

West Lancashire Local Plan 2012-2027

**Strategic and Land Allocation Modifications to the Local Plan  
Options for Additional Housing and Employment Allocations**

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## 1.0 Introduction

- 1.1 The Inspector's letter of 15 May 2013, setting out his interim views on the strategic and land allocation matters of the Local Plan, identified a need to provide an additional housing site(s) and an additional 5 ha of employment land in order to make the Local Plan sound. This Paper assesses the most suitable options for the necessary additional housing and employment sites to make the Local Plan sound, so that the deliberations of the Council in arriving at the proposed Main Modifications to the Local Plan related to the selected additional allocations are transparent and communicated to all who have an interest.
- 1.2 The additional housing site(s) is required to ensure that the increased housing requirement for the Plan period (4,860 dwellings) can be met and a rolling 5-year housing land supply can be maintained throughout the Plan period. Based upon the updated Housing Trajectory provided by the Inspector alongside his letter, and comparing it to the increased overall housing requirement for the Plan period and the amended annual housing targets within the Plan period recommended by the Inspector, the Council has identified that a further housing supply of at least 100 dwellings is required, with at least 50 dwellings being deliverable by 31 March 2018.
- 1.3 The additional 5 ha of employment land is required in order to make-up for the loss of supply within the existing Simonswood employment area that the Inspector considers is not justified by the available evidence.

## 2.0 Identifying an additional housing site(s) – Initial Sieve

- 2.1 Appendix A sets out the relative merits of each of the safeguarded sites in the submitted Local Plan, assessing each site as to its sustainability, deliverability and suitability to meet the identified additional need for housing supply in the Plan period. Other potential housing sites were discussed at the Matter 8 hearing session during the Examination, but it is the Council's view that these are not suitable for housing at this time or are not deliverable, particularly in relation to sites within the catchment of New Lane Waste Water Treatment Works. This focus on the safeguarded sites appears to be corroborated by the Inspector in paragraph 12 of his letter.
- 2.2 The conclusions of Appendix A draw out four of the safeguarded sites as being most suitable as additional housing allocations in the Local Plan, primarily because of their deliverability:
  - Parr's Lane (east), Aughton;
  - Parr's Lane (west), Aughton;
  - Fine Jane's Farm, Halsall; and
  - New Cut Lane, Halsall.
- 2.3 This is consistent with the views expressed by the Council in the Examination hearings and with the Inspector's views at paragraph 12 of his letter.

## 3.0 Identifying an additional housing site(s) – Assessing the Shortlisted Sites

### Parr's Lane, Aughton

- 3.1 Of the four shortlisted sites, two essentially form one large site, Parr's Lane in Aughton. This site is specifically addressed by the Inspector in his letter at paragraph 19, where he addresses the two sites in relation to their respective designations under Policy GN2. The Inspector recommends that consideration should be given to moving Parr's Lane (west) into the Plan B category alongside Parrs Lane (east). He

recommends this “because its merits as a potential Plan B site appear indistinguishable from those of the adjacent, proposed Plan B site at Parr’s Lane (east)”.

3.2 The Inspector goes on to say in paragraph 20 of his letter:

*“Putting both of the Parr’s Lane sites into the Plan B category ... would enable a co-ordinated approach to be taken to their masterplanning and development, which is especially desirable given that the western site controls the access to Prescott Road and its bus services.”*

3.3 Based on this recommendation from the Inspector, it is the Council’s view that, if the Parr’s Lane site is to be developed at some point in the future, be it in this Plan period or beyond, it would be most appropriate if the site were brought forward as a single development site guided by a masterplan. The two key landowners on the site have expressed a clear willingness during the Examination hearings to work together to bring the site forward as one (albeit with two developers able to deliver simultaneously) and such a comprehensive development would appear to be most appropriate in terms of impact on neighbours, as opposed to drawing development out into two (or more) entirely separate development phases, which prolongs uncertainty for neighbours and the impact caused by development.

3.4 Therefore, if the Parr’s Lane site were to be selected as the additional housing allocation for the Local Plan, it should be on the basis of a single, comprehensive development site of approximately 400 dwellings.

3.5 However, this fact in itself forms an argument against including the site as an additional housing allocation in the Local Plan at this time. The approximate additional housing supply required is only 100 dwellings, and so the inclusion of the Parr’s Lane site would enable development of a site four times larger than that which is required. This would not appear to be a sustainable use of land resources and the Borough may be better served by the continued safeguarding of the Parr’s Lane site until such a time as a further 400 dwellings are required for development.

#### Fine Jane’s Farm, Halsall

3.6 The Fine Jane’s Farm site appears readily deliverable and its development would involve the removal of a run-down agricultural site which, according to some, blights the local area. The Council’s only concerns on the site relate to highways access, the viability of the site and the relationship of the site to the neighbouring Borough of Sefton.

3.7 Highways access can, technically, be resolved through an improved and widened site access, which appears to be deliverable. However, the views when turning out of the site would be restricted somewhat by the bend in the road that the site access is on, which is not ideal.

3.8 The viability of the site is queried simply because the Council is not aware of any developer interest in this site (as there is in both the other shortlisted sites) and because there has been no evidence submitted that has assessed the costs of redeveloping this agricultural site (which is entirely hardstanding) and the costs of any piling issues because of the peat deposits in the area. However, at this time there has not been any evidence submitted which would definitively question the viability of this site, and so the Council assumes that there are no “show-stopping” constraints affecting the site.

3.9 With regard to the relationship of the site to Sefton, this is discussed further, together with the similar issue for the New Cut Lane site, below.

- 3.10 Ultimately, this site appears to be relatively sustainable, deliverable and suitable but would only deliver 60 dwellings. Therefore, if it were to be allocated, there would need to be a further allocation alongside it to meet the additional housing supply requirement for the Local Plan.

#### New Cut Lane, Halsall

- 3.11 The New Cut Lane site appears deliverable, with a willing consortium of landowners and a strong developer interest, and reassurances having been provided at the Examination hearings that any costs related to piling can be accommodated within the development. Therefore, the existing safeguarded (Plan B) site at New Cut Lane would appear a ready candidate for an additional housing allocation, barring any concerns with regards its relationship with the adjacent Borough of Sefton.
- 3.12 In relation to the enlarged New Cut Lane site put forward by the landowners of this site at Publication and Examination stage, this again appears very deliverable. The only concern regarding the allocation of this enlarged site would be that it involves the release of a further 3 ha of Green Belt.
- 3.13 However, it must be pointed out that this enlarged site is the same as parcel SEFB13a in the West Lancashire Green Belt Study. Parcel SEFB13a was one of only two parcels in the entire Green Belt Study found to not fulfil one single purpose of the Green Belt after the amendments made to the Study by the Addendum in July 2012. Therefore, the loss of this land from the Green Belt would not have any impact on the wider Green Belt in this location.
- 3.14 Therefore, this site is a very deliverable option for an additional housing allocation, either as the smaller safeguarded site or as the enlarged site equivalent to parcel SEFB13a.

