of these matters is central to the attraction of investment to Crosby to secure the comprehensive regeneration of the Centre in line with Policies ED6 and ED9.

Summary of Suggested Changes

Infrastructure Delivery Plan should identify proposed sources of funding and ideally timescale/strategy for delivery.

Evidence Submitted

Chapter 7 **Plan Order** Policy ED6 **Other Documents**
Policy ED6 **Regeneration Areas**
Respondent No 638 **Response Ref** 12 **Representor Name**
Organisation Name Crosby Investment Strategy Steering Group
Obj/Sup/Com Support

Summary of Main Issues

The principle of Regeneration:

We welcome and support the general principle in para 7.54 that Crosby Centre is identified as having need for new investment, and that Crosby is specifically identified as a Regeneration Area where Policy ED6 applies.

Summary of Suggested Changes

Evidence Submitted

Chapter 7 **Plan Order** Policy ED6 **Other Documents**
Policy ED6 **Regeneration Areas**
Respondent No 638 **Response Ref** 7 **Representor Name**
Organisation Name Crosby Investment Strategy Steering Group
Obj/Sup/Com Support

Summary of Main Issues

The principle of Regeneration:

We welcome and support the general principle of regeneration for Sefton's town and district centres, including Crosby, as set out in Policy ED6 and further referenced in para 7.4.

Summary of Suggested Changes

Evidence Submitted

Chapter 7 **Plan Order** Policy ED6 **Other Documents**
Policy ED6 **Regeneration Areas**
Respondent No 638 **Response Ref** 8 **Representor Name**
Organisation Name Crosby Investment Strategy Steering Group
Obj/Sup/Com Objection

Summary of Main Issues

Given the need to consider the future role and functions of centres post the Portas Review and work by organisations such as the Association of Town and City Management and Centre for Cities, we would suggest that the opening text/ para in 4.6.1 of the Infrastructure Delivery Plan be used to explicitly support policies in the main body of the Local Plan, specifically Policies [...] and ED6. This would have the benefit of recognising centres' role in providing a focus for 'other important services and facilities' and as economic drivers and community hubs and, therefore, strengthen the 'soundness' of the Plan.

Summary of Suggested Changes

Evidence Submitted

Chapter 7 **Plan Order** Policy ED6 **Other Documents**
Policy ED6 **Regeneration Areas**
Respondent No 638 **Response Ref** 10 **Representor Name**
Organisation Name Crosby Investment Strategy Steering Group
Obj/Sup/Com Support

Summary of Main Issues

We welcome and support the general principle of regeneration for Sefton's town and district centres, including Crosby, as set out in Policy ED6 and further referenced in para 7.4.

Summary of Suggested Changes

Evidence Submitted

Chapter 7	Plan Order Policy ED6	Other Documents
Policy ED6	Regeneration Areas	
Respondent No 710	Response Ref 3	Representor Name
Organisation Name GL Europe Bootle Sarl (Ellandi LLP)		
Obj/Sup/Com	Comment	

Summary of Main Issues

Draft Policy ED6 Regeneration Areas – again, we support this policy in principle but would question why the regeneration of the Bootle Central Area isn't dealt with as part of a stand alone policy, similar to that of Central Southport and Crosby (Draft Policies ED7, ED8 and ED9). The inclusion of Bootle as part of a wider regeneration policy suggests that it is less of a priority than those centres which have their own policies. We would also welcome further clarity as to the types of uses that would be acceptable in Regeneration Opportunity Areas (for example Hawthorne Road / the former gasworks site). Where proposals include main town centre uses in these areas, they should be tested in accordance with the criteria outlined at ED2.3 to ensure they do not undermine the Authority's commitment to the regeneration of its town centres.

Summary of Suggested Changes

Evidence Submitted

Chapter 7	Plan Order Policy ED6	Other Documents
Policy ED6	Regeneration Areas	
Respondent No 725	Response Ref 1	Representor Name Paul Daly
Organisation Name Sport England		
Obj/Sup/Com	Objection	

Summary of Main Issues

Policy ED6 includes two regeneration opportunity sites. Both sites (501 – 509 Hawthorne Road, Bootle and Former Gasworks Site, Marsh Lane, Bootle) are shown on the proposals map as including sports grounds. Aerial photographs suggest the sites are not in current use for sport. However the last planning use of certain areas on these allocated sites would appear to be for sport. These sites therefore still retain potential to be brought back into use to meet sporting needs of the community.

No evidence has been provided to demonstrate that loss of these disused sports facilities meets the requirements of paragraph 74 of the NPPF. However, it is recognised that the sports facilities within site 501 – 509 Hawthorne Road, Bootle were / are allocated by the UDP for housing. However, the sports facilities forming part of the Former Gasworks Site, Marsh Lane, Bootle site are designated and protected as public open space by the UDP.

Summary of Suggested Changes

The sports facilities forming part of the Former Gasworks Site, Marsh Lane, Bootle site should be excluded from the allocation, or provision made to mitigate for their permanent loss.

Evidence Submitted

Chapter 7	Plan Order Policy ED7	Other Documents
Policy ED7	Southport Central area	
Respondent No 599	Response Ref 7	Representor Name Ross Anthony
Organisation Name The Theatres Trust		
Obj/Sup/Com	Comment	

Summary of Main Issues

We also note that Policy ED7 also encourages the provision of new social, leisure and cultural infrastructure.

Summary of Suggested Changes

Evidence Submitted

Chapter 7 **Plan Order** Policy ED7 **Other Documents**
Policy ED7 **Southport Central area**
Respondent No 648 **Response Ref** 4 **Representor Name** Emily Hrycan
Organisation Name English Heritage
Obj/Sup/Com Objection

Summary of Main Issues

The NPPF requires that Plan Policies should 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 and how this will be applied locally. The historic environment in Southport makes a significant contribution to its unique character and identity and also its attractiveness as a place to live, work and visit (reinforced in paragraph 11.87 of the Plan). The Plan does little to ensure the historic environment is conserved and enhanced and does little to positively promotes improvements to the historic environment. The Plan should recognise the active work that the Council is already involved in the town in the historic environment and highlight its priorities. The Plan should be expanded to ensure that the strategy for Southport is recognised, conserved and enhanced whilst maximising opportunities to contribute to economic, social and environmental objectives. Specific priorities for the historic environment should be included.

Summary of Suggested Changes

The Plan should be amended to ensure that the policy for Southport will conserve and enhance the historic environment and specifically identify priorities for the town.

Evidence Submitted

Chapter 7 **Plan Order** Policy ED8 **Other Documents**
Policy ED8 **Southport Seafront**
Respondent No 103 **Response Ref** 1 **Representor Name** Sheenagh Burdell
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

My comments are regarding the proposed skatepark project on the Marine Park (ED8) site in support of The Southport Skatepark Project. A new concrete skatepark would be a fantastic edition to the town, as was the original Solid Surf Skatepark, which attracted skateboarders from all over the country. I along with many others spent every hour possible there. I think the new skatepark would replicate this and give alot of kids and even adults (as alot of mature people, including myself at the age of 50 still enjoy skateboarding)somewhere to go and have fun! A great idea!

Summary of Suggested Changes

Evidence Submitted

Chapter 7 **Plan Order** Policy ED8 **Other Documents**
Policy ED8 **Southport Seafront**
Respondent No 104 **Response Ref** 1 **Representor Name** Graham Wells
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

I would like to comment specifically regarding the 'Marine Park' (ED8) SITE, which appropriately includes the area where Southport's original concrete skatepark, Solid Surf Skatepark was located. I would like to state am fully in support of Southport Skatepark Project. It would be great to build a world class skatepark that will be a major tourist attraction for skatepark users across the world as well as local users, and give the children of families visiting Southport a place to visit and talk about for years to come. The clean white concrete would be fully in keeping with the seawall landscape and Ocean Plaza.

Summary of Suggested Changes

Evidence Submitted

Chapter 7 **Plan Order** Policy ED8 **Other Documents**
Policy ED8 **Southport Seafront**
Respondent No 105 **Response Ref** 1 **Representor Name** Steven Lewis
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

I am originally from Southport, I own two business companies in London that work with creative people. One of them is hoping to work with the Southport skate park and the local kids, we have a number of workshops planned and a TV show idea! This project would fill a much needed gap for a safe and fun area for kids and young adults, given the opportunity this park could be the focus of a annual UK wide competition bringing new business and networks. I fully support this proposal and sincerely hope that it is given the green light by Sefton Council.

Summary of Suggested Changes

Evidence Submitted

Chapter 7 **Plan Order** Policy ED8 **Other Documents**
Policy ED8 **Southport Seafront**
Respondent No 132 **Response Ref** 1 **Representor Name** Karyl Cartwright
Organisation Name
Obj/Sup/Com Support

Summary of Main Issues

I support the building of a skatepark whole-heartedly. Southport does not have many public sporting/leisure facilities that provide amenities for older teenagers and no doubt many other age groups. Such leisure facilities will enhance the area and draw in more visitors to the town.

Summary of Suggested Changes

Evidence Submitted

Chapter 7 **Plan Order** Policy ED8 **Other Documents**
Policy ED8 **Southport Seafront**
Respondent No 540 **Response Ref** 1 **Representor Name** Trevor Wells
Organisation Name Southport Skatepark Project
Obj/Sup/Com Support

Summary of Main Issues

Southport Skatepark Project is the proposal for the construction of a world class concrete skatepark facility in Southport. A skatepark designed and constructed by the professional skatepark construction company of our choice, with design input from local skatepark users. The skatepark will provide a safe, secure and inclusive environment for skatepark users of all ages.

The Local Plan for Sefton contains one site on Southport seafront designated exclusively for redevelopment for leisure use, the Marine Park site (ED8). Southport Skatepark Projects proposal is fully consistent with criteria within the detail of the Local Plan for this area. The skatepark development would support Southport's visitor econom. Reflect the regional leisure and tourism role of Southport. It will be consistent with the strategy for the site as a whole and is complementary to the key tourism role of the sit. It will be of high design quality, able to incorporate attractive frontages to both Marine Drive and Esplanade and high quality landscaping, consistent with a seafront area. The skatepark will complement King's and South Marine Gardens, with potential business links with the town centre. As only partial development of the site the skatepark facility will be prepared in the context of a development strategy for the whole site.

Summary of Suggested Changes

Evidence Submitted

Southport SkatePark Vision

Chapter 7 **Plan Order** Policy ED8 **Other Documents**
Policy ED8 **Southport Seafront**
Respondent No 648 **Response Ref** 5 **Representor Name** Emily Hrycan
Organisation Name English Heritage
Obj/Sup/Com Objection

Summary of Main Issues

The NPPF requires that Plan Policies should 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 and how this will be applied locally. The historic environment in Southport makes a significant contribution to its unique character and identity and also its attractiveness as a place to live, work and visit (reinforced in paragraph 11.87 of the Plan). The Plan does little to ensure the historic environment is conserved and enhanced and does little to positively promotes improvements to heritage assets. The Plan should recognise the active work that the Council is already involved in the town in the historic environment and highlight its priorities. The Plan should be expanded to ensure that the strategy for Southport is recognised, conserved and enhanced whilst maximising opportunities to contribute to economic, social and environmental objectives. Specific priorities for the historic environment should be included.

Summary of Suggested Changes

The Plan should be amended to ensure that the policy for Southport will conserve and enhance the historic environment and specifically identify priorities for the town.

Evidence Submitted

Chapter 7 **Plan Order** Policy ED8 **Other Documents**
Policy ED8 **Southport Seafront**
Respondent No 723 **Response Ref** 20 **Representor Name** Laurence Rankin
Organisation Name Sefton Green Party
Obj/Sup/Com Objection

Summary of Main Issues

Southport Seafront: More emphasis should be put on the environment value of the seafront as part of the visitor value. This should include a presumption in favour of development addressing the seafront rather than turning its back on it as Ocean Plaza does.

Summary of Suggested Changes

Evidence Submitted

Chapter 7 **Plan Order** Policy ED9 **Other Documents**
Policy ED9 **Crosby Centre**
Respondent No 638 **Response Ref** 1 **Representor Name**
Organisation Name Crosby Investment Strategy Steering Group
Obj/Sup/Com Objection

Summary of Main Issues

All members of the Steering Group wish to see the urgent early regeneration of Crosby Centre which has been neglected by principal landowners and stakeholders over many years. This is in accordance with our understanding of the National Policy to support High Streets. Our comments are primarily directed at Policy ED9 but we also make general points regarding other related policies.

This response is made by the individuals who are members of the above Group, in connection with policy ED9. The Steering Group was formed at the request of Sefton MBC via [officer name -Service Manager, Tourism and Economic Development]. All individuals are members of the Voluntary, Community and Faith Section who were requested to meet with and feed back to the Council's appointed Consultants as they prepared the Crosby Investment Strategy Report for Sefton Council. We all accepted the Consultants' brief as attached [see separate 'Consultants' Brief' document].)

Summary of Suggested Changes

Evidence Submitted

Chapter 7	Plan Order Policy ED9	Other Documents
Policy ED9	Crosby Centre	
Respondent No 638	Response Ref 5	Representor Name
Organisation Name Crosby Investment Strategy Steering Group		
Obj/Sup/Com Objection		

Summary of Main Issues

Boundary too tightly drawn.

Summary of Suggested Changes

Redefine the boundary of Crosby Centre - extend outwards.

Evidence Submitted

Chapter 7	Plan Order Policy ED9	Other Documents
Policy ED9	Crosby Centre	
Respondent No 638	Response Ref 2	Representor Name
Organisation Name Crosby Investment Strategy Steering Group		
Obj/Sup/Com Objection		

Summary of Main Issues

In the light of the Consultants brief and Sefton Council's stated policy to facilitate the regeneration we unanimously believe that Policy ED9 is overly generalised and un specific, confusing and lacking in the local authority commitment necessary to deliver the long overdue regeneration which the Council undertook to facilitate. In short it is Unsound. In particular we fail to see how the Council is able to promote this regeneration by proposing a Supplementary Planning Document whilst also committing "to have a deliverable strategy that will maximise the economic potential of Crosby". As planning authority and land owner the Council should be taking the lead in regeneration to give effect to their stated aims in the Consultants' brief and National Policy. We have therefore prepared our own version of Policy ED9 for consideration and to be substituted in the final published Local Plan.

Summary of Suggested Changes

Revised Policy ED9 Crosby Centre: Proposed Local Plan Policy ED9 Prepared by Crosby Investment Strategy Steering Group:
Revised Policy ED9 Crosby Centre.

Proposals to secure the early regeneration of Crosby Centre in line with the Investment Strategy will be actively pursued through the preparation of Site Development and Design Briefs and by assisting site assembly with the Council's land and property assets in the Centre. New retail and other district centre developments, of appropriate scale will be supported in order to restore vitality to the Centre. A comprehensive approach to regeneration and development of key sites in the Centre will be required; proposals which will result in a fragmented or piecemeal form of development will not be permitted. The co-operation of key stakeholders and existing landholders will be sought to procure high quality development proposals. The Council will consider the use of appropriate statutory measures if necessary.

Development within the Centre should be of high quality design, giving particular emphasis on regeneration, key routes, public realm and gateways. Development should facilitate and improve pedestrian and cycle connections to the Centre encouraging increased footfall and revitalisation of Moor Lane. Development proposals should have active commercial uses on ground floor frontages and recognise the importance of key routes, gateways and public spaces. New developments should complement the existing building form and character and be of at least 2 storeys in height and both commercial and residential uses will be considered for upper floors.

The improvement of traffic flows and accessibility within and beyond the Centre will form part of the Council strategy including (but not exclusively) pedestrian, cycle and vehicular access, car parking and streetscape.

Evidence Submitted

Chapter 7	Plan Order Policy ED9	Other Documents
Policy ED9	Crosby Centre	
Respondent No 638	Response Ref 4	Representor Name
Organisation Name Crosby Investment Strategy Steering Group		
Obj/Sup/Com Objection		

Summary of Main Issues

This Report prepared by Nexus Planning, Broadway Malayan, Aspinall Verdi and JMP is long overdue. We have recently seen a Draft copy which in our view lacks clarity and a clear delivery strategy and we are taking these issues up with the Council elsewhere. Our view is that an improved, strengthened Policy ED9 together with a coherent Crosby Investment Strategy Report should provide the basis of a Development Brief to secure a Joint Venture partner. There should be no further delay or necessity for a Supplementary Planning Document. Indeed our concern is that this proposed additional level of consultation and delay will make it harder to deliver regeneration as at least one major land owner (Sainsbury) is currently proposing further piecemeal disposals.

Summary of Suggested Changes

Replacement of proposed Supplementary Planning Document for Crosby Village with a more urgent strategy. Local Plan to endorse urgent delivery and Council commitment to strategy set out in Consultant's brief to which we as volunteers have committed our time and energies. [Extract attached as part of the representation said.

Crosby Investment Strategy: Developers Brief: Extract from Nexus Planning, Broadway Malyan, Aspinall Verdi, and JMP Report Draft

"In line with the project brief the Investment Strategy has been developed so as to: Be consistent and have clear strategic links with the emerging Sefton Local Plan and will support the planning and regeneration priorities for the area helping to identify specific development proposals. Be used to guide the future of Council's current property and land holdings in the area. Link in with future Sefton MBC parking strategies and studies. Increase investor confidence and assist private sector developers to dispose of or either develop their assets within the village. Facilitate the use of private and public sector resources to improve the overall economic health and vitality of the town. Particular considerations set out in the consultants brief were to consider: proposals capable of attracting inward investment and to allow a more permeable town centre, increase densities, achieve a broader mix of uses and improve access. The possibility of bringing traffic through the village by introducing a shared surface; incorporating excellent urban design and high quality public realm; greater physical integration and connectivity to the surrounding shopping areas to form a vibrant and distinct district centre. The development of the evening economy while minimising negative impacts, for example noise, crime and disturbance. Support for small businesses, particularly the independent offer. Capturing more of the spending power of local residents, employees and visitors. Retention of a convenience shopping offer for local residents. The importance of greater dwell time, visitor spend and therefore commercial viability. Developing a distinctive identity and offer for the existing town centre based on its strengths. Accommodating leisure/local services so that the town centre is a focus of activity for the local community. Parking proposals that meet the strategic needs of the Council and the private sector while also creating an excellent parking experience for consumers."

Evidence Submitted

Chapter 7	Plan Order Policy ED9	Other Documents
Policy ED9	Crosby Centre	
Respondent No 638	Response Ref 15	Representor Name
Organisation Name Crosby Investment Strategy Steering Group		
Obj/Sup/Com Objection		

Summary of Main Issues

Regarding transport, we would express a high degree of concern that the supporting 'Infrastructure Delivery Plan' (IDP) (Para 9.5 refers) is disappointingly vague about what is proposed, all the more so since the emerging Crosby Investment Strategy is likely to include ideas and proposals about public transport and parking facilities. In the Delivery Schedule to the IDP, in both cases, no costs are identified, nor is any funding secured, nor any source of funding identified, and crucially, no timetable for delivery identified. Resolution of these matters is central to the attraction of investment to Crosby to secure the comprehensive regeneration of the Centre in line with Policies and ED9.

Summary of Suggested Changes

Infrastructure Delivery Plan should identify proposed sources of funding and ideally timescale/strategy for delivery.

Evidence Submitted

Chapter 7	Plan Order Policy ED9	Other Documents
Policy ED9	Crosby Centre	
Respondent No 638	Response Ref 3	Representor Name
Organisation Name Crosby Investment Strategy Steering Group		
Obj/Sup/Com Objection		

Summary of Main Issues

Policy ED9 fails the stated 4 headings in the accompanying notes to the Representation Form. Positively prepared: The plan does not set out the most appropriate strategy, when considered against reasonable alternatives, based on proportionate evidence. Effective: the Plan fails to recognise the difficulties represented by the policy of Sainsbury to dispose of their holding piecemeal so is unlikely to be deliverable over its period. Consistent with national policy: The plan should enable the delivery of sustainable development in accordance with the police in the Framework but shows no commitment to supporting the beleaguered High Street of Crosby following years of inactivity by the Council as Planning Authority and Land Owner.

Summary of Suggested Changes

Evidence Submitted

Chapter 7	Plan Order Policy ED9	Other Documents
Policy ED9	Crosby Centre	
Respondent No 648	Response Ref 6	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. The historic environment should be considered in delivering a number of other planning objectives. In particular it should contain strategic policies for the conservation and enhancement of the historic environment and how this will be applied locally, The historic environment in Crosby makes a contribution to its unique character and identity and also its attractiveness as a place to live, work and visit. The Plan does little to ensure the historic environment is conserved and enhanced and does little to positively promote improvements to heritage assets. The Plan should recognise the active work that the Council is already involved in the town in the historic environment and highlight its priorities..

Summary of Suggested Changes

The Plan should be expanded to ensure that the strategy for the historic environment in Crosby is recognised, conserved and enhanced whilst maximising opportunities to contribute to economic, social and environmental objectives. Specific priorities for the historic environment should be included.

Evidence Submitted

Chapter 8	Plan Order Chapter 8	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 550	Response Ref 17	Representor Name Peter Brown
Organisation Name Merseyside Civic Society		
Obj/Sup/Com Comment		

Summary of Main Issues

MCS is also especially anxious to ensure that any efforts made to bring forward development, to meet affordable housing need, will avoid mere suburban growth and, by involving local people, will seek to create localities with character, good design and good connections.

Summary of Suggested Changes

Evidence Submitted

Chapter 8	Plan Order Chapter 8	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 723	Response Ref 4	Representor Name Laurence Rankin
Organisation Name	Sefton Green Party	
Obj/Sup/Com	Comment	

Summary of Main Issues

It is crucial that existing stock is used to maximum advantage. We need to take advantage of available finance including for the installation of renewable energy devices and improving the energy efficiency of properties. Again self build initiatives could be supported to recover existing dwellings The new "Matchmaker" scheme is to be commended and needs to be energetically marketed across the borough and beyond. This could be more closely linked to commercial estate agent operations with incentives/prizes for performance.

Summary of Suggested Changes

Evidence Submitted

Chapter 8	Plan Order Policy HC1	Other Documents
Policy HC1	Affordable and special housing needs	
Respondent No 31	Response Ref 1	Representor Name Roger Pontefract
Organisation Name		
Obj/Sup/Com	Comment	

Summary of Main Issues

The Local Plan deals in detail with the future housing needs of an ageing population in paras 8.21 - 8.34 and makes a link with the emerging Older Persons Housing Strategy Research findings in paras 8.32 and 8.34.

The question which arises is whether the two documents are fully integrated - such that Council owned land (where it is available) could be utilised to help ensure that the identified requirements of older citizens are met?

Whilst this might not necessarily maximise the capital receipt to the Council from the sale of the land, any short-term reduction in a capital receipt would be more that counter-balanced by future savings in residential care and health service costs, since many more people would be able to remain for longer within a community setting within which their needs could be met. The quality of life of those affected would also be significantly improved.

As far as I am able to ascertain from the Local Plan, sites of this nature (and within Council ownership) have not been "reserved" for the type of use which I have set out, and I would strongly recommend that the Council considers this option as part of its implementation programme for future housing developments to help address the future housing needs of Sefton's rapidly ageing population.

Summary of Suggested Changes

The Council considers reserving land in its ownership for older persons housing.

Evidence Submitted

Chapter 8	Plan Order Policy HC1	Other Documents
Policy HC1	Affordable and special housing needs	
Respondent No 135	Response Ref 2	Representor Name Fiona Kinsella
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

I do not think that the houses being built are/will be the affordable housing stock for our young people, but rather an attractive opening to developers.

Summary of Suggested Changes

Evidence Submitted

Chapter 8 **Plan Order** Policy HC1 **Other Documents**
Policy HC1 **Affordable and special housing needs**
Respondent No 268 **Response Ref** 1 **Representor Name** Fred Weavers
Organisation Name Sefton MBC
Obj/Sup/Com Objection

Summary of Main Issues

The strategic housing market assessment update states that Sefton's housing requirements is 11,070 houses over the life of the local plan. 7850 affordable houses are required and 1660 should be special needs and extra care for older people.

The plan also states that with the exception of Bootle and Netherton 30% of new developments should be affordable Houses 30% of 11,070 is approximately 3300 this plan does not even have the aspiration to meet Sefton's needs In affordable and special needs housing.

Summary of Suggested Changes

Evidence Submitted

Chapter 8 **Plan Order** Policy HC1 **Other Documents** SHMA
Policy HC1 **Affordable and special housing needs**
Respondent No 383 **Response Ref** 4 **Representor Name** Malcolm Gore
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

The whole reason for all the homes in Maghull, according to the council, was to provide affordable homes. There are plenty of houses empty in the area, usually about 400 at any one time.

The council removed the need for affordable homes on the Land East of Maghull site policy, as it was already asking the developers to contribute to the new station, M58 improvements and extension to Summerhill School. This proves without doubt that the council want to build on this site no matter what they build. It is not the housing requirement that is the driving force but the need for money, the "New Homes Bonus", and contributions from developers for large infrastructure projects. The fact that the houses are not needed, are of the wrong type and in the wrong place is immaterial to Sefton.

Summary of Suggested Changes

Evidence Submitted

Chapter 8 **Plan Order** Policy HC1 **Other Documents**
Policy HC1 **Affordable and special housing needs**
Respondent No 421 **Response Ref** 9 **Representor Name** Colin Reader
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Although Sefton Council have included a policy to provide ‘30% affordable houses’ within new developments, as the financial implications of the scale of the proposed development have become clear, Sefton MBC have already found it an economic necessity to withdraw this key policy requirement in a number of specific and noteworthy cases (eg Site MN2.46).

Even with an effective ‘30% affordable homes’ policy in place however, without support from the private rental sector, this is not considered to be sufficient to meet the projected demand from the increasingly aging population. NLP note at para 7.20, that to satisfy demographically-derived affordable homes requirements, something in the order of 361 affordable homes per year are required. When compared with the target build rate of 615 dpa, this equates to a requirement of some 59%, far higher than the 30% affordable homes target implied by current policies. It is increasingly evident however, that when tested on specific sites, Sefton MBC have found it necessary to abandon even the 30% target for affordable homes. It would appear therefore, that even before the Local Plan has been subject to Planning Inspector scrutiny, Sefton MBC have begun to realise that one of the key policies for the future of the borough, the affordable housing policy, can not be delivered.

Summary of Suggested Changes

Evidence Submitted

Chapter 8 **Plan Order** Policy HC1 **Other Documents**
Policy HC1 **Affordable and special housing needs**
Respondent No 433 **Response Ref** 8 **Representor Name** Eric Haworth
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

A key part of the Sefton MBC housing policy in developing this Local Plan was a commitment to a “30% affordable homes” policy, however they have already found it an “economic” necessity to withdraw this key policy, because their developers claim there is insufficient profit in it for them?

Even with an effective ‘30% affordable homes’ policy in place, without support from the private rental sector, this is not considered to be sufficient to meet the projected demand.

Strategic Housing Market Assessment suggests that the significant shortfall between the need for and supply for affordable housing is largely being met by the Private Rented Sector [PRS] which currently has over 10,000 individual claimants for Local Housing Allowance.” NLP note at para 7.20, that to satisfy demographically-derived affordable homes requirements, something in the order of 361 affordable homes per year are required. When compared with the target build rate of 615 dpa, this equates to a requirement of some 59%, far higher than the 30% affordable homes target implied by current policies. It is increasingly evident however, that when tested on specific sites, Sefton MBC have found it necessary to abandon even the 30% target for affordable homes. It would appear therefore, that even before the Local Plan has been subject to Planning Inspector scrutiny, Sefton MBC have begun to realise that one of the key policies for the future of the borough, the affordable housing policy, cannot be delivered.

For the reasons set out above, we object in the strongest possible terms to the current version of the Local Plan and request that this Local Plan is rejected by the Planning Inspector.

Summary of Suggested Changes

Evidence Submitted

Chapter 8 **Plan Order** Policy HC1 **Other Documents**
Policy HC1 **Affordable and special housing needs**
Respondent No 474 **Response Ref** 3 **Representor Name** Bill Esterson
Organisation Name Member of Parliament
Obj/Sup/Com Objection

Summary of Main Issues

If major developments are included by the Inspector, then provision should be made for social housing in such a way that developers cannot exclude development of social housing on viability grounds. A reasonable allocation of social and other types of affordable housing should be included and allocated to people living nearby. I have suggested that 50% of social and affordable private housing be allocated to people who live within 2 miles of a major site to ensure that local people benefit from significant changes to their community. Similarly, infrastructure levies should be used for the immediate area and should be brought forward in such a way to allow infrastructure improvements to happen at the same time as major developments are built.

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.

Evidence Submitted

Chapter 8 **Plan Order** Policy HC1 **Other Documents**
Policy HC1 **Affordable and special housing needs**
Respondent No 548 **Response Ref** 5 **Representor Name** Michael and Julie Corbitt
Organisation Name
Obj/Sup/Com Comment

Summary of Main Issues

The Core Strategy placed heavy emphasis upon 'affordable housing' being the prime requisite. Our enquiries have noted a significant shift in bias from affordable housing to 3 and 4 bed executive type detached housing. This clearly favours house developer's profit margins, not local requirements.

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 8 **Plan Order** Policy HC1 **Other Documents**
Policy HC1 **Affordable and special housing needs**
Respondent No 625 **Response Ref** 5 **Representor Name**
Organisation Name Wainhomes Developments Ltd
Obj/Sup/Com Objection

Summary of Main Issues

Part 2 of policy HC1 does not offer any opportunity for negotiation or to reflect changes in need or in any area.

Summary of Suggested Changes

The following should be added to the end of part 2 of policy HC1: "unless otherwise agreed to meet the needs of the area at that particular time".

Evidence Submitted

None

Chapter 8 **Plan Order** Policy HC1 **Other Documents**
Policy HC1 **Affordable and special housing needs**
Respondent No 635 **Response Ref** 3 **Representor Name** Graham Nelson
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

The Plan offers inadequate provision for suppressed households requiring truly affordable houses and Social Housing. Its definition of “affordable homes” is non-existent, and evidence suggests that the Council regards properties costing around £300,000 can be defined as “affordable”. The emphasis is on executive housing. Indeed, The Plan places inadequate emphasis on bringing brownfield sites back.

Summary of Suggested Changes

Evidence Submitted

Chapter 8 **Plan Order** Policy HC1 **Other Documents**
Policy HC1 **Affordable and special housing needs**
Respondent No 637 **Response Ref** 8 **Representor Name** Ken Hopkins
Organisation Name Mactaggart & Mickel Homes Ltd
Obj/Sup/Com Objection

Summary of Main Issues

Mactaggart & Mickel believe that for the affordable housing policy to operate successfully and not impinge or be a barrier to development coming forward, changes are required to policy HC1. In section 2 the balance between social rented / affordable rented and intermediate housing has to be 50 / 50 and not the 80% / 20% split proposed. This maximises the prospects of affordable housing being devliered in conjunction with market housing. Section 7b is far too prescriptive in terms of 'pepper potted' accommodation restricted to groupings of 'no more than 6'. Mactaggart & Mickel and affordable housing operators wish to have clusters of affordable housing for ease of management.

Summary of Suggested Changes

Amend section 2 of the policy to require 50% of the affordable housing to be social rented / affordable rented housing and 50% to be intermediate housing. Amend section 7(b) of the policy to remove reference to groupings of 'no more than 6' dwellings, to allow larger clusters.

Evidence Submitted

Chapter 8 **Plan Order** Policy HC1 **Other Documents**
Policy HC1 **Affordable and special housing needs**
Respondent No 653 **Response Ref** 1 **Representor Name** Shaun Taylor
Organisation Name Satplan Ltd
Obj/Sup/Com Objection

Summary of Main Issues

Calculating affordable housing requirements from new developments on bed spaces could have a detrimental impact on scheme viability. Furthermore this approach could affect the mix of housing developed and therefore reduce housing availability across the borough.

Summary of Suggested Changes

The affordable housing requirement should be calculated on the basis of a percentage of the total amount of housing proposed.

Evidence Submitted

Policy HC1

Affordable and special housing needs

Respondent No

668

Response Ref 5

Representor Name Andrew Thompson

Organisation Name Morris Homes and Ballygorryveg Ltd

Obj/Sup/Com

Objection

Summary of Main Issues

The policy approach should be reconsidered for the following reasons:

Paragraph 8.13 of the Local Plan states that a single bedroom is considered to be one bedspace, whereas a double bedroom is identified as two bedspaces. However single and double bedrooms have not been defined in the policy, its justification or the glossary for Local Plan publication draft. This policy approach is therefore too ambiguous, and therefore is considered to be contrary to the National Planning Policy Framework paragraph 174. If the definition were to relate to bedroom size schemes with large bedroom sizes will be unnecessarily burdened with affordable housing provision, even if half of the rooms in the open market element of the scheme function as single bedspaces; The 2014 SHMA identifies affordable housing need on a household basis (the outcome of which was 434 dpa between 2012 and 2030), the approach to delivering affordable homes on a bedspace basis does not co-ordinate with the identified need; and The tenure split of affordable units as outlined in HC1 (80% social/affordable rent and 20% intermediate housing) is considered to be inappropriate.

The Local Plan and Community Infrastructure Levy Economic Viability Study (2014) considers the impact of viability on two scenarios at paragraphs 6.72-6.87 in the Formby area. Formby is acknowledged throughout the Local Plan as being one of Sefton's high value areas, however when applying the proposed affordable housing policy criteria only 54% of schemes remained viable. This demonstrates that just over half of the schemes will be able to provide the affordable housing requirement as set out in Policy. This is contrary to paragraph 173 of the National Planning Policy Framework, which requires Local Authorities not to set planning obligations at such a scale that development viability may be threatened.

Due to this ambiguity, it is anticipated that the policy will lead to more than 30% of the dwellings provided on the site being built as affordable homes. This is likely to adversely impact on viability. This will be further impacted on by the tenure split requirements. Both the bedspace approach and the tenure requirements are considered contrary to paragraph 173 of the National Planning Policy Framework. The approach in Local Plan paragraph 8.17 that non-viability should be demonstrated through a full financial appraisal is supported.

Summary of Suggested Changes

Amend policy HC1 so that 30% of the dwellings should be provided as affordable housing, with no specified tenure split. The former is clearer to developers, whilst the latter should be determined at the planning application stage on a site by site basis to meet the Borough's changing needs.

Evidence Submitted

Chapter 8 **Plan Order** Policy HC1 **Other Documents**
Policy HC1 **Affordable and special housing needs**
Respondent No 680 **Response Ref** 3 **Representor Name** J Edgar and MJ Joyce
Organisation Name Reclaim Community
Obj/Sup/Com Objection

Summary of Main Issues

We object in the strongest terms to the policies at HC 1 and paras 8.10 on provision of AH. 7,815 AH over the plan period represent some 70% of the total housing requirement of 11,070 equated to 434 AH DPA.

We refer to Headroom Report 2014 and SHMA 2014. The former claims the only way to increase AH supply is to increase the housing requirement above 11,070, we totally reject that, and the SHMA commits the Council to continued substantial reliance on PRS supply.

NPPF appendix specifies registered providers as the source for AH and excludes PRS from that category – only sensible given the differential rent levels between PRS and AH across most of Sefton.

We recognize some 10,000 tenants in PRS receive HB support to pay their rent, this is consistent with a press report (12/3/2014) GMB Survey that showed Sefton MBC had 15,804 PRS homes of which 10,780 have HB claimants i.e. 68% reflecting low pay both in and out of work across the borough (see also Local Economic Strategy – 2012-2022, published 2/4/2012). It also confirms high levels of deprivation, mostly in Bootle and also central Southport.

We believe the supply of SRH/ AH should be maximized from all other sources.

Figure 5.2 records house builds of 15,680 over 30 years (1984-2014) there is no comparable information on social rented or affordable housing built over the same period, despite the number of PPG 3: Housing issued over the 1990's & 2000's., committing development to provision of that tenure. In our view NPPF 2012 together with the Localism Act 2011 and Housing Act require the LPA with its Strategic Housing Authority role to collate information for this draft local plan on indicative provision of this tenure over the period of the plan. The Council has not done so, we think it must!

We suggest to Policy HC 1 in the following way: -

HC1 part 2 30% of new development of 15+ dwellings should be changed to state – 30% minimum with upward flexibility to 40% on high value sites and downward threshold to 13+ dwellings.

HC 1part 3 Bootle and Netherton should be included in the policy for all Sefton and not reduced to only 15% on 15+ dwellings. As per the Headroom Report and Council agree that the Borough constitutes one housing market area. It is acknowledged there is most supply of SRH/AH as a percentage of the total stock is in the South of Sefton - an historic pattern. Just as minimal supply in Formby of 2.9% AH and in Maghull 4.7 AH is also a long established pattern. But additional supply in Bootle and Netherton can contribute supply for other areas of Sefton where difficult to obtain.

We note at HC1/7a, that AH dwellings should be tenure blind and should no different externally to market housing, we object to AH housing measured in bedspaces as opposed to bedrooms in market housing. We require the same housing standards to apply across all tenures.

At policy MN 2 – Housing Allocation Sites 12 sites amounting to 43.6 hectares with indicative capacity of 1,268 dwellings should be all AH. Of the 12 sites, 10 are former LEA school sites, 1 is a former housing site (demolished under HMRI) and 1 is a former prison site in Maghull. 2 further sites are from the HMRI programme that is the Klondyke and Peoples Site. All 14 sites have been funded by tax payers money and constitute publically owned land. A total 50.7 hectares with capacity for 1,518 AH dwellings, no doubt to be allocated to the 70% Market Housing / 30% Affordable housing.

We note the reference in SHLAA other sites. We know it is a requirement of the, but it is an inadequate tool, the annual call for sites criteria, is restricted to sites which are 'suitable and available for housing development' i.e. it is a wholly reactive, ad-hoc process.

The Council has substantial information on land use in its area.

--- Disused / derelict / contaminated / industrial legacy sites.

--- Empty office buildings

--- Vacant housing

--- Closed shops in residential areas

This information could easily be used for a paper audit of potential additional housing.

We note the loss of some 1,500 + SRH/AH dwellings between 2001 & 2011 census. So such an audit would provide the base data for examining additional supply schemes through registered provider re-lets. Council reserve funds (£10m unallocated), RP funds and RTB receipts could provide a pot for purchase or lease and renovation and re-let, a co-operative social enterprise model could also be used.

Further planned demolitions by OVH the Council house stock transfer housing association, must be stopped. An estimates minimum of 245 dwellings are programmed for demolition, one tower block is still owned by Sexton MBC. Part 1 – Prior Approval applications for two tower blocks have been made and withdrawn. The reasons for the demolition are sited as low demand and uneconomic to renovate, with such a high level of need of 7,815 needs, this is an utter public disgrace and a scandal.

We are all aware of the acute impoverishment and despair of tenants affected by all the Social Security Benefit cuts since 2013 under the current Government. Another £12 billion of un-identified Social Security Cuts were further announced in the budget March 2014. This can only increase the already visible pressures and distress on local residents, particularly in the South of the Borough. We again demand that the Local Plan Team and Strategic Housing Authority Teams undertake an urgent impact assessment of these affects across its communities.

Summary of Suggested Changes

HC1 part 2 30% of new development of 15+ dwellings should be changed to state – 30% minimum with upward flexibility to 40% on high value sites and downward threshold to 13+ dwellings.

Evidence Submitted

Objection to Preferred Option Paper [September 2013]
 Objection to SHMA consultation [March 2014]

Chapter 8	Plan Order Policy HC1	Other Documents
Policy HC1	Affordable and special housing needs	
Respondent No 685	Response Ref 6	Representor Name
Organisation Name Taylor Wimpey		
Obj/Sup/Com Objection		

Summary of Main Issues

TWUK appreciates the importance of delivering high quality affordable housing. However, concerns are raised in respect of how the affordable housing provision is calculated. Government guidance set out in the Planning Practice Guidance establishes a methodology for calculating affordable housing need. This methodology refers to households, dwellings and units. At no point does it refer to bedspaces. The policy as it is currently drafted will disproportionately impact on developers who seek to build larger properties, with more bedspaces, in order to create the value to deliver affordable housing.

Summary of Suggested Changes

All of Sefton outside Bootle and Netherton. For new developments of 15 dwellings or more (or for residential and other conversions involving 15 or more additional dwellings net) 30% of the total scheme (measured by no. of dwellings) will be provided as affordable housing. Affordable housing should be provided as social rented/affordable rented and intermediate housing. Bootle and Netherton.

Affordable housing will be required as part of proposals for new developments of 15 dwellings or more (or for residential and other conversions involving 15 or more additional dwellings net) on the basis of 15% of the total scheme (measured by no. of dwellings).

All Areas. Special needs housing, comprising, can be substituted for up to 50% of the site affordable housing contribution on a bedspace for bedspace basis. The residual affordable housing requirement should meet the relevant tenure requirement. Affordable and/or special needs dwellings shall be: Clustered i.e. there shall be a reasonable dispersal of affordable housing or special needs units within residential developments to promote mixed communities and minimise social exclusion unless it can be demonstrated that this is not possible for functional or management purposes.

Evidence Submitted

Chapter 6 **Plan Order** Policy HC1 **Other Documents**
Policy HC1 **Affordable and special housing needs**
Respondent No 692 **Response Ref** 7 **Representor Name** Peter Harper
Organisation Name UKIP Sefton Branch
Obj/Sup/Com Objection

Summary of Main Issues

The Local Plan includes the statement: "Sefton's current affordable housing policy is that all developments of 15 or more dwellings must provide 30% affordable housing providing this is economically viable. This policy will be applied to new housing sites including any within the Green Belt." The inclusion of "providing this is economically viable" provides an obvious and very simple get-out for reluctant developers, doesn't it? This is completely unacceptable.

Also, the wordnig above makes it clear that 70% of development will not be affordable housing: from where does this "need" to build unaffordable (i.e. expensive, luxury) housing come? Are we supposed to believe that large luxury homes will be built on our Green Belt to accommodate a real "need" for such developments? Surely the development of such housing breaches the entire remit of Sefton's Local Plan.

Summary of Suggested Changes

Evidence Submitted

Chapter 8 **Plan Order** Policy HC1 **Other Documents**
Policy HC1 **Affordable and special housing needs**
Respondent No 696 **Response Ref** 4 **Representor Name** Robin Buckley
Organisation Name Redrow Homes Ltd
Obj/Sup/Com Objection

Summary of Main Issues

It is recognised that Sefton Council has a record of determining the affordable housing requirement for any one development by reference to bedspaces. However, we object to continuing with this approach. In a scheme with a pre-ponderance of larger houses with many bed spaces an affordable requirement based on 30% of bed spaces could well lead to a number of actual affordable units which is in excess of 30% of the total number of units particularly as the SHMA shows a demand for smaller affordable units. This will impact on the viability of bringing development forward.

