

**Our Ref: 2014-020**  
**Your Ref: -**



Martin Pike  
The Planning Inspectorate

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**BY EMAIL**

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Dear Mr Pike

**Sefton Local Plan Examination in Public (EiP) and the Liverpool City Region SHELMA**

We have been made aware of the updated position regarding the Liverpool City Region SHELMA timetable and that this has been placed in the Examination library (Ref: 000 SHELMA Update SMBC – 20 October 2016).

As a result of this update we are writing on behalf of our clients (Peel Holdings (Land and Property) Limited) to highlight our ongoing, and indeed heightened, concern over the significant delay in addressing a key local and national planning issue affecting Sefton Borough.

To date our clients have submitted a number of representations during the production of the Sefton Local Plan:

- Consultation on Issues – 2009;
- Consultation on Options – 2011;
- Consultation on Preferred Options – 2013;
- Consultation on Additional Sites – 2014;
- Consultation on Publication Draft – 2015;
- Appearance at the original EiP sessions; and
- Consultation on Proposed Modifications – 2016.

The EiP was only initially undertaken upon the agreement by the Council that the Plan would be subject to an early review. This was not, at the time of the commencement of the Examination, based on the outcomes of the SHELMA study being produced for the Liverpool City Region. Rather, this was the position that evolved onwards from that point during the Examination process. We have raised concerns throughout the consultation process regarding the delays and an apparent 'kicking into the long grass' what is a fundamental economic issue for the Plan.

I am aware that the EiP process is currently ongoing with hearings on the Proposed Modifications due to reconvene on 01 November 2016. As the hearings are still open I wanted to submit this letter raising further concerns in addition to those raised in the submitted representations.

## **SHELMA Progress Update**

The updated SHELMA study position was given by Peter Richards at West Lancashire Borough Council which sets out the timeframe for the production and adoption of the study. The following timings are given:

- Appointing local authorities are currently reviewing the draft report;
- Report to Housing and Spatial Planning Board in December;
- Consultation on the document to commence January 2017; and
- Final publication in March 2017.

Notably, we believed that the reliance on this document as a key trigger for the Review of the Sefton Plan was very much on the basis of it being completed under the original timetable set out to you at the start of the Examination process.

## **Sefton, the SuperPort and SHELMA**

The Council has been aware for several years of the inextricable and essential link that exists between the imminent opening of Liverpool 2 and the wider SuperPort initiative to grow the logistics sector and employment within Sefton and the LCR. However, the ongoing delays in production of the SHELMA study and the Council's approach to employment land remains an issue for Peel.

In our Hearing Statement on Matter 4 at the original EiP we stressed our concerns over the shortfall in employment land provision that has been made in the Plan, based on the Employment Land and Premises Study. The SuperPort forecasts produced by the LEP in 2014 suggested that there would be an increase in demand in the region of 400 to 500 ha.

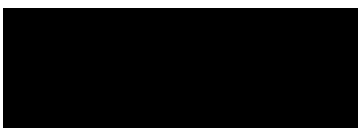
It remains the case that the issue and specifically these forecasts have not been taken into consideration by the Council, especially considering the delays associated with the publication of the SHELMA study, a fundamental omission in our view.

We have also advocated the use of a Criteria Policy that should be included within the Local Plan to make allowances for the evolving situation associated with Liverpool2 and the SuperPort. Suggested wording of the policy text can be found in Section 5 of our representation on the Proposed Modifications (August 2016, Ref 2014-020-002a). This would enable essential logistics infrastructure to be developed to support the growing logistic and employment demands of the region connected to the national significant Liverpool 2 port project.

This position is reinforced by the new timings set out by Mr Richards in his recent letter to you outlining the timescales for production of the SHELMA study. Serious and significant consideration needs to be given to alternative methods of facilitating new development that will support the growth of the Region given the current lack of progress and commitment.

Given the updated position we believe that it is essential that you consider the impacts of this ongoing delay in detail in your own Reporting process and that modifications as proposed by ourselves can be put in place when reaching your final conclusions and recommendations for the Sefton Local Plan.

Yours sincerely,

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**Nick Lee**  
**On behalf of NJL Consulting**