

<p>Ref No.</p> <p>For official use only</p>
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CONTACT DETAILS

1. Personal Details

If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete full contact details of the agent in 2.

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2. Agents Details

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Please note your name and comments will be made publicly available. However, we will not publish any contact information. Contact details will only be used by the Council and the Inspector for Local Plan purposes.

Is your representation [comment] on the Sefton Local Plan:

an objection a support a general comment

Do you consider the Sefton Local Plan is:

Legally compliant? Yes No Don't Know

'Sound'? Yes No Don't Know

If you think the Sefton Local Plan is not 'sound', is this because it is not:

Positively prepared Effective

Consistent with national policy Justified

You should choose the most appropriate category for your response in terms of whether it is legally compliant or 'sound'. Please see the note at the back of this form for guidance. Please set out in your detailed response the reasons for your choice. If you are not sure which to tick please leave this blank.

Please return to local.plan@sefton.gov.uk or Local Plan Team, Magdalen House, Trinity Road, Bootle L20 3NJ by **Friday 27th March 2015**



Please set out your representation [including objections or comments in support] to the Sefton Local Plan. Please state clearly the relevant section, policy, paragraph, figure or site allocation that you are commenting on, using additional sheets if required. If you are submitting supporting information please list this here. Supporting information must also be submitted by 27 March 2015.

West Lancashire Borough Council (“the 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

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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.

Please set out the changes you consider necessary to the Sefton Local Plan to address the comments made in the previous sections. You will need to say why this change will make the Local Plan legally compliant or 'sound'. It would be helpful if you could suggest revised wording if appropriate. Please be as precise as possible. Use additional sheets if required.

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.

If your representation is seeking a change to the Sefton Local Plan, do you consider it necessary to participate in the examination hearing? (please note this will be at the discretion of the Inspector)

No, I do not wish to participate in the examination hearings X

Yes, I do wish to participate in the examination hearings

If you wish to participate in the examination hearings, please outline why you think this is necessary

Please indicate whether you wish to be notified of any of the future stages of the Sefton Local Plan:

When the Sefton Local Plan has been submitted for independent examination X

Confirmation of the timetable for the examination hearings X

The publication of the Inspector's recommendations following the examination X

The adoption of the Local Plan X