The Economic Viability Study shows how sensitive development viability is to different mixes of affordable new housing. The policy should require 30% of new housing to be affordable units.

Summary of Suggested Changes

The policy should require 30% of new housing to be affordable units, not bedspaces.

Evidence Submitted

Chapter 8 **Plan Order** Policy HC1 **Other Documents**
Policy HC1 **Affordable and special housing needs**
Respondent No 706 **Response Ref** 4 **Representor Name** Mike McComb
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

There should be greater flexibility in the percentage split between rent and intermediate housing. Part 2 of policy HC1 currently states that 80% of the affordable housing should be provided as social rented/affordable rented and the remaining 20% provided as intermediate housing. However this would be set in an adopted policy with no opportunity for negotiation or to reflect changes in need or in a particular area.

Summary of Suggested Changes

Add to the end of the part 2 of policy HC1 "unless otherwise agreed to meet the needs of the area at that particular time".

Evidence Submitted

Chapter 8	Plan Order Policy HC1	Other Documents
Policy HC1	Affordable and special housing needs	
Respondent No 707	Response Ref 7	Representor Name Matthew Good
Organisation Name Home Builders Federation		
Obj/Sup/Com Objection		

Summary of Main Issues

The policy is considered unsound as it is unjustified, inconsistent with national policy and will not assist the delivery of the plan.

The HBF support the provision of affordable housing and note the identified need for 434 affordable dwellings per annum outlined within the 2014 SHMA. The policy seeks to meet this need through a geographically variable affordable housing requirement with sites of 15 or more outside of Bootle and Netherton having a target of 30% (measured by bed spaces) and within Bootle and Netherton a target of 15% (measured by bedspaces). The HBF has serious concerns over this policy and its impact upon viability, these are set out below.

The policy identifies a 15% requirement for affordable housing within Bootle and Netherton. This is a significant policy change from the previous consultation which provided a 0% target within Bootle based upon viability issues. The SHMA indicates a surplus of affordable housing within Bootle and Netherton with net requirements for -32 and -9 dwellings per annum respectively. The HBF therefore considers the need within this area not to be justified and as such is considered unsound.

The HBF is broadly supportive of a variable affordable housing target which responds to the differing economic circumstances across the district. The targets are however considered unjustified by the evidence and are considered to be prohibitive to ensuring that the plan can deliver its housing needs.

The Council's 2014 Viability study considers the levels of affordable housing which can be viably delivered across the plan area. The study sub-divides the plan area into five zones and analyses each zone for viability and its ability to provide the relevant affordable housing target.

Within zones 1 and 2 (Bootle and Netherton) a significant quantum of development is unviable, or at best marginal, with affordable housing contributions set at 10% (see tables 6.2 and 6.3). Once the threshold is raised to 20% only 3 sites within zone 2 remain viable, either at the 80/20 or 60/40 social rented/intermediate split. The HBF is unaware that the Council has undertaken an analysis of the 50/50 split contained within the policy. Nevertheless it appears unlikely that the majority of development within these areas can withstand a greater affordable housing requirement than 10% and even this is likely to be challenging.

Within the remainder of the district a 30% requirement is needed with an 80/20 social rented/intermediate split. The study identifies that such a requirement is unlikely to be viable on the majority of brownfield sites within this area. Whilst the study indicates that in the case of greenfield sites the picture is more positive it must be recognised that the tables within section 6 do not consider the cumulative impact of all policies, including the government's push towards zero carbon, but rather separate out these impacts. The HBF therefore questions the overall viability within these areas even on greenfield sites. Section 6 of the study further tests 14 of the proposed allocations and when policy compliant affordable housing requirements are placed upon the sites over 50% (8 out of 14) are marginal.

The NPPG clearly states that; 'Plan makers should not plan to the margin of viability but should allow for a buffer to respond to changing markets and to avoid the need for frequent plan updating. Current costs and values should be considered when assessing the viability of plan policy. Policies should be deliverable and should not be based on an expectation of future rises in values at least for the first five years of the plan period. This will help to ensure realism and avoid complicating the assessment with uncertain judgements about the future. Where any relevant future change to regulation or policy (either national or local) is known, any likely impact on current costs should be considered' (our emphasis 10-08-20140306)

The Council's 2014 viability study also comments that; '....In summary, the delivery of Policy requirements at 30% on site provision (in all areas except Bootle on developments of 15 units or more) measured with reference to bed spaces is not viable in all cases, and may put the delivery of some housing sites at risk.....' (paragraph 9.12).

Based upon the information provided within the evidence base the HBF considers that the proposed affordable housing targets are too high and will have a negative impact upon plan delivery. It is therefore recommended that reduced targets are considered.

The issue of affordable housing targets discussed above will be compounded by the reference to the requirements being for bed-spaces. The implications of this requirement is that in the majority of cases the actual affordable housing requirement, in terms of dwellings provided, is considerably greater than 30% and as such will have a significant impact upon development viability, including those sites currently identified as being viable. The viability study has not sought to assess the impact of the bed space requirement but has rather assessed a flat 30 or 15%. The HBF therefore considers the bed space requirement to be unjustified.

It is worth noting that the bed space requirement is a difficult methodology which creates uncertainties for the development industry. Sefton is the also the only authority within the region which operates such a system for calculating affordable housing.

The policy references conversions and the need to provide affordable housing from such developments. The Council will be aware of the recent ministerial statement in relation to affordable housing on 28th November 2014. This statement introduced vacant building credits. This applies where a vacant building is either brought back into lawful use or is demolished to be replaced by a new building. In such cases a financial credit equivalent to the existing gross floorspace of relevant vacant buildings should be applied (NPPG ID: 23b-022-20141128). For example if an 800sqm floorspace building is demolished and the new development has 1000sqm of floorspace, the affordable housing contribution sought should be a fifth of what would normally be sought. The policy as written is contrary to this change in government policy.

Part 8 of the policy incorporates an element of flexibility which the HBF supports and considers consistent with national policy. It is, however, important that such clauses are not utilised in order to retain unsustainable policy requirements. It is incumbent upon the Council to ensure that its policies are sustainable in the majority of cases.

Summary of Suggested Changes

Evidence Submitted

Policy HC1

Affordable and special housing needs

Respondent No 709

Response Ref 1

Representor Name Peter Furredge

Organisation Name Collective Edge Ltd

Obj/Sup/Com Objection

Summary of Main Issues

This objection is submitted on the basis that policy HC1 renders the Local Plan “not sound” in that it is not effective, i.e. policies HC1 and HC2 will not be deliverable due to the requirements of HC1 point 5: “Special needs housing can be substituted for up to 50% of the site affordable housing contribution on a bedspace by bedspace basis. The residual affordable housing requirement should meet the relevant tenure requirement.” This is supported by paragraph 8.15, which stipulates that “where special needs housing is accepted as an alternative to affordable housing, the bedspaces provided may offset or replace up to 50% of the affordable housing required”.

The requirements of HC1 point 5, supported by paragraph 8.15, which represent a shift from the current policy of allowing extra care bed spaces to be offset against or replace the affordable housing requirement on a 1:1 basis, will impact adversely upon delivery of the 2014 Strategic Housing Market Assessment (SHMA) estimate, detailed in paragraph 8.24 of the Local Plan, that around of 15% of new housing provided over the plan period equivalent to about 1,674 dwellings should be extra care provision for older people.

In the first instance, in removing the 1:1 offset, there is a significant risk that some housing provision for older people, especially extra care facilities, will become an unviable proposition relative to general needs residential development, particularly where HC1’s goal of 30% affordability is concerned. Retirement housing schemes, and extra care in particular, are generally less viable than general needs residential development and, while revenue per unit may be typically higher for specialist older persons’ housing than for general needs apartments, revenue per sq m is not necessarily higher. This is due to a range of factors, including the higher per sq m build cost resulting from the higher specification required in individual apartments. A higher proportion of communal and non-saleable space such as a kitchen that is substantial enough to provide a hot meal each day for all residents, dining areas, common rooms, and activity room. A slower return on investment due to lack of ability to phase development and longer selling periods as schemes need to be fully complete before sales are made. Substantial on-site staff costs that can only be recovered when all apartments are sold or rented and all service charges being paid. Higher land values as schemes work best when they are close to shops, services, GP practices and transport links.

Local Planning Authorities and Consultants require robust information upon which to base the viability studies that will determine the percentage of affordable housing that a site can sustain and the mix of general needs and special needs accommodation to be developed. In order to assist in this The Retirement Housing Group (2013) has prepared generic examples of typical sheltered and extra care schemes that include key variables that may be applied in any part of the country. The key factors to note in respect of the deliverability of HC1 and HC2 are: Sheltered build cost per sq m is typically 9% above that for 1-2 storey fla. Extra care build cost per sq m is typically 13% above that 1-2 storey flats. Marketing costs of sheltered and extra care units are typically 6% of revenue compared with 3% for general needs houses and flats. Sales periods are typically longer for retirement housing than for general needs housing, as a rough guide 40% of units will be sold during the first year of sales and 30% in each of the second and third year of sales. In addition, there is typically an 18 month build period, to scheme completion, before sales commence.

The Retirement Housing Group calculates no chargeable space to be: General needs houses: nil. General needs flats: 1. Sheltered housing: 20% to 30%. Extra care: 35% to 40. In pricing new build retirement housing, the Retirement Housing Group provides the following formula as an indicative guide to the pricing of lower value units that are likely to be affordable to local home owners:

-In medium and low value areas the price of a one bed sheltered property equals 75% of the price of an existing three bed semi-detached house. The price of a two bed sheltered property equals 100% of the price of an existing three bed semi-detached house. In high value areas the price of a one bed sheltered property is linked to the price of high value flats, normally with a 10% to 15% premium. Extra care is 25% more expensive than sheltered.

Based upon these parameters set out by the Retirement Housing Group, a viability appraisal was undertaken comparing the residual land values per hectare for each form of development (general housing, sheltered and extra care) with affordable housing targets in high value, medium value and low value areas outside of London. The study provided the following outcomes: In the high value area, with an affordable housing target of 40% all three schemes provided a positive residual land value, with the highest residual value delivered by general needs housing followed by sheltered and extra care. In the medium value area, with an affordable housing target of 30%, both sheltered and extra care delivered negative residual land values. In the low value area, with an affordable housing target of 25%, all three schemes produced a negative residual land value.

HC1 provides an affordable housing target of 30% for all of Sefton outside of Bootle and Netherton and 15% for Bootle and Netherton. The outcome of the Retirement Housing Group study indicates that the viability of this target in tandem with HC2’s goal of delivering the 2014 SHMA target of 15% of new homes as extra care provision is questionable if special needs bedspaces

provided may offset or replace up to 50% of the affordable housing requirement rather than the existing 100%. Paragraph 8.17 appears to address the issue of economic viability through enabling applications to depart from HC1, based upon a financial assessment to be appraised by independent consultants. However, given that landowners are understandably very reluctant to delay the sale of land while a full planning application is tested for viability and the value that can be achieved is known, the point at which the independent consultants may agree a reduction in the affordable housing requirement that is equal to the current 1:1 offset is likely to be too late in the process to enable a development to proceed. By means of illustration:

In a scenario where an extra care developer offers a landowner a lower price for a portion of land than a housebuilder does, but the extra care developer can demonstrate a benefit to the landowner from employing the 1:1 offset of extra care against the affordable housing requirement, then the landowner is likely to consider the offer from the extra care developer. If, however, the 1:1 offset is only a future possibility, dependent upon a planning application and subject to an economic viability appraisal, then the landowner is likely to accept the higher offer from the housebuilder.

A viability assessment must properly assess the added costs of developing extra care housing, especially the cost of providing communal facilities and staffing the development prior to full occupation. However, in a 2012 study, the Retirement Housing Group concluded that "Few of the Viability Appraisals undertaken by outside consultants include specific consideration of C3 retirement housing". The study contrasted the approach of one of the "few", undertaken by BNP Paribas in Oxford, which specifically concluded that the higher proportion of communal and non-saleable space and slower sales rate in retirement housing relative to general needs would "result in a negative residual land value", with the more common approach illustrated in a Plymouth City Council Viability Assessment that concluded "However, the availability of communal area and other facilities within retirements schemes is likely to be reflected in the purchase price of individual units. Thus the amenity afforded by such areas contributes to higher development values". The Plymouth assessment is clearly contradictory to the evidence provided by the Retirement Housing Group and, if a similar approach were to be employed in Sefton in place of the existing policy of allowing 1:1 offset, would be to the detriment of the objectives of both HC1 and HC2.

The additional costs referenced in this submission add significantly to the overall cost of extra care housing and there is evidence that viability assessments may not properly take these costs into account. Furthermore, in support of retaining the existing 1:1 offset policy, there is substantial evidence that the provision of extra care accommodation has a positive impact in terms of reducing costs to both social services and the NHS.

Summary of Suggested Changes

The proposal is to amend the wording of point 5 of Policy HC1 to read: "Special needs housing can be substituted for up to 100% of the site affordable housing contribution on a bedspace by bedspace basis. Any residual affordable housing requirement should meet the relevant tenure requirement."

This amendment will enable the Local Plan to be "sound" in that it be effective in terms of its deliverability through facilitating the viability of developments that will meet the both the HC1 target for social housing and the HC2 target for the provision of extra care.

"Where special needs housing is accepted as an alternative to affordable housing, the bedspaces provided may offset or replace up to 100% of the affordable housing required. Any balance of affordable housing required must be provided on the basis of a split between 80% social rented/affordable rented and 20% intermediate housing, by bedspaces in all parts of the Borough except Bootle and Netherton, where all affordable housing will be intermediate housing. Where extra care or sheltered housing is proposed to be substituted for affordable housing, 80% of this should be provided as social rented/affordable rented and the remaining 20% provided as intermediate housing for all parts of the Borough, except Bootle and Netherton, where it should be provided as 50% social/affordable rented and 50% as intermediate. Other forms of special needs housing can help meet Sefton's overall housing needs even if they cannot be a substitute for affordable homes."

Evidence Submitted

Chapter 8 **Plan Order** Policy HC1 **Other Documents**
Policy HC1 **Affordable and special housing needs**
Respondent No 717 **Response Ref** 7 **Representor Name**
Organisation Name TR Silcock Ltd, DWH & Barratt Homes
Obj/Sup/Com Objection

Summary of Main Issues

The 2014 SHMA identifies a need for 434 affordable homes per annum over the plan period. This figure includes provision for 1,669 households that are in considered to be currently in need of affordable housing as their existing home is unsuitable and they are unable to afford market housing. This identified backlog in provision is a direct result of a Council's failure to provide sufficient levels of affordable housing over the previous plan period and should be addressed as soon as possible.

Notwithstanding the clear and identified affordable housing requirement, the emerging proposal is to address the backlog of provision that has taken place to date, over the whole plan period of 18 years. This clearly goes against the guidance of PPG. It is also considered highly likely that the affordable housing need within Sefton has been underestimated within the early plan period. This position will be exacerbated through the proposed phasing (stepped approach) to housing delivery (see comments regarding policy MN1).

TR Silcock Ltd, David Wilson Homes and Barratt Homes fully support the need for development to provide a proportion of affordable housing to meet the critical need for such accommodation within the borough. However, they object to the council's suggested approach to calculating the requirement measured by bedspaces. The implications of that approach is that the number of affordable units provided is likely to be a greater percentage than if calculated via the normal means as a percentage of dwellings. This will undoubtedly raise viability issues that have not been properly considered by the council.

Specifically, the use of bed-spaces as the measure for calculating the affordable housing requirement was not tested within the Local Plan & Community Infrastructure Levy Economic Viability Study (December 2014). Further, it is noted that this Study already questions the viability of some developments on the basis of a 30% requirement in terms of actual dwelling numbers. The Council's approach will only serve to exacerbate the identified viability issues and is a likely constraint to future, market and affordable, housing delivery.

Summary of Suggested Changes

Affordable housing contributions should be calculated as a % requirement in terms of actual dwelling numbers rather than bed-spaces.

Evidence Submitted

Chapter 8 **Plan Order** Policy HC1 **Other Documents**
Policy HC1 **Affordable and special housing needs**
Respondent No 721 **Response Ref** 4 **Representor Name** Andrew Thompson
Organisation Name Morris Homes
Obj/Sup/Com Objection

Summary of Main Issues

We are not aware of any other examples of where the number of bed spaces is used as the basis for calculating the affordable housing requirement. Given that the approach is highly irregular, we would expect it to be justified and tested. However, any explanation is absent and the approach has not been justified in terms of viability.

Paragraph 173 of the Framework requires that, to ensure viability, the costs of any requirements likely to be applied to development, including affordable housing should provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable. Paragraph 182 requires that policies should be justified and effective. It has not been demonstrated that the policy meets these tests and so it cannot be regarded as 'sound'.

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** Policy HC1 **Other Documents**
Policy HC1 **Affordable and special housing needs**
Respondent No 723 **Response Ref** 3 **Representor Name** Laurence Rankin
Organisation Name Sefton Green Party
Obj/Sup/Com

Summary of Main Issues

We should encourage and support more self build “clubs” to provide affordable homes and specialist provision in areas of need.

Summary of Suggested Changes

Evidence Submitted

Chapter 8 **Plan Order** Policy HC1 **Other Documents**
Policy HC1 **Affordable and special housing needs**
Respondent No 729 **Response Ref** 4 **Representor Name** Alison Jordan
Organisation Name Mersey Care NHS Trust
Obj/Sup/Com Objection

Summary of Main Issues

Policy HC1 sets a requirement for all new developments (outside Bootle and Netherton) of 15 dwellings or more to provide 30% of the proposed scheme (as measured by bedspaces) as affordable housing. This policy is intended to address the clear and sustained unmet need for affordable housing within the borough.

The 2014 SHMA identifies a need for 434 affordable homes per annum over the plan period. This figure includes provision for 1,669 households that are in considered to be currently in need of affordable housing as their existing home is unsuitable and they are unable to afford market housing. This identified backlog in provision is a direct result of a Council’s failure to provide sufficient levels of affordable housing over the previous plan period and should be addressed as soon as possible, in accordance with the national planning guidance which states tht LPAs should aim to deal with any undersupply within the first 5 years of the local plan period where possible.

The Local Plan proposes to address the backlog of provision that has taken place to date over the whole plan period of 18 years, a position that clearly goes against the guidance of PPG. Linked to this, it is considered highly likely that the affordable housing need within the borough has been underestimated within the early plan period. This position will be exacerbated through the proposed phasing (stepped approach) to housing delivery (see comments regarding policy MN1).

Whilst the Mersey Care NHS Trust fully supports the need for development to provide a proportion of affordable housing to meet the critical need for such accommodation within the borough they object to the council’s suggested approach to calculating the requirement measured by bedspaces. The implications of that approach is that the number of affordable units provided is likely to be a greater percentage than if calculated via the normal means as a percentage of dwellings. This will undoubtedly raise viability issues that have not been properly considered by the council.

Specifically, the use of bed-spaces as the measure for calculating the affordable housing requirement was not tested within the Council's Local Plan & Community Infrastructure Levy Economic Viability Study (Keppie Massie, December 2014). This report already questions the viability of some developments on the basis of a 30% requirement in terms of actual dwelling numbers. The Council’s approach will only serve to exacerbate the identified viability issues and is a likely constraint to future, market and affordable, housing delivery.

Summary of Suggested Changes

It is considered that the policy should be revised with the affordable housing requirement calculated via the normal means as a percentage of dwellings.

Evidence Submitted

Chapter	8	Plan Order	Policy HC1	Other Documents
Policy	HC1	Affordable and special housing needs		
Respondent No	731	Response Ref	1	Representor Name
Organisation Name	Hallam Land Management and Taylor Wimpey			
Obj/Sup/Com	Objection			

Summary of Main Issues

Policy HC1 sets out the criteria for affordable and special needs housing. HLM/TW acknowledge that the Council considers there is a requirement for affordable and special needs housing in the Borough. However, HLM/TW raise concerns in relation to the affordable housing provision calculation. Government guidance on how the policies in the Nation Planning Policy Framework ('The Framework') should be applied is set out in the National Planning Practice Guidance ('The Guidance'). Paragraphs 22 – 29 of the 'Housing and economic development needs assessments' section in The Guidance establishes a methodology for calculating affordable housing need. This methodology refers to households, dwellings and units. It makes no comment about bedspaces.

Therefore, HLM/TW consider that the current draft of Policy HC1 will disproportionately impact on developers who seek to build larger properties, with more bedspaces, in order to create the value to deliver affordable housing. The reference to 'bedspaces' does not accord with the expectations of Government policy for housing.

In addition, HLM/TW also: Consider that the 80:20 tenure split set out at part (2) of Policy HC1 is too rigid and should be determined by the market, both in terms of deliverability and demand. The requirement contained in a policy that will cover the Local Plan Period over at least the next 15 years is too onerous and HLM/TW consider that the aims of the stringently drafted policy will not be achieved. Seek clarification on the reference to special needs housing. Officers recently confirmed at the Housing Market Partnership workshop on 4 March 2015, that special needs housing related to affordable accommodation for older persons. Therefore, Policy HC1 should have a clearer relationship with the strategy requirements for mix and type of housing in Policy HC2. The policies should work together and HLM/TW confirm its request that the Council provide a worked example to demonstrate how the policies would work in practice so this can be considered at the Examination. Consider that the pepper potting of affordable housing often impacts on the ability of Registered Providers (RPs) to manage properties effectively. HLM/TW also consider that the limit of six dwellings is not justified.

Summary of Suggested Changes

In the light of the above, HLM/TW request that Policy HC1 is amended [wording provided]

Evidence Submitted

Chapter	8	Plan Order	Policy HC1	Other Documents
Policy	HC1	Affordable and special housing needs		
Respondent No	732	Response Ref	7	Representor Name
Organisation Name	Bellway Homes Ltd			
Obj/Sup/Com	Objection			

Summary of Main Issues

THIS IS A SUMMARY

Bellway consider that the formula for calculating affordable housing based upon bed spaces is overly complex, and that a calculation based upon a percentage of total dwellings would provide a much clearer and transparent approach. The Council's current approach could also lead to viability implications. The Council's 2014 Viability Study has not sought to assess the impact of the bedspace requirement that the policy is based upon; it assessed a flat percentage approach of 30% or 15%. This is not a consistent approach, cannot be justified, and is likely to impact on viability and deliverability.

Bellway also questions whether the policy should be so prescriptive around tenure. More flexible approach that encourages the right solution to be found through detailed discussions at the time of a planning application is considered more appropriate.

Summary of Suggested Changes

Evidence Submitted

Chapter 8 **Plan Order** Policy HC1 **Other Documents**
Policy HC1 **Affordable and special housing needs**
Respondent No 734 **Response Ref** 4 **Representor Name** Maria Bennett
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

There is a lot to say about affordable housing and we all agree that we need affordable housing for our young people, particular our local young people in Formby, however building on the sites within this Local Plan will not generate affordable housing for our local young people as they will be priced out of the market due to what these homes will sell for on the open market. A home is only affordable if you can afford it, if you are earning enough money to be able to get a mortgage and if it is overpriced. Unfortunately this is not the type of housing that will be built either in Formby or in other areas of the Borough. With regard to social housing, much has been stated in Formby that this will be for local people, this is an incorrect statement to make, whoever is on the top of the housing waiting list will be the person who will get this social housing and that will not be the young people in Formby as they live at home. They do not necessarily choose to live at home but because they cannot afford anywhere else to live. Also many of these new homes will be bought up on a buy to let scheme and the rents will also be higher in this area than in other areas. In order to build true affordable housing. Then this needs to be housing on the open market that is affordable for young people who are only earning the average wage. Unfortunately houses on the market for £250,000 will never be affordable to them.

Another concern is that it is very easy for developers to come back on the sites and say it is uneconomically viable to build the affordable houses and hence they are then removed. This only serves to create a further shortfall on affordable houses. One has to ask the question “when does a profit become not a profit”?

Summary of Suggested Changes

Evidence Submitted

Chapter 8 **Plan Order** Policy HC1 **Other Documents**
Policy HC1 **Affordable and special housing needs**
Respondent No 735 **Response Ref** 3 **Representor Name**
Organisation Name Catalyst Capital
Obj/Sup/Com Objection

Summary of Main Issues

We acknowledge the importance of affordable housing within Sefton, and we advocate the importance of flexibility in the percentage of affordable housing, based upon the viability of the development.

Summary of Suggested Changes

Evidence Submitted

Chapter 8	Plan Order Policy HC1	Other Documents
Policy HC1	Affordable and special housing needs	
Respondent No 738	Response Ref 5	Representor Name Charles Smith
Organisation Name CP&S Ltd		
Obj/Sup/Com Objection		

Summary of Main Issues

There is a clear affordable housing need in Sefton, which a higher housing requirement would contribute towards addressing. The currently proposed target for delivery of 615 d.p.a will not meet the affordable housing needs in the borough.

The SHMA identifies a specific need for affordable housing in the Sefton East Parishes sub-area, which is linked to previous under-delivery. As stated in the Publication draft Local Plan (para. 6.18, pg. 37) only 32 affordable dwellings have been built in Maghull/Lydiate and Aintree since 2002.

Summary of Suggested Changes

Development of the site at Oriel Drive for approximately 350 dwellings will contribute towards meeting affordable housing needs across the borough and within an area of specific need.

Evidence Submitted

Chapter 8	Plan Order Policy HC1	Other Documents
Policy HC1	Affordable and special housing needs	
Respondent No 740	Response Ref 14	Representor Name
Organisation Name Formby Residents Action Group		
Obj/Sup/Com Objection		

Summary of Main Issues

An overview of affordable housing and the potential implication of meeting the identified need in Formby.

Set out in Chapter 10 [page 67-68] of the representation.

Summary of Suggested Changes

Evidence Submitted

Chapter 8	Plan Order Policy HC1	Other Documents
Policy HC1	Affordable and special housing needs	
Respondent No 773	Response Ref 4	Representor Name Neil Roberts
Organisation Name		
Obj/Sup/Com Support		

Summary of Main Issues

Much is said about the need for affordable housing in this plan yet the developers have a get out clause. "Affordable and/or special needs housing will be provided in accordance with this policy unless a robust assessment of a scheme's economic viability confirms that this cannot be achieved."

This must be removed and any development must have it agreed number of affordable homes built. If not it will end up just being a development of four bedroom properties that our children will never be able to afford and just end up making developers rich without address the housing needs. If this development can not produce the required number of affordable homes then it should not be allowed and a site which can should be explored. Every report says Sefton will need smaller 1-2 bed houses not 4-5 bedroom.

Summary of Suggested Changes

Evidence Submitted

Chapter 8 **Plan Order** Policy HC1 **Other Documents**
Policy HC1 **Affordable and special housing needs**
Respondent No 831 **Response Ref** 3 **Representor Name** Kay Thompson
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

When you say we need more affordable homes I fully agree but when the builders are saying starting prices begin at £200,000+. How is that affordable to starter home buyers.

Summary of Suggested Changes

Evidence Submitted

Chapter 8 **Plan Order** Policy HC1 **Other Documents**
Policy HC1 **Affordable and special housing needs**
Respondent No 846 **Response Ref** 2 **Representor Name** J Williams
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Sefton MBC state that part of the aims with these developments are to provide affordable housing, however the plans being put forward are for 3,4 and 5 bedroom executive houses. Hardly affordable homes?

Summary of Suggested Changes

Evidence Submitted

Chapter 8 **Plan Order** Policy HC1 **Other Documents**
Policy HC1 **Affordable and special housing needs**
Respondent No 860 **Response Ref** 2 **Representor Name** Mark Caffrey
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Lack of Affordable Housing — Throughout this debate council officials and officers have made much of the need for affordable houses. A figure of 30% affordable housing is often mentioned. Throughout the debate it has become obvious that this figure is aspirational. The debate on the Local Plan made it very clear that once passed, developers still have the right to reduce levels of affordable housing, unfettered if they see fit. This is unacceptable and does nothing to advance the issue of building houses for first time buyers.

Summary of Suggested Changes

Evidence Submitted

Chapter 8 **Plan Order** Policy HC1 **Other Documents**
Policy HC1 **Affordable and special housing needs**
Respondent No 882 **Response Ref** 3 **Representor Name** Leslie James Baxter
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

It is no excuse to say that Formby has not been subject to development since 1984. Smaller building projects have been going on continuously and in some cases the houses produced have not been sold. The houses proposed to be built in Formby will mainly be B and D houses costing £300,000 or more and this is not affordable housing. Although developers are expected to build a given percentage of affordable houses this does not happen as they claim that they cannot make a reasonable profit on the number of affordable houses they are expected to produce and they revise the affordable figure downwards. It is not possible for Formby to meet the quota of affordable housing because at the suggested rate of 64/year over an 18 year period would require 1152 houses and this is more than the proposed build of 999 total houses over the same period and it is not sustainable to build the required number of affordable houses.

Summary of Suggested Changes

Evidence Submitted

Chapter 8 **Plan Order** Policy HC1 **Other Documents**
Policy HC1 **Affordable and special housing needs**
Respondent No 887 **Response Ref** 2 **Representor Name** LA Roberts
Organisation Name
Obj/Sup/Com Comment

Summary of Main Issues

Houses if built at all should fulfil something at all levels of cost not high market value homes.

Summary of Suggested Changes

Evidence Submitted

Chapter 8 **Plan Order** Policy HC1 **Other Documents**
Policy HC1 **Affordable and special housing needs**
Respondent No 889 **Response Ref** 2 **Representor Name** P Gwyther
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

With regard to 'affordable housing' today, in Elbow Lane, Formby, about 6 new, what appear to be, first time buyers' houses, built on brownfield land, completed and ready to be occupied have just come on to the market.

One should be rejoicing that these homes, built on brownfield land and ideal for our young families to buy in Formby are available. Sadly, the houses had 'To Let' signs displayed outside most of them. How can our young people get on the housing ladder here, or anywhere for that matter, when property speculators are buying up this type of housing and renting it out? I thought the whole point of this building was to enable people to buy their first home.

Despite promises from developers and planning departments, I feel that it is most unlikely that any affordable housing built on Green Belt, will be viable here in Formby. The land is far too expensive to buy and use for affordable homes.

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 8 **Plan Order** Policy HC1 **Other Documents**
Policy HC1 **Affordable and special housing needs**
Respondent No 1037 **Response Ref** 6 **Representor Name** Marilyn Griffiths
Organisation Name
Obj/Sup/Com Comment

Summary of Main Issues

If councils were to get a greater level of affordable housing provision then a higher overall housing target maybe a reasonable policy choice. This might not satisfy commercial interests but help retain our own young people in the community and as the population of Formby is ageing, this has to be a good thing for the town's future.

Summary of Suggested Changes

Evidence Submitted

Chapter 8 **Plan Order** Policy HC2 **Other Documents**
Policy HC2 **Housing type, mix and choice**
Respondent No 241 **Response Ref** 15 **Representor Name** Claire Jenkins
Organisation Name Formby Parish Council
Obj/Sup/Com Objection

Summary of Main Issues

We would wish to see priority given to affordable retirement homes with 1-2 bedrooms, and to ensure affordable homes for first time buyers, and that when built they are close to the amenities required.

Summary of Suggested Changes

Evidence Submitted

Chapter 8 **Plan Order** Policy HC2 **Other Documents** SHMA
Policy HC1 **Affordable and special housing needs**
Respondent No 360 **Response Ref** 5 **Representor Name** John Hill
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

The plan does not insist sufficiently strongly on the need for affordable housing.

Summary of Suggested Changes

Evidence Submitted

Chapter 8 **Plan Order** Policy HC2 **Other Documents**
Policy HC2 **Housing type, mix and choice**
Respondent No 361 **Response Ref** 8 **Representor Name** A D Fraser
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Population data would suggest that 16% of all homes built in Sefton should be designed for the elderly. The council want all developments comprise of 30% affordable homes. In Formby Sites MN2.12, MN2.19 have major mitigation problems so it is not clear how many affordable homes will be built. The latest development (Powerhouse site which has been poorly monitored by the council) has only produced an affordable homes rate of about 6%. At this point in time the council has not managed to produce a CIL charging schedule so we have no idea whether these sites will be viable in terms a 30% rate for building affordable homes. Moreover, I think the public we will be shocked when they find out exactly how much these homes are going to cost.

Summary of Suggested Changes

Evidence Submitted

Chapter 8 **Plan Order** Policy HC2 **Other Documents**
Policy HC2 **Housing type, mix and choice**
Respondent No 421 **Response Ref** 8 **Representor Name** Colin Reader
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

If the future new build is to be left in the hands of the developers, who will want to build 3 or 4 bedroom houses for middle-income families, simply building any specified number of new houses each year will not address the real issues facing the borough: issues of an increasingly elderly population and the consequent need for small 1 or 2 bedroom houses, many which will need to be 'affordable' or other forms of 'social' accommodation. Indeed, it seems that the one clear conclusion that can be drawn from the various studies that Sefton MBC have commissioned, is that there is a dire need for smaller housing units across the borough.

Summary of Suggested Changes

Evidence Submitted

Chapter 8	Plan Order Policy HC2	Other Documents
Policy HC2	Housing type, mix and choice	
Respondent No 625	Response Ref 6	Representor Name
Organisation Name Wainhomes Developments Ltd		
Obj/Sup/Com Objection		

Summary of Main Issues

Whilst Wainhomes recognise that the 2014 SHMA provides advice on the likely need / demand of different sizes of homes over the plan period, they consider that part 1 of the policy is too restrictive. Paragraph 8.21 of the SHMA states: "8.21 We are of the view that it is appropriate through the planning system to seek to influence the balance of types and sizes of market housing through considering the mix of sites allocated for development rather than specific policies relating to the proportion of homes of different sizes which are then applied to specific sites. This approach is implicit within NPPF which requires local planning authorities to 'identify the size, type, tenure and range of housing that is required'."

The SHMA continues: "The mix identified above should inform strategic Borough-wide policies. In applying these to individual development sites regard should be had to the nature of the development site and character of the area, and to up-to-date evidence of need as well as the existing mix and turnover of properties at the local level."

In light of the above whilst the SHMA sets out recommendations on the likely housing mix, it cannot predict this precisely. This is recognised in the explanatory text. The policy does not accord with paragraph 50 of the NPPF. Paragraph 8.27 refers to 4 bed properties. However the SHMA reference is to 4+ dwellings which also includes dwellings with 5 or more bedrooms.

Summary of Suggested Changes

The policy should be revised to read: "In developments of 15 or more dwellings, there should be a range of sizes and types of new properties to reflect site specific constraints, the need and demand in the area, economic viability and/or prevailing neighbourhood characteristics."

Evidence Submitted

None

Chapter 8	Plan Order Policy HC2	Other Documents
Policy HC2	Housing type, mix and choice	
Respondent No 655	Response Ref 4	Representor Name
Organisation Name Nuffield College		
Obj/Sup/Com Objection		

Summary of Main Issues

The Policy is over prescriptive by requiring a minimum of 25% of market dwellings to be 1 or 2 bedroom properties and a minimum of 40% of market dwellings to be 3 bedroom properties. Whilst it is acknowledged the policy identifies lower targets compared to the recommendations identified in the SHMA, such targets will not be appropriate for all sites across the borough. The policy as written could result in many developments not being financially viable or reflective of local market requirements. Whilst the policy does seek to make an allowance for such circumstances, this policy as written is likely to cause delay to the determination of planning applications which will frustrate the delivery of housing which is a clear priority of this plan.

Summary of Suggested Changes

The policy should be re-written to achieve the housing mix targets wherever possible. Revised policy wording is suggested below which would overcome our clients objection.

"In developments of 15 or more dwellings, the applicant will need to demonstrate how the mix of housing proposed reflects the prevailing neighbourhood characteristics".

Evidence Submitted

Chapter 8 **Plan Order** Policy HC2 **Other Documents**
Policy HC2 **Housing type, mix and choice**
Respondent No 668 **Response Ref** 6 **Representor Name** Andrew Thompson
Organisation Name Morris Homes and Ballygorryveg Ltd
Obj/Sup/Com

Summary of Main Issues

THIS IS A SUMMARY

Whilst there is a need to ensure a mix of dwellings is provided during the plan period the Borough has very clear distinct sub housing markets areas each with different requirements. These needs are likely to change over the course of the plan. Data relating to required housing type and Lifetime Homes compliance should instead be used to inform scheme design.

Summary of Suggested Changes

Applying such a restrictive policy is considered to be overly restrictive and unjustified, and therefore should be removed.

Evidence Submitted

Chapter 8 **Plan Order** Policy HC2 **Other Documents**
Policy HC2 **Housing type, mix and choice**
Respondent No 685 **Response Ref** 7 **Representor Name**
Organisation Name Taylor Wimpey
Obj/Sup/Com Objection

Summary of Main Issues

TWUK object to this policy on the basis that it is too prescriptive and would not allow developers to adequately respond to market signals which are likely to change over the Plan period. Site specific constraints and opportunities vary from scheme to scheme and as such the mix of housing would need to be tailored to address this.

TWUK also query whether the Local Housing Strategy (LHS) will become out of date on the publication of the housing standards review. The Council needs to clarify the cross over between the LHS and affordable homes i.e. will the 20% of new homes to meet LHS be included within the 30% affordable housing or does the Council seek 30% affordable homes plus an additional 20% to meet LHS?

Summary of Suggested Changes

TWUK urge the Council to amend the policy in line with the changes proposed to make it more flexible with less room for misinterpretation.

In paragraph 1, '@be as follows' should be replaced with 'reflect local needs'.

The two bullets following this paragraph should be deleted.

Delete paragraph 2 of the policy.

Evidence Submitted

Chapter 8 **Plan Order** Policy HC2 **Other Documents**
Policy HC2 **Housing type, mix and choice**
Respondent No 692 **Response Ref** 6 **Representor Name** Peter Harper
Organisation Name UKIP Sefton Branch
Obj/Sup/Com Objection

Summary of Main Issues

The types of homes which are in demand in Sefton – as elsewhere across Britain – are the smaller, cheaper homes, capable of housing one or two people.) Sefton’s Local Plan should ensure that it is this type of property which is built, rather than catering for the financially-motivated preferences of large building companies, who prefer to build large, luxurious, 4-bedroom detached houses overlooking open fields. The urban area is best suited to the provision of cheap, affordable housing, and Brown-Field sites should be used for exactly this purpose until they are exhausted.

Summary of Suggested Changes

Evidence Submitted

Chapter 8	Plan Order Policy HC2	Other Documents
Policy HC2	Housing type, mix and choice	
Respondent No 696	Response Ref 5	Representor Name Robin Buckley
Organisation Name Redrow Homes Ltd		
Obj/Sup/Com Objection		

Summary of Main Issues

The approach to housing mix and type appears unduly restrictive and will place a considerable burden on developers in circumstances where there is a need to vary the mix to meet site specific circumstances. The ratio of 1 and 2 bed properties and 3 bed properties should be deleted and replaced with a general statement that the mix of housing should have regard to evidence on local need and demand for market housing. This is consistent with advice in the National Planning Policy Framework (NPPF) where market trends are highlighted as a key consideration for planning the mix of housing.

Summary of Suggested Changes

Evidence Submitted

Chapter 8	Plan Order Policy HC2	Other Documents
Policy HC2	Housing type, mix and choice	
Respondent No 706	Response Ref 5	Representor Name Mike McComb
Organisation Name		
Obj/Sup/Com Objection		

Summary of Main Issues

Whilst we recognise that the 2014 SHMA provides advice on the likely need/demand of different sizes of homes over the plan period to 2030, we consider that part 1 is simply too restrictive. Indeed paragraph 8.21 of the SHMA states: "8.21 We are of the view that it is appropriate through the planning system to seek to influence the balance of types and sizes of market housing through considering the mix of sites allocated for development rather than specific policies relating to the proportion of homes of different sizes which are then applied to specific sites. This approach is implicit within NPPF which requires local planning authorities to 'identify the size, type, tenure and range of housing that is required'." (our emphasis). The policy is not influencing but is being specific which is contrary to paragraph 8.21.

Page 93 of the SHMA then states:

"The mix identified above should inform strategic Borough-wide policies. In applying these to individual development sites regard should be had to the nature of the development site and character of the area, and to up-to-date evidence of need as well as the existing mix and turnover of properties at the local level."

In light of the above whilst the SHMA does set out recommendations on the likely housing mix to 2030 it clearly cannot predict it precisely and this is recognised in the explanatory text of the SHMA and there may well be different needs over time and in different areas of the Borough or a higher or lower density may be required to reflect the character of the area. The policy as written is dictating a precise mix to the housing market for the next 15 years and does not accord with the guidance in paragraph 50 of the Framework. One final minor point on the policy is that the 4th bullet point of paragraph 8.27 refers to 4 bed properties. However the SHMA reference is 4+ dwellings which accounts for 5 bed homes or larger.

Summary of Suggested Changes

If part 1 of the policy is to remain then we consider that the word "minimum" should be replaced with "target". Amend the 4th bullet of Local Plan paragraph 8.27 to refer to properties with 4 or more bedrooms.

Evidence Submitted

Chapter 8	Plan Order Policy HC2	Other Documents
Policy HC2	Housing type, mix and choice	
Respondent No 707	Response Ref 8	Representor Name Matthew Good
Organisation Name	Home Builders Federation	
Obj/Sup/Com	Objection	

Summary of Main Issues

The policy is considered unsound as it lacks flexibility and will not be effective in the overall deliverability of the plan.

The HBF recognises the need for a mix of dwellings to meet identified needs. To address such needs the policy identifies that, unless precluded by defined circumstances minimum targets for market dwellings of 25% 1 or 2 bedroom properties and 40% 3 bedroom properties must be provided. This is considered overly prescriptive and does not take account of the variable nature of need across Sefton. The plan area is not homogeneous and as such local needs and market requirements are likely to vary significantly between settlements and over the lifetime of the plan. The HBF therefore recommends that the targets within the policy are provided for context and to aid discussion but local needs and characteristics as well as viability and market demand will ultimately be used to determine the appropriate mix in discussion with the developer on a site by site basis.