#### Cross-boundary concerns with Sefton

- 3.15 The inclusion of either of the Halsall sites, which are either on or very close to the Sefton boundary, cannot be assessed without consideration of their potential implications for Sefton. In the spirit of the Duty to Co-operate, Sefton Council have been consulted on their views following the recommendations of the Inspector's interim views, but at the time of writing this Paper no formal feedback has been received from Sefton Council.
- 3.16 These sites raise several potential concerns in relation to Sefton:
- Their impact upon infrastructure and services in Sefton;
  - The potential market competition they may offer to development sites nearby within Sefton (e.g. Town Lane at Kew); and
  - The question of whether the sites meet the housing needs of Sefton or West Lancashire.
- 3.17 It has always been recognised that, were these Plan B sites to ever come forward, they would be partially reliant on infrastructure and services within Sefton given their distance to key services within West Lancashire. However, the same could be said for much of the Western Parishes of West Lancashire, and residents of any new developments on these sites would also be able to access services within the Western Parishes if they preferred (e.g. Primary Schools in Halsall and Scarisbrick). Ultimately, if new development places a strain on existing infrastructure, there are mechanisms by which developer contributions can be secured to mitigate that strain. While West Lancashire would be the body responsible for collecting those contributions if these

Halsall sites were to come forward, where infrastructure is required within Sefton directly as a result of these developments, West Lancashire would have the option of sharing those contributions with Sefton Council to mitigate impacts of development.

- 3.18 The potential for market competition between these Halsall sites and the Town Lane scheme or any other sites in the Birkdale area is minimal. There is a significant need and demand for new housing in both Sefton and West Lancashire and the addition of one or two relatively small sites will not provide especially significant market competition.
- 3.19 The question of whether the Halsall sites would meet West Lancashire's or Sefton's housing needs is one which it is extremely difficult to answer, and one where no obvious conclusion was drawn at the Examination hearings despite discussion on the topic. Ultimately, the housing markets of North Sefton and the western parts of West Lancashire are closely linked, and to attempt to segregate these markets upon an imaginary boundary would be very dangerous.
- 3.20 What is clear, however, is that the sites are within West Lancashire and so must be considered to contribute, at least in part, to the housing needs of West Lancashire and so it is more a question of what proportion, if any, of the housing on these sites would be considered to meet Sefton's needs.
- 3.21 There appears to be three options involving these Halsall sites which, if they were allocated, would potentially meet the identified additional housing supply required in the Local Plan:
- Allocate just the enlarged New Cut Lane site (capacity 150 dwellings)
  - Allocate the Fine Jane's Farm site and the smaller New Cut Lane site (combined capacity 130 dwellings)
  - Allocate the Fine Jane's Farm site and the enlarged New Cut Lane site (combined capacity 210 dwellings)
- 3.22 Either of the first two options would appear sufficient to meet the additional need for housing supply in the Local Plan, if the site(s) are only considered to meet West Lancashire's housing needs. However, the third option would provide more flexibility and enable a portion of the housing to count towards Sefton's housing needs, while still ensuring that the additional supply of housing required in the West Lancashire Local Plan is met.

### Conclusion

- 3.23 Weighing up the various considerations discussed above, it is the view of the Council that the most suitable additional housing allocations would be:
- An enlarged New Cut Lane site (capacity 150 dwellings); and
  - The Fine Jane's Farm site (capacity 60 dwellings).
- 3.24 Once they are allocated, if the Inspector considers that a portion of the housing on these sites should count towards Sefton's housing needs, there is the option to stipulate that whilst still maintaining the supply of housing required within West Lancashire.

## **4.0 Identifying an additional employment site(s)**

- 4.1 In considering where the 5 ha shortfall of employment land supply identified by the Inspector in paragraph 30 of his letter could be provided, the Council have returned to re-assess those sites put forward by representors at Publication stage as alternative



employment sites and which were considered at the Matter 12 Examination hearing session. These sites were:

- i) Land adjacent to White Moss Business Park (including land owned by Whitemoss Landfill);
- ii) Land north of Vale Lane, Skelmersdale;
- iii) Land at HMS Ringtail, Burscough; and
- iv) A 21ha extension of Simonswood Industrial Estate?

- 4.2 Appendix B provides an assessment of these four locations (or variations upon them) to consider their relative merits in relation to sustainability, deliverability and suitability for making up the 5 ha shortfall identified. It concludes that two of the locations are potentially viable and suitable for the additional employment site(s) (Burscough employment area and Simonswood industrial estate).
- 4.3 It would be the Council's view that the Simonswood industrial estate is the most appropriate location because the loss of employment land supply outlined in the Inspector's letter occurred within the Simonswood industrial estate, and so this "lost" land supply would be replaced directly adjacent to where it was "lost", maintaining the status quo in relation to the submitted Local Plan in all senses except land-take.
- 4.4 It is the Council's view that only a portion of the 21 ha of Protected Land available adjacent to the industrial estate would be necessary for allocation as employment land and that this portion should be located at the eastern end of the Protected Land, adjacent to Fredericks Dairies, so as to minimise the impact of the development of the land on the residential area of Tower Hill (in Knowsley). Based on the ownership plan submitted during the Examination hearings (EX.239b – also included at Appendix C of this Paper), there is a 6.79 ha area of land to the eastern end of the Protected Land which it has come to the Council's attention is in the ownership of Fredericks Dairies, the adjoining business. Fredericks have made the Council aware of their desire to expand their business into this land, and so the allocation of this 6.79 ha for employment uses would appear a readily deliverable and suitable allocation.
- 4.5 Given the location of this site so close to the Borough boundary with Knowsley, and in the spirit of the Duty to Co-operate, Knowsley Council have been consulted on their views following the recommendations of the Inspector's interim views. Knowsley Council responded on 30 May 2013 (see Appendix D) to the effect of that they do not consider that the allocation of an extension to Simonswood industrial estate would be the best way forward for the reasons set out in their letter and they encourage WLBC to consider other alternative locations instead. However, they do note that, were any land to be proposed for release adjacent to Simonswood industrial estate, the land adjacent to Fredericks Dairies would be the least harmful to Knowsley.
- 4.6 However, given that Knowsley Council have not previously objected to the inclusion of 5 ha of employment land within the existing Simonswood industrial estate, and given that the allocation of 6.79 ha adjacent to the industrial estate would essentially replace the original 5 ha of supply, there would appear to be limited net increase in impact compared to the submitted Local Plan, other than land-take. The additional land-take has been minimised and has been located as far away from the Knowsley boundary as possible within the area of Protected Land, so as to minimise the impact.

