



**AGENDA ITEM: 4(a)**

**EXECUTIVE OVERVIEW &  
SCRUTINY COMMITTEE:  
1 & 8 December 2011**

**PLANNING COMMITTEE:  
8 December 2011**

**CABINET: 14 December 2011**

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**Report of: Borough Planner**

**Relevant Managing Director: Transformation**

**Relevant Portfolio Holder: Councillor M Forshaw**

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**SUBJECT: CORE STRATEGY PREFERRED OPTIONS (CSPO) - CONSULTATION  
RESPONSES**

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Wards affected: Borough wide

**1.0 PURPOSE OF THE REPORT**

1.1 To recommend the proposed response of the Council to each representation received during the Core Strategy Preferred Options (CSPO) consultation period in May / June 2011 for approval by Cabinet.

**2.0 RECOMMENDATIONS TO EXECUTIVE OVERVIEW & SCRUTINY  
COMMITTEE**

2.1 That the content of this report be considered and that agreed comments be referred to Cabinet for consideration.

**3.0 RECOMMENDATIONS TO PLANNING COMMITTEE**

3.1 That the content of this report be considered and that agreed comments be referred to Cabinet for consideration.

**4.0 RECOMMENDATIONS TO CABINET**

4.1 That Cabinet take note of the representations received during the CSPO consultation in May / June 2011 and, subject to consideration of the comments

of the LDF Cabinet Working Group, Executive Overview & Scrutiny Committee and Planning Committee, approve the proposed response of the Council to each representation received as set out in Appendix 1 of this report.

- 4.2 That Call In is not appropriate for this item as the report has been submitted to Executive Overview & Scrutiny Committee on 1 December 2011.
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## **5.0 BACKGROUND**

- 5.1 The Core Strategy Preferred Options Paper (CSPO) was consulted upon for a period of 6 weeks from the 12<sup>th</sup> May to the 24<sup>th</sup> June 2011. Consultation was undertaken through a variety of methods, including written representations, surveys, exhibitions and forums. Events were well publicised through a leaflet delivered to all households in the Borough, press notices, press releases, information on the Council website, Twitter feeds, a Facebook page, business cards and mail-outs. In addition, the LDF team involved local schools and met with housing developers, local businesses and some selected groups representing those who are most directly affected by Edge Hill University.
- 5.2 It was important that a wide catchment of opinions and comments were received in order to inform preparation of the Core Strategy and the engagement methods used through the CSPO consultation were designed to maximise interest and involvement.
- 5.3 The consultation exercise invited comments on 17 policies, as well as the options for development on Green Belt. The options for development on Green Belt were:
- Preferred Option 1 – A Strategic Development Site at Yew Tree Farm, Burscough (Burscough option)
  - Preferred Option 2 – Dispersing Green Belt development around several sites at Burscough, Ormskirk and Banks (Dispersal option)
  - Non-Preferred Option – A Strategic Development Site at St Helens Road / Alty's Lane, Ormskirk (Ormskirk option)

## **6.0 CURRENT POSITION**

- 6.1 Following the close of the consultation, officers have prepared a Feedback Report on the results of the consultation exercise, a copy of which is available in the Members' Library. These results have influenced the changes to draft policy incorporated in the preparation of the Local Plan Preferred Options document and will form part of the evidence base for the Local Plan. A summary of this feedback is provided in this report.
- 6.2 Given the number of representations received, the Feedback report is designed to summarise comments and provide an overview of the general consensus. The full range of comments can be viewed through the Council's website portal (<http://westlancs.limehouse.co.uk/portal/planning/>).

- 6.3 A formal Council response to each individual representation has been prepared and they propose actual changes to draft policy that have been reflected in the Local Plan Preferred Options document. The proposed Council response to each individual representation can be seen in Appendix 1.

## **7.0 RESULTS OF THE CONSULTATION**

- 7.1 Over 749 written representations were received from 362 respondents, from a wide range of sectors including public and professional. A further 224 completed a general survey and many more attended the forums, exhibitions and business breakfast meetings.
- 7.2 It should be acknowledged, however, that whilst all the events showed a very positive response to the consultation exercise, it is still acknowledged that those who attended represented views from a small cross-section of West Lancashire's community and will not necessarily represent the views of the wider population of West Lancashire. Whilst these results provide a useful part of collective consultation results, they need to be viewed in line with all other necessary considerations.
- 7.3 Throughout all events and the comments received, focus was primarily on the options for Green Belt release, rather than the policies of the Core Strategy. This was anticipated due to strong feelings and interest over the protection of Green Belt.
- 7.4 Green Belt release was widely opposed by respondents. Inevitably, there were differences of opinion based on the geographical area representations came from. Most objections were received from people living adjacent to each site affected by an option for Green Belt release, who considered that they would be detrimentally affected by any development, and so often supported one of the other options or simply objected to Green Belt release.
- 7.5 However, it was also recognised that development is needed in the Borough and some respondents supported the release of Green Belt in the right location if it delivered significant benefit to a particular town or the Borough in general. Overall, there was general support for all other policies in the CSPO.