Part 2 of the policy requires that at least 20% of all homes, on schemes of 15 or more, should be built to Lifetime Homes standard. The HBF supports the provision of housing for older people and vulnerable groups. However the policy requirement is considered overly restrictive and unjustified. The provision of Lifetime Homes will not only impact upon direct development costs which are estimated by the Lifetime Homes website at between £545 and £1615. They can also have implications for site layouts and density as they require bigger 'footprints'. This comparative increase in size is not usually reflected in sales revenues. The net result is a reduction in revenue as build costs increase, sales revenues remain static and the quantity of housing delivered decreases. Whilst the Council's 2014 Viability study refers to Lifetime Homes it is not considered that the cost nor increased size are adequately considered. The 2014 Viability study simply states;

'Lifetime Homes comprises a detailed list of 16 criteria which can be afforded at minimal cost..... Given that we have assumed significant proportions of dwellings comprise 3 bed dwellings, it is assumed that the circulation space is such that the criteria can be met in respect of a significant proportion of the dwellings without the need to extend the sizes of each dwelling' (paragraph 11.17).

This is a significant and unjustified assumption. As noted above the policy requires at least 25% of dwellings be one or two bedroom dwellings. The HBF consider that the implicit costs of Lifetime Homes should be factored into the viability analysis of the plan. This lack of consideration is a failing in the assessment which needs to be addressed. It is also notable that once the other policy requirements are taken into account viability concerns are raised across a wide cross-section of sites are at best marginal (see comments upon HC1 above). The requirements for Lifetime Homes will simply add further to these viability issues and may push many marginal sites to become unviable. Given these viability issues it is suggested that the Council encourage rather than require such accommodation.

The Council will also be aware of the ministerial statement by Eric Pickles MP on the 25th March 2015 which clearly sets out the government's stance in relation to housing standards. With regards accessibility, the government has indicated that there will be optional accessibility standards set within the Building Regulations. From the date the Deregulation Bill is given Royal Assent (anticipated September 2015), local planning authorities should not set any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings.

The implementation of a new optional technical standard can only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered. The HBF does not consider that the policy and evidence base provided by the Council is adequate to clearly demonstrate the need for an optional accessibility standard, nor is there sufficient viability evidence. It is therefore recommended the policy be deleted.

Summary of Suggested Changes

Evidence Submitted

Chapter 8	Plan Order Policy HC2	Other Documents
Policy HC2	Housing type, mix and choice	
Respondent No 712	Response Ref 9	Representor Name Andrew Pepper
Organisation Name	Persimmon Homes	
Obj/Sup/Com	Objection	

Summary of Main Issues

Persimmon objects to this Policy and considers it to be unsound as currently drafted. The requirement for a specified mix of housing reflects a point in time as indicated by the Council's SHMA. This will need to be updated regularly to understand housing market needs in the future. The Local Plan policy however will need to stand the test of time over the whole plan period. The policy is unlikely to prove effective for all sites, housing development and across all parts of the Borough. Although the policy contains a caveat that allows site specific constraints, economic viability and prevailing neighbourhood characteristics to be taken into account, Persimmon considers that the policy is too overly prescriptive as currently worded. Whilst it is justified at the present time, it is unlikely to be justified in the medium and longer term over the plan period.

Summary of Suggested Changes

Persimmon suggests that paragraph (1) of this policy should be deleted.

Evidence Submitted

Chapter 8	Plan Order Policy HC2	Other Documents
Policy HC2	Housing type, mix and choice	
Respondent No 715	Response Ref 8	Representor Name
Organisation Name	Countryside Properties (UK) Ltd and Persimmon Homes Lancashire	
Obj/Sup/Com	Objection	

Summary of Main Issues

Object to this Policy and consider it to be unsound as currently drafted. The requirement for a specified mix of housing reflects a point in time as indicated by the Council's SHMA. This will need to be updated regularly to understand housing market needs in the future. The Local Plan policy however will need to stand the test of time over the whole plan period.

The policy is unlikely to prove effective for all sites, housing development and across all parts of the Borough. Whilst the policy contains a caveat than allows site specific constraints, economic viability and prevailing neighbourhood characteristics to be taken into account, Persimmon and Countryside consider that the policy is too overly prescriptive as currently worded.

As such, it is unlikely to be effective and whilst justified at the present time, it is unlikely to be justified in the medium and longer term over the plan period.

The landowner therefore suggests that paragraph (1) of this policy should be deleted.

Summary of Suggested Changes

Delete paragraph 1 of the Policy.

Evidence Submitted

Representation submitted [on behalf of the Land East of Maghull Consortia] to the Sefton Core Strategy Options Paper and Evidenc 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 8	Plan Order Policy HC2	Other Documents
Policy HC2	Housing type, mix and choice	
Respondent No 716	Response Ref 10	Representor Name Robert Swift
Organisation Name Robert Swift and family		
Obj/Sup/Com Objection		

Summary of Main Issues

Object to this policy and considers it to be unsound as currently drafted. The requirement for a specified mix of housing reflects a point in time as indicated by the Council's SHMA. This will need to be updated regularly to understand housing market needs in the future. The Local Plan policy however will need to stand the test of time over the whole plan period.

The policy is unlikely to prove effective for all sites, housing development and across all parts of the Borough. Whilst the policy contains a caveat than allows site specific constraints, economic viability and prevailing neighbourhood characteristics to be taken into account, the Landowner considers that the policy is too overly prescriptive as currently worded.

As such, it is unlikely to be effective and whilst justified at the present time, it is unlikely to be justified in the medium and longer term over the plan period.

Summary of Suggested Changes

Paragraph (1) of policy HC2 should be deleted.

Evidence Submitted

Chapter 6	Plan Order Policy HC2	Other Documents
Policy HC2	Housing type, mix and choice	
Respondent No 717	Response Ref 8	Representor Name
Organisation Name TR Silcock Ltd, DWH & Barratt Homes		
Obj/Sup/Com Objection		

Summary of Main Issues

The practical implication of the policy approach in policy HC2 as drafted, is that for each 100 new dwellings proposed within the borough over the forthcoming plan period, no more than 25 of these will come forward as open market 4+ bedroom family housing (assuming that the Council takes forward its policy for affordable housing of 30% assessed above).

The plan indicates that the policy is designed to reflect the evidence of the SHMA (with some allowance made to provide flexibility). However, the SHMA reflects recent demographic trends; i.e. it is backward looking. It makes no allowance for future trends, as required by the Framework, such as the need to cater for larger family homes and higher value dwellings that will be required in order to support economic growth. In addition, it is important for future development to appropriately reflect local needs and market requirements which will be different across the borough, varying significantly between areas and over the duration of the plan period.

TR Silcock Ltd, David Wilson Homes and Barratt Homes object to the proposed overtly restrictive policy approach on the basis that the policy, as drafted is too inflexible and will fail to make adequate provision for the future housing needs of the Borough.

The second part of policy HC2 states that in addition to the prescribed mix of unit sizes, at least 20% of all new homes in developments of 15 dwellings or more should be designed to meet the Lifetime Homes Standards. No provision is made for exceptions to this requirement.

This approach is overly prescriptive. The provision of Lifetime Homes has a direct impact upon development costs, which is not reflected in sales revenues. The effect, in combination with other policy requirements which have a financial implication such as the affordable housing requirement and the provision of infrastructure or other facilities, together with increasingly stringent sustainability standards; this will undoubtedly result in an adverse impact on the viability of schemes. The implication is that the policy will lead to a detrimental impact in terms of housing delivery in the borough, contrary to the objectives of the plan and the Framework.

The policy should be revised, with the figures stated as targets, rather than minima, thus providing flexibility and reducing the potential financial burden on developers.

Summary of Suggested Changes

Policy HC2 should be revised, with the figures stated as targets, rather than minima, thus providing flexibility and reducing the potential financial burden on developers.

Evidence Submitted

Chapter 8	Plan Order Policy HC2	Other Documents
Policy HC2	Housing type, mix and choice	
Respondent No 731	Response Ref 2	Representor Name
Organisation Name	Hallam Land Management and Taylor Wimpey	
Obj/Sup/Com	Objection	

Summary of Main Issues

HLM/TW consider that the policy is too prescriptive and places onerous requirements on developers that have the potential to act as a barrier to development. The requirements of the policy would not allow developers to adequately respond to market signals. Site specific constraints and opportunities are dependant on the circumstances surrounding individual sites – i.e. no two sites are comparable. Therefore, the mix of housing that could be delivered through policy needs to be flexible to respond to this.

HLM/TW also consider that the publication of the housing standards review will mean that the strategy requirements of the Policy HC2 will become out of date. The Council needs to clarify the cross-over between the policy requirements of Policy HC2 and the affordable homes requirement of Policy HC1 – i.e. will the 20% Life Home Standards requirement be included within the 30% affordable housing or does the Council seek 30% affordable housing in addition to the 20% Life Homes Standard. HLM/TW consider that the Council needs to confirm this position in the policy to remove the ability for misinterpretation.

Summary of Suggested Changes

HLM/TW request that Policy HC2 is amended [wording provided]

Evidence Submitted

Chapter 8	Plan Order Policy HC2	Other Documents
Policy HC2	Housing type, mix and choice	
Respondent No 732	Response Ref 8	Representor Name
Organisation Name	Bellway Homes Ltd	
Obj/Sup/Com	Objection	

Summary of Main Issues

Policy HC2 is too prescriptive. As currently written the policy does not take into account the variable nature of need across Sefton, which is significant given that the Local Plan area is not homogeneous and as such local needs and market requirements are likely to vary significantly between settlements and over the lifetime of the plan.

Summary of Suggested Changes

Bellway suggests that the percentage targets within the policy are provided for context and to aid discussion so that local needs and characteristics as well as viability and market demand can ultimately be used to determine the appropriate mix in discussion with a developer on a site by site basis.

Evidence Submitted

Chapter 8	Plan Order Policy HC2	Other Documents
Policy HC2	Housing type, mix and choice	
Respondent No 735	Response Ref 4	Representor Name
Organisation Name	Catalyst Capital	
Obj/Sup/Com	Objection	

Summary of Main Issues

The housing mix in the policy may not appropriately reflect the local housing market. As such, we support the inclusion of viability and prevailing neighbourhood characteristics to determine the most appropriate mix.

Summary of Suggested Changes

Catalyst Capital ask that variations from the suggested mix should be acceptable if adequate justification is provided by the applicant.

Evidence Submitted

Chapter 8 **Plan Order** Policy HC3 **Other Documents**
Policy HC3 **Residential development and development in Primarily Residential Developments**
Respondent No 707 **Response Ref** 9 **Representor Name** Matthew Good
Organisation Name Home Builders Federation
Obj/Sup/Com Objection

Summary of Main Issues

The policy is unsound as it has not been justified by evidence and will place additional constraints upon development.

Part 4 of the policy seeks a minimum density of 30dph across all sites. It is unclear whether such a requirement relates to net or gross site areas. Given other requirements within the plan, such as open space (policy EQ9) it is important that any requirement should relate solely to the net developable area. It should also be noted that the policy requirements may create conflict with other policies particularly policy HC2, which seeks accessible homes which need larger floor areas and therefore will reduce densities, and policy EQ2 which seeks development to be within the context of its local character.

Whilst densities of 30dph on the net developable area will be deliverable on many sites other issues such as character, viability, market requirements and local context can impact upon the density of development. It is recognised that criteria 'a' and 'b' of part 4 recognise issues of site constraints and character of the surrounding area. It is recommended that viability and market factors are also included.

Summary of Suggested Changes

Evidence Submitted

Chapter 8 **Plan Order** Policy HC3 **Other Documents**
Policy HC3 **Residential development and development in Primarily Residential Developments**
Respondent No 735 **Response Ref** 5 **Representor Name**
Organisation Name Catalyst Capital
Obj/Sup/Com Support

Summary of Main Issues

We note the policy and support the aspirations to maximise the efficiency of land and agree with the flexible approach to the density target in appropriate circumstances.

Summary of Suggested Changes

Evidence Submitted

Chapter 8 **Plan Order** Policy HC5 general **Other Documents**
Policy HC5 **Planning for Gypsies and Travellers**
Respondent No 34 **Response Ref** 1 **Representor Name** Robert Gould
Organisation Name
Obj/Sup/Com Comment

Summary of Main Issues

I am concerned regarding new housing property being planned & Gypsy Sites. I wonder what assurances can be given to enable landlord references would be checked with future tenants, especially Housing Benefit tenants. In particular I have no objection to Gypsies & Gypsy sites, in Southport, but do regard it vital & perfectly reasonable to know what references are made with Gypsy residents, a number of people should be identified.

It is not enough to just write out number of pitches , which is what is merely what is entered in this plan. And this has not been thought through in this plan, even if has been done before.

Summary of Suggested Changes

Evidence Submitted

Chapter 8 **Plan Order** Policy HC5 general **Other Documents**
Policy HC5 **Planning for Gypsies and Travellers**
Respondent No 882 **Response Ref** 7 **Representor Name** Leslie James Baxter
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Travellers Sites.

The Plan makes provision for an extension of the Traveller's site at Broad Lane to be extended and proposes a further site in Ince Blundell parish that is close to the residential area of Formby, this is not acceptable because it is on Green Belt agricultural land.

Summary of Suggested Changes

Evidence Submitted

Chapter 8 **Plan Order** Site HC5.3 **Other Documents**
Policy HC5.3 **Land at Plex Moss Lane, Ainsdale**
Respondent No 703 **Response Ref** 25 **Representor Name** Jackie Copley
Organisation Name CPRE Lancashire
Obj/Sup/Com Objection

Summary of Main Issues

This site is suitable in principle for Gypsy and Traveller pitches, however we would wish to see enforceable planning conditions to ensure against environmental harm resulting from waste arisings at the site, such as against the storage of scrap metals, (note that a ditch beside Broad Lane leading to the Red Rose Traveller Park has become a depository for used tyres and abandoned domestic equipment). We ask that the site should be strictly restricted to living accommodation.

We are also concerned about the reliance on a septic tank in a Flood Zone 2 area.

Summary of Suggested Changes

Evidence Submitted

Chapter 8 **Plan Order** Site HC5.3 **Other Documents**
Policy HC5.3 **Land at Plex Moss Lane, Ainsdale**
Respondent No 740 **Response Ref** 26 **Representor Name**
Organisation Name Formby Residents Action Group
Obj/Sup/Com Objection

Summary of Main Issues

Assessment of flood risk issues on this site [page 102 of the rep]. We also wish to rely on the representation of Mr John Williams [Rep No. 1026] for flood risk issue on this site.

Summary of Suggested Changes

Evidence Submitted

Chapter 8 **Plan Order** Site HC5.3 **Other Documents**
Policy HC5.3 **Land at Plex Moss Lane, Ainsdale**
Respondent No 1022 **Response Ref** 4 **Representor Name** Stephen McCloskey
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

The proposed permanent Traveller's site at Plex Moss Lane, Ainsdale is unsound and contrary to national policy as it also is located to the south of the boundary of the road which is a continuation of Moor Lane, which itself is a continuation of the Coastal Road. The Council seems to adjust the goal posts to suit its reasoning. Plex Moss Lane itself is unsuitable for most vehicular movements, especially the large caravans, mobile homes and camper vans favoured by members of the Travelling Community and effectively is a 'road' in name only. The presence of a caravan site literally a stone's throw to the north (approximately 50 yards) surely would suffice people with a desire to live in a caravan. Aside from which, the council itself concedes in Chapter 8, section 8.55 that this site "...is a larger site than is required for the number of pitches..." and as such is a luxury site of Green Belt that should not be afforded to be removed in favour of a more suitable one that conforms more accurately to national policy.

Summary of Suggested Changes

Evidence Submitted

Chapter 8 **Plan Order** Site HC5.3 **Other Documents**
Policy HC5.3 **Land at Plex Moss Lane, Ainsdale**
Respondent No 1026 **Response Ref** 11 **Representor Name** John Williams
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

This site has several problems relating to development:-
1) The ground itself is frequently saturated to a very high level due to its very close proximity to existing watercourses
2) This is some of the lowest lying land in Sefton and as such is at extremely high risk of flooding, no matter what the desired purpose of this site, it would seem to be extremely unfortunate to provide the potential users of this site with such high risk
3) It would therefore be deemed as logical that this site should be discounted on grounds of NPPF Ch10 Para.100

Summary of Suggested Changes

Evidence Submitted

Chapter 8	Plan Order Site HC5.4	Other Documents
Policy HC5.4	Land at New Causeway, Ince Blundell	
Respondent No 52	Response Ref 9	Representor Name Ian Cowell
Organisation Name	Ince Blundell Parish Council	
Obj/Sup/Com	Comment	

Summary of Main Issues

A straw poll in the Village has established there is some antipathy towards a Gypsy and Traveller Site being established in Ince Blundell. Anecdotal evidence was aired at the meeting regarding the unsocial conduct regarding some of the Gypsy and Traveller fraternity. The Powerhouse Site at Formby was a case in point which was left in a dreadful and unhygienic state on a number of occasions as a consequence of unauthorised Gypsy and Traveller occupation. Attempted theft of diesel fuel from local farmers Yards was mentioned. There was also some concern over the safety of livestock in the Parish. With a major convalescent home in Ince Blundell Hall, being one of Sefton and Natural England's most significant heritage sites, concerns were expressed about possible unlawful trespass in the Park Land. Moreover, there were some doubts as to whether Sefton MBC had the will, resources and finance to properly oversee a proposed transit Site in Ince Blundell. Furthermore, why was there consideration of a Transit site when there was already an established Gypsy and traveller settlements at Broad Lane which is but a mile or a mile and a half away up the A565?

Again, under the Department of Communities and Local Government " Planning Policy for Traveller Sites" published in 2012 it clearly states in paragraph 4 the "plan-making and decision-taking should protect Green Belt form inappropriate development". And again, under Pollcy E paragraph 1.4 it is stated "Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development." In addition under paragraph 11(g) it is stated "do not locate sites in areas of high risk of flooding, including functional floodplains, given the particular vulnerability of caravans." In my earlier document I did point out "That the River Alt and Downholland Brook close by the site at what is known as the North End is subject to flooding (see Sefton Metropolitan Borough Council Strategic Flood Risk Assessment). For example paragraph 4.2.44 states, "Within the Lower Alt are five areas shown to be at risk from a 1 in 25 probability event. Two of these are located in the fields at the North End, to the north west of Ince Blundell, that are associated with the Ince Blundell watercourses and which in the larger area abuts Scaffold Lane." See also 4.2.39, 4.2.51, 4.2.77, 4.2.84. As stated in paragraph 100 of the National Planning Policy Framework (NPPF): Inappropriate development in areas at risk of flooding should be avoided by directing away from areas at highest risk....."

The NPPF affirms in paragraph 112 " 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 use areas of poorer quality land in preference to that of higher quality. "The site is in fact on the Best and Most versatile agricultural land Grade 1,2,3a. and appears to be in possible breach of the NPPF.

Summary of Suggested Changes

Evidence Submitted

Chapter 8	Plan Order Site HC5.4	Other Documents
Policy HC5.4	Land at New Causeway, Ince Blundell	
Respondent No 703	Response Ref 26	Representor Name Jackie Copley
Organisation Name	CPRE Lancashire	
Obj/Sup/Com	Objection	

Summary of Main Issues

We are opposed to the proposed redesignation of this green belt site on the grounds that it would represent encroachment into the green belt (contrary to par. 80 of the NPPF) and diminish the openness of the Green Belt which is one of its essential characteristics (NPPF Paragraph 79). In addition, contrary to Constraint 11 of the officer site assessment, the proposed development would be strongly inconsistent with the existing landscape character and could not be mediated without further damaging the openness of the Green Belt. There are no significant physical boundaries to the south and east of the site, making it vulnerable to further development in the future. Due to the proximity of the River Alt, the site is likely the habitat of the vole which is a protected species and therefore an Ecological Assessment would be necessary. We attribute considerable significance to the fact that the site comprises best and most versatile agricultural land.

Summary of Suggested Changes

Evidence Submitted

Chapter 7	Plan Order Site HC5.4	Other Documents
Policy HC5.4	Land at New Causeway, Ince Blundell	
Respondent No 740	Response Ref 29	Representor Name
Organisation Name Formby Residents Action Group		
Obj/Sup/Com Objection		

Summary of Main Issues

We would like to draw your attention to the concerns we have for the Travellers' transit site at the land at New Causeway Ince Blundell. Although the area given over to transit pitches is small it is not well contained. It is possible to leave the road and pitch up on the field right along the New Causeway Road on either side of the road for some distance beyond the suggested Traveller site. We feel that this will attract more than the suggested 4-6 pitches allocated in the Local Plan, and in doing so will bring Travellers into conflict with Local residents and the Police. Given that the boundaries are so porous and this will invite trouble, it might be wiser to distribute the growing demand for pitches towards existing sites and more self contained areas.

For that reason above others we would have to object to this location for a Traveller's transit site, and we see this as yet another example of Local Plan box ticking rather than a considered approach to Planning for the future needs of our community.

Summary of Suggested Changes

Evidence Submitted

Chapter 8	Plan Order Policy HC6	Other Documents
Policy HC6	Assets of community value	
Respondent No 599	Response Ref 2	Representor Name Ross Anthony
Organisation Name The Theatres Trust		
Obj/Sup/Com Support		

Summary of Main Issues

Support this policy in principle, as it aims to resist the loss of assets of community value and 'social infrastructure'.

Summary of Suggested Changes

Evidence Submitted

Chapter 8	Plan Order Policy HC6	Other Documents
Policy HC6	Assets of community value	
Respondent No 599	Response Ref 4	Representor Name Ross Anthony
Organisation Name The Theatres Trust		
Obj/Sup/Com Objection		

Summary of Main Issues

Regarding Policy HC6 Assets of Community Value, we find this to be extremely limited and also does not adequately cover all community facilities that are valued by the community. The nature of the assets of community value system is that most valuable assets are not considered or registered by the community until they come under threat, and unfortunately that is usually too late.

Summary of Suggested Changes

Alternatively, Policy HC6 Assets of Community Value (and accompanying text) could be amended and renamed as follows, and should also incorporate the above definition: Where development will result in the loss, or partial loss of a community facility, planning permission will only be granted where the applicant has demonstrated that: A replacement facility is to be provided or alternative provision will be made to meet community needs in the local area, or an existing accessible facility will provide the facility or service that is being lost with the development, or there is sufficient existing provision to meet the community's day-to-day needs. This change [or suggested change to IN1] would then provide sufficient criteria to resist the loss of all valued community and cultural facilities. This would better reflect item 70 in the National Planning Policy Framework on page 17 which states that to deliver the social, recreational and cultural facilities and services that the community needs, planning policies and decisions should plan for the use of shared space and guard against unnecessary loss of valued facilities. Also to ensure that established facilities and services are retained and able to develop for the benefit of the community.

Evidence Submitted

Chapter 8 **Plan Order** Policy HC7 **Other Documents** Other
Policy HC7 **Education and care institutions in the urban area**
Respondent No 208 **Response Ref** 4 **Representor Name** Ian Cowell
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Under Sefton's Infrastructure Delivery Plan which supports Sefton Council's Local Plan it is apparent that Sefton have yet to make a decision on whether they will progress to a Community Infrastructure levy (CIL). In essence the funding of Infrastructure: Physical- highways, transport links, water flood alleviation, etc; Social – education, health, sports facilities, social care; Green – parks, woodlands, play areas; can be made through planning charges that a Council can ask developers or Landowners to pay. The money raised can be used to fund a wide range of infrastructure needed to support new development in the Council area, not necessarily in the location where the money is raised. Instead, it seems, Sefton will be seeking planning obligations under S106 agreements which can only be obtained when they meet three statutory tests: Necessary to make the development acceptable in planning term. Directly related to the development. Fairly and reasonably related in scale and kind to the development.

Moreover, for employment-related and other non-residential development S106 agreements could continue to be the main mechanism for ensuring that contributions are made to provide the necessary infrastructure. The advantage of using S106 obligations is that Sefton can make sure affordable housing is provided. However, under a viability assessment of the Local Plan undertaken by Keppie Massie, it is pointed out that unless a developer can make a profit of 15%, the provisions of affordable housing may not be viable. So there can be no certainty that 'affordable housing' under a S106 obligation will be built on the school sites mentioned above because it is almost certain developers will claim, except regarding the larger sites, that affordable housing is just not viable. So I oppose Policy HC7 (see paragraph 8.64) regarding the use of these school sites for housing.

Summary of Suggested Changes

Remove MN2.14 & MN2.15 from the plan.

Evidence Submitted

Chapter 8 **Plan Order** Policy HC7 **Other Documents**
Policy HC7 **Education and care institutions in the urban area**
Respondent No 648 **Response Ref** 7 **Representor Name** Emily Hrycan
Organisation Name English Heritage
Obj/Sup/Com Objection

Summary of Main Issues

The policy should ensure that development minimises harm to the historic environment rather than retain heritage characteristics on the site, which does not accord with the requirements of the NPPF and the 1990 Act.

Summary of Suggested Changes

Point 2 of the Policy should be amended to read:
"Development of the site must retain key green infrastructure and minimise harm to the historic environment and its setting."

Evidence Submitted

Policy HC7

Education and care institutions in the urban area

Respondent No 725

Response Ref 17

Representor Name Paul Daly

Organisation Name Sport England

Obj/Sup/Com Objection

Summary of Main Issues

Bullet point three of this policy states that development of former education / institution site for an alternative use which is compatible with the surrounding area is acceptable in principle. However, the fact that an education site or institution is not in use does not mean that any sports facilities on that site are surplus to requirements.

Education and planning have different frameworks of legislation, procedures and consent. The two frameworks have different ways of assessing need and even common terms have different meaning within the two systems, eg 'playing field' has a different definition, 'change of use' has a different definition. Assessments that have shown sites to be surplus based on assessments of education need do not justify loss of sports facilities for the purposes of paragraph 74 of the NPPF.

Paragraph 8.69 of the draft plan goes on to clarify that land which forms playing fields or has been last used as playing fields must also meet the provisions of section 1 (b) of policy NH5 'Protection of open space and Countryside Recreation Areas'. The purpose of this is to prevent the loss of public open space or other outdoor sports and recreation facilities available to the public, in line with national guidance.

This qualification is important as it makes clear that any development involving playing fields must meet further criteria. However, there are two problems. The first is that the protection offered by policy NH5 is in our opinion weaker than that offered by the NPPF. This matter is picked up under our comments on NH5.

The second is that the scope is somewhat narrow in that it does not include indoor sports facilities or ancillary facilities such as changing rooms. Education sites are one of the most important sources of built sports facilities - around three quarters of sports halls in England are located on school sites. Loss of such facilities (without meeting additional criteria) would not accord with paragraph 74 of the National planning Policy Framework. In addition, loss of ancillary facilities (such as changing facilities, car parking etc.) could prejudice the use of any playing field that would remain on a school site.

Summary of Suggested Changes

Bullet point three of the policy should be deleted or the explanation amended such that the requirements of paragraph 74 of the NPPF have to be satisfied in order to allow for redevelopment of a site that includes land or buildings used for sport and recreation.

Evidence Submitted

Policy HC7

Education and care institutions in the urban area

Respondent No 725

Response Ref 18

Representor Name Paul Daly

Organisation Name Sport England

Obj/Sup/Com Objection

Summary of Main Issues

Bullet point three of this policy states that development of former education / institution site for an alternative use which is compatible with the surrounding area is acceptable in principle. However, the fact that an education site or institution is not in use does not mean that any sports facilities on that site are surplus to requirements.

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Summary of Suggested Changes

Bullet point three of the policy should be deleted or the explanation amended such that the requirements of paragraph 74 of the NPPF have to be satisfied in order to allow for redevelopment of a site that includes land or buildings used for sport and recreation.

Evidence Submitted

Chapter 9	Plan Order Chapter 9	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 553	Response Ref 16	Representor Name Alex Naughton
Organisation Name Merseytravel		
Obj/Sup/Com Comment		

Summary of Main Issues

Policy Context. In addition to the National Planning Policy Framework (NPPF) and National Planning Policy Guidance, there needs to be reference to the Merseyside Local Transport Plan 3 and the Transport Plan for Growth document. Other relevant documents include the City Deal and the Growth Deal.

- Liverpool City Region CITY DEAL with Government (July 2012)
<http://www.liverpoollep.org/pdf/120705City%20RegionDeal%20final.pdf>
- Liverpool City Region GROWTH DEAL with Government (July 2014)
<http://www.liverpoollep.org/pdf/LCR%20Growth%20Deal%20-%20Deal%20Final.pdf>

Merseytravel and the Liverpool City Region also work with partners across Northern England as part of Transport for North (TfN) www.transportforthenorth.com to improve transport infrastructure in Northern England. A series of studies (including a TfN Northern Freight Study) is due to be commissioned to support the development of a TfN Northern Transport Strategy by March 2016. We also work with RAIL NORTH on the future specification of the Northern and Transpennine rail franchises. These new franchises will start 1 April 2016. www.railnorth.org. [See:]

- RAIL NORTH Long Term Rail Strategy (Aug 2014)
<http://www.railnorth.org/wp-content/uploads/2013/12/LTRS-Final-August-2014.pdf>
- One North – Plan for an Interconnected North (July 2014)
<http://www.westyorks-ca.gov.uk/uploadedFiles/Content/News/Articles/One%20North.pdf>
- TfN Northern Transport Strategy interim report (March 2015)
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/414815/the-northernpowerhouse-tagged.pdf

Summary of Suggested Changes

Evidence Submitted

Chapter 9	Plan Order Chapter 9	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 722	Response Ref 5	Representor Name Jenny Hope
Organisation Name United Utilities Ltd		
Obj/Sup/Com Objection		

Summary of Main Issues

In accordance with paragraphs 156 and 162 of the NPPF, the Local Plan should include strategic policies to (inter alia) deliver the provision of infrastructure, and LPAs should work with other authorities and providers to assess the quality and capacity of infrastructure within their areas.

United Utilities suggests the inclusion of a policy within Chapter 9 (Infrastructure) of the Local Plan which seeks to ensure that new development is supported by essential infrastructure. We recommend including the following text within the body the policy:

“Once more details are known on development sites, for example, the approach to surface water management and proposed connection points to the foul sewer network, it may be necessary to coordinate the delivery of development with timing for the delivery of infrastructure improvements.

At 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 periods of time and by numerous developers.

Sefton Borough Council will support the principle of investment in infrastructure to respond to development and environmental needs. Infrastructure is key to the delivery of sustainable development and economic growth, and meeting the development needs of the Borough.”

Summary of Suggested Changes

See above

Evidence Submitted

Policy N/A

Rep does not relate to a policy

Respondent No 895

Response Ref 14

Representor Name Yvonne Irving

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

Infrastructure and Traffic

Sefton has very little opportunity to improve its traffic congestion. It has one main road the A565 which runs from Ince Blundell to Southport, changing its name along the way. It is a linear road that runs fairly straight and is known as the by-pass, built in 1939 it is now the only way that traffic can reach Southport unless you want to travel along narrow rural lanes in W. Lancs. Consequently this road takes high volumes of traffic. Its arterial roads that lead into the various settlements are chaotic at certain times of the day and are hemmed in by the built environment with no opportunity to be widened or improved. The traffic at weekends on the by-pass is more akin to a modern motorway with traffic backed up at roundabouts and traffic lights. The densely populated South has a network of main roads that lead from the docks, it has a different set of highway problems and is soon to have the task of accommodating container based trucks from the new super port in Seaforth, air quality in this area is extremely poor. Most traffic travelling from Liverpool and Knowsley come through Switch Island which is a huge highway interchange that sends traffic in all directions. There is soon to be a new short by-pass from Switch Island onto the Sefton by-pass but this will just lead to even more traffic on this busy road. It is also the only route to Preston where you can join the M6. Traffic in Sefton is always high on account of the numbers of visitors the region gets from tourism.

Local residents have seen the volume of cars in the last two years vastly increasing. Formby for example only has three routes in and out of the area. It is traffic chaos at peak times but is always busy anyway. The Local Plan promises to improve the road networks and to alleviate the congestion but it does not say how. This is because they know that the restraints that the borough has also apply to its highways. Bounded by the sea on one side and rural W.Lancs on the other it has no way of expanding its road capacity to accommodate much more traffic.

The infrastructure in Sefton is now wanting and as the settlements have grown and more houses have been built locals have noticed how difficult it is now to book a doctor's appointment, or find a dentist. Southport Hospital has been in crisis quite often over the winter months and is struggling with the increased pressure that a growing population is having on its performance. Many children cannot find school places near to home and parking in the borough has become very difficult. Many of the sites proposed by the local plan are said to be sustainable but this is incorrect. The main mode of travel in Sefton is the car and that is not sustainable. The various sites are on the urban fringe and are therefore not within easy reach of public transport. To travel by train can mean driving to a station but all of the station car parks are full up by 8.30 in the morning. Sefton is highly populated and those that live within five minutes of a station use the train, the rest of the population use the car. How can the Local Plan possibly say that these new developments will act any differently when the composition of the area is not able to change To build 11.500 houses in the borough and call it sustainable is completely absurd. Sefton borough will simply be unable to incorporate this number.

Summary of Suggested Changes**Evidence Submitted**

Chapter General **Plan Order** Policy IN1 **Other Documents**
Policy IN1 **Infrastructure and developer contributions**
Respondent No 5 **Response Ref** 4 **Representor Name** Elizabeth Thompson
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

LOCAL PLAN IS NOT ASPIRATIONAL ENOUGH & NOT ENOUGH CONSIDERATION TO RELATED INFRASTRUCTURE

Nobody wants to hold progress up of the area, but it has to be right change. The council are trying to push this through for the new homes bonus, but they are not assessing the long term impact on the area. They haven't given enough consideration or thought to the infrastructure required to allow these houses to go ahead, and there are not enough schools, GP surgeries, and the roads are already gridlocked, and the public transport service is at breaking point. If the population growth figures do not support this why do we need more houses.

Sefton has large pockets of deprivation and health issues around the Bootle area, which Sefton need to focus on and understand, and they may realise that these problems are down to the lack of green space and mass urbanisation. They will do more harm building these houses and cause more areas like this, as there will be less space for leisure activities. The new homes bonus will be short lived and forgotten about but the government and sefton will be left with the costs of policing; health care and paying out benefits.

There needs to be more thought and planning on how to make the area more viable and productive, and a better place to live for existing residents, instead of seeing us an urbanised money pot where they can pile more houses in and charge more tax.

Please do not let this local plan go ahead, it would be a crime on the local community. The whole process has been unacceptable and this should be addressed. Thousands and thousands of residents have opposed throughout the local plan, please listen to them.

Summary of Suggested Changes

Evidence Submitted

Chapter 9 **Plan Order** Policy IN1 **Other Documents** Infrastructure Delivery Plan
Policy IN1 **Infrastructure and developer contributions**
Respondent No 208 **Response Ref** 1 **Representor Name** Ian Cowell
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Sefton have designated two sites at the rear of Elmcroft Lane for the development of 130 houses. As part of that submission Hightown Council expressed concern at the proposed residential development of Holy Trinity School (MN 2.14 – 50 houses) and the Former Ravenmeols School (currently use as the Formby Professional development centre MN2.15 – 15 houses). You may not be aware that because of the lack of a primary school in Hightown the majority of our children are bussed to Formby Schools for their education. According to the Infrastructure Development Plan “the number of primary school places required for 100 new homes equates to 17.5. The number of homes proposed in Formby is likely to require a 0.5 form entry”. The Plan continues: “Redgate Primary has been reduced to a single form intake school, whilst the accommodation is currently occupied by community uses, there may be the scope to reinstate the capacity to make it a 1.5. form entry if required. The number of homes in Hightown is likely to generate a small increase in primary school pupils who will be able to access places in Formby schools.” On the basis that Formby is to have 999 homes and Hightown 130 homes = 1129 x 17.5 = 197 primary school children! I am told by Primary School Teachers there should not be more than 30 children in a class (though on occasion it has risen to 33) so the rationale behind these figures does not just add up and it is evident the school sites mentioned above will be needed for educational purposes or more land will need to be made available for the development of a school.

Summary of Suggested Changes

Remove MN2.14 and MN2.15 from the plan or provide sufficient land for a new school.

Evidence Submitted

Chapter 9 **Plan Order** Policy IN1 **Other Documents**
Policy IN1 **Infrastructure and developer contributions**
Respondent No 241 **Response Ref** 20 **Representor Name** Claire Jenkins
Organisation Name Formby Parish Council
Obj/Sup/Com Objection

Summary of Main Issues

We are aware of the extra pressure being placed on the services by an increasingly ageing population, specifically on social care and welfare, on all health services such as dentists' and doctors' practices, and the emergency services.

Summary of Suggested Changes

Evidence Submitted

Chapter 9 **Plan Order** Policy IN1 **Other Documents**
Policy IN1 **Infrastructure and developer contributions**
Respondent No 241 **Response Ref** 11 **Representor Name** Claire Jenkins
Organisation Name Formby Parish Council
Obj/Sup/Com Objection

Summary of Main Issues

The final Local Plan must place binding obligations on the developer, the landowners, service providers and the Metropolitan Borough Council, in all its areas of responsibility.

Summary of Suggested Changes

Evidence Submitted

Chapter 9 **Plan Order** Policy IN1 **Other Documents**
Policy IN1 **Infrastructure and developer contributions**
Respondent No 241 **Response Ref** 3 **Representor Name** Claire Jenkins
Organisation Name Formby Parish Council
Obj/Sup/Com Objection

Summary of Main Issues

The Local Plan in its present form relies entirely on the integrity of developers and United Utilities to ensure that the necessary infrastructure is provided, maintained and sufficient to deal with the tidal problems, the fluvial water increase and the human waste treatment. There is no undertaking in this document to ensure that will be done. Indeed there is already a need to increase the capacity of sewage treatment in order to cope with the current demands at peak times - this is a severe problem.

Summary of Suggested Changes

Evidence Submitted

Chapter 9 **Plan Order** Policy IN1 **Other Documents** Infrastructure Delivery Plan
Policy IN1 **Infrastructure and developer contributions**
Respondent No 360 **Response Ref** 4 **Representor Name** John Hill
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

The plan makes insufficient provision for the infrastructure and local facilities and services that would be required should so many new houses be built. Specifically there will be great pressure on schools and health services, already congested roads will become bottlenecks, and sewage, water and drainage services will be overstretched. The plan should address these problems and propose detailed solutions.

Summary of Suggested Changes

Evidence Submitted

Chapter 9 **Plan Order** Policy IN1 **Other Documents**
Policy IN1 **Infrastructure and developer contributions**
Respondent No 361 **Response Ref** 9 **Representor Name** A D Fraser
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

The Plan Making Process and Delivery:
In Formby as in other parts of Sefton the council have chosen sites which in many case previous generations have avoided because of infra-structure and environmental problems. 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 developers produced a good neighbour policy but the planning department failed conspicuously to enforce it. The list of developments is shortly to be added to by a mega development on the Green Belt from Peel Holdings after the local plan has been submitted. At the time of writing Sefton have not produce the CIL charging schedule and there is no guarantee that the mitigation measures outlined for MN2.12,MN2.48,MN2.49 and MN2.16 can be funded. These developments are so complex that I am not sure the council really know whether they will be viable.

Summary of Suggested Changes

Evidence Submitted

Chapter 9	Plan Order Policy IN1	Other Documents Infrastructure Delivery Plan
Policy IN1	Infrastructure and developer contributions	
Respondent No 366	Response Ref 10	Representor Name Margaret Anne Hill
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

United Utilities say that, at the most, they can deal with an increase of 30 new properties a year, not the 600+ proposed by Sefton council. Brownfield sites already have services laid on. The plan is not effective; it cannot be delivered because the infrastructure cannot be established.

8. The necessary infrastructure resulting from the house and industrial development is not planned School places, doctors, dentists, hospital places, shops, roads, buses, trains, water, electricity, gas, drains are all essential infrastructure elements of living in England. If Sefton were really going to have this massive number of additional residents stipulated in the Local Plan, there would indeed need to be an incredibly large infrastructure investment, particularly in Maghull. The plan is not effective.

Summary of Suggested Changes

Evidence Submitted

Chapter 9	Plan Order Policy IN1	Other Documents
Policy IN1	Infrastructure and developer contributions	
Respondent No 380	Response Ref 1	Representor Name Ian Gent
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Infrastructure

Roads - The existing local infrastructure of roads would not cope with the number of additional vehicles the proposed developments would bring, if one assumes an average two cars per household that is an additional 2,000 cars on our roads for every 1,000 properties built. Should the Melling developments be progressed, then Aintree Village will inevitably bear the brunt of the additional traffic, which this would bring about. A number of years ago when Melling saw a number of new housing estates built the amount of traffic which added to Aintree Village's roads rose significantly. Aintree Lane regularly has lengthy tail-backs, which adds to

the amount of pollution, both air and noise, which we are forced to endure on a daily basis.

Public transport - I note that there is a requirement for a second rail station to serve Maghull on the Merseyrail Liverpool-Ormskirk line, which I'm sure would be very much in demand given the significant number of new homes which will be built both in Maghull and in the neighbouring villages of Lydiate and Melling. However, there is no mention of whether the capacity of the line has been tested to see if it would cope with increased passenger numbers, as trains are already increasingly overcrowded at peak times (i.e. would additional carriages and/or trains be provided?)

Doctors / Schools - I fear that our local services, such as schools and doctors' surgeries would not cope with the significant increase in the local population. I am concerned that the increase in the population of Melling will adversely impact the schools and doctors surgery within Aintree Village and schools in neighbouring Melling, Maghull and Lydiate.

Community Resources - It should be noted that Sefton Council no longer directly runs any community services within Aintree Village or Melling, the Council having withdrawn from the Aintree Youth Centre and Aintree Library.

Summary of Suggested Changes

Evidence Submitted

Policy IN1 Infrastructure and developer contributions

Respondent No 433 Response Ref 5 Representor Name Eric Haworth

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

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 [Report of the Infrastructure Working Group, 2014] leaves unanswered lie at the very heart of the provision of adequate education services. It is clear from the quotations given below (taken directly from the IWG Report), that even basic issues associated with assessing and providing adequate education services remain unresolved.

It also 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. The issues discussed in the IWG Report are at best extremely basic, including reference to a local dentist who was looking to sell their practice because they were unaware of the forthcoming Local Plan provisions and the resulting increase in demand for dental services that would result.