## 5.0 Summary

- 5.1 The Council acknowledge and appreciate the recommendations of the Inspector in his letter of 15 May 2013, setting out his interim views. To this end, the Council have prepared this Paper to assess the options for additional sites to meet the requirements for housing and employment land over the 15-year period of the Plan.

- 5.2 Having assessed the various options available, and taking into consideration the discussions at the Examination hearings on the various alternative sites put forward by representors, the Council have concluded that there should be three “new” allocations for housing and employment land:
- The allocation of an enlarged **New Cut Lane site in Halsall** as a housing allocation, and the removal of the part of this site that was previously proposed as a safeguarded site for the Plan B. This enlarged site (see map in Appendix E) totals approximately 5.5 ha and has an indicative capacity of 150 dwellings.
  - The allocation of the **Fine Jane’s Farm site in Halsall** as a housing allocation, and the removal of this site as a safeguarded site for the Plan B, as had been previously proposed. This site (see map in Appendix E) is approximately 2.2 ha in size and has an indicative capacity of 60 dwellings.
  - The allocation of 6.79 ha of **land adjacent to Simonswood industrial estate**, which was previously proposed as Protected Land, for employment land (see map in Appendix E).
- 5.3 In addition, within its strategic and land allocation main modifications, the Council propose the allocation of a housing site at **Guinea Hall Lane, Banks**, which was previously proposed as a safeguarded site (see map in Appendix E). Despite its original proposed allocation as a safeguarded site, the site gained outline planning permission in March 2013 for 115 dwellings. Given this permission, it has been included in the Inspector’s updated housing trajectory as part of the supply for housing, and it is therefore inappropriate to continue to allocate it as a safeguarded site and most appropriate to allocate it as a housing site.

## Appendix A: Initial Sieve of Safeguarded Housing Sites

Safeguarded Site	Indicative Capacity	Sustainability	Deliverability	Suitability	Conclusion
Land at Parr's Lane (east), Aughton	400 dwellings (200 + 200)  As noted by the Inspector, both parcels are "indistinguishable" and a masterplanned approach is "especially desirable". Therefore, both parcels should be considered jointly.	Up to 0.5 miles (10 minute walk) from Aughton Park rail station.  Bus route and bus stops on Prescott Road (B5197) adjacent to site, although service is relatively infrequent.  Primary school across road from site on Prescott Road.  Some local facilities in the form of convenience shopping at Moss Delph Lane and Town Green.  Not close to Ormskirk town centre (30 minute walk).	Both parcels robustly promoted through Local Plan process on behalf of volume housebuilders.  All Landowners identified and a delivery programme submitted through the examination relating to Parrs Lane East.  Access to M58 (J1) on B5197, less than 10 minute drive.  Access would be onto more minor roads and through residential roads in Aughton to reach A59 or Ormskirk town centre.	As noted, the two parts of the site should most logically be delivered jointly, particularly as the west parcel unlocks access to Prescott Road and the bus services.  The total capacity of the combined site is 400 dwellings, which is significantly more than is currently required (100 dwellings).	This site (east and west) has both sustainability and deliverability merits as a result of the good access to sustainable transport links (mainly rail) and some local services.  The additional housing supply requirement is only for 100 dwellings, and so it would be excessive to allocate the entire site.  To allocate a portion of the site may lead to a disjointed approach and the desired benefits of a masterplanned site may not be achieved.
Land at Parr's Lane (west), Aughton		Land is in agricultural use, although more recent assessments by landowners suggest that the quality of this land for agriculture is not as high as first thought.	Existing properties (and gardens) on periphery of site must be built around and at a relatively low density to reflect local character.		However, aside from this concern, site is deliverable and relatively sustainable and should be considered as an option.
Land at Ruff Lane, Ormskirk	10-20 dwellings, depending on density of development	Nearest bus stop 0.5 miles away (10 minute walk through University campus) on St Helens Road.	Access to M58 (J3), approx 6 minute drive, but requiring use of Ruff Lane and Scarth Hill Lane to reach A570 from site.	Site capacity is for 10-20 dwellings, significantly lower than the current need of 100 dwellings.  Therefore, this site would	Although the site is on the edge of the Ormskirk settlement, accessibility is not as good as some of the other sites.

Safeguarded Site	Indicative Capacity	Sustainability	Deliverability	Suitability	Conclusion
		<p>Up to 0.8 miles (16 minute walk) from Ormskirk rail station</p> <p>1 mile (20 minute walk) to nearest primary school</p> <p>Site 14 minute walk (0.7 miles) from Ormskirk town centre and its facilities</p>	<p>Site has been promoted for several years by agent on behalf of a single land owner.</p> <p>Area is subject to waste water constraints of Ormskirk and Burscough, although the likely impact of 10-20 dwellings would be de minimus.</p> <p>Low density required ensuring local context and character is taken account of.</p>	<p>need to be considered in conjunction with other sites.</p>	<p>Main concern relates to the waste water treatment constraint and site capacity as it will not meet the current requirement for additional housing supply, so would be preferable to remain as a Plan B site unless it can be delivered with other lower capacity sites and the waste water treatment constraint overcome.</p>
Land at Red Cat Lane, Burscough	60 dwellings	<p>Access possible onto Red Cat Lane – limited site capacity unlikely to exceed capacity of road.</p> <p>Bus route on A59, 0.4 miles (8 minute walk) and Burscough Bridge train station about 5 minute walk away.</p> <p>0.5 miles (about 10 minute walk) to Burscough Town Centre.</p> <p>Three Primary schools within 0.6miles (12 minute walks).</p> <p>Appears to be mainly Grade 1 agricultural land.</p>	<p>Access to M58 (J3) either via Ormskirk or more minor roads (B5240) – approx 15 minute drive.</p> <p>Public Right of Way across site would need to be maintained.</p> <p>Multiple ownerships may limit development potential.</p> <p>Area is subject to waste water treatment constraints of Ormskirk and Burscough.</p>	<p>Site capacity of 60 dwellings would not meet current need alone and would need to be considered in conjunction with other sites.</p>	<p>The site has good sustainable access links to various transport modes and services but would appear to result in the loss of the best grade agricultural land, which is less than favourable.</p> <p>However, from a deliverability perspective the multiple ownership of site and waste water treatment constraints raise questions at this time.</p> <p>This site should remain as Plan B until deliverability is more certain.</p>