### The Over-arching Spatial Strategy

- 7.6 The vast majority of comments and representations received related to the over-arching spatial strategy, including proposals for strategic sites and Green Belt release.
- 7.7 All the options for Green Belt release gained little support (19 representations in support of the Burscough option, 8 for the Dispersal option and 15 for the Ormskirk option) and both the Burscough option (144) and the Ormskirk option (91) received far more objections. 13 representations also objected to the Dispersal option.

- 7.8 However, as stated above, these results need to be considered in the knowledge that the vast majority of objections to each option were made by residents living in the immediate vicinity of the sites proposed for Green Belt release.
- 7.9 On matters other than Green Belt release, the majority of respondents felt that Skelmersdale was the most suitable location to place the majority of development and would help support regeneration of the town and there was also wide support for the key service centres of the Borough accommodating much of the remaining development requirements as they are the most sustainable.
- 7.10 However, it was strongly felt that the target for residential development in Skelmersdale in the CSPO is too high and is subsequently undeliverable. It was suggested that levels should be reduced in Skelmersdale and increased in the other key settlements.
- 7.11 It was also requested that the Council clarify that the target of 4,500 houses until 2027 should be considered a minimum figure, in accordance with national and regional planning policy.
- 7.12 A review of the disaggregation of the housing target between settlements was therefore requested, along with further detail on how the Core Strategy can be delivered and its timescales and phasing. It was considered essential for there to be a supply of genuinely deliverable housing sites from the plan's inception for the Core Strategy to be considered sound.
- 7.13 More flexible approaches were recommended so that the Core Strategy can adapt to changing requirements. Respondents emphasised the need for the Core Strategy to be flexible and adaptable to change and raised concerns that a reliance on particular sites, which then prove difficult to deliver, could have serious implications. To this end, some representations requested that a more comprehensive and detailed "Plan B" be prepared.
- 7.14 Infrastructure was also raised as a significant concern and central to the delivery of the Core Strategy. It was repeatedly stated that problems of infrastructure need resolving prior to, or through, new development, not afterwards. In the general survey, roads and public transport routes were voted the highest priorities for improvements. This was supported through the wider consensus of opinion at forums and exhibitions, along with support for improvements to utilities infrastructure.

#### Economic Policies

- 7.15 Representations were received requesting greater flexibility for the redevelopment of older employment sites, which aligns with the Government's Growth Agenda, and more mixed-use developments were encouraged.
- 7.16 There was support for the expansion of Edge Hill University, but it was felt by many that this should preferably not be on Green Belt land and should be carefully judged against the actual needs of the University. Once again, however, levels of support or objection varied according to residential area. Far

more people living in Burscough were in support of Edge Hill's expansion than those living in Ormskirk. Resistance to the University's expansion stemmed from loss of town character and problems with traffic and increased student numbers. However, others felt that its contribution to the local economy and employment and the potential for addressing existing issues were important reasons to support development at Edge Hill.

### Housing Policies

- 7.17 Concerns were expressed about the requirement for Lifetime Homes Standard on all new dwellings and suggestions were made about improving the requirement for elderly accommodation as part of residential development proposals.
- 7.18 Comments were received regarding the changing debate on brownfield versus greenfield land and how this affects our proposals for prioritising brownfield development over greenfield and the timing of the release of Green Belt for development.
- 7.19 Some representations felt that the potential for a constraint policy being implemented, as proposed in Policy CS7, is at odds with the Growth Agenda and should be removed entirely.
- 7.20 Concerns were also expressed that the affordable housing policy is too strict because the threshold is too low and the percentage of affordable housing required is too high.
- 7.21 There was support for the provision of more affordable or retirement dwellings on small sites, according to local need and there was also wide support for a restraint on Housing of Multiple Occupancy (HMO's) and students living in residential areas within Ormskirk.
- 7.22 On Policy CS10, it was suggested that criteria for assessing what is a suitable site for Gypsy & Travellers and Travelling Showpeople should be included as well as broad locations.

### Infrastructure & Services Policies

- 7.23 It was suggested that Policy CS11 should refer more to other town centre uses, not just retail, that Policy CS13 should place more importance on broadband provision and that Policy CS14 should be amended to reflect the Community Infrastructure Levy (CIL) and wider infrastructure types

### Environment & Climate Change Policies

- 7.24 Several representations suggested that Policy CS15 should be reviewed in light of latest evidence and guidance, but the overall policy direction was widely supported.

## **8.0 NEXT STEPS**

- 8.1 The results of the CSPO consultation have been used to refine and prepare the policies that now form part of the Local Plan Preferred Options document. The Council's formal response to each individual representation received during the CSPO consultation must be made public so that respondents can see how their comments have been considered. Therefore, the detailed responses to each individual representation are included in Appendix 1 for approval by Cabinet and, should they be approved, will be made available on the Council's website.