Quotations from the IWG Report, illustrate the current lack of understanding within Sefton MBC:

IWG Section 4.2:

“The forecasting of school places was becoming more challenging due to the establishment of Free Schools/Academies and Post 16 provision..... The Local Plan would have a big impact because timescales for development were not known and that there was no nationally used formula to show anticipated numbers of children per new dwelling. It is very complex to work out all the costs and to try to assess what mitigation might be possible and what it would cost.”

“...but problems could be experienced with schools converting to academies and the Council having no control over their admission numbers.”

“Developers could be asked to fund additional classrooms due to increased pupil numbers arising from their developments; however, the establishment of robust criteria would be needed to establish such anticipated additional demand to present to developers together with a mechanism for charging them.”

“Problems would be anticipated persuading a developer to pay for this – how could we prove all children on the new development would attend the new school/form entry?”

IWG Section 4.6:

“If there are long waiting lists to see a G.P. how do we know that further development won’t make a poor situation worse; and could the Working Group be assured that the NHS was monitoring such situations? Response – CCG’s should be closely involved with the Council in this matter.”

“CCGs need to connect with Sefton Council to gauge future population demographics, new housing developments etc.”

“At what point did population/patient numbers trigger the need for a new G.P surgery? Response – many factors would have to be taken into account such as how many other surgeries were in the local vicinity, how many patients were on each list and the age profile/demographics of the local population “

As with education, it is clear from these quotations that even the most fundamental issues associated with assessing and providing adequate health services are not understood and therefore, remain unresolved.

The scale of the proposed development in Lydiate is totally disproportionate with the housing need in the area. In fact it is questionable whether there is any need whatsoever given the number of properties that have been on the market for 12 months or more. However, given this proposed increase to our population, the current population of Lydiate do not have access to a single GP or Dentist within Lydiate. Every Lydiate resident must travel outside the area for the services of GP’s and Dentists, whose waiting lists are currently anything up to a month, and Sefton MBC intend to increase our population by almost a third, without any consideration of the impact on our healthcare.

When questioned about the availability of school places at the full council meeting on Thursday 22nd January, the leader of the council was quoted as saying that he had personally called each of our local schools and could confirm that there was plenty of spare capacity available to accommodate all the additional pupils that will be generated by all the new homes. However, a check of our local schools in Lydiate confirms that no such call was received, and as expected they are all operating virtually at capacity, with some even oversubscribed and operating waiting lists.

Summary of Suggested Changes

Evidence Submitted

Policy IN1

Infrastructure and developer contributions

Respondent No 433

Response Ref 2

Representor Name Eric Haworth

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

The Development Plan of 615 houses per year over 18 years is a total of over 11,000 new houses. It is evident that 11,000 new houses need adequate infrastructure provision. Yet, on the basis of the IWG Report, Sefton MBC are a long way from understanding the implications that development on this scale will have for the infrastructure of the borough. As discussed below, the December 2014 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, raises more questions than it provides answers. It is scandalous that Sefton MBC, can seriously consider development on the scale that is proposed and yet not have anything more than a basic understanding of how this development will be serviced! It is also of great concern the shocking lack of information that Sefton MBC currently hold on infrastructure in the borough 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.

Given the complete lack of understanding of the requirements for infrastructure upgrades that will be needed to facilitate development of the scale required by the Local Plan, there is currently no way that the deliverability of the proposals put forward by Sefton MBC can be viewed as sound and sustainable. On this basis, the Local Plan should be viewed as unsound and should therefore be rejected.

Another indication that this Local Plan 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 can such a large house-building programme be seen as realistic when much lower housing numbers are identified by the available officially published data. The Local Plan proposals need to be deliverable and the key to this for Sefton is the provision of infrastructure.

The financial viability of this Local Plan is key to its implementation. Yet given the lack of clear understanding of the infrastructure costs and the way in which the viability assessments have been completed, it is extremely unlikely that all the necessary costs can be met and the Local Plan will remain undeliverable.

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. On this basis, it is considered that it is 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. Yet it is infrastructure requirements and the associated cost that is most poorly understood by Sefton MBC.

Sefton MBC cannot demonstrate any understanding of the infrastructure requirements, solutions or costs associated with the housebuilding programme included within their Local Plan, and when questioned on this by residents have even gone on record as suggesting that it will be resolved later by the developers. This alone should make this Local Plan to be considered unsound and unsustainable, and thus should be rejected by the Planning Inspector.

Summary of Suggested Changes**Evidence Submitted**

Chapter 9 **Plan Order** Policy IN1 **Other Documents**
Policy IN1 **Infrastructure and developer contributions**
Respondent No 488 **Response Ref** 19 **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:

Schools:

We fear that planning for future school requirements is not a robust part of the Local Plan and that this needs to be addressed especially if the Council presses ahead with major housing developments. A sit and wait to see what develops approach will be irresponsible where significant developments are to take place especially when half of the Borough is already very close to experiencing stresses with regard to primary school places.

It also has to be held in mind that schools in Sefton are popular for parents from West Lancs, Knowsley and Liverpool to send their children to, so housing developments in those neighbouring council areas will have an impact on the demand for places within the Borough.

Summary of Suggested Changes

Evidence Submitted

Chapter 9 **Plan Order** Policy IN1 **Other Documents**
Policy IN1 **Infrastructure and developer contributions**
Respondent No 488 **Response Ref** 20 **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:

NHS Pressure:

We have concerns about the impact of major housing developments in the Borough (and indeed in surrounding council areas) as they will have an impact on the capacity of our local NHS facilities and hospitals. The Local Plan needs to addresses the problems that will occur with extra pressure on hospitals, GP surgeries and NHS dentists. These health aspects have to be a major part of all future major planning applications as accessibility to and the capacity of NHS facilities to cope are big issues.

Summary of Suggested Changes

Evidence Submitted

Chapter 9 **Plan Order** Policy IN1 **Other Documents**
Policy IN1 **Infrastructure and developer contributions**
Respondent No 550 **Response Ref** 14 **Representor Name** Peter Brown
Organisation Name Merseyside Civic Society
Obj/Sup/Com Objection

Summary of Main Issues

The Society has other concerns around the references in the Draft Plan to infrastructure financing. Mention is made of the intention to use Community Infrastructure Levy, S.106 contributions and other agreements to ensure that developments are satisfactory, provide related facilities and meet policy requirements. However, the Society feels that such financial arrangements (with the possible exception of S.106) are very much susceptible to political pressures and can be eroded and deregulated, resulting in pressure to reduce costs and standards of development. The Society feels that the Plan should test some of the policy content to determine the likely contingent effects of this.

Summary of Suggested Changes

Evidence Submitted

Chapter 9	Plan Order Policy IN1	Other Documents
Policy IN1	Infrastructure and developer contributions	
Respondent No 553	Response Ref 19	Representor Name Alex Naughton
Organisation Name	Merseytravel	
Obj/Sup/Com	Comment	

Summary of Main Issues

We request that reference is made in this policy to exploring options to reconnect the Port of Liverpool (Southern Zone) between Alexandra Dock and Sandon Dock to the rail network. 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 rail line from the Bootle Branch should be safeguarded pending further decisions being made on the way forward. Additionally we understand that Peel Ports have an aspiration to extend the existing rail lines within the Port of Liverpool at Seaforth to directly serve the new Liverpool Container Terminal.

Summary of Suggested Changes

Evidence Submitted

Chapter 9	Plan Order Policy IN1	Other Documents
Policy IN1	Infrastructure and developer contributions	
Respondent No 594	Response Ref 6	Representor Name Peter Cushion
Organisation Name	Wirral Council	
Obj/Sup/Com	Comment	

Summary of Main Issues

Provision for Cross Boundary Infrastructure

It is suggested that Policy IN1 - Infrastructure and Developer Contributions or its supporting text should be amended to allow developer contributions to be used to support cross-boundary infrastructure, if required within the Plan period, which could be achieved by amending Point 7 of Policy IN1 Infrastructure and Developer Contributions , or by amending paragraph 9.7 to include an additional bullet point.

Summary of Suggested Changes

Amend Point 7 of Policy IN1 Infrastructure and Developer Contributions to read:

“The Council will work with a range of partners to make sure that infrastructure is provided in the right location where required including cross boundary infrastructure, if a need is identified within the plan period”

[Or amend paragraph 9.7 to include an additional bullet point to read:

- “Cross boundary infrastructure, if a need is identified within the plan perio”]

Evidence Submitted

Chapter 9	Plan Order Policy IN1	Other Documents
Policy IN1	Infrastructure and developer contributions	
Respondent No 594	Response Ref 7	Representor Name Peter Cushion
Organisation Name	Wirral Council	
Obj/Sup/Com	Comment	

Summary of Main Issues

Provision for Cross Boundary Infrastructure

It is suggested that Policy IN1 - Infrastructure and Developer Contributions or its supporting text should be amended to allow developer contributions to be used to support cross-boundary infrastructure, if required within the Plan period, which could be achieved by amending Point 7 of Policy IN1 Infrastructure and Developer Contributions, or by amending paragraph 9.7 to include an additional bullet point.

Summary of Suggested Changes

It is suggested that Policy IN1 - Infrastructure and Developer Contributions or its supporting text should be amended to allow developer contributions to be used to support cross-boundary infrastructure, if required within the Plan period, which could be achieved by:

Amend paragraph 9.7 to include an additional bullet point to read:

- “Cross boundary infrastructure, if a need is identified within the plan period”

[or amend Point 7 of Policy IN1 Infrastructure and Developer Contributions to read:

“The Council will work with a range of partners to make sure that infrastructure is provided in the right location where required including cross boundary infrastructure, if a need is identified within the plan period”]

Evidence Submitted

Chapter 9	Plan Order Policy IN1	Other Documents
Policy IN1	Infrastructure and developer contributions	
Respondent No 599	Response Ref 1	Representor Name Ross Anthony
Organisation Name	The Theatres Trust	
Obj/Sup/Com	Support	

Summary of Main Issues

Support this policy in principle, as it aims to resist the loss of assets of community value and ‘social infrastructure’. We also note that Policy IN1 also encourages the provision of new social, leisure and cultural infrastructure.

Summary of Suggested Changes

Evidence Submitted

Chapter	9	Plan Order	Policy IN1	Other Documents
Policy	IN1	Infrastructure and developer contributions		
Respondent No	599	Response Ref	3	Representor Name Ross Anthony
Organisation Name	The Theatres Trust			
Obj/Sup/Com	Objection			

Summary of Main Issues

However, we are concerned the term 'social infrastructure' is not clear and therefore we are concerned that Policy IN1 may not adequately protect existing essential community and cultural facilities, such as your theatres and pubs, etc. This would be contrary to item 70 in the National Planning Policy Framework that states planning policy should guard against unnecessary loss of valued facilities.

Summary of Suggested Changes

The definition of 'social infrastructure' should be improved for clarity so that guidelines are clear, and we recommend this succinct all-inclusive description be used in the accompanying text to Policy IN1 (and appropriate changes to Policy IN1, point 2) which would obviate the need to provide examples: The function of 'Social Infrastructure' (or 'community facilities') is to provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.

This change (or suggsted change to HC6) would then provide sufficient criteria to resist the loss of all valued community and cultural facilities. This would better reflect item 70 in the National Planning Policy Framework on page 17 which states that to deliver the social, recreational and cultural facilities and services that the community needs, planning policies and decisions should plan for the use of shared space and guard against unnecessary loss of valued facilities. Also to ensure that established facilities and services are retained and able to develop for the benefit of the community.

Evidence Submitted

Chapter	9	Plan Order	Policy IN1	Other Documents
Policy	IN1	Infrastructure and developer contributions		
Respondent No	665	Response Ref	7	Representor Name Tony Dawson
Organisation Name				
Obj/Sup/Com	Objection			

Summary of Main Issues

The plan is severely deficient in respect of examination of the needs of Southport in respect of connection by transport to the North and East into the county of Lancashire (District of West Lancashire) which almost completely surrounds us. This relates to road, and rail infrastructure and public transport.

Summary of Suggested Changes

Evidence Submitted

Chapter	9	Plan Order	Policy IN1	Other Documents
Policy	IN1	Infrastructure and developer contributions		
Respondent No	665	Response Ref	3	Representor Name Tony Dawson
Organisation Name				
Obj/Sup/Com	Objection			

Summary of Main Issues

The plan as it stands contains nothing in terms of the need to provide appropriate infrastructure before major development proceeds. Southport already has significant problems in respect of Primary School entry and there are secondary school issues looming on the horizon. The idea that these can be simply ignored is ludicrous and an abnegation of the responsibility which should underpin any Local Plan. Indeed, matters are worse because the plan actually includes the demolition of schools and building of more houses on their sites and playing fields. The idea that some 'make do and mend' solution could be adopted to the provision of the school places for the children who will live in these houses does not bear thinking about. Sites should be preserved.

Summary of Suggested Changes

Evidence Submitted

Chapter 9 **Plan Order** Policy IN1 **Other Documents**
Policy IN1 **Infrastructure and developer contributions**
Respondent No 685 **Response Ref** 9 **Representor Name**
Organisation Name Taylor Wimpey
Obj/Sup/Com Comment

Summary of Main Issues

TWUK has been actively involved in the Local Plan viability testing and would seek to remain involved with the Council's work on the Community Infrastructure Levy (CIL) Charging Schedule. TWUK consider that the text relating to the viability of providing or contributing to infrastructure is strengthened in the policy. Changes to policy IN1 are proposed at Appendix 10 to strengthen the need for viability testing to ensure that the policy fully accords with paragraph 173 of the National Planning Policy Framework.

Summary of Suggested Changes

Add the following to the end of part 8 of policy IN1 "Where scheme viability will be affected, developers will be expected to provide Viability Assessments which will be taken into account as a material consideration in the determination of planning applications."

Evidence Submitted

Chapter 9 **Plan Order** Policy IN1 **Other Documents**
Policy IN1 **Infrastructure and developer contributions**
Respondent No 692 **Response Ref** 9 **Representor Name** Peter Harper
Organisation Name UKIP Sefton Branch
Obj/Sup/Com Comment

Summary of Main Issues

Assuming that all of the newly-built houses were to be occupied, from where will the funding come to build the new schools, Health Service buildings and other public amenities that will be required by the additional residents? Where will these buildings be sited? How much currently unaccounted-for space will be taken up by these buildings, including children's parks, play areas and school playing-fields?

Summary of Suggested Changes

Evidence Submitted

Chapter 9 **Plan Order** Policy IN1 **Other Documents**
Policy IN1 **Infrastructure and developer contributions**
Respondent No 713 **Response Ref** 3 **Representor Name** Debbie Fifer
Organisation Name Canal & River Trust
Obj/Sup/Com Comment

Summary of Main Issues

The canal is recognised as a form of physical infrastructure in the supporting text of Policy IN1 - Infrastructure and Developer Contributions. However, the policy states that the Infrastructure Delivery Plan (IDP) lists the essential infrastructure required for the implementation of the Local Plan strategy. The Trust is therefore concerned that we have not had a substantive input in the preparation of the IDP, and do not appear to have been given the opportunity to comment on the December 2014 draft. As a result, whilst the canal is recognised in the IDP as a form of green infrastructure and a transport route, no information is provided about the condition of the waterway infrastructure and no priorities for repairs or enhancements are identified. Clearly, it is essential that the Trust is fully involved and engaged in any future revision of the IDP so that the necessary information is included to make potential developers aware of the priorities for contributing towards the canal infrastructure. Going forward, if the council proceeds with adoption of the Community Infrastructure Levy it will be important that canal-based projects are included on the Regulation 123 list as appropriate.

Summary of Suggested Changes

Evidence Submitted

Chapter 9 **Plan Order** Policy IN1 **Other Documents**
Policy IN1 **Infrastructure and developer contributions**
Respondent No 723 **Response Ref** 18 **Representor Name** Laurence Rankin
Organisation Name Sefton Green Party
Obj/Sup/Com Objection

Summary of Main Issues

Infrastructure: All too often infrastructure comes after development if at all. The consequences study identified serious infrastructure challenges particularly with education and health services.

Summary of Suggested Changes

Evidence Submitted

Chapter 9 **Plan Order** Policy IN1 **Other Documents**
Policy IN1 **Infrastructure and developer contributions**
Respondent No 723 **Response Ref** 9 **Representor Name** Laurence Rankin
Organisation Name Sefton Green Party
Obj/Sup/Com Comment

Summary of Main Issues

Infrastructure: We need to consider a part move away from the “big grid” approach to infrastructure. The use of community renewable energy, CHP etc, rainwater capture and grey water reuse, innovative sewage treatment and SuDS, can all help to reduce demand on services in new development. Combined with this we need to ensure that existing infrastructure is used efficiently and effectively through energy and resource conservation, retrofitting where feasible. We need to robustly oppose development where such measures are unable to offset what would be an unacceptable impact on people or the environment.

Summary of Suggested Changes

Evidence Submitted

Chapter 9 **Plan Order** Policy IN1 **Other Documents**
Policy IN1 **Infrastructure and developer contributions**
Respondent No 725 **Response Ref** 16 **Representor Name** Paul Daly
Organisation Name Sport England
Obj/Sup/Com Support

Summary of Main Issues

Policy IN1 is supported in so far as it provides a mechanism which allows for additional demand for sport and recreation that arises from development to be addressed.

Summary of Suggested Changes

Evidence Submitted

Chapter 9	Plan Order Policy IN1	Other Documents
Policy IN1	Infrastructure and developer contributions	
Respondent No 726	Response Ref 3	Representor Name
Organisation Name	Royal London Mutual Insurance Society Ltd	
Obj/Sup/Com	Support	

Summary of Main Issues

Draft Policy IN1 confirms that development contributions may be sought in appropriate locations to assist with regeneration objectives set out elsewhere in the plan. Where appropriate, contributions will be sought to enhance and provide infrastructure to support new development. This may be secured as a planning obligation (through a S106), through CIL or through other agreements.

It is acknowledged that there may be instances when the contribution to infrastructure may make a development unviable. In such cases, it is the responsibility of the developer to demonstrate that this is the case by carrying out a viability assessment (Paragraph 9.13).

The inclusion of reference to viability within the supporting text for Policy IN1 is welcomed. This reflects the need for the Council to be flexible when considering planning obligations and to take account of development viability, in accordance with the Framework.

Summary of Suggested Changes

Evidence Submitted

Chapter 9	Plan Order Policy IN2	Other Documents
Policy IN2	Transport	
Respondent No 379	Response Ref 1	Representor Name Colette O'Neill
Organisation Name		
Obj/Sup/Com	Comment	

Summary of Main Issues

the local bus used to go to and from Formby is a lifeline to all elderly residents please keep them running.

Summary of Suggested Changes

Evidence Submitted

Policy IN2

Transport

Respondent No 433

Response Ref 7

Representor Name Eric Haworth

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

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. It appears that public transport provision is in the hands of private companies and therefore, Sefton MBC have no control over bus services etc.

As stated in Council's Member Infrastructure Working Group Section 4.3 (a section on Open Space!): "The Council cannot insist on bus operators changing routes to cover new developments."

IWG Section 4.4: "Was there a risk that non-commercial bus services were at risk due to austerity measures? Response – yes definitely. There may be a need to utilise developer contributions from the Community Infrastructure Levy"

It has been identified by the Council that traffic congestion is set to increase markedly over existing levels – which are already severe in some areas at peak times. Yet no practical solution is in place.

"due to a lack of improvement in bus service provision many local residents have no option but to use their private vehicles."

"It was anticipated that there would be increases in traffic arising from the Local Plan proposals"

In response to the point that it was difficult to understand how the effects of 5000 additional cars in Lydiate & Maghull could be mitigated, the only answer the IWG Report could give was:

"This figure sounds a lot but spread out throughout the day it could be done."

The best that is on offer at present is a recommendation from the IWG that:

"...any development does not increase the number of additional daily car journeys to unacceptable levels and that policies should be included to require large developments to include (and fund) necessary highways improvements – including improvements to accessibility and sustainable transport choices such a cycle lanes etc."

There is however, no definition of 'unacceptable levels' and Sefton MBC is not clear about what funding can be insisted upon without damaging developers' profits.

Summary of Suggested Changes**Evidence Submitted**

Chapter 7	Plan Order Policy IN2	Other Documents
Policy IN2	Transport	
Respondent No 488	Response Ref 6	Representor Name Ian Brodie Browne
Organisation Name Sefton Council Lib Dem Opposition Group		
Obj/Sup/Com Objection		

Summary of Main Issues

No planning for Southport's clear transportation needs to east and north of Town:

Another concern that we have is so basic in terms of planning for the future of transportation to and from Southport as to beggar belief that it has not been picked up on. 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.

If Sefton Council can see that road and rail improvements are required in Maghull (new station and improved M58 Motorway junction) why can't it see and indeed make the case for such improvements to the road and rail connection to the east and north of Southport?

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 fact that the Local Plan process seems not to be developing a common detailed agenda to address traffic congestion between Southport and Ormskirk and the improvement of rail services to and from Southport along the Wigan Southport railway line is regrettable. The reconnection of the Wigan - Southport and Ormskirk - Preston railway lines at Burscough (via the Burscough Curves) is also surprising by its omission from the draft.

Summary of Suggested Changes

Evidence Submitted

Chapter 9	Plan Order Policy IN2	Other Documents
Policy IN2	Transport	
Respondent No 550	Response Ref 11	Representor Name Peter Brown
Organisation Name Merseyside Civic Society		
Obj/Sup/Com Objection		

Summary of Main Issues

The Society recognises the difficulty Sefton faces in balancing the growth and employment advantages of an expanding port with the inevitable environmental disadvantage of increased road traffic, given that the A5036 will remain the principal highway access to the port from the motorway network. The Society has two main concerns.

[1] The Local Plan does not set out an approach to the likely mitigation of traffic impact that will be needed to protect residential areas from heavy volumes of road traffic, and does not set out the matters to be considered if development is to occur along this route before further studies are completed. Given that port expansion is inevitable, MCS believes this matter should begin to be explored, given that it is likely to be contentious and subject to risk of challenge. The matter of capacity of this route is critical to the future expansion of the Port, and the Society feels that at least some form of scoping paper should be tied to the Local Plan process.

We note that there is no mention of the former 'Rimrose Valley' link road proposal that was favoured at one time as a means of relieving pressure on the Dunning's Bridge Road / Church Road corridor for which we know funding is already committed. We appreciate that such a strategic route would be likely to be reviewed in the ongoing Port Access Study. Favourable re-emergence would inevitably prompt further adjustment of the Local Plan.

Summary of Suggested Changes

Evidence Submitted

Chapter 9	Plan Order Policy IN2	Other Documents
Policy IN2	Transport	
Respondent No 550	Response Ref 13	Representor Name Peter Brown
Organisation Name	Merseyside Civic Society	
Obj/Sup/Com	Objection	

Summary of Main Issues

Other transport related aspects of the Plan are likely to need to be reviewed in the light of the recently published Northern Transport Strategy and the suite of studies arising from it.

This may only be possible when the final version emerges, after the Examination in Public.

Summary of Suggested Changes

Evidence Submitted

Chapter 9	Plan Order Policy IN2	Other Documents
Policy IN2	Transport	
Respondent No 553	Response Ref 20	Representor Name Alex Naughton
Organisation Name	Merseytravel	
Obj/Sup/Com	Support	

Summary of Main Issues

Policy IN2 section 1 and last bullet point reference to the rail line between Bootle and Aintree and the safeguarding of this is welcomed. The rail link is known as the North Mersey Branch.

Summary of Suggested Changes

Evidence Submitted

Chapter 9	Plan Order Policy IN2	Other Documents
Policy IN2	Transport	
Respondent No 553	Response Ref 21	Representor Name Alex Naughton
Organisation Name	Merseytravel	
Obj/Sup/Com	Comment	

Summary of Main Issues

Policy IN2 we understand that Network Rail's Northern Ports & Transpennine Freight Study is due to be published in late summer 2015 as a supporting document alongside the Network RUS: Freight consultation document. The Northern Ports & Transpennine Freight Study has considered anticipated growth in freight traffic levels at ports in the North of England (the most significant of which is at the Port of Liverpool) and also for services operating on the trans-Pennine axis. Options being explored include double tracking the rail lines within the Port of Liverpool to enable better capacity for handling and dispatch of freight trains and linespeed improvements on the Bootle Branch from Edge Hill / Olive Mount to the Port of Liverpool to enable freight trains to better negotiate the line which has steep gradients. In the longer term from the mid 2020s it may be necessary to add extra signals on the Bootle Branch to enhance capacity. Peel Ports predict a total of 76 freight trains in and out of the Port of Liverpool by 2033.

Sefton Council, on behalf of the Liverpool City Region Port Access Group, are undertaking a Lorry Parking Study which is due to complete in June 2015 which will help get a better understanding of these needs associated with the Port and other freight facilities. Also Sefton Council, on behalf of the Liverpool City Region, are commissioning a LCR Gas Refuelling Infrastructure Study which is due to complete by the end of 2015. Merseytravel is also working on a LCR Long Term Rail Strategy (due to be updated 2015/16), LCR Long Term Bus Strategy (being developed) and a LCR Long Term Freight Strategy (due to be complete sometime in 2016).

Summary of Suggested Changes

Evidence Submitted

Policy IN2 Transport

Respondent No 638 Response Ref 18 Representor Name

Organisation Name Crosby Investment Strategy Steering Group

Obj/Sup/Com Support

Summary of Main Issues

Transport policy:

We support the principles expressed in Policy IN2 and particularly where they apply to Crosby Centre regarding:

- The provision of (public transport) interchange facilities in Southport, Crosby and Maghull Centres:
- Improved parking facilities in Bootle, Southport, Crosby and Maghull Centres.

However, we would express a high degree of concern that the supporting 'Infrastructure Delivery Plan' (IDP) (Para 9.5 refers) [see separate record]

Summary of Suggested Changes

Evidence Submitted

Chapter 9 **Plan Order** Policy IN2 **Other Documents**
Policy IN2 **Transport**
Respondent No 680 **Response Ref** 2 **Representor Name** J Edgar and MJ Joyce
Organisation Name Reclaim Community
Obj/Sup/Com Objection

Summary of Main Issues

Objection to policies ED1 & IN2 part2

Our references include LocalPlan references: -

- para 3.18 / 3.19 / 3.35 / 3.51
- paras 4.10 / 4.21 / part C para 6
- paras 5.7 / 5.17 / 5.18 / 5.42
- paras 7.1 / 7.6 / 7.7 / 7.9 / 7.10 / 7.11
- paras 9.17 / 9.21 /
- paras 9.23 (add in A5058 to correct the current Strategic Freight Priority Route)
- related paras in Infrastructure Delivery Plan 2014

Our view is that these policies should be suspended until there is full, open, transparent consultation with all local Sefton communities affected by any further port development prior to the stated 'early review of the Local Plan' as in paras 5.42 & 7.11.

We do so for the following reasons: -

We find access to comprehensive information has been very difficult and fragmented and what there has been made available is lacking in detail.

Public Monies

We have found so far that public money devoted to the Port expansion scheme includes:

- £35m dredging the estuary – RGF
- £230m support for economic growth – LCR/LEP/LGF
- £300m increase access to Port of Liverpool – Autumn December 2014
- £565m Total Public Money, so far known!

Land Assembly

We have calculated from 'LCR Superport Centric Logistics' (undated marketing brochure) a total of 9,585,000 square feet of logistics space.

In Sefton of that space at Port of Liverpool (POL) 100,000 square feet

Planned operation port expansion to Derby Road 370,000 square feet A5036 Dunningsbridge Road Corridor 190,000 square feet

So far Sefton Total 660,000 square feet

In addition Peel Ports recently submitted an application for a further 48 ha site in Green Belt Land at junction M57 and M58 at Switch Island in Netherton. We understand this has been subsequently withdrawn as premature.

We note the Land Assembly Strategy is essentially Employment Land from Super Port Action Plan 2011-2020 we calculate a projected jobs total of some 18,350 across the six local authorities in the LCR: this excludes the Manchester Ship Canal Sites.

Logistics is a euphemism for warehousing and distribution. Jobs are sorters, pickers, packers, and movers associated with endemic, low skill, low pay, insecure work. That to us means labour agency recruitment, zero hour contracts, part time or shift work, with minimum pay, punitive T & c of employment, if not 'self employment' sub contractors.

Access to Port

The Access to Port Study none technical study- November 2011 presents packages of interventions including widening of the Dunningsbridge Road/ Church Road / Princess Way corridor A5036.

Local Plan policy ED 1 part 3 further indicates the possibility of an additional new road. We believe this anonymous new road to be the unpublished plan to construct a new road from the Switch Island to Thornton By Pass, newly constructed, Brooms Cross Road A5758 through the Rimrose Valley Country Part to Seaforth Centre at A5036 Princess Way.

The overriding impelling drive is apparently to focus on road /highway development for most traffic to the Port.

Yet another finding in this summary report was the spare capacity on the rail network that can meet Peel Ports needs. The main constraint to further development of inter modal rail freight services is the limited current terminal capacity within the Port itself!

But that terminal capacity will directly affect the balance between road versus rail haulage, (More rail less Road). It is therefore absolutely essential for our local communities that rail freight is maximized and prioritized over all highway improvements. To reduce as far as possible over reliance on our roads.

Area of Pressure

The access study summary further identifies the effect of Port expansion for the 'local transport network' complaining amongst other matters: -

- current highway congestion
- local network serving local communities
- commuter driving to Liverpool City Centre,

This together with the drive for regeneration and the need to use national routes (TERN) creates an area of pressure, illustrated by a square on a map: -

- o From M58 to North of the Dunningsbridge / Church / Princess Way corridor
- o North to South A565 Derby Road
- o South of A5058 Millers Bridge / Balliol Road / Queens Drive / M57 Junction

This encompasses communities of Bootle / Seaforth / Waterloo / Litherland & Netherton living in the area of pressure.

Port operation land incorporates the former Dock Road / Regent Road to Derby Road A565 frontage. Opposite that Port frontage is demarked in the DLP map as primarily industrial area – undeveloped, under developed old industrial sites. Small pockets of former council housing faces the A565 and is left to intolerable conditions.

Thousands of residents will be affected by this economic growth. The only opportunity we have had to voice our concern was to attend the Peel Ports Consultation Day in 2011 a show of pretty pictures and dense impenetrable reports and nothing since, despite Peel Ports and Atlantic Gateways acknowledged multiple conferences and meetings with businesses and investors, there so-called stakeholders. Of course we residents are not seen as stakeholders. LCR/LEP regional deal with Government 5th July 2012 estimated impact 'improving sustainable access to POL and associated development sites in South Sefton is an essential part of the master plan.'

The governments growth deal for LCR/ LEP 7/7/2014 commits the LEP and its partners to take a more proactive role in consultation on

- long term rail planning
- long term strategic road network planning
- and a co-ordinating role between the 6 constituent local authorities

There has been no consultation with the people most affected. Given our evidence above we believe this justifies suspension of policies ED 1 / 2/ 3 allow a full programme of public meetings of full open and transparent information, to include all of the studies affecting these matters and prior to the early review of the local plan.

Summary of Suggested Changes

Evidence Submitted

Chapter	9	Plan Order	Policy IN2	Other Documents
Policy	IN2	Transport		
Respondent No	694	Response Ref	2	Representor Name Warren Marshall
Organisation Name	The Mersey Docks and Harbour Company			
Obj/Sup/Com	Support			

Summary of Main Issues

We support the Policy in terms of the acknowledgement it gives for 'Improved access to the Port of Liverpool by a range of transport types". As you will be aware Peel Ports are an active participant in the Port Access Steering Group with a number of other Liverpool City Region stakeholders and transport agencies collectively pursuing a number of multi-modal transport interventions. For our part we are actively involved in a number of water freight solutions (coastal shipping and inland container movements along The Manchester Ship Canal) as well as developing a rail strategy around key commodities (e.g. containers and biomass). A key challenge around improved access to the Port concerns the potential road intervention particularly as it has been concluded that existing road congestion will become a significant barrier to port growth as soon as 2020.

Summary of Suggested Changes

Evidence Submitted

Chapter 9 **Plan Order** Policy IN2 **Other Documents**
Policy IN2 **Transport**
Respondent No 712 **Response Ref** 10 **Representor Name** Andrew Pepper
Organisation Name Persimmon Homes
Obj/Sup/Com Objection

Summary of Main Issues

Persimmon objects to Bullet (4) of this policy as it is not consistent with national policy. Paragraph 32 of the National Planning Policy Framework states that 'development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.'

Summary of Suggested Changes

Bullet of policy IN2 should be deleted or redrafted to be consistent with the National Planning Policy Framework, to ensure that it is sound.

Evidence Submitted

Chapter 9 **Plan Order** Policy IN2 **Other Documents**
Policy IN2 **Transport**
Respondent No 715 **Response Ref** 9 **Representor Name**
Organisation Name Countryside Properties (UK) Ltd and Persimmon Homes Lancashire
Obj/Sup/Com Objection

Summary of Main Issues

Object to Part (4) of this policy as it is not consistent with national policy. Paragraph 32 of the NPPF states that 'development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.' This part of the LP policy should be deleted or redrafted to be consistent with the NPPF, to ensure that it is sound.

Summary of Suggested Changes

Delete part 4 of Policy IN2

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 9 **Plan Order** Policy IN2 **Other Documents**
Policy IN2 **Transport**
Respondent No 716 **Response Ref** 11 **Representor Name** Robert Swift
Organisation Name Robert Swift and family
Obj/Sup/Com Objection

Summary of Main Issues

Objects to Bullet (4) of this policy as it is not consistent with national policy. Paragraph 32 of the National Planning Policy Framework states that 'development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.'

Summary of Suggested Changes

Bullet (4) of policy IN2 should be deleted or redrafted to be consistent with the National Planning Policy Framework, to ensure that it is sound.

Evidence Submitted

Chapter 9	Plan Order Policy IN2	Other Documents
Policy IN2	Transport	
Respondent No 723	Response Ref 8	Representor Name Laurence Rankin
Organisation Name	Sefton Green Party	
Obj/Sup/Com	Comment	

Summary of Main Issues

Traffic: We need to move away from the car-centric approach. We also need to accept the fact that more roads lead to more cars and so do not solve the problem in the long run. However we need to avoid stigmatising drivers and trying to "force" them out of their cars by punishing them. Having said that one element of a transport policy has to be about ensuring the proper costs are assigned to different types of transport. Sefton needs to consider a number of measures including a congestion charge, more bus lanes, well provided and marketed park and ride, free commuter buses to rail stations, car clubs, free buses across congested areas, improved cycle and pedestrian routes, 20mph speed limits in all residential areas. Although Merseyrail services are generally good the same cannot be said for all of the bus services. Equally the rail services from Southport and Liverpool to the East are generally of poor quality with old rolling stock, and overcrowded in peak times. This dissuades many people from using them and therefore leads to a lot of car journeys which begin in Sefton. We need to press regional transport authorities to address the poor service on these regional trains.

Transport Development is still seen as too "car-centric". The reality is that new roads mean more traffic, so it is disappointing to see the Switch Island Link road as the first priority. Where is the promotion of car free developments? We need to ensure good access for all through a real commitment to good public transport, provisions to make walking, cycling, easy and attractive, car clubs to reduce individual car ownership. It would be good to see more specific proposals to make this happen. Traffic management is an element of this, requiring more bus lanes, shared street approaches to traffic safety, ensuring 20mph is rolled out; more subsidies for public transport. More energetic promotion of park and ride schemes, and public transport as a key element of the visitor/tourist offer.

Summary of Suggested Changes

Evidence Submitted

Chapter 9	Plan Order Policy IN2	Other Documents
Policy IN2	Transport	
Respondent No 726	Response Ref 4	Representor Name
Organisation Name	Royal London Mutual Insurance Society Ltd	
Obj/Sup/Com	Support	

Summary of Main Issues

This draft policy seeks to secure an efficient and extensive transport network with proposed improvements to ensure better access to the Port of Liverpool and along the A5036 (Dunnings Bridge Road) which is identified as a Freight Priority Route (see paragraph 9.21) and proposes transport management improvements along this route. RLAM supports these objectives. Supporting an efficient and effective transport network between the Port and Switch Island will be important in order for the significant economic benefits of the Port and the Dunnings Bridge Corridor is realised.

Summary of Suggested Changes

Evidence Submitted

Chapter 9	Plan Order Policy IN3	Other Documents
Policy IN3	Managing Waste	
Respondent No 694	Response Ref 3	Representor Name Warren Marshall
Organisation Name	The Mersey Docks and Harbour Company	
Obj/Sup/Com	Support	

Summary of Main Issues

The Policy correctly cross refers to the Joint Waste Local Plan and in the context of the Port of Liverpool the waste management site allocation at Alexandra Dock, Bootle (EMR Metal Recycling Facility).

Summary of Suggested Changes

Evidence Submitted

Chapter 9	Plan Order Policy IN3	Other Documents
Policy IN3	Managing Waste	
Respondent No 723	Response Ref 26	Representor Name Laurence Rankin
Organisation Name	Sefton Green Party	
Obj/Sup/Com	Objection	

Summary of Main Issues

Waste: Sefton should commit to a Zero Waste Policy

Summary of Suggested Changes

Evidence Submitted

Chapter 10	Plan Order Chapter 10	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 594	Response Ref 5	Representor Name Peter Cushion
Organisation Name	Wirral Council	
Obj/Sup/Com	Comment	

Summary of Main Issues

Wirral Council seeks further clarification that policies for the port and maritime zone, for minerals and for pollution and hazards will also apply to cross river communities in Wirral (a principle that has been accepted in some of the supporting documentation), which could be achieved by amending the second sentence of paragraph 10.25.

Summary of Suggested Changes

Amend the second sentence of paragraph 10.25 to read:

“The aim of the policies in this section (EQ4, EQ5 and EQ6) is to complement these statutory processes and to minimise the risk to health and the environment from new developments in the Borough including any cross boundary implications.”

Evidence Submitted

Chapter 11	Plan Order Chapter 10	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 723	Response Ref 6	Representor Name Laurence Rankin
Organisation Name	Sefton Green Party	
Obj/Sup/Com	Comment	

Summary of Main Issues

Climate Change: We need to ensure that development is sensitive to the needs to mitigate against contributing to climate change, and to adapt our lifestyles and infrastructure to the unavoidable changes to come.

Summary of Suggested Changes

Evidence Submitted

Chapter 10	Plan Order Policy EQ1	Other Documents
Policy EQ1	Planning for a Healthy Sefton	
Respondent No 665	Response Ref 5	Representor Name Tony Dawson
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

Regarding playing fields, it is my understanding that the Borough of Sefton has used these for housing development without having any kind of strategy, includig relating to the health agenda.

Summary of Suggested Changes

Evidence Submitted

Chapter 10	Plan Order Policy EQ1	Other Documents
Policy EQ1	Planning for a Healthy Sefton	
Respondent No 723	Response Ref 13	Representor Name Laurence Rankin
Organisation Name	Sefton Green Party	
Obj/Sup/Com	Comment	

Summary of Main Issues

Crime: Policy ED1 should be seen as part coporate and partner initiatives to redress the balance presented in most of the media that crime is widespread.

Summary of Suggested Changes

Evidence Submitted

Chapter 10 **Plan Order** Policy EQ1 **Other Documents**
Policy EQ1 **Planning for a Healthy Sefton**
Respondent No 723 **Response Ref** 12 **Representor Name** Laurence Rankin
Organisation Name Sefton Green Party
Obj/Sup/Com Comment

Summary of Main Issues

Improving Health:

It would be unrealistic to attempt to answer such a broad question in a short element of the core strategy, given range of factors influencing health inequality. Sefton needs to listen to the community. Sefton needs to be ambitious in its approach to well being and should not be afraid to use the word "Happiness" as an aspiration for its people. It may not yet be a material planning consideration, but a happiness test for development would be an interesting and thought provoking way to raise the issue.

Summary of Suggested Changes

Evidence Submitted

Chapter General **Plan Order** Policy EQ2 **Other Documents**
Policy EQ2 **Design**
Respondent No 20 **Response Ref** 1 **Representor Name** John H Miller
Organisation Name
Obj/Sup/Com Comment

Summary of Main Issues

The Local Plan is likely to lead to more uninspiring, poorly designed housing estates. Maghull has a lack of facilities and parking is no longer suitable for modern purposes.

Summary of Suggested Changes

Evidence Submitted

Chapter 10 **Plan Order** Policy EQ2 **Other Documents**
Policy EQ2 **Design**
Respondent No 329 **Response Ref** 2 **Representor Name** Michael Collier
Organisation Name Wildlife Trust for Lancashire, Manchester & North Merseyside
Obj/Sup/Com Objection

Summary of Main Issues

There is no reference in this Policy to biodiversity and the need to protect and enhance it.

Summary of Suggested Changes

Policy EQ2 (2) - Add the following additional requirement to the 2nd part of the Policy:

h. The existing ecology of the site and the need to protect and enhance its biodiversity.

Note: This added requirement would provide some clarity to those designing proposed developments and ensure the consideration of ecology at the very start of the design process, in accordance with the aims of the NPPF.

Evidence Submitted

Chapter 10 **Plan Order** Policy EQ2 **Other Documents**
Policy EQ2 **Design**
Respondent No 550 **Response Ref** 7 **Representor Name** Peter Brown
Organisation Name Merseyside Civic Society
Obj/Sup/Com Support

Summary of Main Issues

The framework for design control within the document appears to be very good. The Society has, through its own publication, sought to argue for development which is small scale, adapted to local circumstance and which maintains the “permeability” of the urban fabric. This places even greater emphasis on the need to reference heritage issues when considering proposals.

Summary of Suggested Changes

Evidence Submitted

Chapter 10 **Plan Order** Policy EQ2 **Other Documents**
Policy EQ2 **Design**
Respondent No 638 **Response Ref** 19 **Representor Name**
Organisation Name Crosby Investment Strategy Steering Group
Obj/Sup/Com Support

Summary of Main Issues

We support the principles expressed in this policy and particularly in its use to support the development and regeneration of Crosby Centre. We would welcome the opportunity to participate in the Local Plan review process in partnership with the Council .

Summary of Suggested Changes

Evidence Submitted

separate document ‘New Realities: A ‘can-do’ collaborative agreement for Sefton Council & Sefton’s voluntary, community & faith sector’

Chapter 10 **Plan Order** Policy EQ2 **Other Documents**
Policy EQ2 **Design**
Respondent No 735 **Response Ref** 6 **Representor Name**
Organisation Name Catalyst Capital
Obj/Sup/Com Objection

Summary of Main Issues

We consider that Policy EQ2 should be amended to be flexible to ensure that design that is innovative as required by Paragraph 63 of the NPPF is not prevented.

