

# SEFTON LOCAL PLAN EXAMINATION

AS29 SHORROCKS HILL

RESPONSE TO EX50- 'STATEMENT ON COUNCIL'S POSITION IN REGARDS TO  
AS29 SHORROCKS HILL'

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ON BEHALF OF ASCOT PROPERTY GROUP

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## **1.0 INTRODUCTION**

- 1.1** On Friday 11 December 2015, we represented Ascot Property, the owner of site AS29- Land at Shorrocks Hill, at the Sefton Local Plan Examination.
- 1.2** At the Examination, we put forward a case for this omission site to be included in the Sefton Local Plan as a residential allocation for 30 dwellings. In contrast to many of the sites allocated in the Plan, Shorrocks Hill is a brownfield site in the Green Belt. Nationally, only 0.1% of land in the Green Belt is previously developed brownfield land suitable for housing.
- 1.3** The site proposed for allocation comprises 3.2 hectares of previously developed land contained by the strong physical boundaries of Lifeboat Road to the north, St Luke’s Church Road to the east, Alexandra Road to the south and dense woodland to the west.
- 1.4** 1.4 hectares, or 44% of the site is occupied by built structures and hardstanding and the legal use is a nightclub- a non-conforming and unpopular use in the site’s context in a Primarily Residential Area.
- 1.5** At the Examination Hearing, it was discussed that the site could be redeveloped under the existing provisions of National Planning Policy Framework (NPPF) Paragraph 89. Indeed, in August 2015, Ascot Property submitted a formal pre-application request for a proposed development of five dwellings, which Sefton Council indicated would be supported in principle. However, the delivery of five market houses would not be an efficient use of the site in land-use terms, would unlikely be financially viable and would fail to deliver any wider benefits including the provision of affordable housing.
- 1.6** During discussion at the Examination, it was apparent that there was no local opposition to the redevelopment of the site, (as confirmed by FRAGOFF representatives), positive support for the extinguishment of the existing nightclub operation and desire/need for car parking facilities in this area for the use of visitors to the Formby coast. Hence, Mr Martin Pike invited Sefton Council to consider whether they might be able to conceive of a ‘creative solution’ for the future use of site AS29.

## **2.0 EX50- STATEMENT ON COUNCIL’S POSITION IN REGARDS TO AS29 SHORROCKS HILL**

- 2.1** Sefton Council has responded in Document EX50, which starts by stating that, “the Council was asked to consider whether the benefits that could be secured on this site would outweigh the adverse ecological impacts of developing the site.”

- 2.2** It would appear from the Council's opening statement that the Council is overlooking the fact that the site is brownfield and already developed.
- 2.3** Furthermore, Sefton Council highlight the need for a tree survey and ecological assessment and appear to consider the need for these surveys to be a constraint to development. In our view, the tree survey and ecological assessments do not constrain development, but are necessary in order to inform and support a suitable and sensitively designed redevelopment, which could feature ecological and biodiversity mitigation and improvement compared to the existing state and use of the site.
- 2.4** Moreover, National Planning Policy is currently changing in order to infer a greater presumption in favour of development of brownfield sites, including brownfield sites in the Green Belt. Consultation is underway (7 December 2015-22 February 2016) on changes to NPPF to allow, "the regeneration of previously developed brownfield sites in the green belt by allowing them to be developed in the same way as other brownfield land," Paragraph 89 of NPPF is to be changed in order, "to enable suitable, sensitively designed redevelopment to come forward...development on such land may be considered not inappropriate development where any harm to openness is not substantial."
- 2.4** Given that the Sefton Local Plan is for now, and for the future, and in order to maintain consistency with the forthcoming national planning policy direction, it would be appropriate to remove the existing Green Belt status of AS29 Shorrocks Hill and/or allocate the site for residential development.
- 2.5** Removal of Green Belt status and allocation of the site at Shorrocks Hill for 30 dwellings would allow meaningful discussion to take place between the site owner and Sefton Council regarding redevelopment. This mutually beneficial position would present the opportunity for the Council to consider the comparative public benefits of a prospective car parking facility in this location, with the potential delivery of three affordable dwellings.
- 2.6** In light of all of the above, we disagree with EX50 which concludes that it would not be appropriate to allocate the site at this time. Such an approach would be inconsistent with the direction of national planning policy and would not demonstrate any commitment to making sure of the best possible use of brownfield land that is suitable for housing and reducing the need for release of open Green Belt land.
- 2.7** For the avoidance of doubt, in our view, we would request that Sefton Local Plan is modified to include either of the following options:

- 1) To remove the Green Belt status and allocate the site for residential development of 30 dwellings; or
- 2) To remove the Green Belt status of the site, which would allow the tree and ecological assessments to take place without a predetermined level of prospective development under the current restrictions of Paragraph 89 of NPPF.