Safeguarded Site	Indicative Capacity	Sustainability	Deliverability	Suitability	Conclusion
Land at Mill Lane, Up Holland	120 dwellings	<p>There is a bus stop on the eastern periphery of the site providing links into Wigan, Skelmersdale and Ormskirk.</p> <p>Public right of way to the north of the site for access to surrounding countryside.</p> <p>There is a village hall within walking distance just north west of the site and the local facilities such as basic shopping, library and post office are all less than five minutes walk to the south of the site.</p> <p>Two Primary schools are also within walking distance of the site.</p> <p>Open space directly to the south of the site.</p> <p>The nearest train station is Up Holland which is approximately 1.5 miles south of the site (about 30 minutes walking distance).</p>	<p>The M58 can be easily reached via the A577 in less than 10 minutes.</p> <p>The A577 is generally free flowing and provides good links into Skelmersdale and Wigan.</p> <p>Site access is potentially an issue but site could be accessed from Mill Lane to the north via an opening where there is currently a track or to the south via the creation of a new road which utilises part of the open space.</p> <p>Topography of site could create constraints to development.</p> <p>Current land dispute may inhibit deliverability of this site.</p>	<p>Site capacity of 120 dwellings would be adequate to meet the identified additional housing need (100 dwellings).</p>	<p>Site has good access to local facilities and a bus service but rail links are weak.</p> <p>Access issues, topography and land ownership dispute could all hamper deliverability.</p> <p>Therefore, despite the broad suitability and sustainability of the site in terms of scale to meet need, deliverability issues pose a risk at this time. Site should remain as Plan B.</p>
Land at Moss Road (east), Halsall	450 dwellings (240 + 210)	<p>Bus route and stops on Bentham's Way, adjacent to site.</p> <p>Within 10-15 minute walk of two primary schools in</p>	<p>Significant costs may result in relation to connections to utility infrastructure and as a result of the relatively deep peat deposits in this</p>	<p>The total capacity of the combined site is 450 dwellings, which is significantly more than is currently required (100</p>	<p>This site has significantly greater capacity than is currently required and is on the best and most versatile agricultural land.</p>

Safeguarded Site	Indicative Capacity	Sustainability	Deliverability	Suitability	Conclusion
Land at Moss Road (west), Halsall					
Land at Fine Jane's Farm, Halsall	60 dwellings	<p>Run down nature of site means redevelopment would be beneficial.</p> <p>Bus route and stops on Bentham's Way, 4 minute walk (0.2 miles) from site.</p> <p>Within 10-15 minute walk of two primary schools in Sefton.</p> <p>Nearest rail station (Birkdale) 1.2 miles (24 minute walk) away.</p>	<p>Significant costs may result in relation to connections to utility infrastructure and as a result of the previous use (removal of concrete. etc) and relatively deep peat deposits in this area.</p> <p>However, site is being promoted by a willing landowner for residential development.</p> <p>Site access not ideal because of blind bend on</p>	<p>Site capacity of 60 dwellings would not meet current need so would need to be considered alongside other sites.</p>	<p>Site has some sustainability benefits such as reuse of previously developed land and access to a bus route.</p> <p>However, some services are further away and questions remain in relation to deliverability of the site, although the land owner promoting the site suggests delivery is realistic.</p>

Safeguarded Site	Indicative Capacity	Sustainability	Deliverability	Suitability	Conclusion
		<p>Nearest Local Centre is over a mile away (20 minute walk).</p>	<p>Moss Road and existing site access would likely need widening.</p> <p>Potential impacts on unclassified (moss) roads and access to the strategic road network is not ideal – 20 minute journey via Ormskirk to J3 M58 or 30 minute journey via A565 to Switch Island.</p>		<p>Highway issues are not entirely prohibitive.</p> <p>The site capacity does not meet the identified need in isolation, but together with another deliverable site, Fine Jane’s Farm should be considered a potential option.</p>
<p>Land at New Cut Lane, Halsall</p>	<p>Plan B site in submitted Local Plan has capacity for 70 dwellings, but enlarged site with a capacity of approximately 150 dwellings promoted by landowners at Publication and Examination</p>	<p>Bus route and stops on Guildford Road a 2 minute walk away (0.1 miles).</p> <p>Within 2 minute walk (0.1 miles) of primary school in Sefton.</p> <p>Nearest rail station (Hillside) approx 1 mile (20 minute walk) away.</p> <p>Nearest Local Centre approx 1 mile away (20 minute walk).</p> <p>The enlarged site at New Cut Lane would result in further Green Belt release (approximately an additional 3 ha).</p> <p>However, enlarged site no longer considered to fulfil any of the purposes of the Green Belt – one of only</p>	<p>Significant costs may result in relation to connections to utility infrastructure and as a result of the relatively deep peat deposits in this area.</p> <p>However, landowners confirmed a serious developer interest in the site at Examination and addressed concerns of viability due to peat deposits..</p> <p>Potential impacts on unclassified (moss) roads and access to the strategic road network is not ideal – 20 minute journey via Ormskirk to J3 M58 or 30 minute journey via A565 to Switch Island.</p> <p>Site access could be</p>	<p>The site capacity could potentially be 150 dwellings, which is slightly more than the required additional housing supply need, but not excessively so.</p>	<p>The site has some sustainability merits including access to bus routes and local services within 2 minutes.</p> <p>Other services and rail plus the loss of the best agricultural land are less desirable.</p> <p>The delivery issues relating to costs are likely to be less of a concern due to the confidence instilled by the willing land owners.</p> <p>Site capacity is suitable to meet required need.</p> <p>The risks associated with the less desirable sustainability merits are lower than other risks associated with other Plan</p>

Safeguarded Site	Indicative Capacity	Sustainability	Deliverability	Suitability	Conclusion
		two assessed as such in the entire Green Belt Study.	provided onto New Cut Lane via existing gap in residential properties.  Willing land owners promoting site with a developer interest.		B sites.  At this time, for reasons of suitability, deliverability and to some extent sustainability, the merits of this site present it as a reasonable option to meet additional housing need.
Yew Tree Farm, Burscough	500 dwellings	Sustainability merits of site have been established in relation to the existing allocation of 500 dwellings and 10 ha of employment land on this site.	While delivery of further housing is very possible in the long-term, it is considered that to anticipate further housing development on this site in the Plan period (beyond the 500 dwellings already identified) would be unrealistic.	Suitability of site is only questioned by the deliverability concern.  Any proportion of the additional 500 dwellings could be incorporated into the existing allocation if it were deliverable.	It is considered unlikely that further housing development at Yew Tree Farm in the Plan period would be deliverable, so safeguarded part of the site should not be considered for development at this time.