Summary of Suggested Changes

We suggest policy is amended as follows:

1. Development will be supported where it is of high quality design.

Evidence Submitted

Chapter 10	Plan Order Policy EQ3	Other Documents
Policy EQ3	Accessibility	
Respondent No 638	Response Ref 20	Representor Name
Organisation Name Crosby Investment Strategy Steering Group		
Obj/Sup/Com Support		

Summary of Main Issues

Policy EQ3 Accessibility

We support the principles expressed in this policy and particularly in its use to support the development and regeneration of Crosby Centre. We would welcome the opportunity to participate in the Local Plan review process in partnership with the Council.

Summary of Suggested Changes

Evidence Submitted

separate document 'New Realities: A 'can-do' collaborative agreement for Sefton Council & Sefton's voluntary, community & faith sector'

Chapter 10	Plan Order Policy EQ3	Other Documents
Policy EQ3	Accessibility	
Respondent No 712	Response Ref 11	Representor Name Andrew Pepper
Organisation Name Persimmon Homes		
Obj/Sup/Com Comment		

Summary of Main Issues

This policy duplicates some of the requirements of Policies SD1 and SD2 which requires new development to be located sustainably. This issue does not go to the heart of the soundness of the Local Plan but would help terms of clarity and in drafting a concise Local Plan.

Summary of Suggested Changes

Those parts of this policy not picked up in policies SD1 and SD2 could easily be done so and policy EQ3 deleted.

Evidence Submitted

Chapter 10	Plan Order Policy EQ3	Other Documents
Policy EQ3	Accessibility	
Respondent No 715	Response Ref 10	Representor Name
Organisation Name Countryside Properties (UK) Ltd and Persimmon Homes Lancashire		
Obj/Sup/Com Comment		

Summary of Main Issues

This policy duplicates some of the requirements of Policies SD1 and SD2 which requires new development to be located sustainably. They consider that there is no reason to duplicate those requirements in this policy and considers that if necessary, those parts of this policy not picked up in policies SD1 and SD2 could easily be done so and Policy EQ3 deleted.

We consider that this issue does not go to the heart of the soundness of the Local Plan but would help terms of clarity and in drafting a concise Local Plan.

Summary of Suggested Changes

Policy ED3 should be deleted. Any parts of this policy not already picked up in policies SD1 and SD2 could easily be added to those policies.

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 10 **Plan Order** Policy EQ3 **Other Documents**
Policy EQ3 **Accessibility**
Respondent No 716 **Response Ref** 12 **Representor Name** Robert Swift
Organisation Name Robert Swift and family
Obj/Sup/Com Objection

Summary of Main Issues

This policy duplicates some of the requirements of Policies SD1 and SD2 which requires new development to be located sustainably. There is no reason to duplicate those requirements in this policy and, if necessary, those parts of this policy not picked up in policies SD1 and SD2 could easily be done so and Policy EQ3 deleted.
Do not consider that this issue goes to the heart of the soundness of the Local Plan but would help terms of clarity and in drafting a concise Local Plan.

Summary of Suggested Changes

Policy EQ3 should be deleted. Any parts of this policy not picked up in policies SD1 and SD2 could easily be added to those policies.

Evidence Submitted

Chapter 10 **Plan Order** Policy EQ3 **Other Documents**
Policy EQ3 **Accessibility**
Respondent No 723 **Response Ref** 7 **Representor Name** Laurence Rankin
Organisation Name Sefton Green Party
Obj/Sup/Com Comment

Summary of Main Issues

Access:
The key element of access should be about the universality of access ie that all the people of Sefton should have equality of access. This can only be achieved by the provision of good comprehensive public transport coupled with innovative use of car availability such as car clubs, and the provision of secure and well maintained cycle and pedestrian routes. The Local Plan has a role in this, as part of wider corporate and partner priorities.

Summary of Suggested Changes

Evidence Submitted

Chapter 10 **Plan Order** Policy EQ3 **Other Documents**
Policy EQ3 **Accessibility**
Respondent No 723 **Response Ref** 31 **Representor Name** Laurence Rankin
Organisation Name Sefton Green Party
Obj/Sup/Com Comment

Summary of Main Issues

Climate Change: We need to ensure that development is sensitive to the needs to mitigate against contributing to climate change, and to adapt our lifestyles and infrastructure to the unavoidable changes to come.. Car usage is both a benefit and a major problem. For too long our urban spaces have been designed for the car. We need to re engineer the car out of more of our living space. Pedestrianisation of some of our towns' streets is a start but we need to go further, e.g.. Restrictions on vehicles on many more streets combined with reduced speed limits, '20s Plenty', in residential areas will reclaim our streets for all who live in them, children, families, older people, walkers, cyclists, horse riders. The creation of communities where cars are excluded, as in other parts of Europe.

Summary of Suggested Changes

Evidence Submitted

Chapter 10	Plan Order Policy EQ3	Other Documents
Policy EQ3	Accessibility	
Respondent No 726	Response Ref 5	Representor Name
Organisation Name Royal London Mutual Insurance Society Ltd		
Obj/Sup/Com Objection		

Summary of Main Issues

Draft Policy EQ3 provides a range of criteria which will be considered in order to ensure that new development improves accessibility in Sefton. This objective is welcomed and recognised as an important contributor towards securing sustainable development in the Borough.

However, the final criterion requires that a new development complies with the Council's parking standards. It is our understanding that the Council parking standards are those which were originally set out in regional guidance and are now out-of-date. However, neither the policy itself nor the supporting explanation provides guidance on whether these remain the Council's standards or whether they are to be updated through a supplementary planning document. As such, it is requested that Policy EQ3 and / or the supporting Explanation to the policy is expanded to provide further clarity.

Of-course adequate car parking provision is one of the key factors in attracting businesses to employment parks such as Atlantic Park and the Council should seriously consider whether a local policy on car parking standards is necessary. The Council should be mindful of the recent Ministerial Statement which should be read alongside paragraph 39 of the NPPF which states that: "Local planning authorities should only impose local parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network."

Summary of Suggested Changes

Policy EQ3 and / or the supporting Explanation to the policy is expanded to provide further clarity on parking standards

Evidence Submitted

Chapter 10	Plan Order Policy EQ7	Other Documents
Policy EQ7	Energy efficient and low carbon design	
Respondent No 417	Response Ref 4	Representor Name Lerato Marema
Organisation Name Sainsbury's Supermarkets		
Obj/Sup/Com Objection		

Summary of Main Issues

Supports this revision of the Preferred Option policy for which major developments can incorporate mitigation measures to reduce greenhouse gas emissions. However, parts of the policy are considered to remain unsound- omission of all reference to Allowable Solutions (item 4). The Council should also provide an up-to-date local evidence base in support of the requirement for new build development proposals to 'use' decentralised or a district energy system and remove items 2, 3, and 4 from the Policy.

Summary of Suggested Changes

The Council should also provide an up-to-date local evidence base in support of the requirement for new build development proposals to 'use' decentralised or a district energy system and remove items 2, 3, and 4 from the Policy.

Evidence Submitted

Chapter 10 **Plan Order** Policy EQ7 **Other Documents**
Policy EQ7 **Energy efficient and low carbon design**
Respondent No 488 **Response Ref** 16 **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 as follows:

Environmental considerations:

Whilst raising issues such as global warming, climate change and sustainable development. The plan is not ambitious enough in this crucial area of environmental sustainability. Sefton's Local Plan and those of neighbouring Councils need to focus on energy conservation and the highest possible energy-saving/low carbon targets for all new developments. District heating is being embraced in one area of Kew in Southport but this can only be the start. Biomass boilers on a communal basis are another way forward that must be grasped.

Whilst doing this the Council should be seeking effective ways to improve, as far as possible, the Borough's current stock of commercial and domestic buildings with regard to energy usage and fire safety.

Summary of Suggested Changes

Evidence Submitted

Chapter 10 **Plan Order** Policy EQ7 **Other Documents**
Policy EQ7 **Energy efficient and low carbon design**
Respondent No 707 **Response Ref** 10 **Representor Name** Matthew Good
Organisation Name Home Builders Federation
Obj/Sup/Com Objection

Summary of Main Issues

The policy is unsound as it is not consistent with national policy.

The policy seeks to reduce carbon emissions where practical via the fulfilment of four potential methods. The supporting text correctly identifies that energy efficiency requirements will be delivered through the amended Building Regulations. The government's Housing Standards Review has clearly expressed that this is the only approach to energy requirements and as such local plans should not seek to introduce new standards. Within this context the HBF is supportive of the Council in no longer seeking to implement a 10% renewable energy requirement on new dwellings.

The supporting text also indicates that the policy now simply seeks to encourage developments to go beyond the Building Regulations requirements and provides a supportive context. This is not, however, replicated within the policy which indicates that;

'Major development should (our emphasis) incorporate measures to reduce greenhouse gas emissions where practicable.....'

This implies that the onus will be on the developer to indicate why it would not be practicable to incorporate such measures. This

Summary of Suggested Changes

The supporting text indicates that the policy now simply seeks to encourage developments to go beyond the Building Regulations requirements and provides a supportive context. This is not, however, replicated within the policy which indicates that;

'Major development should (our emphasis) incorporate measures to reduce greenhouse gas emissions where practicable.....'

This implies that the onus will be on the developer to indicate why it would not be practicable to incorporate such measures. This is contrary to the governments stated policy and as such the HBF recommends that the policy be deleted.

Evidence Submitted

Chapter 10 **Plan Order** Policy EQ7 **Other Documents**
Policy EQ7 **Energy efficient and low carbon design**
Respondent No 723 **Response Ref** 25 **Representor Name** Laurence Rankin
Organisation Name Sefton Green Party
Obj/Sup/Com Comment

Summary of Main Issues

Energy and Carbon Reduction: Welcome policy ref to energy efficiency and decentralised energy options. This policy could also refer to potential for development to be “car independent” as a key measure of reducing energy usage.
Resource Efficiency: Water efficiency should include rainwater capture.

Summary of Suggested Changes

Evidence Submitted

Chapter 10 **Plan Order** Policy EQ7 **Other Documents**
Policy EQ7 **Energy efficient and low carbon design**
Respondent No 723 **Response Ref** 30 **Representor Name** Laurence Rankin
Organisation Name Sefton Green Party
Obj/Sup/Com Comment

Summary of Main Issues

Climate Change: We need to ensure that development is sensitive to the needs to mitigate against contributing to climate change, and to adapt our lifestyles and infrastructure to the unavoidable changes to come. All development must make maximum use of energy and resource efficiency and renewable energy, at least at the level of the Merton Rule but preferably higher.

Summary of Suggested Changes

Evidence Submitted

Chapter 10 **Plan Order** Policy EQ7 **Other Documents**
Policy EQ7 **Energy efficient and low carbon design**
Respondent No 729 **Response Ref** 6 **Representor Name** Alison Jordan
Organisation Name Mersey Care NHS Trust
Obj/Sup/Com Objection

Summary of Main Issues

Fully support the need for development to be more energy efficient and reduce carbon emissions: however, as currently drafted, Policy EQ7 is not sound for a number of reasons.
Neither this policy nor any other in the Local Plan makes reference to the provision of large scale low carbon or renewable energy provision. This is a notable omission given the significant contribution they can make to the transition to a low carbon future and tackling climate change, as recognised in the Framework and in other Government publications.
Paragraph 10.48 of the explanation to Policy EQ7 makes specific reference to Allowable Solutions. However, there is no reference in the policy (or elsewhere) to encourage Allowable Solutions to fund low carbon and renewable energy infrastructure. Again, this is an important omission which should be addressed.
It is a specific requirement of the PPG that Local Plans address climate change, in recognition of the importance placed on doing so in national planning policy. The current approach fails to reflect this guidance and policy.

Summary of Suggested Changes

Amend policy EQ7 to offer explicit encouragement to large scale renewable energy proposals and to the use of Allowable Solutions..

Evidence Submitted

Chapter 10		Plan Order Policy EQ7	Other Documents
Policy EQ7		Energy efficient and low carbon design	
Respondent No 735		Response Ref 7	Representor Name
Organisation Name Catalyst Capital			
Obj/Sup/Com Objection			

Summary of Main Issues

Recent government advice guards against onerous additional policy burdens above building regulations, as this can undermined the viability of a development.

Summary of Suggested Changes

We therefore recommend that policy EQ7 includes a reference to these measures in line with building regulations and viability.

Evidence Submitted

Chapter 10		Plan Order Policy EQ8	Other Documents
Policy EQ8		Managing flood risk and surface water	
Respondent No 241		Response Ref 2	Representor Name Claire Jenkins
Organisation Name Formby Parish Council			
Obj/Sup/Com Objection			

Summary of Main Issues

The Local Plan in its present form relies entirely on the integrity of developers and United Utilities to ensure that the necessary infrastructure is provided, maintained and sufficient to deal with the tidal problems, the fluvial water increase and the human waste treatment. There is no undertaking in this document to ensure that will be done. Indeed there is already a need to increase the capacity of sewage treatment in order to cope with the current demands at peak times.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

Meeting the challenge of climate change, flooding and coastal change:

Sefton is at risk from river flooding, coastal erosion, ground water flooding, tidal surge, surface water flooding & canal flooding. Formby is at risk from all of these except the latter. Flooding is a big issue in Sefton as a whole.

The local Plan is not sustainable because it will bring about an increased risk of flooding. The Sefton coast is unique as it has the largest continuous stretch of dune systems in Britain. Consequently it brings with a unique set of drainage problems, this is why Sefton should be considered a special case. Topological maps prepared by Capita Symonds for Sefton clearly show that the Sand dunes are higher than the immediate hinterland encompassing, Southport, Ainsdale, Formby and Hightown whilst land further east is elevated. This means that between the two river systems surface water drains inland where it becomes trapped and the land water logged. (see Diagram in text).

In order to drain the land east of Formby and Southport there are numerous drainage ditches and water has to be continually pumped (pumping stations) by the Environment Agency to avoid flooding. Developments in West Lancashire, Knowsley and elsewhere all increase the level of Water in the River Alt and hence the risk of flooding in Formby. This is compounded by the fact that the Environment Agency wants to reduce pumping. The Lunt water retention scheme has noticeably slowed the flow of the river and local residents are reportedly seeing annual flooding on land that has never flooded before. As a result of global warming even without new development the flood risk is increasing.

Sefton argue that sites have been selected in areas least likely to flood. The map above clearly shows that in the case of Formby this is untrue. Sites MN2.12 and MN2.49 include flood zone 3 land, areas that should never be developed.

Sefton has a major problem with Surface Water Flooding. There are many water courses and main rivers that flow from dunes towards the lower hinterland. In the case of Formby many of these channels are culverted and flow into Downholland Brook and hence into the river Alt. (See map, in text, of Critical Drainage area 17). All drainage leads to Downholland Brook and the river Alt. Downholland Brook is already at full capacity. During periods of heavy rain main rivers and culverts cannot drain water into Downholland Brook because the water Level is too high this leads to backing up and flooding. This isn't helped by the fact that the culverts are not well maintained. The Environment Agencies's policy of reducing the river flow is making the problem worse. Any new development here in Formby or upstream e.g in Maghull, Switch Island project etc. Will cause flooding.

Land at MN2.12, MN2.48, MN2.49, MN2.19 and MN2.16 plays a major role in absorbing surface water and have a high water table. Concerned that the council have chosen to develop areas around Formby which are particularly prone to flooding see flood maps for river, ground water and surface water flooding. In fact some of the areas chosen are in Flood zone 3 and have flooded recently! The Green Belt areas chosen for development namely MN2.48, MN2.49 and MN2.16 will seriously add to the risk of surface water flooding in Critical Drainage Area 17. The council are aware of this since they provided the data for the Environment Agency flood maps in the first place. The Surface Water Management Plan is conspicuous by its absence and is now crucially dependent upon private developers who may or may not contribute to its delivery. There is no mention of the plan to provide much needed flood mitigation proposed for Duke St. Park. How will MN2.48 affect plans for Bull Cop culvert? I have not been able to find out an answer to these questions and the Surface Water Management Plan (SWMP)(it no longer seems to exist!) has disappeared from the council website. The SWMP should be reflected in the Local Plan. The council seem to think that the adoption of SUDS plans will prevent flooding but SuDS was not designed to mitigate this level of flooding risk. SUDS is designed to mimic and replace natural drainage lost due to development not create a drainage system that never existed in the first place. In major flooding incidents SuDS will just become overwhelmed as was the case in Ruthin in 2012. This is unsustainable development and would not want major flooding in Sefton (as has happened in Ruthin).

Summary of Suggested Changes**Evidence Submitted**

Chapter 10 **Plan Order** Policy EQ8 **Other Documents** Flood Risk Assessment
Policy EQ8 **Managing flood risk and surface water**
Respondent No 394 **Response Ref** 2 **Representor Name** Mark Derbyshire
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Plan has not taken into account the effect it will have with regards to flooding downstream of development.

Summary of Suggested Changes

The plan must be changed to take into account the flooding risks, that due to the climate changing, will only get worse.

Evidence Submitted

Chapter 10 **Plan Order** Policy EQ8 **Other Documents**
Policy EQ8 **Managing flood risk and surface water**
Respondent No 433 **Response Ref** 6 **Representor Name** Eric Haworth
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

One of the major concerns surrounding the Local Plan is the implications for flooding. Areas of the borough are already prone to flooding, and by changing the character of sites from agricultural land to urban land, there will be a greatly enhanced flood risk. Particularly concerning is the risk arising from lack of spare capacity in the existing surface water drainage system. When asked whether the drainage system was capable of coping with 'only' 500 new homes per year, the Council's Member Infrastructure Working Group recorded that surface water run-off should not go into the sewerage system as this could cause very high flows linked to rainfall.

Even under existing investment plans, United Utilities have told Sefton MBC that in Lydiate & Maghull, it can only cope with an additional 30 new houses per year – one third of what Sefton MBC plan to build.

Sefton MBC have previously gone on record claiming that in accordance with the NPPF, areas in danger of potential flooding would be discounted from their development plans. However, the Lydiate Development Site MN2.28 is shown on SMBC's own plans as being immediately adjacent a high risk flood area, and the northern end of Development Site MN2.28 is already prone to flooding. Therefore any residential development will merely eliminate current natural drainage, compounding the current flooding problem.

Furthermore, during the consultation process Sefton MBC amended certain of the flood plain boundaries on their own versions of the maps to accommodate their Development Sites.

Summary of Suggested Changes

Evidence Submitted

Chapter 10	Plan Order Policy EQ8	Other Documents
Policy EQ8	Managing flood risk and surface water	
Respondent No 584	Response Ref 2	Representor Name Lisa Edwards
Organisation Name	Goose Meadow Farming Limited	
Obj/Sup/Com	Objection	

Summary of Main Issues

There has been no consideration of the increase in 'Grey Water' as a result of further development. This water will feed into the sewage system and local drainage system which will in turn impact on the ability of the drainage system into the River Alt to cope. The main route for this water is through highly productive farmland and an increase in the water forced through this system will place pressure on existing drainage and pumping stations. The cost of dealing with this increase in water will fall onto the farmers whose livelihoods are directly affected by flooding and the neighbouring West Lancs Borough. The local plan should address this issue and plan for grey water provision before planning any future housing development in the area, particularly as the continuation of the pumping stations are under threat.

Summary of Suggested Changes

Provision to be made for grey water disposal taking into account existing drainage, sewage works and pumping station capacity and funding for these placed on developers.

Evidence Submitted

Chapter 10	Plan Order Policy EQ8	Other Documents
Policy EQ8	Managing flood risk and surface water	
Respondent No 692	Response Ref 8	Representor Name Peter Harper
Organisation Name	UKIP Sefton Branch	
Obj/Sup/Com	Objection	

Summary of Main Issues

The Local Plan includes the statement: "The Plan does not propose development on sites with the highest risk of flooding". The use of the word "highest" suggests that sites that are known to be prone to flooding will be ear-marked for building upon. (Indeed, they already have been!) Again this is unacceptable: no sites which have been shown to have been prone to flooding in the past should be built upon. Not only will properties built on such land be subject to flooding, but the rain-water that has fallen in such copious amounts as to cause flooding in the past will be diverted into the existing drainage system, placing a greater – and potentially unsustainable – pressure on that system. This may well give rise to flooding in hitherto unaffected areas, adjacent to known flood-sites which are developed.

Summary of Suggested Changes

Evidence Submitted

Chapter 10 **Plan Order** Policy EQ8 **Other Documents**

Policy EQ8 **Managing flood risk and surface water**

Respondent No 715 **Response Ref** 11 **Representor Name**

Organisation Name Countryside Properties (UK) Ltd and Persimmon Homes Lancashire

Obj/Sup/Com Objection

Summary of Main Issues

Paragraph 1 of this policy oversimplifies the role which the planning system plays in reducing the risk from flooding. Planning applications for development within areas at risk of flooding must be assessed in terms of the proposed use, its 'vulnerability' and whether the flood risk are is Flood Zone 1, 2 or 3. Proposals for residential development within FZ2 for example are permissible in principle subject to applying the sequential test to identify whether there are any other sites within a defined catchment that can accommodate the proposed development in FZ1.

Paragraphs (1) and (2) of this policy duplicate national planning policy and oversimplify it in a way which is not helpful and not clear. As such, these two paragraphs should be deleted as presently this part of the policy is not sound as it is not consistent with national policy.

Summary of Suggested Changes

Paragraphs (1) and (2) of this policy should be deleted as presently this part of the policy is not sound as it is not consistent with national policy.

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 10 **Plan Order** Policy EQ8 **Other Documents**

Policy EQ8 **Managing flood risk and surface water**

Respondent No 716 **Response Ref** 13 **Representor Name** Robert Swift

Organisation Name Robert Swift and family

Obj/Sup/Com Objection

Summary of Main Issues

Paragraph 1 of this policy oversimplifies the role which the planning system plays in reducing the risk from flooding. Planning applications for development within areas at risk of flooding must be assessed in terms of the proposed use, its 'vulnerability' and whether the flood risk are is Flood Zone 1, 2 or 3. Proposals for residential development within FZ2 for example are permissible in principle subject to applying the sequential test to identify whether there are any other sites within a defined catchment that can accommodate the proposed development in FZ1.

Paragraphs (1) and (2) of this policy duplicate national planning policy and oversimplify it in a way which is not helpful and not clear. These two paragraphs should be deleted as presently this part of the policy is not sound as it is not consistent with national policy.

Summary of Suggested Changes

Delete paragraphs (1) and (2) of policy EQ8.

Evidence Submitted

Chapter 10 **Plan Order** Policy EQ8 **Other Documents**
Policy EQ8 **Managing flood risk and surface water**
Respondent No 722 **Response Ref** 4 **Representor Name** Jenny Hope
Organisation Name United Utilities Ltd
Obj/Sup/Com Objection

Summary of Main Issues

United Utilities suggests the amendments to draft Policy EQ8 part 4b

Summary of Suggested Changes

b. Surface water discharge is targeted using a sequential approach, and proposals to discharge surface water into anything other than the ground must demonstrate why the other sequentially preferable alternatives cannot be implemented:

- i. soakaway or some other form of infiltration system (using Sustainable Urban Drainage principles),
- ii. an attenuated discharge to watercourse,
- iii. an attenuated discharge to surface water sewer, or
- iv. an attenuated discharge to combined sewer.

Evidence Submitted

Chapter 10 **Plan Order** Policy EQ8 **Other Documents** Policy EQ8
Policy EQ8 **Managing flood risk and surface water**
Respondent No 723 **Response Ref** 29 **Representor Name** Laurence Rankin
Organisation Name Sefton Green Party
Obj/Sup/Com Comment

Summary of Main Issues

Climate Change: We need to ensure that development is sensitive to the needs to mitigate against contributing to climate change, and to adapt our lifestyles and infrastructure to the unavoidable changes to come. Initially new development must take full account of flood risk, and we must be rigorous in opposing development which will create unacceptable vulnerability. Flood risk can also be ameliorated by the intelligent use of Sustainable Urban Drainage Systems, including flood storage basins, urban marshes etc and these should be a requirement of all new developments.

Summary of Suggested Changes

Evidence Submitted

Chapter 10 **Plan Order** Policy EQ8 **Other Documents**
Policy EQ8 **Managing flood risk and surface water**
Respondent No 735 **Response Ref** 8 **Representor Name**
Organisation Name Catalyst Capital
Obj/Sup/Com Support

Summary of Main Issues

Supports Policy EQ8 Managing Flood Risk and Surface Water, and note that development should be permitted where it can be demonstrated that the flood risk has been reduced either through flood defences and on site measures.

Summary of Suggested Changes

Evidence Submitted

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

Objection to the Local Plan based on the National Planning Policy Framework Chapter 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."

Flood Maps, Flood Risk and Flood Insurance

Developers and planning officers in Sefton are using Flood Maps in an incorrect way.

These "theoretical" maps are taking precedence over the "facts" of real world flooding and risk, as against how real world insurance companies treat "Flood Risk."

Individual site descriptions in Sefton's Local Plan even tell us how "part of a site is in Flood Zone 3, part in Flood Zone 2 and part in Flood Zone 1," and then goes on to say how the entire site will be developed. Other than it being irresponsible to develop properties in areas of high flood risk, it also directly contradicts how insurance companies operate.

Insurance companies KNOW that flood maps are only theoretical, approximate and may change from one year to next, insurance companies don't just view if a property is in a flood plain or not, but whether it is near to a potential source of flooding.

Potential sources of flooding include (but are not limited to); the sea, rivers, watercourses, canals, lakes, dams, reservoirs and known flood plains.

An insurance company will therefore suggest that even though a property is not actually in a flood plain, it could be at increased risk of flooding because it is NEAR a potential source of flooding.

Dependent upon the view formed by the actuaries in different insurance companies, they may have different distances from such sources of potential flooding – some insurance companies may view an acceptable distance as 50m, some as much as 500m, but the average appears to be about 250m (see the attached copy of flood assessment for a property on Alt Rd, Formby).

A specific examples fails to refer to relevant flood events, Sefton's Local Plan includes several sites that are closer to sources of flooding than this particular property is, meaning that even if the properties are built in a flood resilient way, they will still be classed as "at risk" of flooding.

It is vital that Sefton Council understand the difference between the way they are treating flood risk and how it is treated in the real world. The Local Plan shows developers where preferred locations for development will be for the next fifteen years and yet the Council are directing developers to locations that would be deemed as "unwise" by the insurance industry. This is surely an irresponsible plan that is putting new residents at risk of either not being able to get flood insurance, or having to pay a very high price for perhaps basic cover.

Summary of Suggested Changes

Evidence Submitted

Flood assessment for a property on Alt Rd, Formby.

Flood Risk Maps, search information, photographs

Information on FloodRe Scheme

Organisation Name**Obj/Sup/Com**

Objection

Summary of Main Issues

Sustainable Urban Drainage Systems

Sustainable Urban Drainage Systems (SUDS) have become an integral part of designing surface water drainage systems and are supposed to try and mimic how a greenfield site drains naturally. The idea is that when developing "upstream" areas they will present no greater load on natural resources (rivers, for example) than existing land conditions.

Unfortunately, SUDS in itself, does not cure flooding problems, they only to prevent additional load from a development affecting areas downstream.

Therefore, if a site currently floods, installing a SUDS drainage scheme will NOT stop the cause of the flooding on that site – at best it will mimic how the site drains now.

The only real solution to sites that flood is to identify the cause of the flooding, and cure that problem. Unfortunately, Sefton's Planning Department seems to view the term SUDS as a panacea (which it is most definitely not) and seem to accept even the mere mention of it as a sign that a development should go ahead. The first questions that need to be asked by the Planning Department when looking at a site are; a) Does the site have a flooding problem? b) Is the site near to a flooding problem? c) What is the cause of the flooding problem? d) What is the cure for the flooding problem? e) Is it feasible for that cure to be implemented?

Storing water on site, will not cure a flooding problem. It only stores water on the site. To create storage on a site, it WILL take away existing storage within the ground.

Having worked in both private practice and public service, I have come across many locations (including some in Sefton) where "features" of designed drainage systems (like non-return valves, flow regulators and balancing ponds) have been cursed by residents of housing estates as they find they cause more problems than solutions. It can be guaranteed, for example, that installing a pond to store water in, with a restricted outlet on it, will result in a significant number of complaints from residents within only a few years installation. They will claim that it is a home to rodents, becomes a stinking bog infested with flies in the summer and becomes so full at times of rain in the winter that they fear their homes will be flooded. Yet, the Planners who approve such designs insist it is not their responsibility and expect other departments in the Council to solve the problem.

insect breeding grounds should not be located adjacent to existing of proposed properties.

Cost of SUDS

Evidence has shown that the cost of maintaining SUDS is significantly higher, many times higher, than maintaining a traditional drainage system.

In view of the ongoing changes to regulations in the Flood and Water Management Act 2010, it is clear that the cost of maintaining these systems may very well be borne (in whole or in part) by the Local SUDS Approving Body - which in this case is Sefton Council itself. Has Sefton accounted for the cost of maintaining these systems? Bearing in mind that due to a reduction in Government funding, Sefton Council has cut the Land Drainage budget for 2015/16 and yet is proposing to allow several SUDS to be installed on sites in this Local Plan at a not inconsiderable to the Council in maintenance costs. It almost appears that the writers of the Local Plan are unaware of this situation.

The Council would bear both the cost of maintaining these systems and also the responsibility should something go wrong and flooding occurs.

Summary of Suggested Changes**Evidence Submitted**

Article from Telegraph 23 March 2015

Chapter 10 **Plan Order** Policy EQ9 **Other Documents**
Policy EQ9 **Provision of public open space, strategic paths and trees in development**
Respondent No 696 **Response Ref** 6 **Representor Name** Robin Buckley
Organisation Name Redrow Homes Ltd
Obj/Sup/Com

Summary of Main Issues

Our comments in relation to Policy EQ9 (Provision of Public Open Space, Strategic Paths and Trees in Development) are specific to the way in which the Local Plan Policy Map shows the division between housing and Proposed Open Space on land at Andrew's Close, Formby. We believe that further local and relevant assessment is needed to determine the housing to open space mix. This will examine sustainable urban drainage flood risk and mitigation along with the overall amenity functions of the open space and will inform any decision on the balance of new housing and Proposed Open Space. With specific reference to the mixed land use allocation on land at Andrew's Close, Formby there is a need for a further section in Policy EQ9 which requires further local relevant assessment of drainage, flood risk, flood risk mitigation and the function of the open space in order to determine the balance between housing and Proposed Open Space.

Summary of Suggested Changes

With specific reference to the mixed land use allocation on land at Andrew's Close, Formby there is a need for a further section in Policy EQ9 which requires further local relevant assessment of drainage, flood risk, flood risk mitigation and the function of the open space in order to determine the balance between housing and Proposed Open Space.

Evidence Submitted

Chapter 10 **Plan Order** Policy EQ9 **Other Documents**
Policy EQ9 **Provision of public open space, strategic paths and trees in development**
Respondent No 723 **Response Ref** 24 **Representor Name** Laurence Rankin
Organisation Name Sefton Green Party
Obj/Sup/Com Comment

Summary of Main Issues

Green Infrastructure: Good to see policy to protect, enhance and extend. Included within "key components" should be the natural waterways within Sefton, and the Leeds and Liverpool Canal, all of which offer Green corridors in their own right, and which can act as pathways for people and animals from urban to rural environments. One element missing in managed Green infrastructure is the provision of allotments, and the promotion of "edible bus stops", "edible train stations" etc which raise awareness of the natural environment and benefits all. While recognising the benefit of managed Green infrastructure, there is a need to be wary of the adoption of "Theme Park" approaches, focussing on tidy/pretty plants and animals. There is always scope to incorporate "wild" elements in all Green developments. The opportunity should be taken within this policy to highlight the health benefits (in both social and economic terms) of ready access to Green Infrastructure.

Summary of Suggested Changes

Evidence Submitted

Chapter **Plan Order** Policy EQ9 **Other Documents**
Policy
Respondent No 725 **Response Ref** **Representor Name** Paul Daly
Organisation Name Sport England
Obj/Sup/Com

Summary of Main Issues

deleted REP

Summary of Suggested Changes

Evidence Submitted

Chapter 10	Plan Order Policy EQ9	Other Documents
Policy EQ9	Provision of public open space, strategic paths and trees in development	
Respondent No 725	Response Ref 20	Representor Name Paul Daly
Organisation Name Sport England		
Obj/Sup/Com Objection		

Summary of Main Issues

The broad objectives of this policy [EQ9] are supported. However, there is a difference between the policy aim set out in para 10.63 and the actual scope of the policy. Para 10.63 states that the policy sets out the requirements for provision of new or enhanced public open space, green network etc. in relation to new development. However, the policy wording itself only appears to cover new provision. For example, bullet points 1,2, and 3 deal with public open space, but there is no reference to ensuring new development contributes to assessing any qualitative deficiencies that might exist.

In addition, the policy appears only to cover onsite provision of public open space. Presumably, policy IN1 would be the mechanism for securing off site provision of public open space. The policy explanation is clear that in some instances off site provision would be more appropriate, but policy EQ9 itself would not appear to provide a mechanism to do so.

Summary of Suggested Changes

It is recommended that the policy wording of EQ9 is amended to allow for improvements to public open space, and that the policy explanation clarifies the mechanism that would be used to secure off-site provision.

Evidence Submitted

Chapter 10	Plan Order Policy EQ9	Other Documents
Policy EQ9	Provision of public open space, strategic paths and trees in development	
Respondent No 735	Response Ref 9	Representor Name
Organisation Name Catalyst Capital		
Obj/Sup/Com Objection		

Summary of Main Issues

Support this policy, however it is considered that the viability of development is compromised by the provision of open space, an off-site contribution is considered.

Summary of Suggested Changes

Catalyst Capital recommends that the policy includes the consideration of an off-site provision of open space for a development of 50 or more homes.

Evidence Submitted

Chapter 10	Plan Order Policy EQ10	Other Documents
Policy EQ10	Food and drink	
Respondent No 446	Response Ref 7	Representor Name Hugh McAuley
Organisation Name Formby Play Sports Ltd		
Obj/Sup/Com Support		

Summary of Main Issues

Some minor changes to the proposed wording are suggested in order to create better clarity with regard to proposals outside town, district and local centres.

Summary of Suggested Changes

Add new sub-paragraph 3;

3. Proposals for food and drink uses outside of town, district and local centres will not be supported unless the use can be fully justified by reference to the fact that it would either serve a clear need, satisfies the sequential test, or is justified by reference to other policies.

Evidence Submitted

Summary of Main Issues

Limiting the number and location of hot food takeaways would be unsound. By way of overview, the Framework provides no justification at all for using the development control system to seek to influence people's dietary choices. The Framework should seek to create, not restrict choice.

There is no adequate evidence to justify the underlying assumption, that locating any A5 use within certain distances of schools or primarily residential areas causes adverse health consequences, which would in turn have negative land use planning consequences. The evidence does not support this chain of reasoning or a restriction on the location of A5 uses.

Such an approach is not positive, justified, effective or consistent with the Framework.

Restricting the quantity and location of new A5 proposals within the borough, is not a positive approach to planning. The Framework "foreword" sustainable development is about positive growth, making economic, environmental and social progress for this and future generations.

The suggested restrictions, take an ambiguous view of A5 uses in relation to the proximity to schools and residential properties. It would apply an over-generic approach to restrict development with little sound planning reasoning or planning justification. This is contrary to Para 14 of the Framework which advises authorities to positively seek opportunities to meet development needs of their area.

Thus is inconsistent with Para 19 and 21 of the Framework. Para 19 states: Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.

Para 21 states: Investment in business should not be over-burdened by the combined requirements of planning policy expectations.

There is a lack of evidence to demonstrate the link between fast food, school proximity and obesity. We confirm this at Appendix A [provided].

A systematic review of the existing evidence base by Oxford University (December 2013), funded by the NHS and the British Heart Foundation 'did not find strong evidence at this time to justify policies related to regulating the food environments around schools.' It instead highlighted the need to 'develop a higher quality evidence base'.

This lack of evidence has been confirmed in a number of planning decisions. For example, in South Ribble the Planning Inspectorate raised concerns about a similar 400m school proximity restriction on fast food, stating 'the evidence base does not adequately justify the need for such a policy', and due to the lack of information, it is impossible to 'assess their likely impact on the town, district or local centres'.

The evidence provided at Appendix B confirms that 70% of purchases by students in the school fringe are purchased in non A5 shops.³

No consideration has been given to other A class uses and their contribution or impact on daily diet or wellbeing. The suggest approach is therefore not holistic and will not achieve the principle aim.

There is lack of evidence to demonstrate that purchases in fast food outlets are any more or less healthy than purchases in other A Class premises. Evidence confirming this is set out in Appendix C.

Research by Peter Dolton states that "At least 50% of the days in a year kids don't go to school if we count weekends and holidays and absence. They are only there for 6 hours and all but 1 are lessons. So only around 2-3% of the time can [children] get fast food at school."⁴ This clarifies that a blanket restriction on opening hours is unjustified.

Similarly, research by Brighton & Hove concluded that 'the greatest influence over whether students choose to access unhealthy food is the policy of the individual schools regarding allowing students to leave school premises during the day'.⁵

Only limited purchases of food are made at A5 uses on journeys to and from school. Further details are set out in Appendix D.

Given the limited access that children have to fast food during the school day, a generic restriction is disproportionate; is not justified; and would not be effective.

Such an approach would have a disproportionate effect on land use planning and the economy when taking into account the limited purchases made by school children who may only have the potential to visit A5 establishments at the end of the school day, and only during term time.

The Framework cannot be interpreted to provide generic restrictions on a particular use class. Moreover, the evidence does not support such restrictions. The need for evidence is emphasised in para 158 of the Framework which states that each local plan should be based on adequate, up-to-date and relevant evidence. Compliance with the soundness test is still required.

The proposal does not accord with the “golden thread” running through the Framework which seeks to build a strong competitive economy. Such a policy could potentially stifle economic development and is not consistent with the Framework.

We consider that restricting the quantity and location of hot food takeaways would be unsound and fails to meet the four tests of the Framework. It is not a positively approach to planning; justified; effective; or consistent with national planning policy. Such a policy should therefore not be taken forward to the next stage of the plan making process.

Many restaurant operators have made major steps to expand the range of healthy options and work with the communities within which they are / will be part of.

Summary of Suggested Changes

Evidence Submitted

Appendix A - Outline of a lack of evidence to demonstrate link between fast food, school proximity and obesity

Appendix B - Evidence that food in the school fringe tends to be purchased in non-A5 uses

Appendix C - Reiew of evidence that food in fast food outlets are any more or less healthy than purchases in other class A premises

Appendix D - Review of evidence to show only limited number of journeys to and from school involve a purchase at a food outlet.

Outline of McDonalds business model and the community/economic benefits they bring.

Summary of Main Issues

We consider that no regard has been given to national policy and advice in preparing Policy EQ10 (2) because none of the National Planning Policy Framework (NPPF) policies deal with dietary issues. This means that the draft LP does not comply with sub-section 19 (2) (a) of The Planning and Compulsory Purchase Act 2004 (PCPA04).

Specifically, taking into account proximity of hot food takeaways to residential areas or schools has no basis in national policy and national practice guidance simply refers to a briefing paper containing case studies on the issue. Indeed, restricting accessibility to services and facilities is directly contrary to national policy.

We consider that no regard has been given to national policy and advice in preparing Policy EQ10 (2) because the draft LP would furthermore be rendered unsound in terms of the criteria set out at NPPF paragraph 182. This also means that the draft LP does not comply with sub-section 19 (2) (a) of PCPA04.

We do not consider a reasoned justification for the draft policy has been substantially provided in accordance with regulation 8 (2) of The Town and Country Planning (Local Planning) (England) Regulations 2012. Neither the text at paragraph 10.77 – 10.81 nor the evidence base referred to support restrictions on food and drink uses in or adjacent to Primarily Residential Areas, schools or educational establishments.

Notwithstanding the intention expressed at paragraph 10.81 to prepare supplementary guidance, the draft policy defines neither what will be considered “adjacent” nor criteria for how such uses might be considered to “encourage unhealthy lifestyle choices”. Leaving this to an SPD would unlawfully avoid scrutiny of critical matters.

We consider that the inclusion of Policy EQ10 renders the draft LP unsound because the draft policy fails to meet the criteria set out at NPPF paragraph 182, as follows:

The draft policy is not based on any objectively assessed development requirement. It effectively assesses the requirement for hot food takeaways in or adjacent to Primarily Residential Areas or close to school and educational establishments as zero, but does so without evidence of either a link between incidence of obesity and proximity of hot food takeaways to schools or of any distance at which a link is demonstrated. Consequently, the development requirement has not been objectively assessed.

In fact, the policy could have the effect of banning hot food takeaways from almost all of the Borough. Because no assessment has been made of the number of hot food takeaways that might be refused as a result of this or what the social, economic or environmental impacts of that might be, it is not possible to balance these impacts.

The policy is negative in its assumptions, using the concept of ‘unhealthy food’, which is at best unhelpful in isolation from an understanding of the person eating the food, their health and lifestyle, and at worst is simply subjective. Furthermore, it assumes all hot food takeaways offer little choice and serve the same type and standard of food.

There does not appear to be any evidence specific to the draft policy in the evidence base. The Health and Wellbeing Strategy does not mention hot food takeaways at all. Indeed, the objective of draft Policy EQ10 (2) has to be inferred from a suggestion that too many such uses “may ... encourage unhealthy lifestyle choices”.

There is no objective evidence for any link between the incidence of obesity and the proximity of hot food takeaways to either Primarily Residential Areas or educational establishments, so it is at best unclear whether refusing planning applications for hot food takeaways on the basis suggested could ever discourage unhealthy lifestyles.

The inclusion of primary schools is particularly problematic, as it is clear that children at primary schools are not usually permitted to leave the premises at lunchtime and, given their age, are unlikely to travel to or from school unaccompanied. Outside school time, children’s diets are quite properly the responsibility their parents or guardians.

Consequently, it is far from clear how refusing planning permission for hot food takeaways “close to” primary schools could ever be justified. This was the view taken by a Planning Inspector in an appeal (APP/P4415/A/11/2159082) against refusal of a restaurant and hot food takeaway in January 2012.