## **9.0 SUSTAINABILITY IMPLICATIONS / COMMUNITY STRATEGY**

- 9.1 The CSPO was prepared in conjunction with a Sustainability Appraisal (SA), undertaken by consultants URS / Scott Wilson, which evaluated the potential economic, social and environmental sustainability implications of the Core Strategy. The SA was published at the same time as the CSPO and the public were able to submit comments on the SA as well throughout the consultation period.
- 9.2 All the comments received through the CSPO will be acknowledged and incorporated into the refinement of policies for the Local Plan. A further Sustainability Appraisal will be prepared alongside the Local Plan Preferred Options document to ensure that changes made to the document do not have any adverse impacts on sustainability and this will be made available for consultation alongside the Local Plan Preferred Options document.
- 9.3 Progressing the Local Plan should, in turn, help progress the implementation of key aspects of the Sustainable Community Strategy (SCS).

## **10.0 FINANCIAL AND RESOURCE IMPLICATIONS**

- 10.1 The volume of response received has had some impact on staff time due to the analysis of comments. Some comments have also required further work and investigation into the feasibility of selected policies, for example, comments on the deliverability of infrastructure improvements will need to be further explored with utility and service providers.

## **11.0 RISK ASSESSMENT**

- 11.1 PPS12 requires the evidence base to contain two elements: research and fact findings and the participation of the local community and stakeholders. A failure to consult correctly could possibly lead to the Local Plan being found 'unsound'. The results of this consultation exercise will be used to demonstrate that decisions within the Local Plan process are backed up by evidence.
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## **Background Documents**

The following background documents (as defined in Section 100D (5) of the Local Government Act 1972) have been relied on to a material extent in preparing this Report.

<u>Date</u>	<u>Document</u>
September 2011	Core Strategy Preferred Options Consultation – Feedback Report

## **Equality Impact Assessment**

There is a significant direct impact on members of the public, employees, elected members and / or stakeholders. Therefore, an Equality Impact Assessment is required. A formal equality impact assessment is attached as an Appendix to this report, the results of which have been taken into account in the Recommendations contained within this report

## **Appendices**

1. The Core Strategy Preferred Options Consultation Responses
2. Equality Impact Assessment
3. Minute of LDF Cabinet Working Group – 29 November 2011
4. Minute of Executive Overview & Scrutiny Committee – 1 December 2011  
*(Planning Committee and Cabinet only)*
5. Minute of Planning Committee – 8 December 2011 *(Cabinet only)*
6. Minute of Executive Overview & Scrutiny Committee – 8 December *(Cabinet only)*

## **Appendix 1**

### **The Core Strategy Preferred Options Consultation Responses**

Given the number of representations received during the Core Strategy Preferred Options consultation period, this appendix has been provided separately. It is available on the Council's website (CoInS) and a paper copy made available in the Members' Library. Paper copies available on request.

Appendix 1 sets out a summary of the representation received, the officer response to the representation and the officer recommendation for any action proposed in response to the representation.



## Appendix 2

### Equality Impact Assessment - process for services, policies, projects and strategies

1.	<p>Using information that you have gathered from service monitoring, surveys, consultation, and other sources such as anecdotal information fed back by members of staff, in your opinion, could your service / policy / strategy / decision (including decisions to cut or change a service or policy) disadvantage, or have a potentially disproportionately negative effect on, any of the following groups of people:</p> <p><i>People of different ages – including young and older people</i>  <i>People with a disability;</i>  <i>People of different races / ethnicities / nationalities;</i>  <i>Men;</i>  <i>Women;</i>  <i>People of different religions / beliefs;</i>  <i>People of different sexual orientations;</i>  <i>People who are or have identified as transgender;</i>  <i>People who are married or in a civil partnership;</i>  <i>Women who are pregnant or on maternity leave or men whose partners are pregnant or on maternity leave;</i>  <i>People living in areas of deprivation or who are financially disadvantaged.</i></p>	No
2.	What sources of information have you used to come to this decision?	The Local Development Framework Evidence Base
3.	How have you tried to involve people / groups in developing your service / policy / strategy or in making your decision (including decisions to cut or change a service or policy)?	Decision is directly related to a consultation exercise and the methods used in for this exercise are described in the report
4.	<p>Could your service / policy / strategy or decision (including decisions to cut or change a service or policy) help or hamper our ability to meet our duties under the Equality Act 2010? Duties are to:</p> <p><i>Eliminate discrimination, harassment and victimisation;</i>  <i>Advance equality of opportunity (removing or minimising disadvantage, meeting the needs of people);</i>  <i>Foster good relations between people who share a protected characteristic and those who do not share it.</i></p>	Help – an improved Local Plan document will seek to deliver development and infrastructure improvements that benefit all and endeavour to support a more equal society
5.	What actions will you take to address any issues raised in your answers above	N/A