**Appendix B: Assessment of Alternative Locations for Employment Land Shortfall**

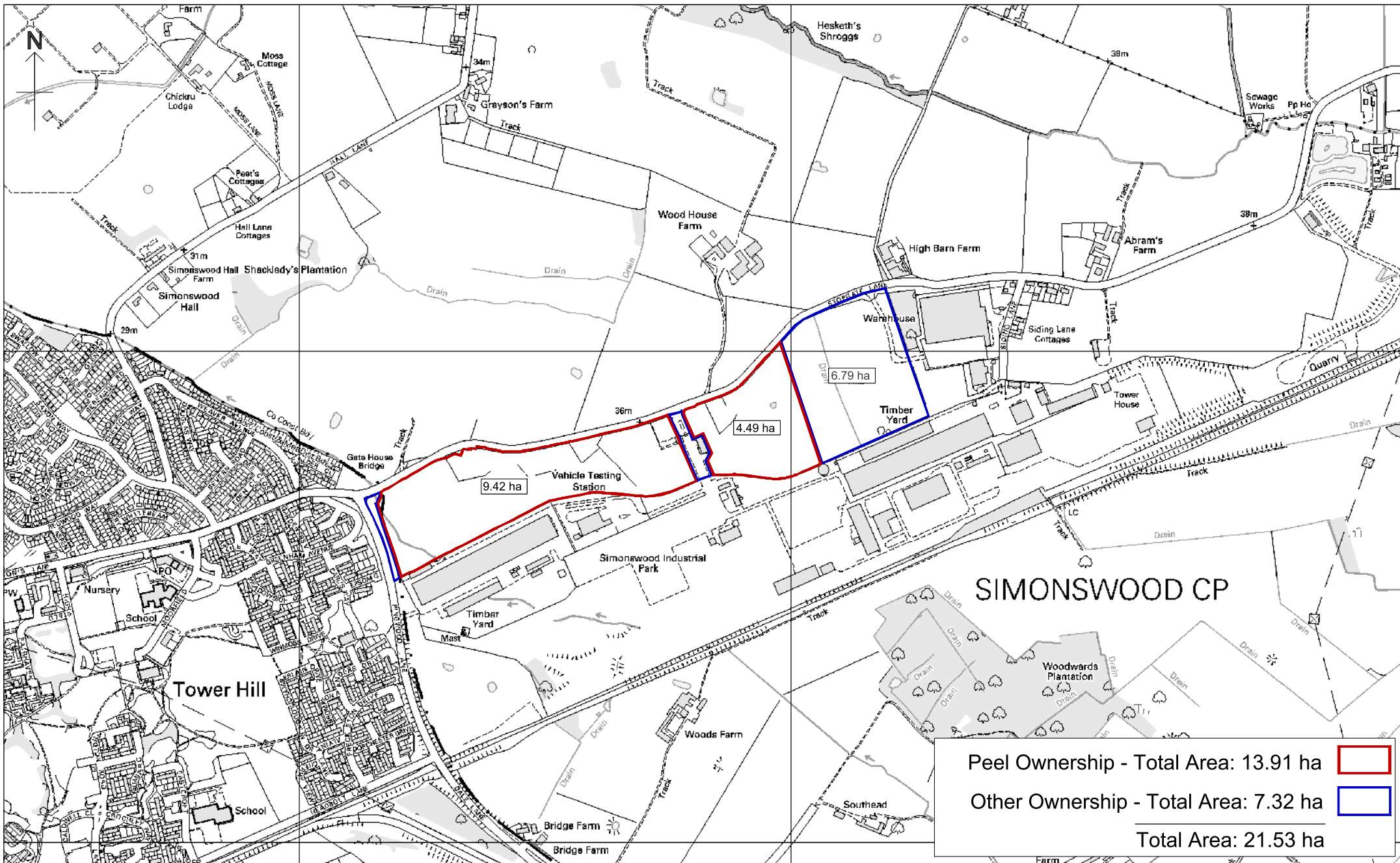
Proposed Location	Sustainability	Deliverability	Suitability	Conclusion
Land adjacent to White Moss Business Park, Skelmersdale	<p>It is acknowledged that, although White Moss Business Park is an established business park on the edge of Skelmersdale, it is not especially sustainable in terms of access by public transport or access to local services.</p> <p>However, the principle of employment uses at this location is established and existing allocated land at the business park is considered sustainable enough for inclusion in the Local Plan.</p> <p>An extension of the business park onto additional land would, however, involve the release of Green Belt and potentially impact upon local nature designations, and so, environmentally, may not be ideal.</p>	<p>The deliverability of an additional release at White Moss Business Park would have to be questioned, given the challenging economic environment at this time, and especially the level of demand for B1 employment uses in the Borough when White Moss Business Park already has land available for this purpose that has not been taken up.</p>	<p>Given the need to maintain the character of White Moss Business Park, B1 employment uses would only be appropriate, and so the allocation of this option would be replacing B2/B8 at Simonswood with B1 at White Moss. This would not be a suitable replacement for the supply lost at Simonswood.</p> <p>In addition, the only alternative site actually put forward by representors for employment land at White Moss was a small area (approximately 1 ha) adjacent to the Hazardous Waste Landfill. Even if this site were deemed appropriate, it could not, in isolation make up the entire 5 ha shortfall.</p>	<p>The deliverability of further employment land at this location is questionable, and it would not deliver the same type of employment land as that lost at Simonswood.</p> <p>Furthermore, only one small alternative site has been put forward for employment development at White Moss.</p>
Land north of Vale Lane, Skelmersdale / Lathom	<p>This location covers a large area of Green Belt to the north west of Skelmersdale and it is unclear precisely which part of the large site put forward would be most suitable for employment.</p> <p>The large site put forward has no strong boundaries within it, and so any release of Green Belt in this location would require the release of the whole site to ensure amendment</p>	<p>The land in question is greenfield land and so there should be limited constraints on development.</p> <p>However, there is already available land and empty units within the XL</p>	<p>Given the scale of Green Belt release that would be involved in this location, it would be unsuitable to release such a large amount of land from the Green Belt simply to identify 5 ha of it for employment</p>	<p>This location is not suitable for release from the Green Belt for employment land at this time, especially given the fact that there is land and empty units in the nearby XL Business Park already</p>