Diet is clearly a key determinant both of general health and obesity levels. Exercise is the other key determinant which must be considered for a complete picture. Focussing on improving access to open space, sport and recreation facilities would be a far

more appropriate strategy for reducing childhood obesity.

Whilst no evidence is presented to support any public health effects of “unacceptable” (however defined) groups of food and drink uses referred to in draft Policy EQ10 (1), we consider high concentrations of any one type of use are unhealthy in retail health terms, and that this may sometimes also be the case in terms of human health.

For the reasons set out (see 3.6 and 3.7), it is unclear how refusing permission for hot food takeaways “close to” primary schools could ever be effective.

Some hot food takeaways, together with restaurants, pubs and shops are clearly a source of cheap, energy dense and nutrient poor foods; however, not all hot food takeaways, restaurants, pubs and shops are, and the planning system is ineffective in distinguishing between those that are and those that are not.

The area that would be affected by the policy potentially covers most of the Borough, so it is hard to see how the effectiveness of its extent could be monitored. Would poor or negative achievement against the objective result in redefining proximity criteria? What other corrective action might be taken short of its withdrawal?

We consider that no regard has been had to national policy and advice in preparing Policy EQ10 because none of the NPPF policies include dietary issues.

The NPPF recognises the role planning takes in better enabling people to live healthier lifestyles. However, it seeks to do this by creating, not restricting choice, by increasing access to recreation and health services, and by ensuring developments are walkable. National practice guidance simply refers to a briefing paper containing case studies.

In summary, KFC (GB) Limited considers that inclusion of Policy EQ10 renders the draft LP unsound and so OBJECTS to Policy EQ10 (2) on the above grounds.

Summary of Suggested Changes

The amendment sought by KFC (GB) Limited, and the only change to the draft LP that would render it sound, is the deletion of the text relating to unhealthy lifestyle choices in Policy EQ10 (2) of the draft LP.

Evidence Submitted

Chapter 10	Plan Order Policy EQ11	Other Documents
Policy EQ11	Advertisements	
Respondent No 648	Response Ref 8	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. The historic environment should be considered in delivering a number of other planning objectives. Whilst English Heritage broadly supports the policy, it could further benefit from clarification on the application of this policy in the historic environment. Advertisements on listed buildings will require listed building consent and therefore, will not be determined using the proposed development management policy EQ11. Point 4 could also be further enhanced through the use of "setting" rather than "adjacent to".

Whilst Lord Street (Point 5) is a conservation area, some of the buildings with verandas are also designated heritage assets and therefore any advertisements will be subject to an LBC. The policy does not make this clear and needs to be amended to provide clarity to those submitting applications for consent.

Summary of Suggested Changes

The Plan should be amended to provide clarity to ensure that those wishing to erect an advertisement are clear that the policy does not override the need to apply for listed building consent and that these will be considered on a case by case basis. It should also be amended to ensure that it is clear that Lord Street is within a conservation area and the verandas are designated heritage assets.

Evidence Submitted

Chapter 11	Plan Order Chapter 11	Other Documents
Policy NH11	Development affecting Conservation Areas	
Respondent No 570	Response Ref 1	Representor Name Lynn Gibson
Organisation Name	Green Lane Conservation Area Society	
Obj/Sup/Com	Objection	

Summary of Main Issues

Sefton Local Plan, Green Lane Conservation Area, Formby. We are a recently formed group of residents living within the Green Lane Conservation Area dedicated to protecting and enhancing it. We believe that a change to the Local Plan Proposal is required to be consistent with National Policy 12. Conserving and enhancing the historic environment. With a recognition that this Conservation Area is at specific risk "through neglect, decay or other threats" Although an assessment of the area was to be carried out, now some years ago, nothing has been done to assess, protect or enhance the area. Unsympathetic developments have taken place, roads, and street furniture have decayed. In particular the Embassy Building, situated directly on Green Lane is now a building in crisis and urgent action needs to be taken to remedy it. Therefore, we request the following: A full and comprehensive assessment be carried out, without delay of the Green Lane Conservation Area. Outcomes identified by the assessment to be acted upon within the suggested framework of the Sefton Local Plan, particularly 11.92, and NH11. That the Council use legislation already in place to monitor and control enhancements and any further development within the Conservation area. With a full assessment of any "negative contributions" to the significance of assets. That a long term plan and funding be sought to protect this special area. It is the only Conservation Area in Formby, and has a high number of listed buildings and heritage assets. We are keen to work constructively with all interested parties within the Area, and would welcome the help and advice of Sefton's newly appointed heritage Officer.

Summary of Suggested Changes

We believe that a change to the Local Plan Proposal is required to be consistent with National Policy 12. Conserving and enhancing the historic environment. With the addition that there is recognition that this Conservation Area is at specific risk "through neglect, decay or other threats"

Evidence Submitted

Chapter 11	Plan Order Chapter 11	Other Documents
Policy NH1	Environmental assets	
Respondent No 648	Response Ref 17	Representor Name Emily Hrycan
Organisation Name	English Heritage	
Obj/Sup/Com	Support	

Summary of Main Issues

English Heritage supports the proposal to undertake a separate heritage strategy for the historic environment. Such an ambition should be included within a strategic policy for the historic environment.

Summary of Suggested Changes

Evidence Submitted

Chapter 11	Plan Order Chapter 11	Other Documents
Policy NH14	Development affecting non-designated Heritage Assets	
Respondent No 648	Response Ref 12	Representor Name Emily Hrycan
Organisation Name	English Heritage	
Obj/Sup/Com	Support	

Summary of Main Issues

We welcome recognition of the importance of undesignated heritage assets in the Borough.

Summary of Suggested Changes

Evidence Submitted

Chapter 11 **Plan Order** Chapter 11 **Other Documents**
Policy NH9 **Demolition or substantial harm to designated Heritage Assets**
Respondent No 648 **Response Ref** 13 **Representor Name** Emily Hrycan
Organisation Name English Heritage
Obj/Sup/Com Objection

Summary of Main Issues

Whilst we welcome recognition of the different types of heritage assets both designated and undesignated. The Plan will need to ensure that the starting point is the conservation and enhancement of heritage assets and their setting. The text in this paragraph infers that change is acceptable without considering the requirements of the NPPF and the 1990 Act on these matters. It also refers to "heritage value of sites" and not the significance of heritage assets and their settings.

Summary of Suggested Changes

The Plan should be amended to provide further clarity and consistency:
Development offers the opportunity to enhance the public appreciation and enjoyment of Sefton's historic environment. Where development proposals affect a heritage asset and its setting which has deteriorated, or which has been harmed by inappropriate development, opportunities should be taken to better reveal the significance of the asset, for example to make repairs, reinstate missing architectural features, undo previous inappropriate changes and secure the long term maintenance of the site's features.

Evidence Submitted

Chapter 11 **Plan Order** Chapter 11 **Other Documents**
Policy NH9 **Demolition or substantial harm to designated Heritage Assets**
Respondent No 648 **Response Ref** 16 **Representor Name** Emily Hrycan
Organisation Name English Heritage
Obj/Sup/Com Objection

Summary of Main Issues

For clarity and consistency, the Plan should be amended to ensure that development considers the harm on the significance of heritage assets and their setting. In line with the requirements of the NPPF and the 1990 Act.

Summary of Suggested Changes

The advice of suitably qualified person should be sought by applicants in relation to proposals which affect heritage assets and their setting. A written 'heritage statement' prepared by a suitably qualified person must accompany all applications that affect designated and non-designated heritage assets and their setting, to detail how its significance has been taken into account. Through the heritage statement applicants should show that they understand the significance of the heritage asset and how the changes proposed might impact on it. Sources of information which can be consulted to help find out about the value of a heritage site are varied. They include the historic environment record, local libraries an archives and property deeds.

Evidence Submitted

Chapter 11 **Plan Order** Chapter 11 **Other Documents**
Policy NH1 **Environmental assets**
Respondent No 648 **Response Ref** 14 **Representor Name** Emily Hrycan
Organisation Name English Heritage
Obj/Sup/Com Objection

Summary of Main Issues

The paragraph appears to be confusing as it refers to historic areas, heritage site and heritage interest. The NPPF requires that development proposals should conserve and enhance the significance of heritage assets and their setting including those that contribute to the Borough's unique identity.

Summary of Suggested Changes

The Plan should be amended to provide clarity.

Evidence Submitted

Chapter 11	Plan Order Chapter 11	Other Documents
Policy NH10	Works affecting Listed buildings	
Respondent No 648	Response Ref 21	Representor Name Emily Hrycan
Organisation Name	English Heritage	
Obj/Sup/Com	Comment	

Summary of Main Issues

The NPPF requires that proposals affecting a heritage asset should sustain and enhance the significance of the heritage asset. The Plan will benefit from reference to this when listing features of importance or "significance" when dealing with applications for heritage assets. This will ensure clarity and consistency.

Summary of Suggested Changes

Evidence Submitted

Chapter 11	Plan Order Chapter 11	Other Documents
Policy NH9	Demolition or substantial harm to designated Heritage Assets	
Respondent No 648	Response Ref 15	Representor Name Emily Hrycan
Organisation Name	English Heritage	
Obj/Sup/Com	Objection	

Summary of Main Issues

For clarity and consistency, the Plan should be amended to ensure that development considers the harm on the significance of heritage assets and their setting. In line in with the requirements of the NPPF and the 1990 Act.

Summary of Suggested Changes

Development Proposals for a heritage asset will ideally be in support of its 'optimum viable use'. This is the use which is viable, and where the changes are optimum in terms of entailing the least harm to the significance of the heritage asset and its setting. The 'optimum viable use' is not necessarily the most profitable one. The most profitable use may be less than [sic] optimum in terms of its impact on the significance of the heritage asset.

Evidence Submitted

Chapter 11	Plan Order Chapter 11	Other Documents
Policy NH4	The Sefton coast and development	
Respondent No 663	Response Ref 6	Representor Name Alan Hubbard
Organisation Name	National Trust	
Obj/Sup/Com	Objection	

Summary of Main Issues

Para 11.45:

It would probably be truer to say 'a substantial part of the National Trust site at Formby'. It is also noted that in addition to replacement of some facilities that there is also in some areas the potential for a more subtle approach based around adaptation as well.

Summary of Suggested Changes

Para 11.45:

It would probably be truer to say 'a substantial part of the National Trust site at Formby'. It is also noted that in addition to replacement of some facilities that there is also in some areas the potential for a more subtle approach based around adaptation as well.

Evidence Submitted

Chapter 11	Plan Order Chapter 11	Other Documents
Policy NH10	Works affecting Listed buildings	
Respondent No 663	Response Ref 3	Representor Name Alan Hubbard
Organisation Name National Trust		
Obj/Sup/Com Support		

Summary of Main Issues

Policy NH10:

The approach set out in this Policy is considered to be both appropriate and proportionate; it is also considered to be in accordance with national planning advice as set out in the NPPF.

National Trust welcomes and supports the Policy.

Summary of Suggested Changes

-

Evidence Submitted

Chapter 11	Plan Order Chapter 11	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 723	Response Ref 5	Representor Name Laurence Rankin
Organisation Name Sefton Green Party		
Obj/Sup/Com Comment		

Summary of Main Issues

Natural Environment: It is vital that we not only protect our valuable and high quality natural environment, but that we seek to enhance and improve it wherever possible. Firstly we must ensure that current Green Belt and Green Space land is protected from development. Green space should be well maintained and used as a corridor for connection of urban space to the wider natural environment, whether of the coast or of the countryside hinterland of the borough. Creating and maintaining this connection will be to the benefit of people (re health, fitness, general well being) and to biodiversity by maintaining pathways (subject to measures to ensure that Grey squirrels do not gain access to the Red squirrel areas). Our rivers, drainage ditches and the L and L Canal all offer opportunities as these corridors. This approach should not be seen as a barrier to development but rather than as an enhancer of development i.e. in many places development with access to water and natural environments is seen as of high value, therefore enhancing our natural environment will act as a positive stimulus to sensitive development.

Summary of Suggested Changes**Evidence Submitted**

Chapter 11 **Plan Order** Policy NH1 **Other Documents**
Policy NH1 **Environmental assets**
Respondent No 329 **Response Ref** 3 **Representor Name** Michael Collier
Organisation Name Wildlife Trust for Lancashire, Manchester & North Merseyside
Obj/Sup/Com Objection

Summary of Main Issues

LWT strongly supports the inclusion of this chapter within the plan and the recognition of the international, national and regional importance of the wildlife resources of Sefton, together with the need to maintain and enhance their extent and integrity. We do, however, wish to comment on specific points on policies within this chapter.

LWT supports these policies but thinks that more specific proposals should be contained within the plan to support them in addition to support for the Green Infrastructure proposals. For example, there is a pressing need for the Sefton Coast Nature Conservation Strategy and Biodiversity Plan to be revised, updated and implemented as an integrated plan for the coast. Additional support for and promotion of the long-established and successful Sefton Coast Partnership should also be included. Until recently Sefton Council, the largest land-owner on the coast, played a pivotal role within the Partnership but budget pressures have resulted in its officers largely withdrawing from active involvement, seriously threatening the Partnership's future and, for example, its ability to attract external funding. Other "enhancements" could include the designation and management of Hightown sand-dunes as a Local Nature Reserve and a much-needed Management Plan for the Crosby dunes. These kinds of actions are extremely low cost, can be effectively supported by volunteer effort and accord well with the aims and objectives of the Local Plan.

We do not fully understand the final sentence of clause 4 and think that it needs to be clarified and made more specific. It is recommended that the positive proposals / actions referred to above be included as proposals in the local plan.

Summary of Suggested Changes

NH1. Environmental Assets

Include the following specific proposals in the Local Plan:

- A revised and updated Sefton Coast Nature Conservation Strategy and Biodiversity Plan to be implemented as an integrated plan for the coast.
- Additional support for and promotion of the Sefton Coast Partnership.
- The designation and management of Hightown sand-dunes as a Local Nature Reserve.
- A Management Plan for the Crosby dunes.

Clarify the wording of the final sentence of clause 4 and make it more specific.

Note: Inclusion of the above would help to provide a more positive and effective Local Plan.

Evidence Submitted

Chapter 11 **Plan Order** Policy NH1 **Other Documents**
Policy NH1 **Environmental assets**
Respondent No 329 **Response Ref** 11 **Representor Name** Michael Collier
Organisation Name Wildlife Trust for Lancashire, Manchester & North Merseyside
Obj/Sup/Com Support

Summary of Main Issues

Supports in principle the inclusion of this chapter within the plan and the recognition of the international, national and regional importance of the wildlife resources of Sefton, together with the need to maintain and enhance their extent and integrity.

Summary of Suggested Changes

Evidence Submitted

Chapter 11	Plan Order Policy NH1	Other Documents
Policy NH1	Environmental assets	
Respondent No 550	Response Ref 5	Representor Name Peter Brown
Organisation Name	Merseyside Civic Society	
Obj/Sup/Com	Objection	

Summary of Main Issues

Concerned by the risks of decay to built areas of conservation value and to those buildings and groups of buildings in the borough which the Council has already identified as at risk. The Plan refers to the intention to prepare a "Heritage Strategy", and this is welcomed. However, in contrast with the very detailed assessment made to illustrate the need for housing land, the background information concerning the character and condition of buildings is lacking. Whilst we understand that the Plan must focus on "objectively assessed development needs", the lack of a heritage strategy within the Local Plan means that the important connection is missing between the character and condition of buildings in town centres, in particular, and the way in which new policies and proposals can help regenerate such areas. This is especially important when town centres are having to adapt so markedly to changes in the retail economy. There is an opportunity to develop "place changing" strategies for such areas, particularly by the inclusion of residential and mixed use development. Although we understand that the Council has appointed consultants to advise on these matters, the fact remains that the Local Plan does not include clear policies or programmes to guide and promote regeneration with those valuable and opportunistic links to heritage.

Summary of Suggested Changes

Evidence Submitted

Chapter 11	Plan Order Policy NH1	Other Documents
Policy NH1	Environmental assets	
Respondent No 550	Response Ref 8	Representor Name Peter Brown
Organisation Name	Merseyside Civic Society	
Obj/Sup/Com	Support	

Summary of Main Issues

In summary, we welcome the broad content and thrust of the Draft Local Plan and commends, in particular, the commitment to safeguard the borough's natural environment. We commend the principles outlined in the Local Plan for the protection of the natural and built environment.

Summary of Suggested Changes

Evidence Submitted

Chapter 11	Plan Order Policy NH1	Other Documents
Policy NH1	Environmental assets	
Respondent No 550	Response Ref 9	Representor Name Peter Brown
Organisation Name	Merseyside Civic Society	
Obj/Sup/Com	Support	

Summary of Main Issues

The Plan refers to the intention to prepare a "Heritage Strategy", and this is welcomed. We would commend the Council for the recent appointment of an officer to develop this work.

Summary of Suggested Changes

Evidence Submitted

Chapter 11	Plan Order Policy NH1	Other Documents
Policy NH1	Environmental assets	
Respondent No 594	Response Ref 8	Representor Name Peter Cushion
Organisation Name Wirral Council		
Obj/Sup/Com Comment		

Summary of Main Issues

The suggestion that reference should be made to the potential for cross boundary partnership working to address the impact on designated European Sites has only partly been taken forward. The supporting text to Policy NH1 - Environmental Assets only refers to partnership working to manage recreational pressure on the Sefton Coast (paragraph 11.8 refers), although the Implementation and Monitoring section highlights the future need for a more formal framework or strategy for monitoring and managing recreational access across the City Region (paragraph 12.8 refers).

It is therefore suggested that Policy NH1 - Environmental Assets or its supporting text should be amended to also refer to managing visitor pressure at other internationally important nature sites within the City Region, which could be achieved by amending the first sentence of paragraph 11.8:

Summary of Suggested Changes

Amend the first sentence of paragraph 11.8 to read:

“The local authorities in the City Region, Natural England, and other partners also continue to work together to manage visitor pressure on the Sefton Coast and at other internationally important nature sites within the City Region” (which could also be replicated in paragraph 12.8 in the Monitoring section).

Evidence Submitted

Chapter 11	Plan Order Policy NH1	Other Documents
Policy NH1	Environmental assets	
Respondent No 648	Response Ref 11	Representor Name Emily Hrycan
Organisation Name English Heritage		
Obj/Sup/Com Objection		

Summary of Main Issues

The policy lacks any mention of setting. The significance of heritage assets can be affected by development within their setting and the policy needs to ensure that this is mentioned.

Summary of Suggested Changes

The policy needs to be amended to ensure that it refers to the setting of heritage assets.

Evidence Submitted

Chapter 11 **Plan Order** Policy NH1 **Other Documents**
Policy NH1 **Environmental assets**
Respondent No 648 **Response Ref** 9 **Representor Name** Emily Hrycan
Organisation Name English Heritage
Obj/Sup/Com Objection

Summary of Main Issues

The NPPF requires that Plan Policies should 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. Whilst we welcome the inclusion of a strategic policy it does not properly address how the presumption in favour of sustainable development should be applied locally (Para 15). The policy as drafted is generic and does not detail the priorities for Sefton and the long term strategy for its historic environment. This should ideally be informed from the evidence base and the spatial portrait of the Borough. At the moment, there is little to localise this policy. English Heritage is concerned that the policy does not put forward a positive strategy for the historic environment and is therefore contrary to the requirements of the NPPF and the 1990 Act.

Summary of Suggested Changes

The Plan should be amended to ensure that policy NH1 contains a positive strategy for the historic environment and how it is to be applied locally.

Evidence Submitted

Chapter 11 **Plan Order** Policy NH1 **Other Documents**
Policy NH1 **Environmental assets**
Respondent No 648 **Response Ref** 10 **Representor Name** Emily Hrycan
Organisation Name English Heritage
Obj/Sup/Com Objection

Summary of Main Issues

The Policy appears to include elements that are related to development management and what needs to be considered when submitting a planning application rather than a strategic policy for Sefton.

Summary of Suggested Changes

Evidence Submitted

Chapter 11 **Plan Order** Policy NH1 **Other Documents**
Policy NH1 **Environmental assets**
Respondent No 663 **Response Ref** 8 **Representor Name** Alan Hubbard
Organisation Name National Trust
Obj/Sup/Com Support

Summary of Main Issues

The approach set out in this Policy is considered to generally be both appropriate and proportionate; it is also considered to be in accordance with national planning advice as set out in the NPPF. National Trust welcomes and supports the Policy.

Summary of Suggested Changes

Evidence Submitted

Policy NH1 **Environmental assets**

Respondent No 723 **Response Ref** 21 **Representor Name** Laurence Rankin

Organisation Name Sefton Green Party

Obj/Sup/Com Objection

Summary of Main Issues

Environmental Assets: It is difficult to see how the thrust of this policy can be achieved notably section 3; at the same time as permitting development on the Green Belt. The intent to protect and extend habitats will be undermined by the loss of established habitats in the Green Belt.

Summary of Suggested Changes

Evidence Submitted

Chapter 11	Plan Order Policy NH2	Other Documents
Policy NH2	Protection and enhancement of nature sites, priority habitats and species	
Respondent No 329	Response Ref 4	Representor Name Michael Collier
Organisation Name Wildlife Trust for Lancashire, Manchester & North Merseyside		
Obj/Sup/Com Objection		

Summary of Main Issues

"1. Development which may result in a likely significant effect on an internationally important site must be accompanied by sufficient evidence to enable the Council to make a Habitats Regulations assessment. Adverse effects should be avoided, or where this is not possible they should be mitigated, to make sure that the integrity of internationally important sites is protected. Development which may adversely affect the integrity of internationally important sites will only be permitted where there are no alternative solutions and there are imperative reasons of overriding public interest, and where compensatory provision has been made. Such mitigation or compensation must be identified before development commences. Any mitigation or compensation must be functional before any likely adverse effect arises and should be accompanied by a dedicated project related Habitats Regulations Assessment. This also applies to sites and habitats outside the designated boundaries that support species listed as being important in the designations of the internationally important sites (i.e. supporting habitat)."

It should be made clear that the Habitats Regulations require that where agreed provision of compensatory habitat and its prior functionality must be directly linked to the requirements of the designated 'features' of the site.

11.21 "In Sefton priority species include natterjack toads, sand lizards, Whooper swans and Pink-footed geese. Priority habitats sit outside the designated site hierarchy and may be of national (e.g. Ancient woodlands) or local importance. Legally protected species include badgers, 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."

It would be useful to provide a full list of Priority Species and legally protected species that occur in Sefton as an appendix.

11.23 "The Habitats Regulations Assessment of the Local Plan (in its Appendix) identifies a number of allocated sites where a site-specific Habitats Regulations assessment will need to accompany any planning application. This is primarily to allow the Council to assess whether the sites support species listed as being important in the designations of Sefton's Special Protection Areas and Ramsar sites and if so to make sure that appropriate protection is given to the integrity of this bird population or to the amphibian populations of the Ramsar site. More information is set out in the Habitats Regulations Assessment of the Local Plan. This also refers to the need for site-specific Habitat Regulations assessments for development proposals that are likely to result in an increase of more than 1% in nitrogen inputs into the Sefton Coast Special Area of Conservation (SAC). Such proposals are likely to include those in or within 200 metres (m) of the SAC, and those which could increase traffic flows on roads within 200m of the SAC by over 1,000 vehicle movements per day or 200 heavy duty vehicle movements per day (in terms of annual average daily traffic flows). This might include housing developments of 200 or more homes, office developments of 7,000 m2 or more, industrial estates of 15,000 m2 or more, warehousing of 35,000 m2 or more, hotels with 300 or more bedrooms and leisure facilities or exhibition centres of 9,000 m2 or more."

In addition to these provisions planning proposals should take into consideration potential impacts arising from other sources of pollution, increased human disturbance or hydrological changes.

11.26 "Section 3 of the policy sets out the approach to avoidance, mitigation, and, as a last resort, compensation. The Council will prepare a Supplementary Planning Document (SPD) to provide more guidance on mitigation, compensation and enhancement. This will apply to both designated sites and habitats outside the designated sites that support species listed as being important in the designations of the internationally important sites. In this policy compensation means provision in kind, for example similar habitat elsewhere which supports the same range of species, rather than financial compensation. It is crucial to the strategic priority of 'no net loss' set out in paragraph 11.16 above that appropriate mitigation or, as a last resort, compensation is made. The location of appropriate mitigation, replacement or other compensation must follow the sequential approach set out in section 3 and should ideally be as close as possible to the development site. The immediate locality of the site includes nearby sites in West Lancashire (including any future Nature Improvement Areas) or another district."

We consider it regrettable that it has not been possible to produce the SPD in time to accompany the plan. LWT would welcome the opportunity to comment on the SPD when it has been produced.

Crucial to the successful implementation of the mitigation, compensation and enhancement aspects of this and other policies relating to nature conservation is the means to enforce planning conditions and other mechanisms imposed at the planning application stage. In order to achieve this specific reference should be made in Policy PIM1 Planning Enforcement to conditions etc. relating to nature conservation. This should be cross-referenced here.

Summary of Suggested Changes

Policy NH2 (1)

Amend the Policy to make it clear that the Habitats Regulations require that where the provision of compensatory habitat is agreed, the functionality of such compensatory habitat must directly reflect the designated 'features' of the existing site.

Note: Without this amendment it is considered that the policy would not make clear the precise requirements of the Habitats Regulations.

Paragraph 11.21

Provide a full list of Priority Species and legally protected species that occur in Sefton as an appendix.

Note – This would make the Local Plan more effective and clearer to potential developers, in accordance with NPPF.

Chapter 11

Plan Order Policy NH2

Other Documents

Policy NH2

Protection and enhancement of nature sites, priority habitats and species

Respondent No 909

Response Ref 1

Representor Name Carole Dean

Organisation Name

Obj/Sup/Com Comment

Summary of Main Issues

I am concerned about the longevity of our very rare red squirrel reserve. It is imperative that Formby and Freshfield are isolated as much as possible to prevent any invasion by the grey squirrels.

Summary of Suggested Changes

Evidence Submitted

Chapter 11	Plan Order Policy NH3	Other Documents
Policy NH3	Development in the Nature Improvement Area	
Respondent No 694	Response Ref 4	Representor Name Warren Marshall
Organisation Name	The Mersey Docks and Harbour Company	
Obj/Sup/Com	Objection	

Summary of Main Issues

We strongly object to Policy NH3 in particular the designation of a portion of the River Mersey as a 'Nature Improvement Area'. Based upon (1) the legality of the designation and (2) the potentially damaging impacts upon the current and future vessel activity associated with a nationally significant trade gateway.

In terms of (1) we are firmly of the opinion that Policy NH3 can only be properly exercised in terms of a Local Planning Authorities "terrestrial" jurisdiction. In the context of the River Mersey as a "marine" asset the key regulator is the Marine Management Organisation(MMO). It is also difficult to conceive how Sefton MBC would implement the Policy objectives in the context of any development projects affecting the River Mersey which would be regulated by the MMO.

Previous versions of the Local Plan for Sefton which did not include any reference to "Nature Improvement Areas" we wish to query the basis or otherwise in terms of the process followed in consulting potentially affected landowners, as well as the evidence base pertaining to the designations themselves. Appendix 2 of the Local Plan cites 16 no. Nature Improvement Focus Areas within the Liverpool City Region including 01 Sefton Coast which we assume relates to the River Mersey. However, there is no evidence published relating to the nature conservation characteristics of these potential designations nor any narrative around the nature conservation improvement objectives.

Accordingly we do not consider the applicability of the Policy upon the River Mersey in terms of its spatial inclusion within the Local Plan to be "legally compliant". We would also challenge the "soundness" of the approach adopted in that we consider it clearly fails the defined tests as set out paragraph 182 of the National Planning Policy Framework. As the policy will impact on the delivery of key infrastructure and development requirements, it fails the tests of being positively prepared, effective and consistent with national policy. In addition it is not justified by evidence and is not the most appropriate strategy.

In terms of (2) this section of the River Mersey is very actively utilised for commercial shipping and other vessel activity as follows:

- Some 25,000 vessel movements per annum traverse the western portion of the proposed designation being outbound transits from the Port of Liverpool and The Manchester Ship Canal;
- Some 3,200 vessel movements per annum in/out of Gladstone Lock;
- Some 3,200 vessel movements per annum in/out of Langton Lock.

There is also a regular maintenance dredging regime applicable to the approaches of both Gladstone and Langton Locks to maintain published dredged depths to facilitate continued vessel access to the Port of Liverpool.

Significantly our deepwater container terminal (Liverpool2) immediately abuts the proposed designation in the north-eastern quadrant and the berth pocket itself will be within the designation. Through the MMO we have secured the necessary marine licence for the construction of the quay wall and the future dredging of the berth pocket to facilitate the handling of Post-Panamax container ships.

The proposed designation would also be regarded as prejudicial to any future in-river port infrastructure adjoining Alexandra Dock. The Mersey Ports Master Plan highlights the potential for future in-river port development which lie within the eastern portion of the proposed NIA. There has previously been a consent under the Harbours Act 1964 for the development of the Langton River Berth to facilitate increased Irish Sea roll on/roll off freight activity.

We would re-iterate our position over the "soundness" of the approach in that we do not consider the Policy and its designation upon part of the River Mersey to be sound.

Summary of Suggested Changes

Evidence Submitted

Chapter 11 **Plan Order** Policy NH4 **Other Documents**
Policy NH4 **The Sefton coast and development**
Respondent No 123 **Response Ref** 1 **Representor Name** Frances Quirk
Organisation Name
Obj/Sup/Com Comment

Summary of Main Issues

I am concerned about the scale/erosion taking place along the coast between Burbo Bank and Hightown and strongly feel that sea defences in the area should be strengthened on an urgent basis.

I was astonished to notice a bush, which was a good 20ft from the cliff is now almost on the edge and this in a remarkably short period of time.

Should builders rubble be transferred there, covered in some hard weaving material or cages to minimise the effect of the force of the waves?

This area is in a Conservation Area and badly needs conserving.

I do hope that effective measures can be introduced immediately to save this vulnerable area.

Summary of Suggested Changes

Evidence Submitted

Chapter 11 **Plan Order** Policy NH4 **Other Documents**
Policy NH4 **The Sefton coast and development**
Respondent No 663 **Response Ref** 7 **Representor Name** Alan Hubbard
Organisation Name National Trust
Obj/Sup/Com Support

Summary of Main Issues

Policy NH4:

(NB See also response to Para 11.45)

The approach set out in this Policy is considered to generally be both appropriate and proportionate; it is also considered to be in accordance with national planning advice as set out in the NPPF. The detailed requirements are considered to cover the substantive issues raised by coastal processes and development.

National Trust welcomes and supports the Policy.

Summary of Suggested Changes

Evidence Submitted

Chapter 11	Plan Order Policy NH5	Other Documents
Policy NH5	Protection of open space and Countryside Recreation Areas	
Respondent No 725	Response Ref 2	Representor Name Paul Daly
Organisation Name	Sport England	
Obj/Sup/Com	Objection	

Summary of Main Issues

The broad aims of policy NH5 are supported. However, the wording of bullet point 1 b) is considered to result in an ineffective policy, and one that weakens the protection offered by paragraph 74 of the NPPF. Specifically, the policy would allow for development where "An assessment has been undertaken which has clearly shown the public open space or outdoor sports facilities to be surplus to Sefton's standards". A standard, however, is incapable of showing that a specific site or facility is surplus to requirements (as per para 74 of the NPPF). In contrast to PPG17, the National Planning Policy Framework does not require local standards to be calculated for sport and recreation. Instead, paragraph 73 requires planning policies to be based on robust and up to date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. It also states that "The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area". -Sport England has produced guidance on undertaking such assessments for playing fields which is referenced by national planning practice guidance. Importantly, neither of these guidance documents advocates the calculation of standards. Instead the guidance on assessments seeks to identify specific geographic and / or individual facility needs. These can then be clearly set out in a list and taken forward in a strategy/policy document which identifies how best the needs and issues can be addressed and delivered. Local standards do not identify specific needs. A policy based on achieving a local standard will not address needs.

Summary of Suggested Changes

Bullet point 1 b) should be amended to read "An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements" .

Evidence Submitted

Chapter 11	Plan Order Policy NH6	Other Documents
Policy NH6	Urban Golf Courses	
Respondent No 67	Response Ref 1	Representor Name Clive Narrainen
Organisation Name		
Obj/Sup/Com	Support	

Summary of Main Issues

Support policy

Summary of Suggested Changes

None

Evidence Submitted

Chapter 11	Plan Order Policy NH7	Other Documents
Policy NH7	Rural Landscape Character	
Respondent No 663	Response Ref 5	Representor Name Alan Hubbard
Organisation Name	National Trust	
Obj/Sup/Com	Support	

Summary of Main Issues

Policy NH7:

The approach set out in this Policy is considered to be both appropriate and proportionate; it is also considered to be in accordance with national planning advice as set out in the NPPF. National Trust welcomes and supports the Policy.

Summary of Suggested Changes

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Evidence Submitted

Chapter 11 **Plan Order** Policy NH8 **Other Documents**
Policy NH8 **Minerals**
Respondent No 488 **Response Ref** 38 **Representor Name** Ian Brodie Browne
Organisation Name Sefton Council Lib Dem Opposition Group
Obj/Sup/Com Objection

Summary of Main Issues

Shale Gas extraction has to be a major issue for Sefton as exploration work is already happening in neighbouring West Lancashire and the license under which that is taking place also covers parts of our Borough. It is almost certain that the UK will need to exploit this source of fuel within the next few years yet the Local Plan is all but silent on the matter. As the plan is meant to cover the next 15 to 20 years for it to virtually ignore this issue is far from being a sound planning process.

Summary of Suggested Changes

Evidence Submitted

Chapter 11 **Plan Order** Policy NH8 **Other Documents**
Policy NH8 **Minerals**
Respondent No 594 **Response Ref** 4 **Representor Name** Peter Cushion
Organisation Name Wirral Council
Obj/Sup/Com Comment

Summary of Main Issues

Wirral Council seeks further clarification that policies for the port and maritime zone, for minerals and for pollution and hazards will also apply to cross river communities in Wirral (a principle that has been accepted in some of the supporting documentation), which could be achieved by:

Adding an additional bullet point to Point 4 of Policy NH8 Minerals.

Summary of Suggested Changes

Adding an additional bullet point to Point 4 of Policy NH8 Minerals to read:

- “Any relevant cross boundary implications”

Evidence Submitted

Chapter 11	Plan Order Policy NH8	Other Documents
Policy NH8	Minerals	
Respondent No 719	Response Ref 1	Representor Name Malcolm Ratcliff
Organisation Name	Mineral Products Association	
Obj/Sup/Com	Objection	

Summary of Main Issues

Policy NH8 MINERALS

The Policy is UNSOUND because it is

- not JUSTIFIED as not being in accordance with the recommended BGS information on the presence of economic mineral resources
- not EFFECTIVE in that it seeks the prior extraction of mineral which it says does not exist and does not contain effective development management criteria as recommended by good practice
- not CONSISTENT WITH NATIONAL POLICY since it does not safeguard minerals of known current or potential economic interest, and does not safeguard all mineral related infrastructure.

Paragraph 1

The MPA was surprised to learn that “Sefton has no...known resources considered likely to be commercially viable during the period covered by the plan.” (para 11.63) since the BGS Mineral Resources Map for Merseyside (which includes Sefton) maps economic deposits of sub alluvial sand and gravel within the borough. Although not shown on the main Map the Local Plan area also contains deposits of rare silica sand. Although these may not be commercially viable on their own, prior extraction of them during development may yield valuable quantities of mineral. The BGS maps have been produced to assist local authorities in the delineation of Mineral Safeguarding Areas (MSAs). The BGS good practice guidance says, “A robust and credible starting point for defining MSAs is the BGS/DCLG mineral resource information which has been produced specifically to support planning “ (para 4.1.2). We can find no background information in the Local Plan supporting evidence base that would suggest that a different approach should be taken, or that expert advice was sought or given that would exclude the deposits included in the BGS map. However, we are aware that a document called ‘The Evidence Base for Minerals Planning in Merseyside, August 2008’ may have been used to produce policy, but if so, this should be part of the Local Plan evidence base. In any event, we believe this document to be flawed and in need of substantial revision since it precedes NPPF and the most recent good practice advice produced by BGS.

The BGS indicates that the alluvial deposits of the River Alt are the best developed in the Merseyside region and they remain according to the best available information minerals of economic importance which merit safeguarding for future generations.

Consequently, MSAs should be designated to cover alluvial sand and gravel and silica sand in order to make the Plan sound.

In addition, the policy makes provision of prior extraction in line with NPPF para 143. However, this would be illogical if there are no known resources present within the borough. The concept of prior extraction goes alongside the concept of MSAs. Indeed, it is the designation of MSAs that prompts developers and the local planning authority to provide for prior extraction since this will only be necessary where development affects deposits of economic importance. This is particularly relevant for the safeguarding of silica sand which although may not be present in quantities to justify a commercial operation on its own, may nevertheless yield useful quantities during extraction prior to development. As such, it too should feature in any MSA.

However laudable prior extraction may be there is no explanation in the policy or the supporting text of what the ‘special circumstances’ might be that would justify overriding the presumption in favour of prior extraction. The BGS guidance for good practice and endorsed by PPG (para 27-002) advises that development management criteria are adopted which assess the circumstances in which applications for non mineral development should be treated when sterilisation might be an issue (Section 5.2 and chapter 7). In order to be sound the Local Plan needs to include such development management criteria.

Paragraph 2

We support the safeguarding of the Port of Liverpool facilities for aggregates landing and any rail infrastructure. However, this paragraph falls short of the requirements of national policy in NPPF para 143. This requires the safeguarding of “existing, planned and potential..” infrastructure when the policy appears to only relate to existing facilities. Secondly, the paragraph also requires the safeguarding of “existing, planned and potential sites for concrete batching, the manufacture of coated materials, other concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material”. The policy does not meet this requirement and must therefore be considered unsound because it is not in accordance with national policy.

In addition, we object to the criteria as drafted which we believe will be ineffective. Within safeguarded areas there should be a presumption against any development that could prejudice the potential use of the protected transport facility for the handling, processing and transport of minerals. Protection should extend to the site itself and to its environs to stop incompatible development from being established nearby that would make the operation of the facility impossible.

We also believe that the connection between the criteria should be 'and' and not 'or'. This is because as written any development that can show an 'overriding need' will be permitted at the expense of the mineral infrastructure. We do not think this sufficiently recognises the essential character of such infrastructure or its importance to the national economy. NPPF confirms that "Minerals are essential to support sustainable economic growth and our quality of life. It is therefore important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs." (para 142). Para 144 also requires local authorities to 'give great weight to the benefits of mineral extraction, including to the economy' and 'not normally permit other development proposals in mineral safeguarding areas where they might constrain potential future use for these purposes'. We suggest therefore that even if there is an overriding need for alternative development that alternative facilities are assured before minerals landing, processing and transport capacity is lost.

Paragraphs 3 & 4

We support these paragraphs.

Summary of Suggested Changes

Suggested amendments to policy

In the light of the nature of the objections relating to mineral safeguarding we do not believe it is possible to suggest amendments to the policy which will make it sound. This is because the designation of MSAs must be preceded by widespread consultation and there is no other policy vehicle that we know of which is programmed to deal with this matter. In other words, it must be dealt with by this Local Plan.

However, we suggest that in due course a policy could be formulated on the following lines,

1.The Council will safeguard potential mineral resources from development that would preclude their future extraction. Accordingly, Mineral Safeguarding Areas (MSA) have been defined on the Proposals Map for Sand and Gravel & Silica Sand resources as shown on the Mineral Resource Map: Merseyside (comprising City of Liverpool and Boroughs of Knowsley, Sefton, St Helens and Wirral). In addition, existing and potential mineral infrastructure sites such as rail depots, railheads and their associated transport links, wharves, coating plants, and concrete plants, will be safeguarded against development on the site and nearby that would prevent their use for mineral transport, handling and processing.

Priority will be given to the production and supply of recycled and secondary aggregates.

Planning permission will not be granted for any form of development within a Mineral Safeguarding Area that is incompatible with safeguarding the mineral and significant infrastructure unless:

- the applicant can demonstrate to the satisfaction of the Local Planning Authority that the mineral concerned is no longer of any value or potential value; or
- the mineral can be extracted satisfactorily prior to the incompatible development taking place; or
- the incompatible development is of a temporary nature and can be completed and the site restored to a condition that does not inhibit extraction within the timescale that the mineral is likely to be needed; or
- there is an overriding need for the incompatible development; or
- it constitutes 'exempt development', namely householder application and development already allocated in a statutory plan.

2.The Port of Liverpool and strategic rail freight links suitable for the movement of minerals will be safeguarded from inappropriate development. Proposals for non-mineral related development that may threaten the functioning of the wharfrage of the Port of Liverpool, transport links or other infrastructure through which minerals are landed, processed (including secondary and recycled materials) and transshipped, will only be permitted where it can be demonstrated that development would not result in the loss of established minerals related infrastructure and waste management sites unless:

- An alternative site within an acceptable distance can be provided, which is at least as appropriate for the use as the safeguarded site; and
- It can be demonstrated that the infrastructure no longer meets the current or anticipated future needs of the minerals, building and construction industry or the waste management industry.

Evidence Submitted

Chapter 11	Plan Order Policy NH8	Other Documents
Policy NH8	Minerals	
Respondent No 723	Response Ref 23	Representor Name Laurence Rankin
Organisation Name	Sefton Green Party	
Obj/Sup/Com	Objection	

Summary of Main Issues

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

Summary of Suggested Changes

Evidence Submitted

Chapter 11	Plan Order Policy NH9	Other Documents
Policy NH9	Demolition or substantial harm to designated Heritage Assets	
Respondent No 550	Response Ref 6	Representor Name Peter Brown
Organisation Name	Merseyside Civic Society	
Obj/Sup/Com	Objection	

Summary of Main Issues

MCS is concerned at the balance of wording of para.11.83 in the draft Plan. Although it is stated that there is a presumption against harm or loss of a heritage asset, the subsequent wording is too vague in places. The Society feels that wording such as "reasonable period" and "realistic price" are not satisfactory in providing a basis for reaching critical decisions about demolition of listed structures. It might be appropriate to develop the relevant tests in supplementary guidance.

Summary of Suggested Changes

Evidence Submitted

Chapter 11	Plan Order Policy NH9	Other Documents
Policy NH9	Demolition or substantial harm to designated Heritage Assets	
Respondent No 648	Response Ref 18	Representor Name Emily Hrycan
Organisation Name	English Heritage	
Obj/Sup/Com	Objection	

Summary of Main Issues

The Plan states that the policy generally seeks to protect designated and non-designated heritage assets from demolition or harm, yet the policy (NH9) only refers to designated assets.

Summary of Suggested Changes

Evidence Submitted

Chapter 11 **Plan Order** Policy NH9 **Other Documents**
Policy NH9 **Demolition or substantial harm to designated Heritage Assets**
Respondent No 648 **Response Ref** 19 **Representor Name** Emily Hrycan
Organisation Name English Heritage
Obj/Sup/Com Support

Summary of Main Issues

We welcome the inclusion of this policy and the approach to proposals affecting designated heritage assets.

Summary of Suggested Changes

Evidence Submitted

Chapter 11 **Plan Order** Policy NH9 **Other Documents**
Policy NH9 **Demolition or substantial harm to designated Heritage Assets**
Respondent No 663 **Response Ref** 4 **Representor Name** Alan Hubbard
Organisation Name National Trust
Obj/Sup/Com Support

Summary of Main Issues

Policy NH9:

The approach set out in this Policy is considered to be both appropriate and proportionate; it is also considered to be in accordance with national planning advice as set out in the NPPF.

National Trust welcomes and supports the Policy.

Summary of Suggested Changes

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Evidence Submitted

Chapter 11 **Plan Order** Policy NH10 **Other Documents**
Policy NH10 **Works affecting Listed buildings**
Respondent No 648 **Response Ref** 20 **Representor Name** Emily Hrycan
Organisation Name English Heritage
Obj/Sup/Com Objection

Summary of Main Issues

The NPPF requires that Plan policies should contain a positive strategy for the conservation and enhancement of the historic environment. The policy does not reflect the requirements of the NPPF with regards conserving and enhancing the significance of heritage assets and their setting. Their [sic] does not appear to be any reference to the word "significance". It also fails to refer to opportunities to better reveal the significance of heritage assets. The setting of heritage assets can be affected by development that is

not just in its immediate surroundings and the Plan needs to be amended to provide further clarity on this matter.

Summary of Suggested Changes

The Plan should be amended to reflect the requirements of the NPPF :

"a) Any alterations preserve the historic fabric and features of the building and/or its setting which contribute to its significance.

b) The policy should refer to opportunities to enhance the special architectural or historic interest of a building (significance) and better reveal its significance.

C) The Policy should be amended to ensure that development that affects the setting of a listed building is considered not just "in the setting". The setting of listed buildings can be affected by development not just adjacent to or in its immediate surroundings.

The Policy needs to be amended to ensure that it safeguards and enhances the setting of heritage assets in line with the requirements

of the NPPF.

Evidence Submitted

Chapter 11 **Plan Order** Policy NH11 **Other Documents**
Policy NH11 **Development affecting Conservation Areas**
Respondent No 648 **Response Ref** 23 **Representor Name** Emily Hrycan
Organisation Name English Heritage
Obj/Sup/Com Objection

Summary of Main Issues

The NPPF requires local authorities to support opportunities for new development within or affecting the setting of conservation area which will better reveal their significance. The Plan should be amended to provide further clarity on this matter and to provide further advice to those putting forward proposals.

Summary of Suggested Changes

Section should be amended to say:
Development proposals which provide opportunities to better reveal the significance of conservation areas and their setting will be supported.

Evidence Submitted

Chapter 11 **Plan Order** Policy NH11 **Other Documents**
Policy NH11 **Development affecting Conservation Areas**
Respondent No 648 **Response Ref** 22 **Representor Name** Emily Hrycan
Organisation Name English Heritage
Obj/Sup/Com Objection

Summary of Main Issues

Polciy NH11, Point 2:
The NPPF refers to the significance of conservation areas and the loss of any building (or other element) which makes a positive contribution to the conservation area should be treated as either substantial harm or less than substantial harm relative to the significance of the element affected. The proposed development management policy does not particularly accord with the requirements of the NPPF on this matter.

Summary of Suggested Changes

The policy should be amended to read:
Development which affects elements which make a positive contribution to the significance of a conservation area or its setting will not be permitted where. Where the loss is justified. proposals will be required to:

Evidence Submitted

Chapter 11	Plan Order Policy NH11	Other Documents
Policy NH11	Development affecting Conservation Areas	
Respondent No 660	Response Ref 1	Representor Name Ann Victoria Hall
Organisation Name	Green Lane Conservation Area Society	
Obj/Sup/Com	Objection	

Summary of Main Issues

In response to the consultation period for the Sefton Local Plan, please find below our contribution with regard to the Green Lane Conservation Area, Formby. We believe that a change to the Local Plan Proposal is required to be consistent with National Policy 12. Conserving and enhancing the historic environment. With a recognition that this Conservation Area is at specific risk 'through neglect, decay or other threats'. Although an assessment of the area was to be carried out, now some years ago, nothing has been done to assess, protect or enhance the area. Unsympathetic developments have taken place, roads and street furniture have decayed. In particular the Embassy Building, situated directly on Green Lane has lost several of its unique features, and appears to be suffering from a deliberate policy of neglect, whilst other features, totally out of keeping with the original structure have been allowed by yourselves. Built in 1928, it is a heritage asset, and due to it's size and location has a significant impact on the Conservation Area as a whole. It is now a building in crisis and urgent action needs to be taken to remedy it. Therefore we request the following: A full and comprehensive assessment be carried out, without delay of the Green Lane Conservation Area. Outcomes identified by the assessment to be acted upon within the suggested framework of the Sefton Local Plan, particularly 11.92 and NH11. That the Council use legislation already in place to monitor and control enhancements and any further development within the Conservation area. With a full assessment of any 'negative contributions' to the significance of assets. That a long term plan and funding to be sought to protect this special area. It is the only Conservation Area in Formby, and has a high number of listed buildings and heritage assets. We are keen to work constructively with all interested parties within the Area, and would welcome the help and advice of Sefton's newly appointed Heritage Officer

Summary of Suggested Changes

To make the Local Plan legally compliant or 'sound it should include the following commitment: The Local Plan will be consistent with National Policy 12. Conserving and enhancing the historic environment. The Local Plan recognises that the Green Lane Conservation Area is at specific risk 'through neglect, decay or other threats'.

Evidence Submitted

Chapter 11	Plan Order Policy NH11	Other Documents
Policy NH11	Development affecting Conservation Areas	
Respondent No 663	Response Ref 2	Representor Name Alan Hubbard
Organisation Name	National Trust	
Obj/Sup/Com	Support	

Summary of Main Issues

Policy NH11:

The approach set out in this Policy is considered to be both appropriate and proportionate; it is also considered to be in accordance with national planning advice as set out in the NPPF.

National Trust welcomes and supports the Policy.

Summary of Suggested Changes

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Evidence Submitted

Chapter 11 **Plan Order** Policy NH12 **Other Documents**
Policy NH12 **Development affecting Registered Parks and Gardens**
Respondent No 648 **Response Ref** 24 **Representor Name** Emily Hrycan
Organisation Name English Heritage
Obj/Sup/Com Objection

Summary of Main Issues

NH12, point1:

The NPPF requires that Plan policies should contain a positive strategy for the conservation and enhancement of the historic environment. The policy does not reflect the requirements of the NPPF with regards conserving and enhancing the significance of heritage assets and their setting. There does not appear to be any reference to the word "significance" rather it uses the word "features" and for proposals to be "sympathetic to".

Summary of Suggested Changes

The Plan should be amended to ensure that all proposals affecting a registered park and garden and its setting will not harm those elements which contribute to its significance and proposals should conserve and enhance rather than be sympathetic.

Evidence Submitted

Chapter 11 **Plan Order** Policy NH12 **Other Documents**
Policy NH12 **Development affecting Registered Parks and Gardens**
Respondent No 663 **Response Ref** 11 **Representor Name** Alan Hubbard
Organisation Name National Trust
Obj/Sup/Com Support

Summary of Main Issues

Policy NH12:

The approach set out in this Policy is considered to be both appropriate and proportionate; it is also considered to be in accordance with national planning advice as set out in the NPPF.

National Trust welcomes and supports the Policy.

Summary of Suggested Changes

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Evidence Submitted

Chapter 11 **Plan Order** Policy NH13 **Other Documents**
Policy NH13 **Development affecting archaeology and Scheduled Monuments**
Respondent No 648 **Response Ref** 26 **Representor Name** Emily Hrycan
Organisation Name English Heritage
Obj/Sup/Com Objection

Summary of Main Issues

NH13, point 2:

It is not clear whether this part of the policy applies to scheduled monuments and sites of national importance or non-designated archaeology.

Summary of Suggested Changes

Evidence Submitted

Chapter 11 **Plan Order** Policy NH13 **Other Documents**
Policy NH13 **Development affecting archaeology and Scheduled Monuments**
Respondent No 648 **Response Ref** 25 **Representor Name** Emily Hrycan
Organisation Name English Heritage
Obj/Sup/Com Objection

Summary of Main Issues

The NPPF considers scheduled monument to be of the highest significance and any harm to them should be wholly exceptional. It also considers that archaeological sites of national importance be subject to the same principles, The policy does not accord with the requirements of the NPPF on this matter. Proposals should be refused were they will lead to substantial harm or total loss of significance of the scheduled monument/site of national importance unless there are substantial public benefits. The policy also does not provide clarity for those submitting applications affecting sites of archaeological importance and what the Council's preferred approach will be including avoiding damage to such remains through the preservation of archaeological remains in situ. When in-situ preservation is not justified, the developer will be required to make adequate provision for excavation, recording, analysis and publication of assets at a level that is proportionate to their significance and to the scale of the impact of the proposal. This information will need to be made publicly accessible in the County's Historic Environment Record and published appropriately if the results merit this. The policy needs to be amended to make it clear about the process of archaeological assessment and evaluation. It also needs to specify whether it applies not only to sites where there are grounds for believing there is an archaeological potential but also where there is knowledge that there are archaeological remains but where their significance, extent and state of preservation is not clear.

Summary of Suggested Changes

The policy should be amended to ensure that any proposals affecting scheduled monuments or sites of national importance that will harm their significance or setting will not be permitted rather than at present "detract from the importance of the site". The Policy needs to be amended to be clear that the process of archaeological assessment and evaluation applies not only to sites where there are grounds for believing there is an archaeological potential but also where there is knowledge that there are archaeological remains but where their significance, extent and state of preservation is not clear.

Evidence Submitted

Chapter 11 **Plan Order** Policy NH13 **Other Documents**
Policy NH13 **Development affecting archaeology and Scheduled Monuments**
Respondent No 648 **Response Ref** 27 **Representor Name** Emily Hrycan
Organisation Name English Heritage
Obj/Sup/Com Objection

Summary of Main Issues

NH13, point 2:
With regards non-designated assets the policy needs to be amended to make it clearer what the Council's preference will be. There is no mention of preservation in situ and if the public benefits justify the harm then it needs to be clear that other parts of the policy will apply.

Summary of Suggested Changes

Evidence Submitted

Chapter 11 **Plan Order** Policy NH13 **Other Documents**
Policy NH13 **Development affecting archaeology and Scheduled Monuments**
Respondent No 663 **Response Ref** 1 **Representor Name** Alan Hubbard
Organisation Name National Trust
Obj/Sup/Com Support

Summary of Main Issues

Policy NH13:

The approach set out in this Policy is considered to be both appropriate and proportionate; it is also considered to be in accordance with national planning advice as set out in the NPPF.

National Trust welcomes and supports the Policy.

Summary of Suggested Changes

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Evidence Submitted

Chapter 11 **Plan Order** Policy NH14 **Other Documents**
Policy NH14 **Development affecting non-designated Heritage Assets**
Respondent No 723 **Response Ref** 27 **Representor Name** Laurence Rankin
Organisation Name Sefton Green Party
Obj/Sup/Com Objection

Summary of Main Issues

Traditional workers housing in Bootle and other like areas should be considered as Heritage assets, and protected from substantial harm or demolition.

Summary of Suggested Changes

Evidence Submitted

Chapter 12 **Plan Order** Chapter 12 **Other Documents**
Policy N/A **Rep does not relate to a policy**
Respondent No 550 **Response Ref** 15 **Representor Name** Peter Brown
Organisation Name Merseyside Civic Society
Obj/Sup/Com Comment

Summary of Main Issues

The Society recognises that the Local Plan cannot easily capture the changing nature of the demand for infrastructure and land use needs. As such, rigorous monitoring of the effectiveness of policies is essential. The Society is concerned that, given the scale of cuts to local government expenditure, the local authority might be unable to afford the necessary resource to do this.

Summary of Suggested Changes

Evidence Submitted

Chapter 12	Plan Order Chapter 12	Other Documents
Policy NH1	Environmental assets	
Respondent No 594	Response Ref 9	Representor Name Peter Cushion
Organisation Name Wirral Council		
Obj/Sup/Com Comment		

Summary of Main Issues

Nature Conservation

The suggestion that reference should be made to the potential for cross boundary partnership working to address the impact on designated European Sites has only partly been taken forward. The supporting text to Policy NH1 - Environmental Assets only refers to partnership working to manage recreational pressure on the Sefton Coast (paragraph 11.8 refers), although the Implementation and Monitoring section highlights the future need for a more formal framework or strategy for monitoring and managing recreational access across the City Region (paragraph 12.8 refers).

Summary of Suggested Changes

Amending the first sentence of paragraph 11.8, and replicating this in paragraph 12.8 in the Monitoring section:

“The local authorities in the City Region, Natural England, and other partners also continue to work together to manage visitor pressure on the Sefton Coast and at other internationally important nature sites within the City Region”

Evidence Submitted

Chapter 12	Plan Order Policy PIM1	Other Documents
Policy PIM1	Planning enforcement	
Respondent No 329	Response Ref 5	Representor Name Michael Collier
Organisation Name Wildlife Trust for Lancashire, Manchester & North Merseyside		
Obj/Sup/Com Objection		

Summary of Main Issues

Crucial to the successful implementation of the mitigation, compensation and enhancement aspects of this (NH1) and other policies relating to nature conservation is the means to enforce planning conditions and other mechanisms imposed at the planning application stage. In order to achieve this specific reference should be made in Policy PIM1 Planning Enforcement to conditions etc. relating to nature conservation. This should be cross-referenced here.

Summary of Suggested Changes

Evidence Submitted

Chapter Appendix 2	Plan Order Appendix 2	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 329	Response Ref 10	Representor Name Michael Collier
Organisation Name Wildlife Trust for Lancashire, Manchester & North Merseyside		
Obj/Sup/Com Objection		

Summary of Main Issues

Appendix 2 – List of Internationally Important Designated Nature Sites
Mersey Narrows and North Wirral Foreshore is a confirmed Ramsar site, not a proposed one.
Appendix 2 – List of Nationally Important Designated Nature Sites
Add Mersey Narrows SSSI.
Appendix 2 – Local Wildlife Sites Where Parts (including large parts) of the LWS also have International and/or National Designations
Add Seaforth Nature Reserve.

Summary of Suggested Changes

Appendix 2 – List of Internationally Important Designated Nature Sites
Mersey Narrows and North Wirral Foreshore is a confirmed Ramsar site, not a proposed one.
Appendix 2 – List of Nationally Important Designated Nature Sites
Add Mersey Narrows SSSI.
Appendix 2 – Local Wildlife Sites Where Parts (including large parts) of the LWS also have International and/or National Designations
Add Seaforth Nature Reserve.

Evidence Submitted

Chapter Appendix 4	Plan Order Appendix 4	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 615	Response Ref 2	Representor Name Rachael Musgrave
Organisation Name Health and Wellbeing Board		
Obj/Sup/Com Support		

Summary of Main Issues

The supplementary planning guidance will be pivotal to realise these strategic aspirations. The Health and Wellbeing Board is keen to support the development of these supplementary documents and that these extend beyond food and drink to include a range of issues related to health and wellbeing.

Summary of Suggested Changes

Evidence Submitted

Chapter Policy Map	Plan Order Policy Maps	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 417	Response Ref 6	Representor Name Lerato Marema
Organisation Name Sainsbury's Supermarkets		
Obj/Sup/Com Objection		

Summary of Main Issues

Support the amendment of the maps to show clearly, where more than one policy designation applies to a specific site and continue to recommend that shopping parades should be shown on the maps.

Summary of Suggested Changes

Shopping parades should be shown on the maps

Evidence Submitted

Chapter	Policy Map	Plan Order	Policy Maps	Other Documents
Policy	N/A	Rep does not relate to a policy		
Respondent No	625	Response Ref	7	Representor Name
Organisation Name	Wainhomes Developments Ltd			
Obj/Sup/Com	Objection			

Summary of Main Issues

The Policy Map shows the areas designated under policy NH2. This designation is carried forward from the UDP. However, it does not take account of the fact that part of MN2.2 is allocated for housing.

Summary of Suggested Changes

The area allocated within site MN2.2 (Land at Bankfield Lane) should be excluded from the area designated under policy NH2.

Evidence Submitted

None

Chapter	Policy Map	Plan Order	Policy Maps	Other Documents
Policy	N/A	Rep does not relate to a policy		
Respondent No	638	Response Ref	6	Representor Name
Organisation Name	Crosby Investment Strategy Steering Group			
Obj/Sup/Com	Objection			

Summary of Main Issues

Need to redefine the boundary of Crosby Centre.

Summary of Suggested Changes

Redefine the boundary of Crosby Centre.

Evidence Submitted

Chapter General	Plan Order Consultation General	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 5	Response Ref 3	Representor Name Elizabeth Thompson
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

THE LOCAL PLAN PROCESS WAS NOT FAIR OR JUST

From the beginning of the local plan the way Sefton Council has managed the process has been subjective and biased towards trying to lead the process to the outcome that they want. Communication of the Local Plan has been very poor particularly in the early stages. I knocked at every house in the Green Park Estate, Maghull and 80% of residents had not heard of the proposed plan, until I told them. We lived 8 metres from a proposed site and only about 10 house received a letter about the consultation 14 days before the first deadline in the process. It appeared the council were conveniently try to minimise objection by letting as few people know what was happening as possible. At one point there was a questionnaire that Sefton Council devised. I work in research and this would not be acceptable in the research world. It was the most purpose led and biased questionnaire I have seen, rather than representing the real views of the community. I have a copy of this questionnaire if required.

I am sure you will hear more about this from a community group called FRAGOFF, but Sefton council have been very devious in some of their dealings during this process, and have not been transparent at all. Figures/statistics generated by sefton council in their bid to support the need for building and the local plan, have been proved wrong many times, and we feel these have been conveniently doctored to try and lead the plan down a certain path.

Councillors and councils have had an authoritarian method, and many have not represented or listened to their electorate. Many have decided that the council needs the new homes bonus and this is distorting their logic and what is really needed in the area. They have the potential to ruin the area. Population growth figures do not support the need for so much new housing in the area, but when questioned where this population growth will come from Sefton council have never been able to give us a good answer. Nobody wants to hold progression of the area back, but we want the right progression. The councillors do not realise a lot of their electorate are intelligent people, and they area opposing this because they want the area to get better not worse, and they can see the flaws in the plan. The councillors work for us the tax payer and they should be listening, instead we have got a backward approach where the councillors are of the opinion they are of a higher species, they make the decisions only, and they do not want to listen to the community. A good example was the recent meeting at Bootle Town Hall, where the final decision vote was being made to see whether the local plan would go ahead or not. 3 residents took the time to prepare presentations to the present to the councillors on the views of the community ahead of the vote. However, Councillor Dowd told everyone that they had met the night before, the party had decided on a block vote, so anything the residents said on the night was pointless. Surely this makes the process illegal.

There was also evidence in early stages of plan that Sefton Council had dealings with housing developers, and I am sure FRAGOFF will give you more details on this.

Summary of Suggested Changes

Evidence Submitted

Chapter General	Plan Order Consultation General	Other Documents
Policy N/A	Rep does not relate to a policy	
Respondent No 48	Response Ref 1	Representor Name Christopher Wood
Organisation Name		
Obj/Sup/Com	Objection	

Summary of Main Issues

What an absolute disgrace. All our hard work has been ignored. How many more times do we have to repeat ourselves? A disgusted resident of Moss Lane.

Summary of Suggested Changes

Evidence Submitted

Policy

Respondent No 88	Response Ref	Representor Name Karen Atkinson
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Organisation Name**Obj/Sup/Com** Objection**Summary of Main Issues**

I feel that 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**

Policy

Respondent No 94	Response Ref	Representor Name Alan Dobson
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Organisation Name**Obj/Sup/Com** Objection**Summary of Main Issues**

The Council and the Councillors have been undemocratic in the whole Local Plan consultation and have not represented their electorate. They have not listened to their residents and have been deviant and have poorly communicated information especially in the early stages.

Summary of Suggested Changes**Evidence Submitted**

Policy

Respondent No 98	Response Ref	Representor Name Steve Rowe
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Organisation Name**Obj/Sup/Com** Objection**Summary of Main Issues**

The council and councillors actions have been undemocratic in the whole local plan consultation, and have not represented their electorate. Residents have not been listened to and have poorly communicated information about the local plan to residents.

Summary of Suggested Changes**Evidence Submitted**

Policy

Respondent No 99	Response Ref	Representor Name Jim O'Gorman
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Organisation Name**Obj/Sup/Com** Objection**Summary of Main Issues**

Lack of communication and consultation on behalf of the council. Decisions being made before public meetings, making such meetings pointless.

Summary of Suggested Changes**Evidence Submitted**

Policy

Respondent No 136	Response Ref 2	Representor Name Derek McStea
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Organisation Name**Obj/Sup/Com** Objection**Summary of Main Issues**

I consider 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****Policy**

Respondent No 154	Response Ref	Representor Name Liz Williams
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Organisation Name**Obj/Sup/Com** Objection**Summary of Main Issues**

There has been a huge lack of consultation and local councillors do not directly answer questions

Summary of Suggested Changes**Evidence Submitted****Policy** N/A**Rep does not relate to a policy**

Respondent No 241	Response Ref 7	Representor Name Claire Jenkins
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Organisation Name Formby Parish Council**Obj/Sup/Com****Summary of Main Issues**

There has been a failure to consult fully by the Sefton Authority, and there is evidence where elected representatives have not been included in its preparation. That is a serious omission.

This Parish Council is disappointed that in the final draft, additional sites for housing have been included. These were not in the original consultation, which we genuinely believe again contravenes the 'duty to consult' and certainly is in breach of our recently updated Parish Charter for Sefton adopted by the ten local parish councils and the local authority.

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.

Formby Parish Council was not consulted by Sefton on the original draft, prior to publication, contrary to its legal obligation to consult. Nor was the Parish Council consulted on the additional sites put forward in the latest draft.

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** Consultation General **Other Documents** Consultation General
Policy N/A **Rep does not relate to a policy**
Respondent No 424 **Response Ref** 1 **Representor Name** Ian Brandes
Organisation Name
Obj/Sup/Com Comment

Summary of Main Issues

I have tried on three separate occasions to complete your online forms. There were two alternatives and neither of them worked properly, which makes me highly suspicious of the process. The 1st option did not work at all, and the second (Microsoft Word) only allowed me to fill in my name and address, and then seemingly malfunctioned when, asked certain questions like 'Is the Local Plan sound?' These are issues you need to address immediately if your consultation process is to be judged valid by the Independent Planning Inspector. At the moment, I would say it is totally invalid.

Summary of Suggested Changes

Evidence Submitted

Chapter **Plan Order** Consultation General **Other Documents** Consultation General
Policy
Respondent No 478 **Response Ref** 3 **Representor Name** J Smallpage
Organisation Name
Obj/Sup/Com Comment

Summary of Main Issues

Concerns regarding the consultation process
I assume consultation with appropriate bodies was undertaken but voting en bloc in the council meetings and the fact that two local councillors failed to reply to or acknowledge the concerns and objections I raised makes me wonder how responsive elected councillors have been to residents' worries. One councillor who replied merely pointed out that there was no compulsory purchasing of agricultural land and ignored other concerns.

Summary of Suggested Changes

Evidence Submitted

Chapter **Plan Order** Consultation General **Other Documents** Consultation General
Policy N/A **Rep does not relate to a policy**
Respondent No 548 **Response Ref** 6 **Representor Name** Michael and Julie Corbitt
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

The Core Strategy process was poorly communicated with few residents being informed of the Local PalaAlocal group was formed following the inadequate consultation on the Preferred Option. Houses within circa 50m of proposed sites were written to and notices placed upon telephone poles. The Local Plan has significant impact for Thornton residents, so required greater engagement – this was ineffective and inadequate.
When the Local Plan has been submitted through various stages of Planning Approvals, why is it that the elected members always follow 'party orders' and not the wishes of their local communities? Please review voting outcomes at each stage, by each party in order to understand this phenomenon – surely this is no co-incidence? Why do politics override actual requirements? This cannot be justified or positively prepared.
There is a mass of related information on the Sefton Council website relating to the Local Plan. How is anyone who is not typically a qualified lawyer or architect with a wealth of time at their disposal meant to be able to review, assess and derive conclusions as well as come up with reasoned legal objections. Does the 'common man' really stand a chance in this exercise. We believe this approach to be not justified.

Summary of Suggested Changes

Confirm who within Sefton actually supports the Local Plan, apart from local councillors (from one party) and house developers. Is there any evidence of true support for the proposed Local Plan amongst local communities?

Evidence Submitted

Chapter Plan Order Consultation General **Other Documents** Consultation General
Policy
Respondent No 561 **Response Ref** 2 **Representor Name** Bridget Carroll
Organisation Name
Obj/Sup/Com Comment

Summary of Main Issues

I feel that there has been a lack of publicity regarding this and consultation has been inadequate.

The Local Plan is something which affects the lives of everyone living in Sefton. Current proposals will have an adverse, detrimental effect on our life now and in the future and needs more public debate with more interaction with Councillors.

Summary of Suggested Changes

Evidence Submitted

Chapter Plan Order Consultation General **Other Documents** Consultation General
Policy
Respondent No 562 **Response Ref** 2 **Representor Name** Amanda and Dave Mercer
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

We are also concerned that there has been a lack of consultation and that the public have not been given the opportunity to have their questions answered.

Summary of Suggested Changes

Evidence Submitted

Chapter General **Plan Order** Consultation General **Other Documents** Consultation General
Policy N/A **Rep does not relate to a policy**
Respondent No 590 **Response Ref** 1 **Representor Name** Sheila Brown
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

There was a lack of initial consultation and no answers to questions and the many concerns raised by the public. It was poorly advertised in local papers which one could easily overlook.

Summary of Suggested Changes

Evidence Submitted

Chapter		Plan Order Consultation General	Other Documents Consultation General
Policy	N/A	Rep does not relate to a policy	
Respondent No	597	Response Ref 1	Representor Name David Parmley
Organisation Name			
Obj/Sup/Com	Comment		

Summary of Main Issues

There was, in theory, a public consultation. As a resident of Kenyons Lane directly opposite to Mortons Dairy my wife specifically queried at a consultation meeting the inclusion of that site in the plan. She was advised that the site was only a "secondary option" and would only be developed if other sites were adjudged unsuitable. Now the site appears as an integral part of the plan. Whilst on the subject of this site one should note that this is a commercial site where a business operates and provides jobs. If the site is developed that business will be relocated, perhaps out of the area. From all appearances this public consultation was nothing of the kind. I am yet to see any positive support for this plan (indeed I understand a survey on residents' views conducted by Maghull Town Council indicated only 6percent of 556 households surveyed were in favour) and certainly there is little evidence that views expressed at consultation have been taken account of let alone allowed to influence the plan.

4.Before the vote on January 22, I wrote to five councillors but only one, Cllr Gatherer, bothered to respond stating that as I was not in her ward she could not deal with me. I later learned that all Labour councillors had met and come to a considered opinion and accordingly voted as one. This procedure is hardly consistent with the councillors representing their electorates.

6.I have commented to the council at various stages that this plan has not been properly thought through and has been driven by planners taking an easy option. The councillors have followed like sheep without a proper understanding and at all stages public opinion has been ignored or fobbed off with platitudes. There is no justification for building on the green belt and little substance to the plan itself. I should urge the Inspector to reject this out of hand.

Summary of Suggested Changes

Evidence Submitted

Chapter General **Plan Order** Consultation General **Other Documents** Consultation General
Policy N/A **Rep does not relate to a policy**
Respondent No 692 **Response Ref** 1 **Representor Name** Peter Harper
Organisation Name UKIP Sefton Branch
Obj/Sup/Com Objection

Summary of Main Issues

Sefton Council has made it very difficult indeed for anyone wishing to comment upon/object to their Local Plan to submit any such comment/objection. A person wishing to object might reasonably think that the best way to do it would be to access Sefton Council's website: www.sefton.gov.uk. The first page of the website appears as shown in the screenshot [provided]. Note that the large 'picture' section of the screen rotates between 6 different, selectable screens, one of which links to the Local Plan page, with each screen remaining for approximately 6 seconds before moving to the next screen in the series. This gives a 1-in-6 chance of a visitor to the site being presented with the link they seek. Screenshots of each of the six available sections of the screen provided.

As shown the screenshot, if you look at the sections of the main website beneath that which shows one of the above views, there is no obvious means of navigating to – or even towards – the page that details the Local Plan and the means of objecting to/commenting upon it. The most likely option would appear to be to click on the icon with 'Online Survey' written on the red keyboard-button. However, please read the text beneath this screenshot.

This takes you to the Sefton's Consultation page [screenshot attached]. The first page (apparently of four, according to the statement in blue at the foot of the below webpage) of Sefton Council's 'Consultation Finder' - <https://www.engagespace.co.uk/sefton/Default.aspx> - provides details of 4 consultations, but does not include any mention of the most important issue to hit Sefton for decades – and this on the last day on which comments/objections can be submitted. Clicking on the blue text referred to does not result in any action at all, and there appears to be no way of moving to any other of the claimed 4 pages. (Is a link to a consultation on Sefton Council's Local Plan available on one of those other pages? If so, how can any of those other pages be accessed?)

At approx. 4:45pm today (Friday 27th March, 2015), I rang Sefton Council's helpline number regarding how a person wishing to make a comment against the Local Plan should find the web-page containing the relevant details. I spoke to a helpful young lady who spent a couple of minutes attempting to find a way to navigate through, but could not find one. Finally, she suggested that the only way that she could find a way of getting through to the required web-page was to type in 'local plan' to the search box. How many residents would be aware of this?

Summary of Suggested Changes

Evidence Submitted

Chapter General **Plan Order** Consultation General **Other Documents** Consultation General
Policy N/A **Rep does not relate to a policy**
Respondent No 692 **Response Ref** 10 **Representor Name** Peter Harper
Organisation Name UKIP Sefton Branch
Obj/Sup/Com Objection

Summary of Main Issues

The people of Sefton have made it abundantly clear that they are opposed to building on the Green-Belt. Their wishes should be respected.

Summary of Suggested Changes

Evidence Submitted

Chapter General	Plan Order Consultation General	Other Documents Consultation General
Policy N/A	Rep does not relate to a policy	
Respondent No 699	Response Ref 1	Representor Name P O'Hanlon
Organisation Name Maghull and Lydiate Action Group		
Obj/Sup/Com Objection		

Summary of Main Issues

We would draw the Inspector's attention to what we consider to be irregularities in the whole consultation process itself, namely:- One of Sefton Council's chosen consultants are Nathaniel Lichfield and Partners who are also representing the developers, undoubtedly a conflict of interests here. We have an email from a local Labour Councillor verifying that the decision to approve the Local Plan by our Labour Controlled Council was taken prior to the Full Council meeting on 22nd January 2015. Paperwork relating to a survey conducted by Maghull Town Council in 2013 into residents' views of the Local Plan has been destroyed. The results indicated that, out of 556 households surveyed, only 6% were in favour of development. An anonymous leaflet circulated on 10th November 2014, i.e. a month before Sefton Council's Local Plan was made public in early December 2014, contained information concerning chosen sites and numbers of houses to be built on each site which was so accurate that it could only have been leaked from the Council itself.

Summary of Suggested Changes

Evidence Submitted

Policy

Respondent No 723 **Response Ref** 28 **Representor Name** Laurence Rankin

Organisation Name Sefton Green Party

Obj/Sup/Com Objection

Summary of Main Issues

1. The consultation process for this major study was inadequate for 2 reasons;
 - a) the consultation period was limited to 4/5 weeks, rather than the normal period of 12 weeks for issues directly affecting people. This is particularly unacceptable given the sheer size of the report at 151pages.
 - b) the consultation did not appear through the normal Sefton consultation portal, and had to be separately searched. Direct entry of the www.sefton.gov.uk/studiesconsultation address produced a site security warning which was likely to discourage respondents.
2. In general the SHMA was a disappointing mix of anecdotal evidence and a plethora of raw statistical data, both of which were used to draw dubious conclusions, which mainly appeared to attempt to justify the conclusions of the preferred local plan option. As such this assessment is a further flawed justification for housing need projections and in particular fails again to justify the proposals to build on the Green Belt in Sefton.
3. The SHMA refers to the NPPF doc and that Local plans “should meet objectively assessed development needs, with sufficient flexibility to respond to rapid change, unless the adverse impacts of doing so would significantly or demonstrably outweigh the benefits or policies within the Framework indicate that development should be restricted. (my emphasis). I would contend that this SHMA does not objectively assess need. Nor does it in any way lend further argument to reduce the need to restrict development because of the adverse impacts as outlined in the NPPF, of building on the Green Belt.
4. The stakeholder analysis seems to consist mainly of the opinions of estate agents, who have a vested interest in stimulating and over egging housing demand. The bedroom tax and the mismatch of property size is recognised as a significant challenge for tenants, but no weight is given to the impact this may have on household size, and therefore housing release in the medium term.
5. The housing stock analysis shows the only trend is toward an increase in flats/apartments, which would again indicate a relative lowering of demand for housing space per unit. The higher than average national level of vacant housing is also a cause for concern and action.
6. Despite the clear indication that there is no discernible trend in terms of inward migration, see Fig 6.3, and that household size is not falling as expected see para 6.25, still the study raises the housing requirement from the CLG figure of 392, to a figure of 500. There is no clear justification for this on the basis of the evidence.
7. The employment section takes the Local plan “target” as a “projection”, and then subjects this to an elaborate but flawed analysis, to add a further 162 to the annual housing need. This despite the only authoritative figure quoted (2001 census) indicating a significant out commute from Sefton, and no indication that this trend will change. As the report states, “The link between homes and jobs is however imperfect and moving forward will be influenced by a range of factors including commuting patterns.” It should be noted that the para. “Understanding Occupancy Patterns” at 6.32 is virtually unintelligible, and adds nothing to the understanding, and if anything adds further doubt to the robustness of the modelling involved throughout the report. Given the Sefton unemployment is greater than the NW and English averages, it seems odd to suggest increasing employment will mean an influx rather than a reduction in Sefton's own unemployment levels. 8. Given that Sefton saw a reduction of 3.2% in population 2001-2011, less than 1% change in households, only a small drop from 2.42 – 2.32 in household size, and has a current higher than average under occupancy rate of 40%, it is somewhat remarkable that the study forecasts a 3.5% population increase and an 8.6% households increase to 2030. It would be interesting to know at what point the current downward trend of population is supposed to change to an upward trend, not least from the point of view of the provision of infrastructure and services!
9. Unfortunately, in conclusion, this report adds very little to the serious consideration of housing need in Sefton. Current data on population, immigration, household size, vacancy rates and economy and commuting patterns, are all interpreted and extrapolated in a way which seems to be predicated solely on the aim of justifying the figures in the Local Plan preferred option. The CLG per annum housing need figure of 392, is dubiously inflated to 662, and then some sort of quasi average figure of 594 is proposed, which fits neatly with the Local Plan.
10. Whilst the report recognises some of the demographic changes in Sefton, it relies solely on traditional housing approaches to future provision. Like the Local Plan there is an absence of innovation or originality in the analysis of issues, and potential provision. As with the local plan the provision of more housing is presented as a panacea and as a fait accompli, without any regard to alternative approaches. By default the report therefore tends to support the proposed development on the Green Belt, despite the protections within the NPPF, and this remains wholly at odds with a genuine sustainable development approach.

Summary of Suggested Changes

Evidence Submitted

Chapter		Plan Order Consultation General	Other Documents Consultation General
Policy			
Respondent No	734	Response Ref 8	Representor Name Maria Bennett
Organisation Name			
Obj/Sup/Com	Objection		

Summary of Main Issues

Consulting with the Public

With regard to Public Consultation I find this very difficult to agree that they have consulted with the public. At every stage they have disengaged from the public, refused to let them attend meetings, refused to let them attend the Consequence Meeting which would have given them the opportunity to speak with the consultants directly, stating "you are not stakeholders". I would have thought that the public, who pay their council tax are the biggest stakeholder in the borough.

There are many emails which clearly show that questions have not been answered, cases of where emails disappear and various excuses used as to what has happened to objections sent in. I would not call this engaging with the public. The Local Plan is one of the biggest things to happen in the borough and will affect how people will live over the next 15 years, what disruption they will have and the impact it will have on them.

Being involved with the Campaign Group I find it appalling that they can state that they have consulted with the public. This has not been the case and indeed any meetings requested with the Head of Planning and others were refused stating that they did not have to speak with us. When they did answer a question it was in such a way that the questions were never fully answered.

Making residents make appointments to go and have a look at the Local Plan and discuss it does not make it a very approachable consultation. Indeed I personally attended one of these consultations and I found it very strange that the residents that did attend were split up from each other in such a way that they were sent to different people from the council to ask questions, they never knew what questions were being asked by other residents and indeed many of my questions were never answered.

Summary of Suggested Changes

Evidence Submitted

Chapter General	Plan Order Consultation General	Other Documents Consultation General
Policy N/A	Rep does not relate to a policy	
Respondent No 740	Response Ref 30	Representor Name
Organisation Name	Formby Residents Action Group	
Obj/Sup/Com	Objection	

Summary of Main Issues

Critique of the public consultation on the Local Plan

Set out in Chapter 15 [page 108-109] of the representation.

Summary of Suggested Changes

Evidence Submitted

Chapter General **Plan Order** Consultation General **Other Documents** Consultation General
Policy N/A **Rep does not relate to a policy**
Respondent No 742 **Response Ref** 3 **Representor Name** RF Hughes
Organisation Name
Obj/Sup/Com
Summary of Main Issues
Further consultation with neighbouring villages, e.g. Aughton, Downholland, Altcar and West Lancashire DC is required
Summary of Suggested Changes
Evidence Submitted

Chapter **Plan Order** Consultation General **Other Documents** Consultation General
Policy
Respondent No 767 **Response Ref** 6 **Representor Name** J Avery
Organisation Name
Obj/Sup/Com Objection
Summary of Main Issues
Residents have been consulted on Option 2 of the Local Plan not Option 3 which is what it has become. Option 2 consultation consisted of open days at various locations with a short video presentation. Residents had to book time slots to attend where they could ask members of the planning department questions. Maghull Town council put a very small advert in the local paper asking residents to attend a meeting about the Local Plan in July 2013. Because it was poorly advertised only about 25 people turned up including residents from Lydiate who were told they could not speak as they were not Maghull residents. Maghull and Lydiate are inextricably linked. Development in Maghull affects Lydiate residents and vice versa. We were told of the Town Council's survey in which only 6% of those residents surveyed were in favour of Option 2 of the Local Plan. The hard copies of the survey have since been mysteriously destroyed. In order to speak at the full council meeting local resident's groups each were told to supply a petition of nearly 3000 signatures. The consultation pro forma provided for this current consultation contains so many legal terms and jargon to render it unusable for many residents who want to comment / object but are put off by it. This is not consultation. This appears to be an attempt to stifle local democracy.
Summary of Suggested Changes
Evidence Submitted

Chapter **Plan Order** Consultation General **Other Documents** Consultation General
Policy
Respondent No 769 **Response Ref** 6 **Representor Name** D Avery
Organisation Name
Obj/Sup/Com Objection
Summary of Main Issues
Residents have been consulted on Option 2 of the Local Plan not Option 3 which is what it has become. Option 2 consultation consisted of open days at various locations with a short video presentation. Residents had to book time slots to attend where they could ask members of the planning department questions. Maghull Town council put a very small advert in the local paper asking residents to attend a meeting about the Local Plan in July 2013. Because it was poorly advertised only about 25 people turned up including residents from Lydiate who were told they could not speak as they were not Maghull residents. Maghull and Lydiate are inextricably linked. Development in Maghull affects Lydiate residents and vice versa. We were told of the Town Council's survey in which only 6% of those residents surveyed were in favour of Option 2 of the Local Plan. The hard copies of the survey have since been mysteriously destroyed. In order to speak at the full council meeting local resident's groups each were told to supply a petition of nearly 3000 signatures. The consultation pro forma provided for this current consultation contains so many legal terms and jargon to render it unusable for many residents who want to comment / object but are put off by it. This is not consultation. This appears to be an attempt to stifle local democracy.
Summary of Suggested Changes
Evidence Submitted

Chapter	Plan Order Consultation General	Other Documents Consultation General
Policy		
Respondent No	772	Response Ref 2 Representor Name Paula Robinson
Organisation Name		
Obj/Sup/Com	Objection	
Summary of Main Issues		
<p>For the past two months I have asked many local people their opinion of this plan and very few are even aware. As a Social Policy student with a passion for my home town and I have had to search for information concerning this project. There has not been any posters, leaflets, letters or announcements concerning this local plan apart from a couple of vague misleading articles in the local champion and yet literature concerning what cuts to services and council tax increase details are readily available, as is the campaign for votes. I vote for fairness.</p>		
Summary of Suggested Changes		
Evidence Submitted		

Chapter	Plan Order Consultation General	Other Documents Consultation General
Policy		
Respondent No	773	Response Ref 3 Representor Name Neil Roberts
Organisation Name		
Obj/Sup/Com	Objection	
Summary of Main Issues		
<p>National policy requires the council to seek advice from the Environment Agency to find out if they have any objections. I have contacted the Environment Agency and to date they have been unable to supply me with a any correspondence to state if they have any objections. I have also looked on the Sefton Council web site and again can not find any correspondence stating the EA have no objections. There is nothing in the Sefton Plan stating the Environment Agency have no objections. The report does mention that the Council have worked with Environment Agency and that the Environment Agency and United Utilities are responsible for waste water but nowhere does it say that they have no objections. This is a breach of National Planning Policy.</p>		
Summary of Suggested Changes		
Evidence Submitted		

Chapter	Plan Order Consultation General	Other Documents Consultation General
Policy		
Respondent No	793	Response Ref 2 Representor Name Gail Pickett
Organisation Name		
Obj/Sup/Com	Objection	
Summary of Main Issues		
<p>A very poor consultation process was undertaken and the views of local people have not been truly adopted into the plan</p>		
Summary of Suggested Changes		
Evidence Submitted		

Chapter		Plan Order Consultation General	Other Documents Consultation General
Policy			
Respondent No	794	Response Ref 2	Representor Name Phil Pickett
Organisation Name			
Obj/Sup/Com			
Summary of Main Issues			
A very poor consultation process was undertaken and the views of local people have not been truly adopted into the plan			
Summary of Suggested Changes			
Evidence Submitted			

Chapter		Plan Order Consultation General	Other Documents Consultation General
Policy			
Respondent No	802	Response Ref 3	Representor Name M O'Hanlon
Organisation Name			
Obj/Sup/Com	Objection		
Summary of Main Issues			
Lack of consultation and conflict of interest This is called a "Local Plan" which has been developed by Sefton's consultants. However, the same consultants were used by the building developers. This is surely a conflict of interest. The consultants' services were paid for using the community's money, with a total arrogant disrespect for the community. The Council should be listening to the community not dictating to them. Maghull Town Council carried out a survey on the Local Plan. Only 6% of the people surveyed were in favour of the Plan. The Councillors ignored the survey and had the paperwork destroyed. Is this democracy?			
Failure to represent the community I personally have witnessed Councillors voting not to build on the Green Belt/agricultural land and then the same Councillors voting to build on Green Belt/agricultural land at the Full Council Meeting at the Town Hall against the wishes of the community. These Councillors were elected on their policy of no building on Green Belt/agricultural land. They have sworn an oath to serve the community and have gone back on their word, rejecting the community wishes.			
We want a Local Plan for our community here in Sefton, preserving our environment, our countryside and our quality of life, so please Inspector listen to our community not these profit driven developers and reject this Plan in its current form.			
Summary of Suggested Changes			
Evidence Submitted			

Chapter		Plan Order Consultation General	Other Documents Consultation General
Policy			
Respondent No	821	Response Ref 1	Representor Name A McCaffley
Organisation Name			
Obj/Sup/Com			
Summary of Main Issues			
I am strongly objecting to the Local Plan. The reason being that Sefton Council have ignored the wishes and objections of the residents of Maghull not to build in Green Belt. Instead councillors voted in favour. Labour's policy when elected was no to Green Belt development but they changed there policy to yes.			
Summary of Suggested Changes			
Evidence Submitted			

Policy

Respondent No	828	Response Ref	2	Representor Name	S Brodie
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Organisation Name

Obj/Sup/Com	Objection
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Summary of Main Issues

I would also like to point out that their so called public consultations have been set up more to exclude people rather than include them. When they wanted to install 20mph zones they wrote to every household yet the local plan was advertised in a wraparound in the local plan, which many residents just throw it the bin due to its content. Why did they not write to individual households? Also if you wanted to discuss the plan you had to make an appointment and this was extremely difficult if you worked and had other family commitments.