	<p>of the Green Belt boundary to a sufficiently strong boundary.</p> <p>The site has limited public transport access or access to local services given its peripheral location to Skelmersdale, but any employment development would essentially form an extension of the XL Business Park / Stanley Industrial Estate.</p>	<p>Business Park that would meet any demand for employment uses in this area.</p>	<p>development now.</p>	<p>available for employment uses.</p>
<p>Land at HMS Ringtail / Yew Tree Farm, Burscough</p>	<p>This location covers a large area of land incorporating the existing Strategic Development Site (SDS) at Yew Tree Farm, and land to the west of this on the site of the former airfield.</p> <p>If 5 ha of employment land were to be released in this location it would logically be as an increase of the employment land allocation within the SDS, utilising some of the land proposed for safeguarding in the Local Plan or as a release of the strip of land directly to the west of Tollgate Road from the Green Belt.</p> <p>The former would appear to have less impact on the Green Belt, but the latter would likely only have limited impact on the Green Belt, given its shape and location.</p> <p>Both sites would act as an extension of the existing employment areas and would benefit from existing services and transport infrastructure servicing the estates and proposed improvements so services and transport as a result of the SDS.</p> <p>However, there must be consideration of the impact of further employment land in this location, on top of the existing employment areas and the 10 ha already proposed within the SDS.</p> <p>In particular, any traffic impact of further HGV</p>	<p>There is little doubt that the greenfield nature of the land in this location and its proximity to the existing employment areas would make it an attractive location to the market.</p> <p>However, there must be a question of how much the market will deliver in this area over the Plan period given that 10 ha is already proposed within the SDS at Yew Tree Farm.</p>	<p>The suitability of this location must focus on whether allocating a further 5 ha of employment land in Burscough would be deliverable in the Plan period and whether the traffic impacts of this could be managed and mitigated.</p> <p>The likelihood is that traffic impacts could be managed and mitigated suitably, but it is difficult to be sure how the market would respond to a further 5 ha in Burscough in this Plan period.</p> <p>However, the land is available and, if there is market interest, could be brought forward with relative ease.</p>	<p>This location is a viable option and, if it were to be selected as the preferred location for an additional employment allocation, increasing the supply of employment land within the SDS from 10 ha to 15 ha would appear the most sustainable option.</p>

	<p>movements not only within Burscough but further afield as the HGVs access the motorway network and the Port of Liverpool must be weighed into the balance.</p>			
<p>Land adjacent to Simonswood Industrial Estate</p>	<p>Simonswood industrial estate is relatively sustainable in that it adjoins the built-up area of Kirkby (specifically Tower Hill) within Knowsley and so has access to public transport and other services via adjoining residential area.</p> <p>However, it is acknowledged that Simonswood is fairly peripheral in relation to West Lancashire, and direct public transport links with the rest of West Lancashire are poor.</p> <p>The land adjacent to Simonswood industrial estate is currently proposed as Protected Land within the submitted Local Plan, and so utilising a portion of this land for employment would not involve further loss of Green Belt.</p> <p>In addition, aside from the additional take-up of land required, the selection of this option would not demonstrate a net increase in any impact associated with employment development compared to the submitted Local Plan.</p> <p>The submitted Local Plan included an allowance of 5 ha of new employment land within the existing industrial estate which the Inspector has concluded is unjustified.</p> <p>Therefore, replacing those 5 ha lost within the estate with 5 ha adjacent to the site will have no net increased impact on matters such as traffic, noise or any other impact caused by the use of the site for employment.</p>	<p>There is no reason to consider that any part of the 21 ha of land adjacent to the industrial estate is not deliverable within the Plan period.</p> <p>The majority is in the ownership of Peel Holdings, who promoted the site for employment uses at Publication and Examination stage, and the remainder is in the ownership of Fredericks Dairies who own the business premises to the east of the land in question and are seeking to expand their premises.</p>	<p>Simonswood industrial estate is a suitable location for the additional employment site, particularly because the 5 ha of land lost from the employment land supply was within the industrial estate.</p> <p>If this location was selected for the additional employment site, only a portion would be needed (with the remainder maintained as Protected Land) and it would appear most prudent to utilise the land to the eastern end of this Protected Land, furthest away from Tower Hill, to minimise any impacts.</p>	<p>This location is a viable option that would have no net impact compared to the submitted Local Plan other than the additional land-take of approximately 5 ha.</p>



**Appendix C: Examination document EX.239b – landownership adjacent to  
Simonswood Industrial Estate**



Peel Ownership - Total Area: 13.91 ha

Other Ownership - Total Area: 7.32 ha

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**Total Area: 21.53 ha**



# Simonswood Ownership Plan



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BDS: n/a

Ref: NB / RK

Date: 06:03:13

Scale: 1:10000

@ A4

**Appendix D: Letter from Knowsley Council (30 May 2013)**







**Knowsley Council**

**Please ask for:** Jonathan Clarke  
**Tel No:** 0151 443 2299  
**Email:** jonathan.clarke@knowsley.gov.uk

Peter Richards  
LDF Team Leader  
West Lancashire District Council  
PO Box 16,  
52 Derby Street  
Ormskirk  
West Lancashire  
L39 2DF

Our Ref: West Lancashire / JC  
Date: 30 May 2013

Dear Peter,

**RE: MODIFICATIONS TO THE WEST LANCASHIRE LOCAL PLAN**

Thank you for your letter dated 17 May 2013. We understand that you need to address the issues raised in the Inspector's letter and we would like to assist in this process.

As you correctly state Knowsley Council did not object to the submission draft of the West Lancashire Local Plan. This included proposals to make more efficient use of the existing Simonswood Industrial Estate through a remodelling exercise and thereby effectively create the equivalent of about 5 hectares of "new" employment land. The basis for our approach on this was that although in our view the existing Industrial Estate is not well located or attractive for a wide range of employment uses it is also poorly laid out and would therefore benefit from internal remodelling if this were practicable. A future remodelling of this area would also have offered the opportunity to improve the current environment of the industrial estate.

It is clear that the Inspector is not (on the basis of available evidence) convinced of the deliverability of the remodelling exercise and has therefore asked you to consider how the 5 hectares of new employment land could be otherwise provided.