Summary of Suggested Changes**Evidence Submitted****Policy**

Respondent No	838	Response Ref	2	Representor Name	L Smith
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Organisation Name

Obj/Sup/Com	Objection
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Summary of Main Issues

No adequate consultation took place with Sefton Residents. A survey indicated that only a tiny percentage of residents were in favour of the plan in its current form. However, this was apparently destroyed by Sefton council.

Summary of Suggested Changes**Evidence Submitted****Policy**

Respondent No	840	Response Ref	2	Representor Name	JF Smith
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Organisation Name

Obj/Sup/Com	Objection
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Summary of Main Issues

The consultation process was highly flawed. Sefton council admitted to having destroyed a survey which clearly indicated that Sefton residents did not agree with the plan in its current form. Also, a resident received an email prior to the full council meeting at which the final vote was to take place. This stated that the Labour councillors would be voting en masse, having reached a decision before hearing the debate and speeches at the full council meeting. This was an admission that they would heed neither fellow councillors' or residents' speeches, nor the content of any debate at the meeting. Ten thousand signatures had been collected within a short period of time to allow three residents to deliver speeches.

Summary of Suggested Changes**Evidence Submitted**

Policy

Respondent No 870	Response Ref 1	Representor Name JV Alderson
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Organisation Name

Obj/Sup/Com	Objection
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Summary of Main Issues

Although I am well-educated and computer-literate I have been unable to find what I would call a plan for the Sefton area. I am sure there are a great many other residents who are equally ignorant of what our council really has in mind for the future of Sefton, and in particular Formby.

Summary of Suggested Changes**Evidence Submitted****Policy**

Respondent No 887	Response Ref 4	Representor Name LA Roberts
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Organisation Name

Obj/Sup/Com	Comment
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Summary of Main Issues

We accept the need for homes with consultation being on a much wider base.

Summary of Suggested Changes**Evidence Submitted****Policy** N/A**Rep does not relate to a policy**

Respondent No 889	Response Ref 4	Representor Name P Gwyther
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Organisation Name

Obj/Sup/Com	Objection
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Summary of Main Issues

Lastly, I feel that there was a lack of consultation and opportunity to discuss, or, even the ability by the powers that be' to answer questions raised by the public re the local plan.

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 Plan Order Consultation General **Other Documents** Consultation General
Policy
Respondent No 890 **Response Ref** 2 **Representor Name** NL Gwyther
Organisation Name
Obj/Sup/Com Objection
Summary of Main Issues
I feel there was a lack of consultation with residents. What happened to Localism?
Summary of Suggested Changes
Evidence Submitted

Chapter General **Plan Order** Consultation General **Other Documents** Consultation General
Policy N/A **Rep does not relate to a policy**
Respondent No 955 **Response Ref** 1 **Representor Name** E Williams
Organisation Name
Obj/Sup/Com
Summary of Main Issues
Public consultation was severely flawed. Sefton council are failing to represent. The wishes of its residents. This was clearly demonstrated by an e mail to a resident from a Labour councilor, prior to the Full Council meeting of 22nd January 2015, which stated that Labour councillors vote en masse having reached a decision between them. This decision is supposed to be democratic, and reached after hearing residents' and councillors' speeches. This was not the case.
Summary of Suggested Changes
Evidence Submitted

Chapter General **Plan Order** Consultation General **Other Documents** Consultation General
Policy
Respondent No 960 **Response Ref** 3 **Representor Name** I R Vaudrey
Organisation Name
Obj/Sup/Com Objection
Summary of Main Issues
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.
Summary of Suggested Changes
Evidence Submitted

Policy

Respondent No 961 **Response Ref** 3 **Representor Name** M Vaudrey

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

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.

Summary of Suggested Changes

Evidence Submitted

Policy

Respondent No 965 **Response Ref** 2 **Representor Name** Tracy Smith

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

Lack of genuine consultation with Sefton residents.

Our local plan should have as its priority the genuine all-round welfare of the people of Sefton, and the protection and enhancement of our shared environment. It should not be simply about house-building, nor about handing over swathes of our precious farmland to developers whose sole aim is their own financial profit.

Again and again the NPPF reiterates the need for Local Plans to be developed in real collaboration with local residents:

- "This should be a collective enterprise. Yet, in recent years, planning has tended to exclude, rather than to include, people and communities. In part, this has been a result of targets being imposed, and decisions taken, by bodies remote from them".
- "The National Planning Policy Framework ..provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities".
- The core planning principles state that planning should be "genuinely plan-led, empowering local people to shape their surroundings... (and should) take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside..."
- "Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area".

Sefton Council will no doubt point to the "consultation exercises" they have held over the past three years and claim that genuine consultation has taken place. In point of fact, these exercises were not a genuine consultation but a presentation of decisions already arrived at in conjunction with landowners and developers. The views and concerns of Sefton residents have been largely ignored or overridden. For instance:

- The most recent "public consultation" in summer 2013 had stringent attendance restrictions and required places to be pre-booked.
- In order for Sefton residents to be allowed to speak before the Council, they must collect 2,750 signatures, entitling their representative to speak for five minutes.

This has been done on at least two occasions in relation to the Local Plan, which goes some way towards indicating the strength of opposition from residents of the borough.

- At a full council meeting in Southport in October 2013, residents presented a petition of over 3,000 signatures asking the council to reconsider its intention to recommend this plan. This petition was completely ignored - despite the fact that it represented the views of more people than were allowed to attend during the whole of the public consultation exercise.
- Again, at a full council meeting in January 2015, petitions totalling over 9,000 signatures were presented to the Council, urging councillors to reconsider key elements of the Local Plan. This was also completely disregarded, with the adoption of the plan having been agreed by the Council prior to the public meeting.

Summary of Suggested Changes

Evidence Submitted

Chapter		Plan Order Duty to Cooperate Statement	Other Documents Duty to Cooperate Statement
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Policy

Respondent No 542 **Response Ref** 2 **Representor Name** Jennifer Hadland

Organisation Name Liverpool and Chester Property Company

Obj/Sup/Com Support

Summary of Main Issues

The Council has complied with the Duty to Cooperate in relation to reviewing the Green Belt in order to meet future development needs

Summary of Suggested Changes

None

Evidence Submitted

N/A

Chapter General	Plan Order Duty to Cooperate Statement	Other Documents Duty to Cooperate Statement
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Policy N/A **Rep does not relate to a policy**

Respondent No 648 **Response Ref** 29 **Representor Name** Emily Hrycan

Organisation Name English Heritage

Obj/Sup/Com Comment

Summary of Main Issues

As you are aware, English Heritage is listed as one of the “prescribed” bodies relating to the Duty to Cooperate on the planning of sustainable development. Prescribed bodies are required to cooperate with local planning authorities constructively, actively, and on an ongoing basis in the preparation of development plans in relation to strategic matters. We do not consider that there are any strategic matters as set out in S33A(4)(a) of the Planning and Compulsory Purchase Act which affect the historic environment. However, bearing in mind that the Duty to Co-operate is an ongoing process, we would hope that should any strategic matters arise which would affect the historic environment of the area, English Heritage will be able to continue to work closely with the Council in the policy framework for these areas.

Summary of Suggested Changes

Evidence Submitted

Policy

Respondent No 707 **Response Ref** 1 **Representor Name** Matthew Good

Organisation Name Home Builders Federation

Obj/Sup/Com Objection

Summary of Main Issues

The HBF is concerned that the Council has not fully discharged its requirements under the duty to co-operate (DtC).

The DtC requires Councils to co-operate upon strategic priorities that cross administrative boundaries. The National Planning Policy Framework (NPPF) sets out in paragraph 156 that those strategic priorities include housing provision. NPPF paragraph 159 further notes that local planning authorities need to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. Housing is, therefore, a key issue for consideration which must be addressed through the DtC.

The HBF note that the Council has clearly undertaken significant work with regards identified sub-regional issues. In relation to housing the plan (paragraph 1.15) and the background evidence paper, Draft Duty to Co-operate Statement (DtC statement), (paragraph 2.19 and 2.20) both identify that no neighbouring authority can assist Sefton in meeting its objectively assessed housing needs and vice-versa. This led the Council and the neighbouring authorities of Knowsley and West Lancashire to undertake Green Belt reviews, based upon a common methodology, to ensure that they could meet their own housing needs within their respective boundaries. The HBF is supportive of this action.

A further critical cross-boundary issue with implications for the scale of housing provision in Sefton is the expansion of the Port of Liverpool and the associated economic stimulus this may create. It is noted that due to the uncertainties associated with the economic impacts of the expanded port the city region is undertaking work to assess the impacts (DtC statement, paragraph 2.25). The plan responds to this uncertainty by indicating the potential for an early review (paragraph 4.42).

The HBF is not generally supportive of early plan reviews as this inherently implies that the plan is not based upon a sound footing. It is, however, recognised that the Port of Liverpool proposals are likely to have significant implications for the scale and location of distribution centres and other port related activities. This in turn is likely to lead to enhanced job creation. Dependent upon the scale and location of the new employment this may have implications for housing needs at a regional scale. Whilst the HBF consider it would be preferable for these issues to be addressed prior to the examination of the Sefton Local Plan we do not wish to stall plan preparation and the release of much needed housing sites pending a full understanding of the regional impact of the port.

The Council's acknowledgement that once the implications of this and other studies are known a full review may be required is therefore, in this instance, supported. The plan is, however, considered to lack a firm commitment to undertake such a review, simply stating that there is in principle agreement to undertake further work. The HBF consider that as part of the DtC, and soundness of the plan a firm commitment which identifies triggers and a broad timescale for the review should be included as an intrinsic element of the plan.

In addition the plan also recognises that a review may be required to take account of the findings of a sub-regional Strategic Housing Market Assessment (SHMA), paragraph 4.44. Once again the plan does not identify any specific triggers or timescale for such work or the review.

Whilst the issues were slightly different the recently adopted Rotherham Core Strategy, policy CS36 as amended by main modification MM1, provides a framework within the plan for a greater commitment for such a review to take place.

Summary of Suggested Changes

Evidence Submitted

Policy N/A Rep does not relate to a policy

Respondent No 421 Response Ref 4 Representor Name Colin Reader

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

THIS IS A SUMMARY

The list of sites included in the KM Report (December 2014) is given as Table 2.1 and does not fully represent the list of allocated sites that is being considered in the current draft of the Local Plan. Rather than assess the economic viability of every site, the KM report looks at viability generally in terms of the nature of the Local Plan proposals and assesses whether such viability will be adversely impacted by Sefton MBC policies.

The methodology used by KM when undertaking the viability assessments is summarised on their Table 3.1 and appears both logical and widely used. The first part of the viability assessment is to focus on a number of recent developments. The viability of the recent developments was then reassessed using different development mixes (i.e. the numbers of 2-, 3- or 4-bed houses in each

development), different proportions of affordable housing, different development densities etc. to assess the potential impact of Sefton MBC policies on these completed developments. The number of scenarios modelled was further extended to allow consideration of greater or lesser numbers of apartments, policies on net developable area, individual house sizes and a range of other relevant variables.

The methodology was then extended to assess the viability of a number of the developments proposed under the previous draft of the Local Plan. The majority of the residential sites assessed were greenbelt sites, with only two being classified as 'urban greenspace'. The large site 'east of Maghull (ref MN2.46) was also assessed.

It is not clear where the assessment of highways improvements has been included in the viability assessment.

One of the clear results of the viability assessment is that development on greenfield sites appears generally to be more viable than development on brownfield land. Based on over twenty years'

consultancy experience working with many housing developers in the brownfield sector, I wish to challenge this conclusion. There is no such thing as a typical 'brownfield' land price. Land values for brownfield sites are determined by taking relevant greenfield prices and then deducting the costs of the abnormal items which would not be applicable in a greenfield scenario (for example remediation costs, demolition of old buildings etc). When these 'abnormal cost assessments' are undertaken correctly, the net costs of brownfield and greenfield land are by definition, generally comparable. Why has the report consistently found greenfield development to be more viable than brownfield?

Why have KM consistently found greenfield development to be more viable than brownfield?

In paragraph 5.13, the viability report states "in addition many Greenfield sites may require significant initial expenditure on services and infrastructure to enable them to be developed for residential purposes." It is not clear where (or whether) this factor has been included in the calculations. It is not clear whether the cost of the cabling to supply the sub-stations has been included. What about the costs of new water mains, telecoms, gas etc. to serve the proposed greenfield developments? Do the entries for "Inc Service Costs" in Appendix 3 and 7 (which are carried forward as "Base Construction Costs" to Appendices 4 and 6) relate to these service provisions? Without further elaboration by KM it is not clear that all relevant costs associated with infrastructure provision to proposed greenfield sites have been included in the viability assessments.

Drainage costs in the order of £50/sq m have been included in the viability assessments. It appears however, that the allowance of £50/sq m is no longer regarded as sufficient. As discussed in section D7.3 of my submission, more recent assessments appear to suggest that a figure of £90/sq m is required. Given that the KM assessments do not include this recently revised figure for drainage provision, it can not be assumed that the viability study remains valid. Nor is it clear what implications the additional cost burden of draining green field land will have for the Local Plan overall.

It is evident that the viability study's conclusion that development on greenbelt is generally more viable than development on brownfield land, may be unreliable. Yet, these considerations appear to have had significant influence on the Local Plan 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 Policies EQ1 and EQ7, Sefton will not be enforcing a brownfield-first policy, allowing developers to 'cherry pick' what have been billed by the viability study as being the more viable (= more profitable) sites in the greenbelt. This approach is contrary to the National Planning Policy Framework and to current Government policy.

The simple message of the viability report is that the greater the number of policy provisions, the more likely that the resulting development will be unviable and the developer will walk away from the scheme. And all of this before specific Section 106/278 or Community Infrastructure Levy (CIL) requirements have been properly and fully considered. The Local Plan achieves none of the required objectives but allows commercial development companies an opportunity to profit from destruction of valuable agricultural land in the green belt.

Given the lack of clear understanding of the infrastructure costs and the way in which the viability assessments have been completed, it is extremely unlikely that all the necessary costs can be met and the Local Plan will remain deliverable.

Summary of Suggested Changes

Given the questions identified above regarding the reliability of the viability assessments that KM have produced, together with

the resulting policy steer towards prioritising green belt development – which is contrary to current Government guidance – the current draft of the Local Plan should be rejected.

Evidence Submitted

Chapter		Plan Order Infrastructure Delivery Plan	Other Documents Infrastructure Delivery Plan
Policy	N/A	Rep does not relate to a policy	
Respondent No	638	Response Ref 16	Representor Name
Organisation Name	Crosby Investment Strategy Steering Group		
Obj/Sup/Com	Objection		

Summary of Main Issues

‘Infrastructure Delivery Plan’

However, we note what is said in the supporting ‘Infrastructure Delivery Plan’ in the section on ‘Social Infrastructure’ about ‘Essential Shops’ (para 4.6) and particularly in Para 4.6.1 ‘Town, District and Local Centres’. Given the need to consider the future role and functions of centres post the Portas Review and work by organisations such as the Association of Town and City Management and Centre for Cities, we would suggest that the opening text/ para in 4.6.1 be used to explicitly support policies in the main body of the Local Plan, specifically Policies ED2 and ED6. This would have the benefit of recognising centres’ role in providing a focus for ‘other important services and facilities’ and as economic drivers and community hubs and, therefore, strengthen the ‘soundness’ of the Plan.

Summary of Suggested Changes

Infrastructure Delivery Plan should identify proposed sources of funding and ideally timescale/strategy for delivery.

Evidence Submitted

Chapter		Plan Order Infrastructure Delivery Plan	Other Documents Infrastructure Delivery Plan
Policy	N/A	Rep does not relate to a policy	
Respondent No	638	Response Ref 17	Representor Name
Organisation Name	Crosby Investment Strategy Steering Group		
Obj/Sup/Com	Objection		

Summary of Main Issues

[W]e would express a high degree of concern that the supporting ‘Infrastructure Delivery Plan’ (IDP) (Para 9.5 refers) is disappointingly vague about what is proposed, all the more so since the emerging Crosby Investment Strategy is likely to include ideas and proposals about public transport and parking facilities. In the Delivery Schedule to the IDP, in both cases, no costs are identified, nor is any funding secured, nor any source of funding identified, and crucially, no timetable for delivery identified. Resolution of these matters is central to the attraction of investment to Crosby to secure the comprehensive regeneration of the Centre in line with Policies ED6 and ED9.

Summary of Suggested Changes

Infrastructure Delivery Plan should identify proposed sources of funding and ideally timescale/strategy for delivery.

Evidence Submitted

Chapter General **Plan Order** NLP Housing Needs Assessment **Other Documents** NLP Housing Needs Assessment
Policy N/A **Rep does not relate to a policy**
Respondent No 548 **Response Ref** 2 **Representor Name** Michael and Julie Corbitt
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

The housing requirement projections are based upon models. These models reflect national and not local statistics for demand. This is not legally compliant as latest census figures were not used within the Core Strategy forecasts. This affected the projections that were previously thought to forecast 11,000 homes, but it is now thought to be 6,000 homes, however, the plans have not changed to reflect this. This is not justified or positively prepared.

The facts state that Thornton residents are living longer, yet the trend between the last two population Census shows a declining number in Thornton. What would attract additional residents to this area – modelling does not apply in this scenario?

If Thornton is subjected to all nominated sites being built upon, this could actually double the existing population of Thornton. This increase in scale and proportionality is not tolerable within the small existing footprint. The additional burden and demand placed on healthcare, schools, roads, environment and infrastructure, amongst others is not feasible. When the Local Plan is reviewed, it only states that issues like this will be considered and developed at a future point.

Summary of Suggested Changes

Confirm that there actually is a housing demand requirement within Sefton.

Ensure that the modelling plans used are valid and relevant within Sefton, and not specific to housing demands in the south of England.

Confirm what new jobs and industry are known to be coming to this area over the next 15 years.

Evidence Submitted

Chapter General **Plan Order** NLP Housing Needs Assessment **Other Documents** NLP Housing Needs Assessment
Policy N/A **Rep does not relate to a policy**
Respondent No 692 **Response Ref** 4 **Representor Name** Peter Harper
Organisation Name UKIP Sefton Branch
Obj/Sup/Com Objection

Summary of Main Issues

In the drawing up of the Local Plan, much emphasis has been given to data and reports produced by Nathaniel Litchfield and Partners (NLP), a private company which Sefton Council has frequently referred to as “independent consultants”. The fact that NLP are engaged in work on behalf of David Wilson Homes (DWH)/Barratt Housing in their efforts to build a large number of houses on a field in Formby suggests, very obviously, that they should not be considered “independent” at all. In fact, it is blindingly obvious that NLP could be seen as having a vested interest in producing reports and estimates which greatly exaggerate the true requirements for building on Sefton’s Green land.

(For the purpose of clarification of this important issue, please advise: on what date NLP commenced work on behalf of David Wilson Homes (DWH)/Barratt Housing; during which (dated) periods NLP carried out work for use in the drawing up of Sefton’s Local Plan and; on what dates NLP presented those reports to Sefton Council

Summary of Suggested Changes

Evidence Submitted

Chapter 6 **Plan Order** NLP Housing Needs Assessment **Other Documents** NLP Housing Needs Assessment
Policy N/A **Rep does not relate to a policy**
Respondent No 692 **Response Ref** 5 **Representor Name** Peter Harper
Organisation Name UKIP Sefton Branch
Obj/Sup/Com Objection

Summary of Main Issues

Information is available to show that in 1981 there was an average of 2.8 people per household in Sefton and that the current Sefton average is around 2.3 people per household – a fall of 0.5 persons per household. The average size of a Sefton household was shown to fall by 0.1 persons over the ten-year period between the Censuses of 2001 and 2011, indicating that the earlier twenty-year period (between 1981 and 2001) saw an average fall of 0.4 persons per house in Sefton, i.e. an average fall of 0.2 persons per household during each 10-year period. This halving of the rate of reduction in average household-size suggests a major flaw in NLP’s suggestion that the falling size of households is a key driver of the need to build across Sefton: there is a clear and measurable downward trajectory in the actual, real-life, trend.

Paragraph 2.6 of NLP’s 04Dec2012 “HEaDROOM Update Report”, subtitled “Review of RSS Housing Requirement for Sefton” suggests that the ONS’s 2010 estimate for international immigration into Sefton is almost 250% of what it was in 2008 [something for our heads-in-the-sand Labour, Conservative and Liberal Democrat friends to ponder on]. However, this projected increase can be discounted in relation to Sefton by rational reasoning: the 2011 Census indicates that immigration into Sefton has been extremely low – almost negligible - when compared to the rest of England. What should cause such a drastic change in Sefton’s migration trend? No evidence has been presented in the Local Plan or in any of its supporting documents as to why the rate of international migration (i.e. the number of people from foreign countries who might decide to come to Britain) should suddenly increase within Sefton. If evidence exists that supports the projection, then this should be clearly presented.

UKIP is not aware of any specific plans to encourage any vastly increased rate of immigration into Sefton, which gives rise to our suspicion that the projected figures have no valid basis.

The massive discrepancy between the figures presented by the ONS in 2010 compared to those it presented a mere two years earlier suggests that the ONS’s ability to predict future migration patterns are so unreliable as to be practically worthless - and certainly should not be used as a basis on which to develop such a massively important plan as the Local Plan proposed for implementation by Sefton Council.

15.Paragraph 2.3 of NLP’s 04Dec2012 “HEaDROOM Update Report”, subtitled “Review of RSS Housing Requirement for Sefton” includes the following text: -
“The clearest indication of the differences between the two data sources relates to the population growth forecasts. Figure 2.1 shows the clear divergence between the projections, whereby the 2008-based projections indicate a continuation of the trends experienced in Sefton throughout the 1980s and 1990s, with the population declining from 274,200 in 2008 to 265,800 in 2027 (a fall of 8,400 or 3.1%). Conversely, the more recent projections suggest the exact opposite – a growth in population of 9,900 to 283,400 to 2027 (+ 3.6%).” Again, this clearly demonstrates a complete inability by the ONS to deliver reliable predictions. This definitely provides an incredibly flimsy basis on which to concrete over our Green Belt! (Who is to say that the next set of predictions won’t revert to what was forecast in 2008, i.e. a declining population across Sefton? ... and are the 2010 projections the latest ones (given the implicit suggestion that these ONS reports are produced every two years)? When is the next such ONS report to be produced?)

Summary of Suggested Changes

Evidence Submitted

Chapter	General	Plan Order	NLP Housing Needs Assessment	Other Documents	NLP Housing Needs Assessment
Policy	N/A	Rep does not relate to a policy			
Respondent No	715	Response Ref	1	Representor Name	
Organisation Name	Countryside Properties (UK) Ltd and Persimmon Homes Lancashire				
Obj/Sup/Com	Objection				

Summary of Main Issues

Summary:

In summary it is considered that 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, it is considered that 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

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		Plan Order	NLP Housing Needs Assessment	Other Documents	NLP Housing Needs Assessment
Policy					
Respondent No	750	Response Ref	2	Representor Name Joan Gore	
Organisation Name					
Obj/Sup/Com	Objection				

Summary of Main Issues

It is not ethical that NLP are working for Sefton and the developers.

Summary of Suggested Changes

Evidence Submitted

Chapter General **Plan Order** SHLAA **Other Documents** SHLAA
Policy N/A **Rep does not relate to a policy**
Respondent No 128 **Response Ref** 2 **Representor Name** John Armstrong
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

Finally, have we exhausted the search to take into account all "brown field" sites in Sefton - again I am not convinced that has been done. Please confirm the process for logging this email and for a response to be made by the appropriate personnel

Summary of Suggested Changes

Evidence Submitted

Reassess urban housing supply.

Chapter General **Plan Order** SHLAA **Other Documents** SHLAA
Policy N/A **Rep does not relate to a policy**
Respondent No 568 **Response Ref** 4 **Representor Name** Peter Greener
Organisation Name
Obj/Sup/Com Objection

Summary of Main Issues

I would like to bring your attention to the Windfall Section of the 2014 SHLAA.

Para 4.4 shows a average number of Windfalls as 259.8 There is mention of 10 sites that have then been excluded and a figure of 127.2 is then brought forward.

I believe that a number of these sites that were removed on the grounds of 'not like to happen again', (normally not permitted). So sites S/2013/1024, S/2013/024, S/0030, S/2012/)550 (and I understand there is another site) are all designated as Urban Green Space and as you can see the council has permitted development. I feel this sets a precedent and development on this type of land should not be considered as not normal.

Another site I would like to bring to your attention is S/2011/0909, The Ashworth development for 300 hundred houses was withdrawn as not like to happen again. But then the Prison (MN2.29) site for 370 houses was brought forward. This type of development could obviously happen again and so should not perhaps have been removed from the Windfalls. Indeed there appears to be a number of sites in the proximity of Ashworth with developers interest!

The Crown Packaging Site S/2012/0600 , a designated industrial site brought into the housing sector we are told unlike to happen again. Given the number of industrial sites that have been lying unloved for a period of time now , it could be claimed that this could very well happen again.

Given the examples mentioned above I would call upon you to consider the Windfalls and increase the number accordingly.

Summary of Suggested Changes

Evidence Submitted

Policy N/A Rep does not relate to a policy

Respondent No 421 Response Ref 3 Representor Name Colin Reader

Organisation Name

Obj/Sup/Com Objection

Summary of Main Issues

THIS IS A SUMMARY

The JG Consulting Strategic Housing Market Assessment (SHMA) has much in common with the NLP report. For example, both state that Sefton can be considered as a self-contained planning area.

Paragraph 3.13 of the SHMA states that over the 10-year period from 2004/5 to 2013/14 "housing delivery has fluctuated between delivery of 267 homes (net) in 2010/11 and a high point of 564 in 2007/8. Around 3,776 net additional homes have been provided (378 per annum) – this is below the housing target in the former Regional Spatial Strategy of 500 net additional homes per annum." Never in the preceding decade has house building in the borough approached 615 dpa. Furthermore the 615 dpa figure that is proposed, is to be maintained for a period of 18 years (2012 to 2030). This represents a sustained 63% increase in peak historic building rates at a time of continued austerity with further local authority spending cuts to come.

The SHMA confirms the conclusions reached in the NLP Report that the projected population of Sefton is unusual given the increasingly elderly component³² and the decrease in certain key age groups, particularly 30-39 year olds, which NLP indicated was an important population component in terms of first time buyers. It also also confirms that average household size has reduced markedly in Sefton in the past ten years, refering to increases in "one person households along with increases in childless couples, lone parents and 'other' households" as a possible explanation. The SMHA also identifies the notable decrease in the number of couples with children (both dependent and nondependent children)", which can also be seen as a driver towards smaller households. These is another example why I find the need to build 615 houses a year over 18 years difficult to assimilate with the relevant data.

The SHMA, on page 35 which is a summary of chapter 4, states "The Borough as a whole has a relatively high proportion of households with non-dependent children and relatively few single non-pensioner households. We might therefore expect greater demand for 'familysized' accommodation moving forward..." This raises a number of issues:

* Are these children the potential house-buyers of the immediate future – the suppressed households that NLP failed to find any evidence for? If so, they represent only a small proportion of the population of Sefton (12.7% according to Fig 4.5 of the SHMA).

* If this is the correct interpretation of this data, then dependent children must also be considered significant as the potential house-buyers of the longer term periods of the Local Plan (a child born in 2012 will be eighteen and a potential house-buyer at the end of the Plan). As the data from Fig 4.5 of the SHMA indicates, the proportion of dependent children in the borough in 2011 is lower than regional or national levels. Fig 4.6 of the SHMA shows, the current trend is for a decrease in households with children (both dependent and non-dependent) so where within this self-contained housing market, will the demand for 615 houses a year come from?

*Single non-pensioner households. If as stated in the SHMA, there are relatively few single non-pensioner households in the borough, it follows that the majority of the single households are pensioners. If the demographic of the borough is characterised by a large proportion of single pensioners as JG Consulting suggest, on what basis do the authors of the SHMA consider that future development in the borough should focus on family-sized accommodation?

Page 35 of the SHMA states "The population aged 30-39 has declined and affordability of housing may be one of the contributory factors to this." Given that the birth rate for the period between 30 and 39 years ago can not have been influenced by current levels of affordability, this statement must indicate that there has been an element of outward migration by those in this age group seeking more affordable housing elsewhere. By an extension of this logic, if affordability in Sefton remains an issue, and the established solution is for outward migration to address this, how can it be concluded that Sefton's population will continue to rise at a level that requires 615 new houses to be built every year? Will it not be the case that housebuyers will follow existing trends and move to more affordable areas outside the borough? The SHMA concludes that "the key constraint on the market is not the affordability of housing...".

In order to justify NLP's "accelerated" approach in their housing needs assessment, the SHMA refers to the Holmans Report (TCPA) which concluded that about half of the current suppression in the housing market was due to economic downturn and the difficulties in obtaining mortgages, with the remainder attributed to "the culture of recent immigrants forming larger households". As Sefton has relatively low levels of immigration I deduce that suppressed housing market in Sefton must be the result of difficulties in obtaining mortgages. The expectation of NLP and the SHMA appears to be that the suppressed market will be released as economic conditions improve. I disagree because (i) there has not been any increase in over-crowding; (ii) if there has been any switch to people renting as they have not benn able to obtain a mortgage this would not result in any increase in households; and (iii) potential house buyers may have moved out of the area until the housing market imporves and they can move back to Sefton. This will be reflected in the official migration statistics. As Sefton is regarded as a self-contained housing market this would not place major pressure on its housing market.

The table on page 93 of the SHMA only focuses on 'market housing'. When affordable housing is considered alone, the vast majority of the projected requirement as shown on the table on page 93, is for 1 bed accommodation (45-50%). When all housing is considered, it is noteworthy that 1 and 2 bed accommodation combined, accounts for up to 55% of the projected new build. Clearly, based on the findings of the SHMA, policy should be driven towards smaller new-build housing stock and not the 'familysized' accommodation suggested on page 35 of the SHMA.

I do not consider that 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 in the SHMA when deriving the projected housing demand for Sefton of 615 dpa. I accept that 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 can not 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.

Summary of Suggested Changes

Evidence Submitted

Policy

Respondent No	496	Response Ref	3	Representor Name	Allan Watson
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Organisation Name

Obj/Sup/Com	Objection
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Summary of Main Issues

Evidence of the council's failure to take any realistic account of the sustainability of the proposed housing development:

(i) SMBC commissioned URS Infrastructure & Environment UK Limited (URS) to provide a sustainability appraisal of its Local Plan. The document is 126 pages long and covers the entire borough. Due to its length and detail it is impractical to address the appraisal point by point. Indeed the aspirations covered amount to a truly utopian vision of regeneration of the borough with jobs and housing abundant and the environment improved in all aspects. Unfortunately the impracticality implicit in any utopian ambition is particularly applicable to the proposal to build a housing estate on the green belt farmland, pasture and woodland that comprise SR4.03. It is difficult to imagine a less suitable site when sustainability is considered. In the Local Plan, Chapter 5, "Sustainability" Table SD2 "Principals of Sustainability Development" parrots the high aspirations in the URS report but offers no example of how any of the principals will be incorporated in practice. It is not acceptable to imply that the important issue of sustainability need not be addressed in a practical way at this stage and can be sorted out some time in the future. An informed decision to approve the proposal to develop SR4.03 could be made at this stage only with the provision of practical, applicable and economically viable plans to overcome the major challenges regarding the sustainability of the proposed development.

(ii) Sustainability is a relatively complex issue to evaluate when applied to change of use of land. The Sustainable Development Commission (SDC) was a non-departmental public body responsible for advising the UK Government on sustainable development. It was set up in 2000 and closed in 2011. The website is still accessible as an archive, but the SDC is not referred to by SMBC, nor URS advising SMBC and certainly is not referred to in the Local Plan at all. In view of its direct relevance this omission is difficult to understand.

(iii) Transport is a key factor in considering the sustainability of any development. It is emphasised by the SDC that minimising the use of cars by residents is of primary importance. This is not just a matter of harmful local effects but incorporates a wider view of environmental issues, including fossil fuel depletion and global warming. In proposing site SR4.03 as an option for building over 500 houses SMBC is apparently paying no heed at all to sustainability as it should be considered, as the residents would be reliant on cars due to the lack of any accessible public transport and the infeasibility of providing a safe and economically viable public transport service for the proposed estate. The details of the unsuitability of roads accessing site SR4.03 in both directions is professionally assessed and documented by Hydrock Consultants Limited (attached as a pdf document). Therefore this point will not be addressed further here apart from emphasising that access to schools and doctor's surgeries (already over-subscribed) as well as the nearest shops and pharmacies would be difficult for any individual or family with or without a car. For example traffic congestion around Churchtown Primary School (the main primary school in the area) is very heavy at arrival and leaving times. Saturation parking extends to up to 800 metres from the school, and also along Bankfield Lane with parents walking their children through the Botanic Gardens to the school.

(iv) SMBC has taken no account of the economic circumstances and trends for Southport, the borough as a whole, the UK and our position in the global economy. This failure renders its conclusions untrustworthy and its Local Plan inappropriate to the extent of being unfit for purpose. SMBC asserts that although the population of the borough is consistently declining that more dwellings are needed due to an increase in family splits (parental divorce or separation) with a decrease in the number of people occupying individual dwellings. This assertion is misguided because it does not take account of the ability of individuals (particularly younger people) to rent or purchase a property, and then maintain themselves independently. Children are staying at home until they are older, and are having to return home to live with their parents, if unable to sustain themselves independently. If and when they do find suitable employment this is more likely to be in a city than locally, so they will move out of the area. These trends are manifest in most of Western Europe. The unemployment rate for the borough is above the national average, and average wages in the UK have fallen compared with a full decade ago when adjusted for inflation. This is a direct result of globalisation, combined with an increasing proportion of work being done more efficiently by computers and robots than by people. Affordability of housing will be further diminished when interest rates begin to rise to regain a more normal level (historically).

(v) Although a detailed survey of SR4.03 has not been carried out the land is known to be unstable, consisting largely of peat and clay at different levels and in different proportions. Any new houses or extensions built now have to be on reinforced concrete piles or rafts. This adds significantly to the cost of building. There is also an issue of sustainability because a properly supported house should remain stable, but surrounding structures including driveways, paths and drains may not. This can result in pooling of water around houses and drains subsiding or moving laterally so as to become detached from the pipes leading from the houses. The maintenance costs of houses in this situation are likely to be higher than normal. They would therefore cost more in the first place and be less sustainable than they would be if built on an alternative site of stable land.

(vi) SMBC, through its local plan, shows it has no grasp of the unsustainability in economic terms of permitting the building of a

housing development as a development projecting out from the edge of a town into green belt land with poor current and potential access. Following the credit crunch of 2008 and the subsequent relatively weak economic recovery in the UK the reality is that most public service budgets will continue to have to be reduced in real terms (inflation adjusted). The infrastructure (including the provision of essential services) of the borough is already suffering from a lack of adequate maintenance and building out onto Green Belt land such as SR4.03 would require considerable extra investment in upgrading infrastructure, where it is possible at all. Improving access from the east along Wyke Lane, which is single track for part of its length, and is subject to ongoing subsidence problems, would be very costly and there is no evidence that West Lancashire have been consulted about this issue. Wyke Lane (in West Lancashire) approaching Southport leads to a single lane bridge across Three Pools Waterway which is already a traffic bottleneck, particularly at the beginning and end of the working day.

(vii) The inadequacy of the current roads accessing the proposed site SR4.03 from Churchtown to the west (Moss Lane, and further afield) and across farmland from the east (Wyke Lane, and further afield) is described professionally in detail by Hydrock Consultants Limited in a document referred to already and attached. Their independent report makes it clear that the cost of upgrading Moss Lane and providing safe footways, if possible at all, would be high. The cost of maintaining, let alone widening, the forever sinking and undulating Wyke Lane would be exorbitant. It matters not whether the potential costs are borne by taxpayers, developers or purchasers, it is still a cost to the community. Public transport (the local bus service) would be relatively inaccessible (about one kilometre's walk away with no continuous pavement on the relevant side (south) of Moss Lane at the Old Links Gold Course). The provision of a dedicated bus service to the proposed estate would be impractical and uneconomic.

(viii) The Hydrock analysis of traffic along Moss Lane shows the volume of traffic heading in each direction at different times of day. SMBC has been in possession of this report before issuing its current Local Plan. What the council has failed to take account of, or chosen to ignore, is that the flow of traffic is at its highest leaving Southport eastbound in the morning (heading for the single lane bridge over the waterway, and the deficient Wyke Lane beyond in West Lancashire). The evening peak flow is Westbound. This shows that a high proportion of the traffic is commuters. It is likely that if the proposed housing development were to be built on SR4.03 that a good proportion of those residents with jobs would be joining the commuters heading out of Churchtown to jobs some distance away. This would add to the problems of the bottlenecks at the single lane bridge and the single lane section of Wyke Lane. It would accelerate the degradation of Wyke Lane which is not stable. These problems would be exceedingly expensive to properly address, and would fall to a large extent to West Lancashire council to fund. There is no written evidence that West Lancashire have been consulted regarding this issue or have any awareness of the potential cost to their residents if a 500 dwelling housing estate were built on their border with Sefton. This is further evidence of SMBC's failure in its Duty to Co-operate outlined in paragraph 2 above.

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 General	Plan Order Sustainability Appraisal	Other Documents Sustainability Appraisal
Policy N/A	Rep does not relate to a policy	
Respondent No 648	Response Ref 30	Representor Name Emily Hrycan
Organisation Name English Heritage		
Obj/Sup/Com Objection		

Summary of Main Issues

English Heritage has raised a number of issues in relation to the soundness of the Local Plan for Sefton (see letter reference: 1616). 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. In view of our comments on the Plan, English Heritage disagrees with the content of the Sustainability Appraisal. Local Plans have to enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework. One of the core dimensions of sustainable development is the protection and enhancement of the historic environment.

The Local Plan for Sefton needs to set out a positive strategy for the conservation, enhancement, improvement and enjoyment of the historic environment, be based on an up to date evidence base and include strategic policies to deliver it. In view of the comments on the Local Plan policies for the historic environment, English Heritage disagrees with the SA that Policy NH I sets out the development principles for protecting heritage assets, which requires development to avoid losses or harm to historic features and their settings. In addition, we also disagree with the SA which also states that Policies NH9- 14 build upon these principles by making it clear that development will only be permitted where it contributes to the protection or enhancement of designated and non-designated heritage assets and their settings. It is considered that together they will not have a significant positive effect on the baseline position rather a negative effect, as it does not put forward a positive strategy for the historic environment and the Plan does contain strategic policies for the conservation and enhancement of the historic environment, that can be applied locally.

In addition, English Heritage disagrees with the Sustainability Appraisal, in particular that Policies ED6 and ED7 will have positive implications for the historic environment. These Local Plan policies do not provide a strong approach to the protection and enhancement of heritage assets or offer opportunities to protect and enhance the built environment, and secure improvements to the public realm. The historic environment in Southport makes a significant contribution to its attractiveness as a place to live, work and visit and the policies lack any strategy for its historic environment. Therefore, it is considered that they will have negative implications for the historic environment. Finally, we would like to stress that this opinion is based on the information provided within the report. To avoid any doubt, this does not affect our obligation to provide further advice and potentially object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the Plan) where we consider that, despite the SA/SEA, these would have an adverse effect upon the historic environment.

Summary of Suggested Changes

Evidence Submitted