Unfortunately we do not consider that the proposal to allocate the additional 5 hectares of employment land in the area identified in the "Simonswood Ownership Plan" attached with your letter is the best way forward. The reasons for this were set out in the evidence which we provided for hearing session 12 (in response to the objection by Peel). Our concerns about any proposal to expand the current industrial estate into the areas that you have identified include:

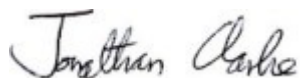
- The lack of evidence that these sites are in fact the most suitable to meet West Lancashire's needs given the minor nature of the highways which serve this area from the remainder of West Lancashire;
- the site is more closely linked to Knowsley in terms of accessibility but is not required to meet Knowsley's employment needs which are in our view suitably met by the diverse range and quality of sites for example in Knowsley Industrial Park; and
- the unnecessary competition that the expanded Simonswood site would present to the nearby Knowsley Industrial Park (KIP).

We would therefore stress the need for West Lancashire District Council to consider other alternative site options to provide the additional 5 hectares of employment land allocation requested by the Inspector.

If notwithstanding the above points West Lancashire does pursue a new site allocation at Simonswood the area edged in blue on the "Simonswood Ownership Plan" maybe slightly the least harmful. This part of the site is (unlike the area edged red on your site plan) at least adjacent to an existing employment use fronting Stopgate Lane and may therefore integrate slightly better with the character of the area. However, as mentioned above we would urge you to consider if there are better locations available in the West Lancashire area.

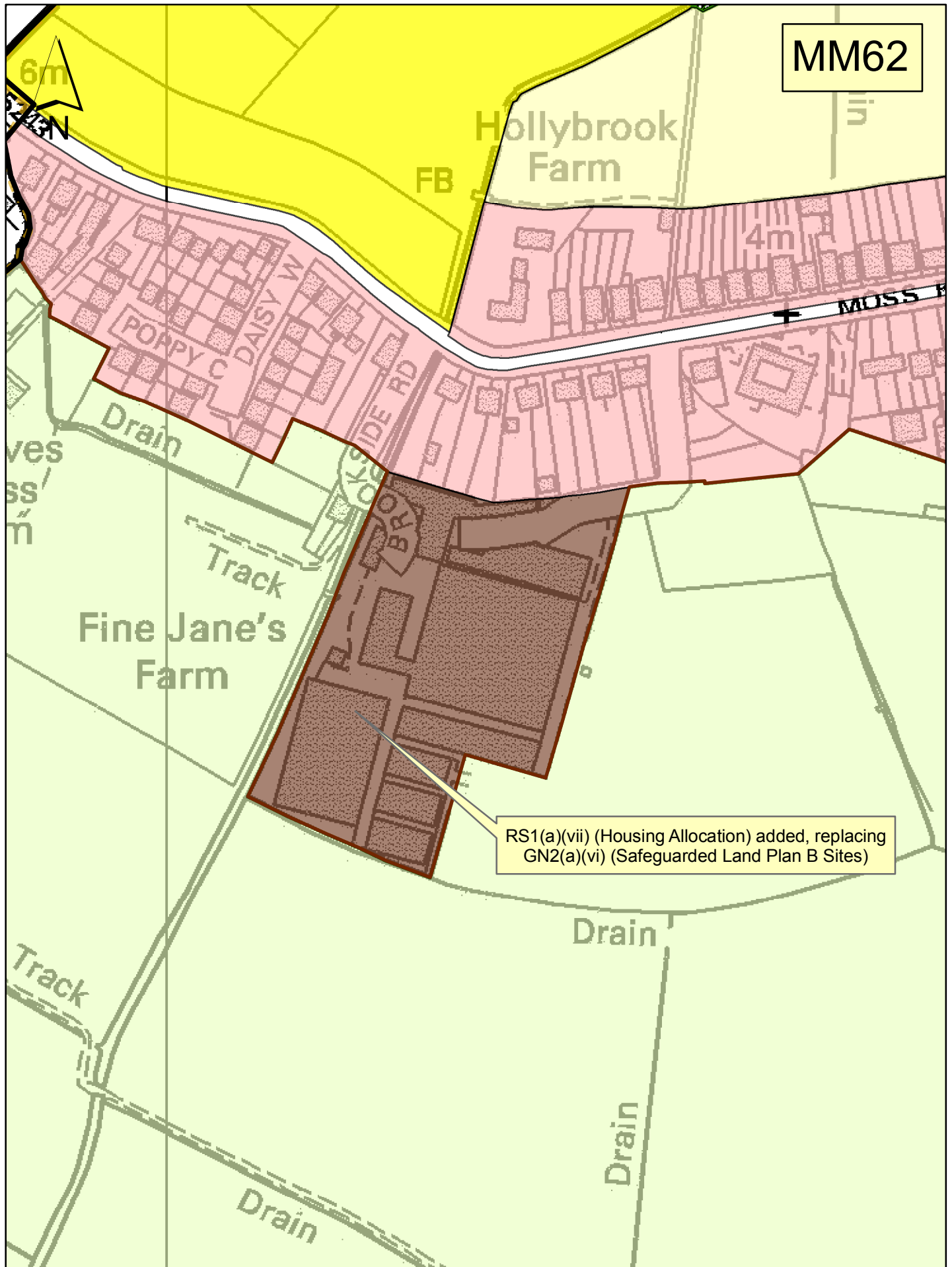
Please do not hesitate to contact me if you wish to discuss this matter again.

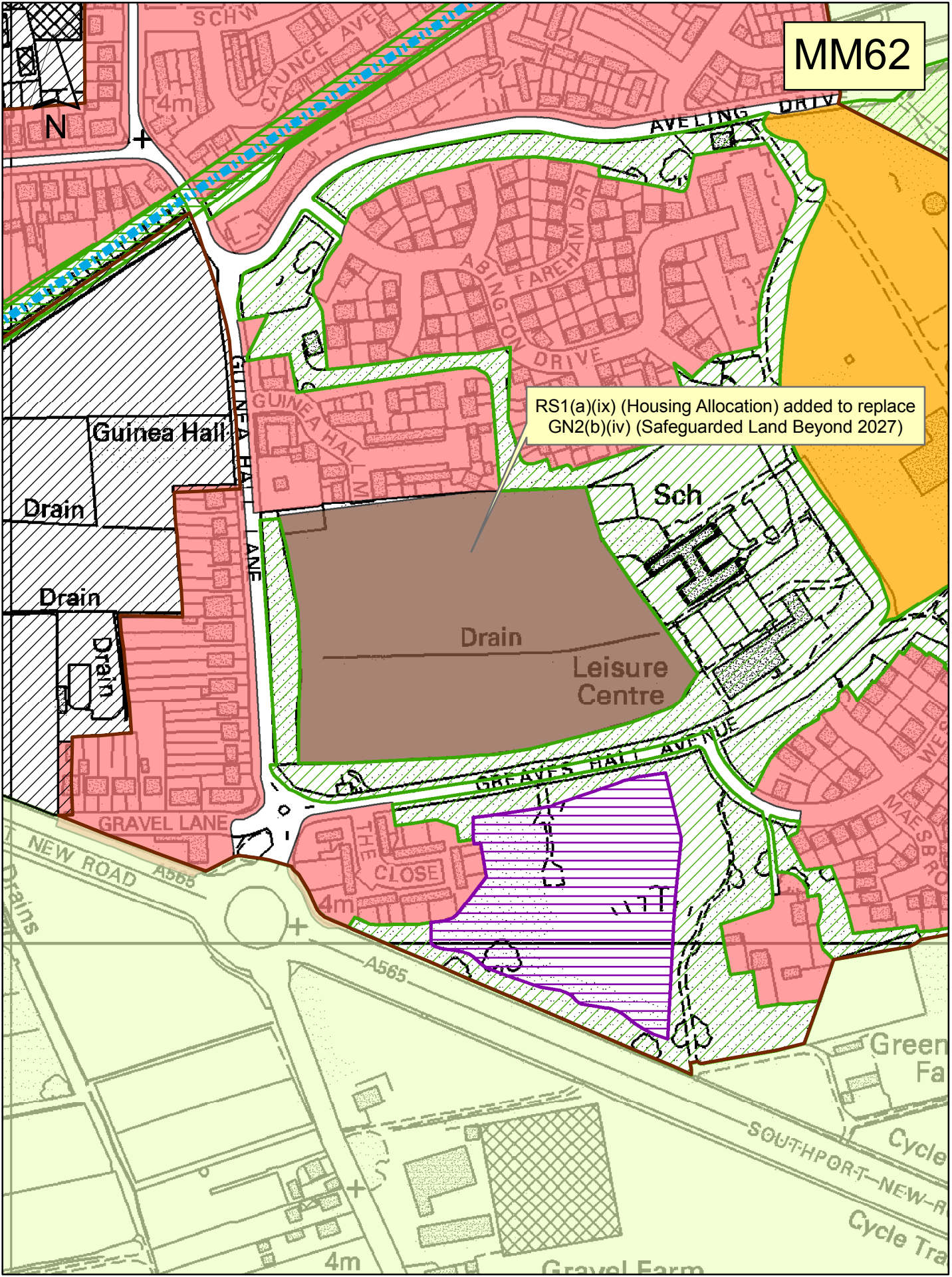
Yours sincerely,



**Jonathan Clarke**  
Policy Manager - Places

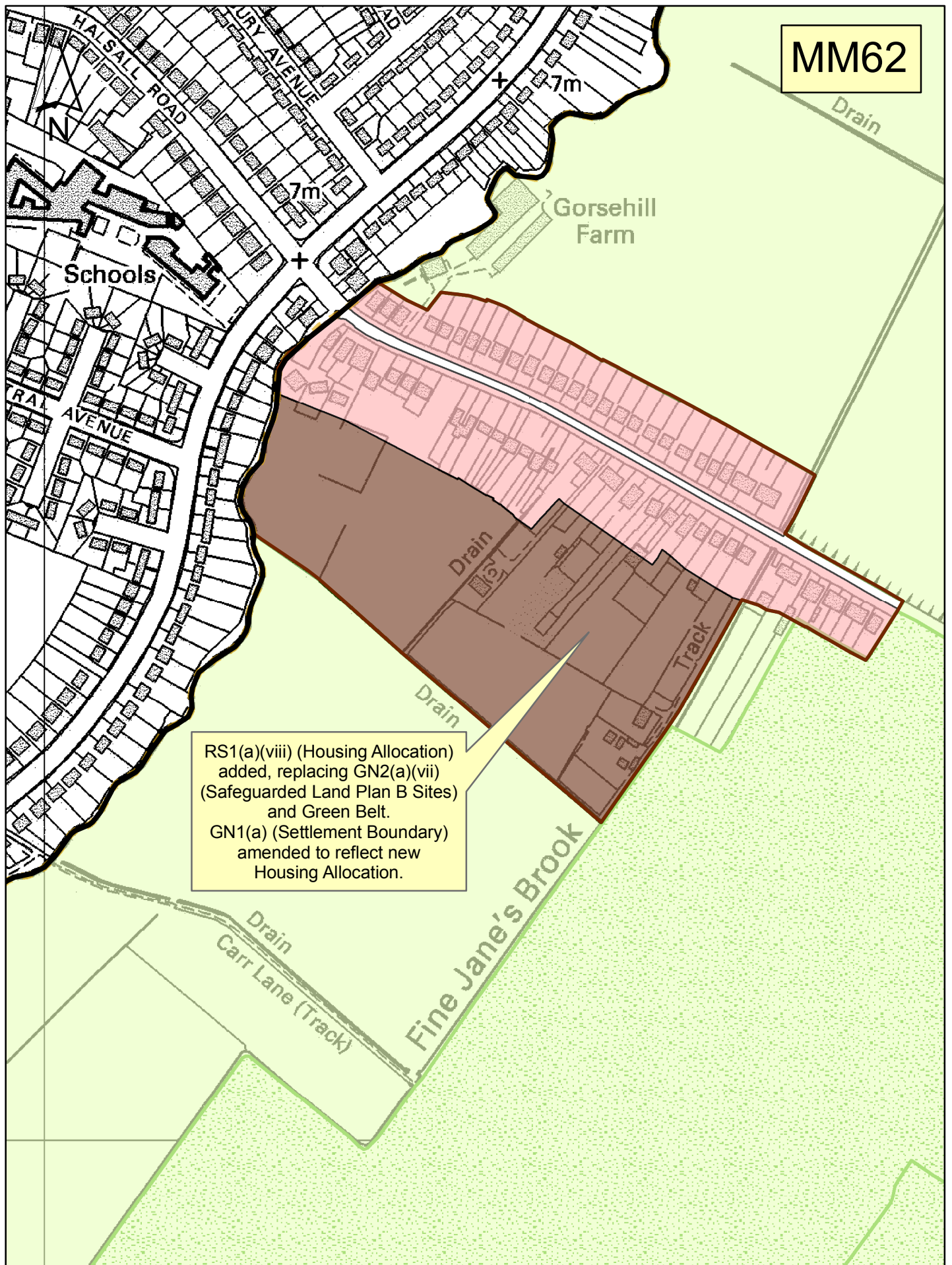
**Appendix E: Maps of proposed additional housing and employment sites**





MM62

RS1(a)(ix) (Housing Allocation) added to replace GN2(b)(iv) (Safeguarded Land Beyond 2027)



MM67

